CASA KRULLENBOL

Privacy & Cookie Policy

Casa Krullenbol & Cheap Houses Sweden

Last updated: 8 October 2026

Controller: Zwets Industries B.V., trading under the name Casa Krullenbol, Speenkruid 37, 4251 KD Werkendam, the Netherlands. Chamber of Commerce number 64955508, VAT number NL855920014B01. support@casakrullenbol.com

1. Who we are

Casa Krullenbol is a trading name of Zwets Industries B.V. Zwets Industries B.V. is the controller for the personal data processing described in this Policy. We are not currently required to appoint a Data Protection Officer.

For privacy questions, requests or complaints, contact support@casakrullenbol.com.

2. Scope of this Policy

This Privacy & Cookie Policy applies to our websites, landing pages, checkout pages, digital products, the Dutch online programme “Investeren in Zweeds vakantievastgoed”, course environments and communities, Cheap Houses Sweden Weekly, and our related email communications.

Where you follow a link to an external website, property portal, real estate agent, Google Maps or another third-party service, that third party's own privacy policy applies to its processing.

3. Personal data we process

Depending on how you interact with us, we may process the following categories of personal data:

- First and last name
- Email address
- Billing or postal address, where provided
- Telephone number and WhatsApp profile name, where relevant to a Community or support request
- Order details, including product, subscription plan, amount, payment status and transaction status
- Subscription details, including monthly/yearly plan, start date, renewal date, cancellation status and access status
- Course account and progress information where a course environment is used
- IP address, browser type, device data and website usage data
- Email delivery and engagement data, such as delivery status, opens and clicks, where our email platform records this
- The content of messages, support requests, feedback and complaints that you send us

We do not receive your full card number or online banking login credentials. Payment data is processed directly by the relevant payment service provider; we generally receive only transaction and payment-status information.

We do not intentionally process special-category personal data and our products and services are not directed at children under 18.

4. Purposes and legal bases

Purpose	Legal basis
Processing orders and providing access to a purchased guide, Course, subscription or digital service	Performance of the contract
Processing payments, instalments, subscription renewals and payment status	Performance of the contract
Delivering Cheap Houses Sweden Weekly to paid Subscribers	Performance of the contract
Managing subscription access, archive access, renewal and cancellation	Performance of the contract
Providing service and product updates relating to a purchased Product or Service	Performance of the contract
Providing access to a private Community, where included	Performance of the contract and, where appropriate, consent
Responding to questions, support requests and complaints	Performance of the contract and/or legitimate interest
Sending a free marketing newsletter to people who have opted in	Consent
Sending offers for similar products or services to existing customers where legally permitted	Legitimate interest; you can object at any time
Keeping accounting, invoice and transaction records	Legal obligation
Securing and improving our websites and preventing misuse	Legitimate interest
Measuring email delivery and engagement in order to operate and improve our paid or service emails	Legitimate interest, subject to applicable e-privacy rules
Using analytics, advertising or tracking cookies that require consent	Consent

Where we rely on legitimate interests, we consider our interests against your privacy rights. You may object to processing based on legitimate interests in the situations provided by law.

5. Cheap Houses Sweden Weekly

If you purchase Cheap Houses Sweden Weekly, we use your name, email address, subscription plan, payment status and subscription status to deliver the paid newsletter, manage access, administer renewals and cancellations, and send service communications about the subscription.

If yearly subscribers receive access to an archive, download, map or partner benefit, we may process the minimum data needed to provide or verify that benefit.

A paid newsletter is a contractual service. Delivery of the paid newsletter itself is therefore not dependent on separate marketing consent. Marketing emails that are not necessary to deliver the paid service are handled separately in accordance with applicable marketing rules.

6. Retention periods

- **Order, invoice and payment records:** generally seven years where required by Dutch tax and accounting law.
- **Course account and progress data:** for the duration of access and normally for up to twelve months afterwards, unless a longer period is needed for a legal claim or another lawful purpose.
- **Paid subscription data:** for the duration of the subscription and afterwards for as long as necessary for accounting, dispute handling, fraud prevention or legal obligations.
- **Marketing newsletter data:** until you unsubscribe. We may retain a suppression record to ensure you are not contacted again against your wishes.
- **Community contact data:** until you leave the Community or ask us to remove information that we are not legally required to retain.
- **Support messages and complaints:** normally for up to two years after closure, unless a longer period is reasonably necessary.
- **Cookie data:** according to the retention period of the relevant cookie or technology.

After the relevant retention period, data is deleted or anonymised unless we are legally required to retain it.

7. Service providers and recipients

We do not sell personal data. We share personal data only where this is necessary to provide a Product or Service, comply with law, protect legitimate interests, or where you have given consent.

- **Huddle:** course environment and account hosting, where used.
- **Plug&Pay:** checkout, order administration and sales process.
- **Mollie:** payment processing and, where used, recurring payment collection.
- **MailBlue / ActiveCampaign technology:** email communication, paid newsletters, service emails and marketing emails.
- **WhatsApp / Meta:** private Community communication where used.
- **Website, cloud and security providers:** hosting, storage, analytics, security and technical operation where applicable.
- **Professional advisers:** accountants, legal advisers or other advisers where reasonably necessary and lawful.

Where required, we enter into data-processing agreements or other appropriate contractual arrangements with service providers.

8. Partner benefits

Some Products or subscriptions may include optional discounts or services from independent partners, for example an interior designer or a local viewing service. We do not automatically send your personal data to such partners merely because a benefit is available.

If you choose to use a partner benefit, you may be redirected to that partner or asked to provide information directly. The partner is responsible for its own privacy practices unless we expressly state that it acts as our processor.

9. International data transfers

Some service providers may be located outside the European Economic Area or use infrastructure outside the EEA. Where personal data is transferred internationally, we rely on an adequacy decision, Standard

Contractual Clauses or another lawful transfer mechanism and, where appropriate, supplementary safeguards.

10. Security

We take appropriate technical and organisational measures to protect personal data against loss, unauthorised access, alteration and unlawful processing. These measures include access controls, secure connections (SSL/TLS) and use of established payment and platform providers.

If you suspect misuse or a data breach affecting your information, contact support@casakrullenbol.com as soon as possible.

11. Your privacy rights

Subject to the conditions in applicable data-protection law, you may have the following rights:

- Access to your personal data
- Correction of inaccurate or incomplete personal data
- Deletion of personal data where there is no lawful reason to continue processing it
- Restriction of processing in certain circumstances
- Data portability where applicable
- Objection to processing based on legitimate interests
- Objection at any time to direct marketing
- Withdrawal of consent at any time where processing is based on consent

You can exercise these rights by emailing support@casakrullenbol.com. We normally respond within one month, subject to the rules of applicable law. We may request information necessary to verify your identity.

If you are dissatisfied with how we handle your personal data, please contact us first so that we can try to resolve the issue. You also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) or, where applicable, another competent supervisory authority.

12. Email communications

Service emails are messages necessary to perform an Agreement, for example purchase confirmations, access instructions, subscription notices and the paid Cheap Houses Sweden Weekly newsletter. You cannot opt out of essential service messages while continuing to receive the relevant service.

Marketing emails are separate promotional communications. Where consent is required, we send them only after you have opted in. Every marketing email contains an unsubscribe method or equivalent way to object.

Email platforms may record delivery, opening and click information. We use this information to operate, secure and improve our communications and, where required by applicable law, only with the necessary consent.

13. Cookies

Our websites use cookies and similar technologies. Cookies are small files or identifiers stored on or accessed from your device.

We distinguish the following categories:

- **Functional and necessary cookies:** required for core website, checkout and security functionality. These may include cookies used by Plug&Pay, payment flows, login functions and security providers. Consent is generally not required where these cookies are strictly necessary.

- **Analytics cookies:** used to understand website traffic and usage so that we can improve our pages and services.
- **Marketing and tracking cookies:** used by us or third parties to measure advertising, understand campaign performance or personalise advertising, for example through Meta technologies where implemented.

Analytics, marketing or tracking cookies that require consent are placed only after the required consent has been obtained through our cookie banner or preference tool.

14. Managing cookie preferences

When you first visit our website, you may be shown a cookie banner that allows you to accept, reject or configure non-essential cookies. You can also change browser settings or delete cookies through your browser.

If our cookie tool offers a preferences icon or settings panel, you can use it to update your choices. Disabling certain cookies may affect the functionality of the website.

15. Automated decision-making

We do not make decisions that produce legal effects or similarly significant effects solely on the basis of automated processing or profiling, unless we inform you separately and a lawful basis exists.

16. External links

Our websites, newsletters and Courses may link to third-party websites, including property portals, selling agents, Google Maps and partner websites. We are not responsible for the privacy practices of those third parties. Please review their privacy information before providing them with personal data.

17. Changes to this Policy

We may update this Privacy & Cookie Policy from time to time. The current version will be published on our website with the date of the latest update. If a change materially affects existing Customers or Subscribers, we will provide additional notice where appropriate.

18. Contact

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