

Privacy Statement of VDB Notarissen B.V.

This statement explains how our firm handles personal data which are processed within the scope of our work and services.

Our contact details

Name: VDB Notarissen B.V.
Address: Eindhoveneweg 126
Postcode / City: 5582 HW Waalre
Contact person: Mr Marco Haanappel
E-mail address: marcohaanappel@vdbn.nl

Our services

Our firm requests your personal data for the following purposes only:

- To carry out assignments for the drafting of a notarial deed, to provide expert legal advice and/or other services;
- To meet statutory duties and obligations;
- To represent the legitimate interests of VDB Notarissen B.V. In doing so, we will always assess whether those interests bear more weight than your interests or fundamental rights. This is the case, for instance, when making use of your contact details in order to keep in touch with our business relationships (hereinafter referred to as: "Legitimate Interest"); or
- For purposes for which you have specifically given your consent.

Your personal data will not be processed for any other purposes without your consent.

Rules for personal data in notarial deeds

If our firm draws up a notarial deed containing your personal data, we are held to observe rules of law, which have an impact on the processing of personal data:

1. It is mandatory for the civil-law notary to record specific (personal) data in the deed. In other words, your personal data are processed on a statutory basis.
2. It is mandatory for the civil-law notary to archive the signed deed containing your personal data in perpetuity.
3. As soon as the deed has been signed by the civil-law notary, it becomes an official piece of evidence. From then on nothing may be changed to it, even in case of any inaccuracies in the personal data. If any changes are needed, the civil-law notary must draw up a new deed containing the change.
4. It is mandatory for the civil-law notary to double-check specific (personal) data in the Personal Records Database of the Netherlands ("BRP"), the Register of Companies, and the Land Registry.
5. It is mandatory for the civil-law notary to verify your identity. For that purpose the civil-law notary must ask you to produce a valid identity document. Please note that the civil-law notary is one of the few people who are entitled to copy your identity document including all personal details. The civil-law notary will verify the authenticity of Dutch identity documents via the Verification Information System ("VIS") of the Dutch National Credit Register ("Stichting BKR").
6. Your personal data fall within the scope of the professional confidentiality of the civil-law notary. Unauthorized persons will be denied access to any of your personal data.

Expert legal advice and other services

All further processing of personal data by our firm is related to assignments given by you - or on your behalf - to draw up agreements and other corresponding documents bearing a general connection with the provision of the legal, financial and/or administrative services assigned to us. It also enables us to contact you, for instance for the invoicing of services provided by us, but also to be able to invite you for events organized by us and to send you other legal updates, for instance by means of a newsletter.

Source of processed personal data

If our firm processes any of your personal data which we have not obtained from you yourself, this will always occur within the scope of the assignment given to us. In that case, the source of those personal data will be any of the following:

- public registers, including but not limited to the Register of Companies of the Chamber of Commerce and the Land Registry;
- an estate agent or another consultant in connection with a sales agreement to which you are one of the parties;
- a benefactor;
- a lawyer, tax consultant, financial consultant or other consultant in connection with an agreement to which you are one of the parties or for which party you fulfil a position such as Board member, supervisor or authorized representative;
- counterparty in an agreement;
- other sources such as the Personal Records Database of the Netherlands ("BRP") and the VIS;
- public sources such as social-media platforms and business websites.

In the following tables we explain what type of personal data we process, for which purpose we process these personal data, and on what statutory basis we do so.

If you (possibly) are a client:

| Type of personal data | Purpose for the use of personal data | Statutory basis justifying the processing |
|--|--|---|
| Identification data and contact details such as: <ul style="list-style-type: none"> • Name, address, and city of residence • Telephone number, e-mail address • Date and place of birth • Dutch tax and social security number • Gender • ID photo / ID copy | For identification and verification purposes and to carry out the client screening prescribed by law | <ul style="list-style-type: none"> - Legitimate Interest - Statutory obligation - Execution of the agreement |
| | For contact purposes | <ul style="list-style-type: none"> - Execution of the agreement - Legitimate Interest |

| | | |
|---|--|---|
| | To draft agreements and deeds | - Execution of the agreement |
| | To create and manage a client data base | - Legitimate Interest |
| | To send invoices | - Legitimate Interest - Execution of the agreement |
| | To record the personal data within the scope of applicable legislation | - Execution of the agreement - Statutory obligation |
| | For customer relations management, promotion and marketing | - Legitimate Interest - Your consent |
| | To secure and administer our property and systems | - Legitimate Interest |
| <p>Details regarding and for our services such as:</p> <ul style="list-style-type: none"> • Business data, such as an extract from the Register of Companies and VAT registration numbers; • Company name and position of the contact person and/or representative; • Bank and payment details; • Meeting minutes; • Your financial situation; • Dutch tax and social security number ("BSN", for tax returns et cetera); • The contents of dossiers, such as correspondence, legal expert opinions and a range of documents related to an assignment given to us to consult and/or check your organisation; • The contents of communications via e-mail, by letter or otherwise. | To provide services to clients | - Execution of the agreement - Statutory obligation - Legitimate Interest |

Forwarding your personal data

Our firm will only forward your personal data to others (third parties) if it is prescribed by law or if it is really required in order to carry out the work.

Our firm will provide personal data to the following recipients:

- Dutch Tax Authorities;
- public registers, such as the Land Registry and the Register of Companies, if the law prescribes that those personal data must be registered there;
- other parties and their consultants or stakeholders to a notarial deed and/or agreement to which you are a party, as well as the parties with whom we join forces for the provision of our services;
- banks, if and insofar as we take care of the payments made in connection with legal services;
- processors of personal data with whom a processing agreement has been signed.

Our firm will not forward any personal data outside the EU or to any international organisation.

Keeping your personal data archived

Our firm will not archive your personal data any longer than required for the purpose for which those data were gathered, for the fulfilment of statutory responsibilities and statutory obligations, or for the execution of agreements (this may refer to limitation periods). Statutory retention periods apply as prescribed by, for instance, the Dutch Notaries Act and the Dutch Public Records Act. Notarial deeds will be archived in perpetuity.

Your rights with regard to personal data processed by us

If your personal data are processed by our firm, you may rely on the following rights by virtue of the General Data Protection Regulation. You may do so by submitting a (preferably written) application via the contact details specified in this privacy statement. Before we honour your application, we will first establish your identity based on a valid identity document.

Right of access of the data subject

You may enquire anytime which personal data our firm is processing, for what purpose, and how long these will remain archived. Possibly there is a statutory basis that prevents us from honouring your request; we will assess this and notify you.

Right to rectification

If you believe that specific personal data have not been processed correctly, you have the right to demand rectification of these data. If it involves data in a notarial deed, this will not be possible and will require the drafting of a new deed serving as rectification to the incorrect deed.

Right to erasure ('right to be forgotten')

If you wish your personal data to be removed, you may submit a request for this. If the personal data are stated in a notarial deed, the civil-law notary cannot erase such data.

Right to restriction of processing

If you wish to restrict the processing of personal data by our firm (pending a rectification of your personal data as requested by you, an objection raised against processing, or precisely because you do not wish that any personal data are removed in spite of their processing being unlawful), you may submit a request for this.

Right to data portability

If your personal data are not processed for a notarial deed and you wish to transfer the personal data to another service provider, you may submit a request for this. Incidentally, such a data transfer is not always possible, given that statutory notarial obligations may oppose any data transfer.

Possible restrictions in the exercise of your rights under the General Data Protection Regulation ("GDPR")

Our firm will do everything possible to honour your rights under the General Data Protection Regulation. However, it cannot be excluded that these rights are in conflict with other statutory provisions such as the Dutch Notaries Act. Should the civil-law notary be unable to honour any of the aforementioned requests for that reason, you will be notified in writing.

Complaints regarding the processing of your personal data by our firm

Should you have any complaints regarding the processing of personal data by our firm, please let us know by informing Mr Marco Haanappel in writing and/or electronically. You may also file a complaint with the applicable supervisory authority in the Netherlands: the Dutch Data Protection Authority. For more information please visit <https://www.autoriteitpersoonsgegevens.nl/>.