



## Privacy Statement

NNEK is engaged in asset accumulation and investment advice for their customers. For our activities we process personal data. We would like to inform you about this in a clear and transparent way. In this privacy statement we will answer the most important questions about how we process your personal data.

### Our privacy policy

NNEK respects and protects your privacy. We find it very important that the processing of your personal data is done in a way that is consistent with the existing safeguards for the protection of your privacy. We observe the rules of the General Data Protection Regulation (GDPR) including the implementation law of this regulation in all our activities.

This means in any case that we:

- process your personal data in accordance with the purpose for which they are provided. These purposes and types of personal data are described in this privacy declaration are described;
- limit the processing of your personal details to only those that are minimally necessary for the purposes for which they are processed;
- always ask for your explicit permission if we need to process your personal details processing of your personal data;
- have taken appropriate technical and organisational measures so that the security of your personal data is guaranteed;
- not pass on personal details to other parties, unless this is necessary for execution of the purposes for which they have been provided;
- are aware of your rights regarding your personal data and respect them.

By using our website or our services through Curvo's application, you agree to this privacy statement. The most recent privacy statement can always be found on [NNEK's website](#).

### Responsibility

We are responsible for the processing of your personal data. We have appointed a Data Protection Officer who supervises the application of and compliance with the General Data Protection Regulation within NNEK.

We are NNEK, Noordnederlands Effektenkantoor B.V., also acting under the name Fondsenplatform, with registered office in Heerenveen, K.R. Poststraat 100-2, 8441 ER, registration KvK02017874.

## Processing

Processing is a legal term. It concerns everything you can do with personal data. From collecting to destroying. The Personal Data Protection Act defines processing as: 'the collection, recording, organisation, storage, updating, modification, retrieval, consultation, use, transmission, dissemination, making available, combining, linking, blocking, erasure and destruction of data'.

## Personal data

Personal data is data that tells us something about you or that we can relate to you. You share personal data with us when you are a customer or when you have contact with us. Even if you are a self-employed person or if you have a one-man business, a general partnership or a partnership, you are seen as a person and the data is also directly or indirectly informative about you. We hold personal data on everyone who has (had) contact with us. And of contact persons and representatives of our business customers and suppliers.

## What (personal) data do we process?

We may collect and process the following personal data.

- your name, address, telephone number and email address and that of your company or foundation. If your children are customers, also the names and dates of birth of your children. And names of contact persons and representatives of your company.
- the details that appear on your identity document or that have been gathered through itsme.
- your role (e.g. as authorised representative, legal representative or director).

In addition, we may store (personal) data for the above purposes:

- about your transactions and payments, for example, in order to be able to properly to properly execute your payment or order.
- about your contact history. This way we can see what we have talked to you about before or we can read back and answer your question or complaint. The data is recorded in your customer file.
- of telephone conversations and can record these conversations for listening back if necessary for security and to prevent and combat fraud.

- about your investment profile. This includes data about objectives, risk appetite, knowledge and experience.
- that are considered sensitive, such as your Citizen's Service Number (BSN). We only do this if it is legally required.
- about your IP address. Every server that you log into, for example our website, records this information,
- possibly without you being aware of it, data about the IP address of your computer, telephone number, operating system and internet browser used by you as well as the login and logout time (session time) and the amount of information sent. This information enables us to improve quality and accessibility. We may use such data to administer our services, for example, for the purposes of (technical) operations and support in the event of malfunctions, and to identify interests so that we can better tailor our services to the needs of our users. We process this data anonymously.
- of companies and their representatives as listed in the Land Registry and the Trade Register of the Chamber of Commerce.

## For what purposes do we process your personal data?

We process your personal data for the following purposes:

- for entering into or executing our agreements and the resulting services.
- the ability to comply with legal obligations.
- administrative purposes.
- because we (or a third party) have a legitimate interest in doing so.

## Protection of your (personal) data

We have taken the following technical and organizational measures to protect personal data against loss or any form of unlawful processing:

- all persons who can take knowledge of your data on behalf of NNEK are bound to secrecy.
- we use a combination of username and password on all our systems;
- we use a virus scanner.
- we use a secured mail environment.
- we make back-ups of the personal data in order to be able to restore them in the event of physical or technical incidents.
- We regularly evaluate our measures.

## Providing (personal) data to third parties

We may provide the (personal) data you give us to third parties when this is necessary for the execution of the purposes described in this privacy statement.

- we store data on our (virtual) servers. These servers are operated by Microsoft.

- we may share information with your financial advisor or service provider.
- we may share data with your bank.
- we use Google Analytics to track how visitors use our website.
- we use Mailchimp to send, for example, news updates.

We have concluded a processing agreement with these parties. Google and Mailchimp are located outside the EU.

We do not provide your personal data to third parties outside NNEK without your explicit permission unless this is required by:

- legal obligations, for example reporting to the tax authorities.
- the execution of the agreement.
- guarding the integrity of the financial system, for example in the context of combating money laundering or terrorism
- preventing or combating abuse or fraud, for example reporting or requesting (personal) data by the tax authorities.
- (personal) data retrieval by the judicial authorities in the context of an investigation.
- the Authority for the Protection of Personal Data (AP), which checks whether we comply with the Personal Data Protection Act.
- Protection of Personal Data Act (Wet bescherming persoonsgegevens).
- De Nederlandsche Bank (DNB), the European Central Bank (ECB) and the Netherlands Authority for the Financial Markets (AFM) who supervise our activities.
- Markets Authority (AFM) who supervise the financial sector and therefore also us.
- Companies that design, maintain and improve our IT systems, internal tools and applications.

## Storage terms

We keep the above data for as long as is necessary for the purpose for which we use your data. And as long as the law requires us to keep your data. We keep all data in any case as long as you are a customer of NNEK and with due observance of our retention period after termination.

## Your rights

You always have the right to see your personal data, to correct them or have them removed, all this in accordance with the purposes and retention periods set for that purpose. You have to realize that this can mean that we can no longer perform our services for you. NNEK does take the (statutory) storage terms into account.

## Questions or complaints

Do you have questions about your personal data, the way we handle it or about this Privacy Statement? Then please send your letter to:

NNEK

K.R. Poststraat 100-2 8441 ER Heerenveen

or by e-mail to [info@nnek.nl](mailto:info@nnek.nl)

Please mention your name, e-mail address, telephone number and the number of your investment account. We may ask you to identify yourself before we can answer your questions. If you are dissatisfied with the way in which we use your data or how we respond to your privacy-related questions, you can lodge a complaint with the Dutch Data Protection Authority. More information can be found on the website of the Personal Data Authority.

## Use of our website(s) and cookie policy

If you visit our website, general visitor data (such as click behaviour, time of visit, frequency of visit, etc.) is collected and stored by us in order to promote the user-friendliness of our website. We may use so-called temporary or permanent cookies to improve the functioning of our website(s) and/or to better attune it to the preferences of our visitors. Cookies are small files that a website places on your computer, tablet or mobile phone when you visit the website. These cookies store information and preferences about your website visit. The use of cookies enables a website to recognise you the next time you visit the website.

(Temporary) cookies can also be used to improve the operation of an Internet page. You can usually deactivate the acceptance of cookies in your Internet browser and/or regularly delete the cookies stored on your computer. You may then have more restricted access to an Internet site. For more information, please consult the user manual of your Internet browser.

**Heerenveen, June 1st, 2019**