# Privacy Policy Welgevonden Macadamia B.V.



Welgevonden Macadamia BV (Welmac) takes the privacy of its (minority) shareholders and other business relations very seriously and will process and use information on such relations carefully. Welmac will use reasonable efforts to ensure that non-public personal information provided remains private and is used only for the purposes stated and in the manner described in this Privacy policy.

Welmac has its office at Wagenweg 252 (2012 NP) in Haarlem and is registered with the Chamber of Commerce under number 65887107.

## What information is collected and processed by Welmac In the course of its business?

In the course of doing business with (minority) shareholders, Welmac may collect non-public personal information. Non-public personal information is personally identifiable information and for example includes name and address, identification number, date of birth, contact information, bank account information and information about investment activities, such as purchase and sale or redemption history.

This personal information is required by Welmac to issue/transfer shares and to keep the register of shareholders up to date, so that the (minority) shareholders can be informed about Welmac's activities and to facilitate that any dividend payments on the shares can be made.

## What information is collected and processed by Welmac on its website?

Users may use Welmac's website without registering, but the contact form on the website requires specific contact information: name, e-mail address and organisation. This contact information is used to handle complaints, suggestions and/or questions.

Welmac may collect automatically general information about the users of its website and their behaviour during the use of the website. This information may help Welmac determine how many visitors the website has and/or which parts of the website visitors find most valuable and thus how Welmac can continually improve the information it provides. Welmac may use a user's IP address and/or the type of device used to help diagnose problems with the servers and to administer the website. Cookies may also be used, as described below.

#### What are cookies and how does Welmac use them?

When the website is used, Welmac may use uses cookies that are stored by a user's browser temporarily ("session" cookies) or for a longer period of time ("permanent" cookies) on the device used. Cookies are tiny files with information that the server of Welmac and/or third parties could send to a user's browser with the intention that this information be sent back to the server of Welmac and/or the particular third party upon a subsequent visit.

## For what purposes will Welmac use the information it collects?

Welmac may use the personal data collected for the following purposes:

- in order to issue/transfer shares and keep a register of shareholders, as well as to make dividend payments in relation thereto;
- in order to handle complaints, suggestions and questions;
- in order to keep shareholders up to date on developments, which includes sending Welmac's mailings and shareholders' meetings;
- in order to set up statistical data in anonymous form based on automatically generated information; and
- in order to provide information to third parties on the basis of legislation and regulation or if Welmac sees another reason to do so on grounds of this Privacy policy.

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### **Use by Welmac**

Welmac may use personal data from shareholders to issue/transfer shares and make dividend payments in relation thereto.

Welmac also wants to keep shareholders updated on its activities, if they have provided an (email) address for the purpose of receiving mailings. If there is relevant news, Welmac may notify shareholders thereof via mailings. If shareholders no longer wish to receive mailings, they can unsubscribe by sending an email to info@welmac.nl. In case of an unsubscription, shareholders are advised to still stay up to date on Welmac's activities by for instance visiting its shareholders' meetings.

Welmac will also process personal data of shareholders and other business relations, such as name, (email) address and/or telephone number, to handle any complaints, suggestions or questions if this personal data is provided to Welmac for such purpose. This enables Welmac to make contact in order to handle the complaint, suggestion or question.

## Use by third parties

Welmac may provide (access to) personal data to third parties to provide infrastructure, security and hosting of our networks, firewalls, databases and backups and for accounting purposes. Welmac has made agreements with these parties to safeguard the careful processing of personal data.

Welmac will not provide personal data to third parties for direct marketing purposes (for example, for the sending of advertising), without a notification in advance if that is the case. Welmac may provide information to third parties however, to the extent these data cannot be traced to users personally and are therefore not personal data (such as automatically generated information, excluding IP addresses).

Welmac may provide personal data to third parties if it is required to do so by law, it is forced to do so as the result of a court case and/or it deems this necessary in order to protect its own rights. Personal data are provided to the justice department if a lawfully issued order requiring this is received from a public prosecutor or if another statutory provision requires Welmac to provide personal data to any other authorities, such as the Authorities for the Financial Markets. If personal data indicates evidence of criminal offences, Welmac may decide to report this and voluntarily surrender the personal data to the competent authorities as evidence. In exceptional cases, Welmac may decide that a private third party may have access to this personal data. This requires a weighing of the interest that the private party has in accessing the data and the interest of the data subject, such as the right to protection of his/her privacy. If possible and if desired by Welmac, consultation will be held with the data subject in this context.

## Parental permission

In principle, anyone may visit Welmac's website or buy shares. Welmac does not sell shares to anyone younger than sixteen (16), since special legal rules apply thereto, such as the requirement of permission from parents or a guardian. At the parents' or guardian's request for donation purposes or their heirs for inheritance purposes, Welmac may however approve with transfers from parents or a guardian to their/his/her children or other younger relatives.

#### How does Welmac protect personal information?

Welmac has taken appropriate technical and organisational measures to secure personal data against loss or any form of unlawful processing. Welmac can directly or indirectly make agreements with the external parties that have been engaged to safeguard the careful processing of personal data. The external parties that have been engaged have also taken

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their own adequate measures to secure against unauthorised access to or abuse of processed personal data. The persons who may view the personal data are explicitly required to observe secrecy. Access to the personal data is password protected. Passwords are regularly changed.

### Transfer of undertaking

In the future, it is possible that one or more divisions or assets of Welmac may be transferred to a third party or that Welmac may merge with a third party. In that case, personal data may also be transferred.

## Storage of personal data

Welmac does not keep personal data for any longer than necessary for realisation of the purposes for which these data are collected and processed.

## Insight into and correction of personal data

If you want to know what data Welmac has recorded on you, you may contact the following email address: <a href="mailto:info@welmac.nl">info@welmac.nl</a>. Welmac will notify you within four weeks after receiving your email whether Welmac processes your personal data and If this is indeed the case, Welmac will send you a complete overview of the personal data that Welmac processes on you.

With reference to the overview provided, you may ask Welmac at reasonable intervals to correct, delete or protect personal data if these are factually incorrect, incomplete for the processing purpose or purposes or irrelevant or you believe it is being processed otherwise in violation of a statutory regulation. Welmac will notify you within four weeks whether or to what extent Welmac will honour the request.

#### How far does Welmac's responsibility extend?

Welmac's website may contain (hyper)links or other references to third-party websites. Welmac has no control over the third-party websites to which (hyper)links or references are provided. It may be the case that a different privacy policy applies to the use of these third-party websites. This Privacy policy only pertains to personal data that are processed by Welmac. Welmac does not accept any responsibility or liability for (the functioning and/ or content of) third-party websites.

### Can this Privacy policy be amended?

This Privacy policy dated 1 September 2017 may be evaluated, reviewed and amended from time to time, as Welmac strives for improvement and there may be statutory, technological, industry, business or other changes that call for updating it.

#### Questions?

If you have any questions about this Privacy policy, you may send an email to: info@welmac.nl.