

# Privacy Notice

## Brxs B.V.

*Last updated: November 2021*

# Privacy Notice

## 1 Who are we and what do we offer?

We are Brxs B.V. (“**Brxs**”). We provide a **Platform** where you, as a retail investor, can invest in real estate properties (**Investment Services**). If you want to make use of our Investment Services, you can sign up for our **Waiting List**. By doing so, you will be contacted as soon as these services are available.

You can access our Platform via our **Website**: [www.brxsapp.com](http://www.brxsapp.com). The use of the Platform, the Website and our Investment Services are collectively: our **Services**.

## 2 Privacy Notice

This is our Privacy Notice. In this document we explain what kind of Personal Data we collect via our Services. We also explain what role we have in the processing of Personal Data, how long we retain Personal Data and what rights you have as a data subject.

## 3 Personal Data and Controller

We process **Personal Data**. Personal Data means all information by which a person can be directly or indirectly identified. Under the General Data Protection Regulation (**GDPR**) we are the so-called Controller of your Personal Data. If you have questions about the processing of your Personal Data, you can always contact us through the contact details listed at the bottom of this Privacy Notice.

## 4 What Personal Data do we collect as Controller?

As the Controller, we may process your Personal Data in different contexts.

We will process your Personal Data if you sign up to our **Waiting List**. We may process Personal Data in a general context, e.g. via our Website and social media accounts (**General**). We will also process your Personal Data if you apply for a job at Brxs (**Applicants**).

If you sign up to our Waiting List, we may process the following Personal Data:

(Personal) Data:	Purpose(s):	Legal basis:
e-mail address.	<i>We use these data to:</i> <ul style="list-style-type: none"> <li>- verify your contact details;</li> <li>- register you on our waiting list;</li> <li>- contact you for the Services as requested; and</li> <li>- grant you a preferred status (only if the referral signs up to our our Waiting List). This status includes i.a. getting discounts and/or early access to our Services.</li> </ul>	We may process these Personal Data perform our contract with you, i.e. with respect to placing on our Waiting List. te: if you are invited by someone else to sign up for our Waiting List, we will only process these data if we have your <b>consent</b> .

Personal Data that we may process of all users of the Services:

(Personal) Data:	Purpose(s):	Legal basis:
Information: on your device type, browser type, session date	use data to:	process these data because we have a <b>legitimate interest</b> to do so, i.e. to provide you with a good

and time, IP address and browser type.	<ul style="list-style-type: none"> <li>- communicate in the same language of the browser;</li> <li>- adapt our Website to the used device;</li> <li>- enable you to use our Website; and</li> <li>- improve the usability of our Website.</li> </ul>	functioning Website and improve our Services for our users.
<p><i>social media pages:</i></p> <p>of visitors who leave a comment or otherwise post something on our social media pages, including the Personal Data within these comments and/or posts.</p>	<p><i>use data to:</i></p> <ul style="list-style-type: none"> <li>- contact the visitors in reply of their post and/or comment via our social media pages; and</li> <li>- process the feedback left on our social media pages.</li> </ul>	<p>process these Personal Data, because we have a <b>legitimate interest</b> to process these data and because the visitors voluntarily made public such information.</p> <p>social media pages are also controlled by the social medium itself. Please check their own privacy notices, to see how each social medium handles Personal Data:</p> <p><b>LinkedIn:</b> <a href="#">Privacy Notice</a></p> <p><b>Facebook:</b> <a href="#">Data Notice</a></p> <p><b>Instagram:</b> <a href="#">Privacy Notice</a></p> <p><b>Twitter:</b> <a href="#">Privacy Notice</a></p>
<p><i>If you contact us:</i></p> <p>email address and the content of the correspondence (if the correspondence takes place via email)</p>	<p><i>We use these data to:</i></p> <ul style="list-style-type: none"> <li>- answer your questions and/or handle any complaints;</li> <li>- support you in using our Services; and</li> <li>- improve our Services as a result of questions and feedback from you.</li> </ul>	process these data, because we have a <b>legitimate interest</b> to contact and assist you based on your comment or question and to improve our Services as a result of the questions and feedback we receive.
<p><i>If you subscribe to our newsletter:</i></p> <p>Name and e-mail address</p>	<p><i>We use these data to:</i></p> <ul style="list-style-type: none"> <li>- send you our newsletter and keep you informed on all our (future) Services.</li> </ul>	<p>process these data, if you gave us <b>your consent</b> to do so (by subscribing via our Website).</p> <p>and our users – who paid for our Services – newsletters, because we have a <b>legitimate interest</b> to do so.</p> <p>newsletter there is a link via which you can unsubscribe.</p>

Personal Data we may process if you are an **Applicant**:

<b>(Personal) data:</b>	<b>Purpose(s):</b>	<b>Legal basis:</b>
<i>Contact details:</i>	<i>We use these data to:</i>	We may process these Personal Data, because we

First name and surname, e-mail address, address and telephone number.	- contact the Applicant about the application.	have a <b>legitimate interest</b> in processing these data. We need the data to get (and keep) in touch with the Applicant and to process and review the application.
<i>Application information:</i> Information provided by the Applicant, among others: Personal Data included in the Curriculum Vitae and motivation letter, qualifications, photo, gender and day of birth.	<i>We use these data to:</i> - assess whether the Applicant suits the job and Brxs; - determine which Applicant is the most suitable candidate.	We may process these Personal Data, because we have a <b>legitimate interest</b> in processing these data and because the Applicant provides this data itself and voluntarily. We need the data to get (and keep) in touch with the Applicant and to process and review the application.
<i>Information retained during application process:</i> Notes from interviews.	<i>We use these data to:</i> - Assess whether the Applicant suits the job and Brxs; - Determine which Applicant is the most suitable candidate.	We may process these Personal Data, because we have a <b>legitimate interest</b> in processing these data. We need the data to get (and keep) in touch with the Applicant and to process and review the application.
<i>Information from public sources:</i> Information in public profiles, such as LinkedIn and other social networks (where applicable).	<i>We use these data to:</i> - Assess whether the Applicant suits the job and Brxs; - Determine which Applicant is the most suitable candidate.	We have a <b>legitimate interest</b> to process these Personal Data as we need them to process and assess the application.  We only process information that is relevant for the application and the Applicant gets the opportunity to react to our findings.

## 5 Mandatory information

When you engage our Services, it may be legally or contractually required that you provide us with certain Personal Data, as indicated with a (\*). For example, we may need information regarding your contact details so that we can contact you. Where you do not provide us with such information, this will usually imply that we will not be able to provide you with specific Services or perform part of our agreement with you.

## 6 Cookies

We may use functional, tracking and/or analytical cookies on our Website. A cookie is a simple small text file that can be stored in your device when visiting the Website. This text file identifies your browser and/or device. When visiting our Website again, the cookie ensures that your browser/device is recognized.

For more information on our use of cookies, please refer to our cookie statement: [www.brxsapp.com/cookie-statement](http://www.brxsapp.com/cookie-statement).

## 7 How long do we keep the Personal Data?

We will not process or store any Personal Data that we do not need. We store Personal Data for as long as we need it for the above purposes, unless we are legally obliged to retain the Personal Data for a longer period. In this respect, we apply the following retention periods:

- **Personal data of potential clients** | These data are stored as long as necessary to determine whether we enter into an agreement with a potential client and for a maximum period of 24 months after our last contact.
- **Personal data of clients** | These data are stored as long as we have a contract with our client and for a maximum period of 5 years after, unless we are legally obliged to retain the data for a longer period.
- **Newsletters** | We retain the Personal Data used for sending newsletters until you unsubscribe from our newsletter.
- **Personal Data in our correspondence** | This data is stored as long as necessary to handle your message/question/complaint and for a period of 5 years thereafter.
- **Personal data of job applicants** | We store these Personal Data for a maximum of 1 year after the application process. If we would like to process the Personal Data for a longer period (e.g. in order to include you in our talent pool), we will always ask you for your consent.

After expiry of the aforementioned retention period(s), we may process and retain certain Personal Data to comply with legal retention obligations and/or for fraud/misuse investigations or to substantiate a (judicial) claim. In such events, we will retain the Personal Data separately and only use such Personal Data for the aforementioned purposes.

## 8 Do we share your Personal Data with others?

### *Processors*

We use third parties (**Processors**) who support us in providing our Services. Within this context these Processors receive Personal Data from us which they process on our behalf. For instance, we use, Processors for building and maintaining our Website and Platform, for managing our referral system, sending our newsletters and hosting our data.

These Processors may only use or disclose the data collected and processed by us within the scope of our instructions to them and under no circumstances for other purposes. We enter into a data processing agreement with all of our Processors.

Apart from the above, we will not share your Personal Data with third parties, unless we are legally obliged to do so.

## 9 Export of Personal Data outside the European Union

We may transmit Personal Data to parties outside the European Union, if one of our Processors or Controllers is established outside the European Union. The Personal Data will only be transferred to countries and/or parties that provide an adequate level of protection in accordance with the European standards. You contact us if you wish to receive more information or a copy of the safeguards we take in this scope where necessary.

## 10 Third party websites

You may find advertising or other (hyper)links on our Website that link to the websites, products and services of partners, suppliers, advertisers, sponsors, licensors or other third parties. We do not control the content or the links that appear on these websites and we are not responsible for the practices employed by websites linked to or from our Website. In addition, these websites, products and services, including their content and links, may be constantly changing. These websites, products and services may have their own privacy notices, user terms and customer service policies. Browsing and interaction on any other website, including websites that are linked to or from our Website, are subject to the terms and policies of that website.

## 11 Changes of the Privacy Notice

The Privacy Notice may be changed from time to time. Please check our Privacy Notice frequently. The new Privacy Notice will be effective immediately upon posting on our Website. If we change our Privacy Notice significantly, then we will state so on our Website together with the revised Privacy Notice.

## 12 Your rights as a data subject and our contact data

As laid down in the Privacy Legislation, you have the right to:

- Ask us to rectify or update your Personal Data;
- Ask us to remove your Personal Data from our systems;
- Ask us for a copy of the Personal Data processed by us. Such copy may also be transferred to another data controller at your request;
- Withdraw your consent to process your Personal Data. This only affects the processing activities that are based on your consent and does not affect the validity of such processing activities before you have withdrawn your consent;
- Object to the processing of your Personal Data;
- File a complaint with the Dutch Data Protection Authority, if you believe that your Personal Data is processed unlawfully.

If you have questions or concerns about this Privacy Notice or your privacy, you can contact us at [hello@brxsapp.com](mailto:hello@brxsapp.com)

**Brxs B.V.**

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