

## PRIVACY STATEMENT

For the purpose of providing services, personal data is shared with Crowe Foederer on a daily basis. This data provides information about the customer or can be linked to the customer. Crowe Foederer respects the privacy of the individuals about whom it receives information and treats this information as strictly confidential. In this privacy statement, we explain which personal data Crowe Foederer processes and for what purposes. We recommend that you read this privacy statement carefully.

Crowe Foederer Holding B.V. (hereinafter: Crowe Foederer), located at Beukenlaan 60, 5651 CD Eindhoven, Chamber of Commerce number 17034844, is the controller for the processing and storage of your personal data. If you have any questions about the content of the privacy statement, please contact our Privacy Officer at [privacy@crowefoederer.nl](mailto:privacy@crowefoederer.nl).

Crowe Foederer complies with the General Data Protection Regulation (hereinafter: GDPR) when processing personal data. This means that Crowe Foederer guarantees, among other things, that:

- the processing of personal data is lawful, transparent, and fair;
- we only process data for legitimate purposes and no more or longer than necessary;
- we monitor the accuracy, integrity, and confidentiality of data. We do this by taking appropriate technical and organizational measures.

### What personal data do we process and what is our basis for doing so?

#### *Purposes and legal bases*

Crowe Foederer only processes personal data for specific purposes based on a legitimate legal basis. The overview below shows Crowe Foederer's purposes for processing personal data and the legal basis on which Crowe Foederer processes that data.

Purposes	Legal basis GDPR
The performance of agreements with customers	Article 6(1)(b) GDPR – performance of the agreement and/or legitimate interest
The performance of agreements with suppliers	Article 6(1)(b) GDPR – performance of the agreement and/or legitimate interest
The performance of agreements with employees	Article 6(1)(b) GDPR – performance of the agreement and/or legitimate interest
The exercise of rights (including claims) arising from agreements	Article 6(1)(b) GDPR – performance of the agreement
Conducting marketing activities	Article 6(1)(a) GDPR – consent of the data subject; or Article 6(1)(f) GDPR – legitimate interest
Conducting recruitment activities	Article 6(1)(b) and (f) GDPR – performance of the agreement and/or legitimate interest
Compliance with legal obligations incumbent on Crowe Foederer	Article 6(1)(c) GDPR - compliance with legal obligations
The (specific) purpose for which personal data is processed with the consent of the data subject	Article 6(1)(a) GDPR - consent of the data subject

If the processing of personal data by Crowe Foederer is based on the consent of the data subject, the data subject has the right to withdraw consent at any time. The withdrawal of consent only applies to future processing.

### *Types of personal data*

**Identification data**

- Name;
- Address;
- Date of birth;
- Place of birth;
- Social security number;
- Identity card number;
- Telephone number;
- Email address;
- Member State.

**Transaction data**

- Bank account number;
- Credits to, debits from, and transfers to bank accounts.

**Financial data**

- Tax returns;
- Financial and advisory reports;
- Invoices;
- Credit notes
- Pay slips;
- Payment history
- Income.

**Audiovisual data**

- Surveillance images taken at Crowe Foederer offices.

**Who receives your personal data?**

Crowe Foederer does not share your personal data with companies, organizations, or individuals outside Crowe Foederer except in one of the following circumstances.

***Execution of the agreement***

The provision of your personal data to third-party organizations is permissible when this is necessary to fulfill Crowe Foederer's contractual obligations towards you. This includes the processing and, if applicable, delivery of your order.

***With your consent***

With your consent, Crowe Foederer may pass on your personal data to other parties. Consent only applies if it is clear what you are consenting to and what the consequences are.

***For external processing***

Crowe Foederer provides personal data to its partners so that they can process data for Crowe Foederer, based on Crowe Foederer's instructions and in accordance with Crowe Foederer's privacy policy and other appropriate confidentiality and security measures. Partners include Crowe Foederer's IT suppliers and the administrator of Crowe Foederer's CRM system.

***For legal reasons***

Crowe Foederer shares personal data if it believes that disclosure of the data is necessary to comply with applicable laws and regulations, legal proceedings, or requests from government authorities.

***Legal obligation***

Crowe Foederer will disclose your personal data if required to do so by law. For example, the police may request data from Crowe Foederer in the context of a fraud investigation. Another example is that, pursuant to Section 47 of the General Tax Act, the tax inspector may request all data necessary to levy tax. Crowe Foederer makes agreements with the recipients of your personal data to ensure that the personal data is treated confidentially and is secured.

**Transfer of personal data outside the European Union**

Crowe Foederer stores your data within the borders of the European Union (hereinafter: EU) in principle. If data is shared outside the EU in the context of providing services, Crowe Foederer guarantees an appropriate level of security and takes appropriate measures (if necessary) to protect your personal data. Crowe Foederer will always inform you if it shares your data outside the EU. Transfers outside the EU may also take place if there is an adequacy decision or if you have given your consent.

**What are your rights?**

You have a number of legal rights vis-à-vis Crowe Foederer. We explain these rights below. We also explain how you can exercise these rights vis-à-vis Crowe Foederer.

#### *Right of access*

At your request, Crowe Foederer will inform you in writing whether it processes your personal data. When submitting your request, you must identify yourself by providing a copy of your driver's license or identity document. In its response, Crowe Foederer will explain which of your personal data it has processed or is still processing. It will also explain the purposes for which the data is or will be processed, with whom the data is shared, how long it is expected to be stored, and what other rights you can exercise.

#### *Right to correction or addition*

If you have been given access to the processing of your personal data, you can request Crowe Foederer to correct any inaccuracies or supplement any omissions. Crowe Foederer will explain the reasons for its response. If Crowe Foederer proceeds with the correction, you will receive an additional statement from Crowe Foederer. Any recipients of your inaccurate or incomplete data will also receive this statement.

#### *Data erasure*

You may request Crowe Foederer to erase your personal data from its systems in one or more of the following cases:

- the personal data are no longer necessary for the purposes for which Crowe Foederer processed them;
- you withdraw your consent to (further) processing; and there is no other basis for processing;
- you raise a reasoned objection, and there are no compelling reasons not to honor your objection;
- the personal data has been processed unlawfully by Crowe Foederer;
- Crowe Foederer is required to erase your personal data on the basis of a legal obligation.

#### *Restriction of processing*

If you have reported an inaccuracy or incompleteness in your personal data to Crowe Foederer, you can request Crowe Foederer to restrict the processing while they are processing your request. You may also ask Crowe Foederer to restrict the processing of your data if you believe that we are processing your data unlawfully or no longer need it, or if you have objected to its (further) processing. After receiving your restriction request, we will only process the data after obtaining consent or for compelling reasons (such as legal proceedings).

#### *Transfer of digital data*

If you have provided personal data to Crowe Foederer in a structured, commonly used digital file format, and they have processed your data with your consent or in the performance of a contract with you, you have the right to request Crowe Foederer to provide you with a copy of this data. In such cases, you may also request Crowe Foederer to transfer your data directly to another service provider.

#### *Objection*

You may object to the processing of personal data relating to you at any time. This applies in particular to profiles that Crowe Foederer has created based on your personal data. Crowe Foederer will cease processing your data upon receipt of your objection, unless Crowe Foederer can demonstrate compelling legitimate grounds that outweigh your interests, rights, and freedoms.

If Crowe Foederer processes your personal data for direct marketing purposes, you may object to this at any time and Crowe Foederer will immediately cease processing.

#### *Exercising rights*

If you wish to exercise one or more of your rights mentioned above, please contact Crowe Foederer at [privacy@crowefoederer.nl](mailto:privacy@crowefoederer.nl). Crowe Foederer will decide on your request within four weeks, unless they inform you within that period that they need more time.

Is your personal data processed on the basis of your consent? Then you have the right to withdraw your consent. Any withdrawal of your consent does not affect previous processing based on that consent.

**How long do we retain your data?**

Crowe Foederer does not retain your personal data longer than necessary, unless Crowe Foederer has a legal obligation to retain your personal data for a longer period. Crowe Foederer's basic principle is that it only retains personal data for as long as necessary to provide you with its services. After this period, Crowe Foederer will, as far as possible, delete your personal data. For example, if you have provided your email address so that Crowe Foederer can keep you informed about its services, it will continue to store your data for this purpose.

**How do we protect your personal data?**

Crowe Foederer takes all technical and organizational measures that can reasonably be expected of it to protect your personal data. Naturally, these measures are fully in line with applicable laws and regulations and the current state of technology.

When new employees join the company, they are made aware of the rules and procedures within the organization, in particular with regard to the applicable security rules and procedures. Regular attention is paid to increasing security and privacy awareness among employees.

Aca It Solutions, Crowe Foederer Data Science B.V., and Crowe Foederer HR Services B.V. are ISO27001 certified. This means that their processes comply with the international standard for information security. The scope of the certificate is: 'Developing, maintaining, and supporting customer portals and digital files, as well as managing ICT infrastructures and the services provided in the field of cybersecurity and forensics & technology'.

**Contact or questions?**

Do you have any questions? Please send an email with your question to: [privacy@crowefoederer.nl](mailto:privacy@crowefoederer.nl). This privacy statement is in accordance with the GDPR. We reserve the right to update this privacy statement periodically. The latest version will be published on this page.