

## Privacy Statement

March 2018

Primevest Capital Partners B.V. processes personal data. We wish to inform you about this clearly and transparently. This privacy statement will answer your most important questions about the processing of personal data by Primevest Capital Partners B.V.

In this privacy statement we will use certain terms. Below is an explanation of those terms.

- **Personal data:**

data that directly or indirectly identify you. Examples are your name and address, but also your income.

- **Processing:**

any acts that can be performed in relation to personal data. These may include collection, but also storage, use and removal of your data from our records.

### 1. Whose personal data are processed by Primevest Capital Partners B.V.?

We process personal data of persons with whom we have, wish to have, or used to have, a direct or indirect relationship. These may include personal data of:

- clients and their representatives;
- persons who show an interest in our products and services; or
- persons who are associated with a business or organisation with which we have, wish to have, or used to have, a relationship.

**Please note:** if your business or organisation provides us with personal data of employees, you are under the obligation to inform your employees thereof. You may provide them with this privacy statement, so that your employees can see how we treat their personal data.

To protect your interests as well as our own, we may process personal data of third parties. We may do so, for example, for purposes of fraud control.

### 2. Who is responsible for the processing of my personal data?

All Primevest Capital Partners B.V., located in the Netherlands and subsidiaries process personal data. The key Primevest Capital Partners B.V. subsidiary is:

- Primevest Capital Partners Deutschland B.V., located in Berlin

### 3. For what purposes does Primevest Capital Partners B.V. process personal data?

We process personal data for the following purposes:

*a. To be able to enter into a relationship with you*

If you wish to become a Primevest Capital Partners B.V. client, we will require personal data. For example, we will have to carry out an investigation to review whether we can accept you as a client. To that end, we can also use data about you that we receive from others. We are allowed to make a copy of your ID document.

*b. To maintain the relationship with you and to execute orders*

If you are a Primevest Capital Partners B.V. client, we want to provide you with quality service. For that purpose, we process personal data. We will use your name and address details, for example, to maintain contacts with you. We may also disclose your name to others, e.g. in the context of payment transactions. We can make (audio, video and chat) recordings for the purpose of providing evidence, combating criminal activities and monitoring quality.

- c. To protect your interests as well as our own*  
To protect your interests as well as our own and the security and integrity of the financial sector, we may process personal data. For instance, to combat or investigate fraud. For this purpose, we may consult and enter personal data in the incident registers and alert systems of the financial sector, like the so called EVR. Furthermore, we may also for this purpose consult public sources such as public registers, newspapers and the internet.
- d. For purposes of development and improvement of our products and services*  
In order to be able to continue to provide you with quality service, we are constantly developing and improving our products and services. In some cases, this may involve the processing of personal data, for example if you have a question about our services.
- e. For promotional and marketing purposes*  
We may process your personal data for promotional or marketing purposes. For example, to inform you about a new product that may be of interest to you, or to better anticipate your wishes. If you do not wish to be contacted for commercial purposes, please notify the Primevest Capital Partners office that you do business with.
- f. Conclusion and execution of agreements with suppliers and corporate clients*  
If you have business contacts with Primvest Capital Partners B.V, we may process your personal data. For example to be able to ascertain that you are authorised to represent your company. Or to grant you access to our offices.
- g. To perform statutory obligations*  
We are required by certain national and international laws and regulations to collect data about you. For example we are sometimes required to initiate a (further) investigation. If you have certain assets or in the event of an unusual transaction in your account. Furthermore, we might be required to ascertain who the ultimate beneficial owner (UBO) is of a company with which we have a relationship. Laws and regulations may also require us to disclose data about you to a government, tax authority or a regulatory body within or outside the Netherlands.
- h. For purposes of our operations*  
As a financial investment manager, it is important to us, and necessary, to have a good overview of our client relations. That includes knowing whether you collaborate with other parties that may pose a risk. To obtain such overview, and to take measures, we process personal data, e.g. in order to assess our risk when providing a loan and to decide whether we wish to take out insurance in that respect.
- i. For archiving purposes*  
We do not collect more personal data than is necessary for the purposes set forth above. If we do not store the data for those purposes, we may nonetheless do so for archiving purposes. That means that they will only be used for legal proceedings, or for historic, statistical or scientific purposes.

#### **4. Does Primevest Capital Partners B.V. also process sensitive data?**

Sensitive data are special types of personal data, for example data concerning physical or mental health, criminal data or racial or ethnic data. Primevest Capital Partners B.V. participates in incident registers and alert systems for the financial sector, and may process data concerning criminal records for that purpose. The purpose of an incident register or alert system is to protect the interests of financial institutions and their clients, e.g. by detecting fraud.

Furthermore, we will process sensitive data only if so required by law, with your consent, or at your request. If you request us to record sensitive data about you, or if you disclose such data yourself, we will only process them if that is necessary for our services.

#### **5. How does Primevest Capital Partners B.V. treat my personal data?**

Your personal data are stored carefully and no longer than necessary for the purpose for which they were processed. Within Primevest Capital Partners B.V., your personal data can be used only by employees who require access to such data for the performance of their duties. Our employees are subject to a confidentiality obligation.

If we wish to use data for a purpose other than that for which they were originally processed, then we may only do so if the two purposes are closely related. Your personal data may also be shared between the various Primvest Capital Partners B.V. subsidiaries, but only if this is reconcilable with the purpose for which the personal data were collected and if this is compliant with other requirements following from applicable privacy laws and regulations.

We sometimes engage third parties to edit personal data. We can engage third parties only if this fits the purpose for which we have processed your personal data, e.g. for promotional and marketing purposes. In addition, such third party may only obtain our order if he has demonstrably taken appropriate security measures and warrants confidentiality.

Your personal data may also be shared with third parties that we engage in our operations or the provision of our services. This may, for example in the context of payment transactions, include transfer to third parties in countries that do not have the same level of protection for personal data as in the European Union or other countries considered to have an adequate data protection level. Your personal data may, both during and after processing, be subject to investigation by competent national authorities in the countries where such data are located for purposes of processing. Your personal data will not be sold or hired out.

#### **6. Can I view the personal data that Primevest Capital Partners B.V. processes about me?**

Yes, you may request a summary of the personal data processed about you from the Primevest Capital Partners B.V. office that you do business with. If you feel that your personal data have been processed incorrectly or incompletely, or if you feel that such processing was unnecessary, then you can file a request for editing, supplementation or removal your personal data with the Primevest Capital Partners B.V. office that you do business with.

#### **7. Who can I turn to if I have a question or a complaint?**

If you have any questions or complaints about Primevest Capital Partners B.V.'s processing of personal data, please contact the division that you do business with.