

# **Verbrugge International B.V. (and Group Companies)**

## **Privacy Policy**

### **1 Introduction**

#### **1.1 Who we are**

We are Verbrugge International B.V. (“Verbrugge”, “we”, “us”), a limited liability partnership incorporated and registered in the Netherlands with company number 21009387 and registered office at Finlandweg 8, Terneuzen.

#### **1.2 Purpose of this Privacy Policy**

We take your privacy very seriously. As such, we ask that you read this Privacy Policy carefully as it contains important information about:

- (a) what personal data we may collect from you;
- (b) how we will use, store and protect your personal data;
- (c) with whom we may share personal data; and
- (d) your rights under relevant data protection laws.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

### **2 Lawful basis for processing**

Under data protection laws, we must have a legal basis in order to process your personal data. The legal bases on which we may process your data are:

- **Legitimate interest:** in order to carry on and promote Verbrugge business and related activities.
- **Consent:** where you have consented for us to process your personal data for one or more specific reasons.
- **Performance of a contract:** in order to perform a contract that Verbrugge may have with you.
- **Legal obligation:** where processing of the data is required by law. For example, to carry out ‘know your client’ checks required by our regulator or similar requirements in respect of any of our subsidiaries.

### **3 What data we may collect from you**

We may collect and process the following personal data:

- your name, email address, telephone number(s), organisation, role and information related to our business relationship with you;
- for clients and commercial counterparties, the personal data of its representatives and staff, including the data set out above as well as date of birth, gender, financial information and data contained in identity documentation;
- cookie data (please see our Cookies Policy on our website for further information); and
- technical data such as internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.

#### **4 How we collect information from you**

We collect your personal data in a number of ways:

- as you browse the Verbrugge website certain information is collected automatically using cookies, server logs and other similar technologies. Please see our Cookies Policy on our website for further information;
- during the communications between us, such as via email, telephone, correspondence or in meetings;
- any personal information you provide to us or one of our subsidiaries during your relationship with us as a client or commercial counterparty of us or one of our subsidiaries; and
- from third parties/public sources:
  - o any personal data shared with us by our investments and prospective investments;
  - o technical data may be obtained from the following parties:
    - (a) our website management provider,
    - (b) data analytics providers, such as Google Analytics, and
    - (c) investor reporting applications, such as Intralinks;
  - o identity and contact data from publicly available sources such as internet searches, Companies House, Financial Conduct Authority and Dun & Bradstreet or ratings agencies (and including updates of such searches from time to time).

#### **5 How we use your personal data**

We may use your personal data for the following purposes:

- to contact you to discuss any Verbrugge services and to respond to any queries you have raised;
- to store your contact details in our Client Relationship Management databases;
- where you are a client or commercial counterparty of Verbrugge or one of our subsidiaries:
  - a. to provide the relevant services,
  - b. to carry out necessary anti-money laundering and anti-fraud checks, including any periodic updates of the same,
  - c. to enable us or our subsidiaries to conduct day-to-day business activities with you, and
  - d. to carry out general investor relations activities and communications;
- to personalise your experience on the Verbrugge website; and
- as we believe to be necessary or appropriate:
  - o in order to comply with a legal obligation. This applies where the processing is necessary for us to comply with the law,
  - o to enforce or apply this Privacy Policy, and
  - o to protect our legitimate rights, privacy, property or safety, and/or those of a third party and your rights do not override those interests.

#### **6 Marketing**

We or our group companies contact you about our services where we are legally entitled to do so and it is in legitimate interests to provide such information to you. In some cases, we may obtain your consent for such marketing communications.

#### **7 Third party links**

The Verbrugge website may contain links to and from other applications, plug-ins and websites of other networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that

they (and any services that may be accessible through them) have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these apps, websites or services. Please check these policies before you submit any personal data to these websites or use such services.

### **8 Retention of your data**

We will not retain your personal data for longer than is necessary for the purposes for which the personal data is processed. This means that your data will only be retained for as long as it is still required to provide you with services or is necessary for legal (including regulatory) reasons. When calculating the appropriate retention period for your data, we consider the nature and sensitivity of the data, the purposes for which we are processing the data, and any applicable statutory retention periods. Using these criteria, we regularly review the personal data which we hold and the purposes for which it is held and processed.

When we determine that personal data can no longer be retained (or where you request us to delete your data in accordance with your right to do so (please see section 12 below for more information)), we ensure that this data is securely deleted or destroyed.

### **9 Accuracy of your data**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **10 Security of your data**

We seek to ensure that we have appropriate organisational and technical security measures to protect your personal data. These measures include ensuring our internal IT systems are suitably secure and implementing procedures to deal with any suspected data breach. All company desktops have relevant antivirus and endpoint protection installed. IT penetration testing is carried out regularly to test and mitigate the risk of intruders accessing the firm's IT systems. We have a dedicated, external IT team who monitor and upgrade our IT systems.

In the unlikely event of a data breach, we will take steps to mitigate any loss or destruction of data and, if required, will notify you and any applicable authority of such a breach.

### **11 Transfer of your data**

#### **Transfers within our group**

We may share your data with other companies and branches within the Verbrugge group.

#### **Transfers to third parties**

There may be circumstances in which we may also need to share your personal data with certain third parties, including third parties located outside of the Netherlands and the European Economic Area (EEA).

The third parties to which we may transfer your personal data include:

- Suppliers. We employ other companies and individuals to perform functions on our behalf, including our software suppliers, data hosting providers, data analytics providers, and antimoney laundering tools;
- Banks who assist us or our subsidiaries by acting as depositories for client funds;
- Other professional advisors such as accountants, lawyers, consultants and other business advisors engaged by us or our subsidiaries; and
- Other third parties where required under law or applicable regulation, or in connection with legal or regulatory proceedings.

The security of your data is important to us and Verbrugge will, therefore, only transfer your data to such third parties if:

- the third party has agreed to comply with Verbrugge's instructions, required data security

standards, policies, and procedures and put adequate security measures in place;

- the transfer complies with any applicable cross border transfer restrictions and suitable safeguards have been put in place; and
- a written contract containing suitable obligations and protections has been entered into between the parties.

As mentioned above, Verbrugge will only transfer your data where suitable safeguards have been put in place. These safeguards are intended to ensure a similar degree of protection is afforded to your data wherever it may be transferred and include:

- only transferring your personal data to countries which have been deemed to provide an adequate level of protection for personal data by the European Commission;
- where your data will be transferred by Verbrugge outside of the EEA, entering into specific contractual terms which have been approved by the European Commission and which give personal data the same protection as within the EEA.

## **12 Your rights**

You have certain rights in relation to the personal data Verbrugge process and hold about you. These include:

- **Right to rectification:** you have the right to require Verbrugge to correct any inaccuracies in your data.
- **Right to erasure:** you have the right to require Verbrugge to delete your data, subject to certain legal requirements.
- **Right to restriction of processing:** you have the right to require Verbrugge to restrict the way in which Verbrugge processes your personal data. You may wish to restrict processing if, for example:
  - o You contest the accuracy of the data and wish to have it corrected;
  - o You object to processing but Verbrugge is required to retain the data for reasons of public interest; or
  - o If you would prefer restriction to erasure.
- **Right to data portability:** you have the right to obtain from Verbrugge easily and securely the personal data we hold on you for any purpose you see fit.
- **Right to object to processing:** you have the right to require Verbrugge to stop processing your personal data should you wish the data to be retained but no longer processed.
- **Right of access:** you have the right to request access to personal data that Verbrugge may process about you.
- **Right to withdraw consent:** you have the right at any time to withdraw consent allowing Verbrugge to process your personal data.

If you would like to exercise any of the above rights, please contact Verbrugge at [info@verbrugge.nl](mailto:info@verbrugge.nl)  
We will respond to requests made by you within one month.

## **13. The use of cookies**

Verbrugge uses:

**Javascrpts;** these ensure that your browser is able to collect information. This information is then converted into:

**Cookies.** These are small files with information on your surfing behaviour, etc. that is saved in the browser of your computer, tablet or smartphone when you first visit our website. There are three types of cookies, i.e. “functional cookies”, “analytics” and “tracking cookies”.

Functional cookies ensure that our website works properly and your preferences, for example, are saved. We also collect statistics (analytics) from the users of our website, which we use to continually improve our website. Finally, we also place cookies that track your surfing behaviour (tracking cookies) so that we can offer you tailored content and advertisements.

When you first visit our website, you will be informed about these cookies which you will be able to either accept or decline. If decide not to accept the cookies, you may not be able to make full use of our website. Browsers also allow you to erase cookies.

### **Google Analytics**

Verbrugge uses Google Analytics to monitor how users use the website and the effectiveness of Google's Adwords advertisements.

Read Google's privacy policy for more information. Google's privacy policy includes the privacy policy of Google Analytics. Google uses this information for the purpose of monitoring the use of our website, to produce reports about the website and to be able to offer information to its advertisers about the effectiveness of their campaigns.

Google may disclose this information to third parties if Google is required to do so by law, or insofar as those third parties process the information on Google's behalf.

This is beyond the control of Verbrugge. Verbrugge has not granted Google permission to use data obtained via Analytics for other Google services.

### **Why cookies?**

Websites use smart and useful techniques to enhance user-friendliness and to make the site as interesting as possible for each visitor. One of the best known techniques involves cookies. Cookies can be used by website owners or third parties - like advertisers - who communicate through the website you visit.

Using cookies is safe. It is impossible to retrace personal information such as phone numbers or e-mail addresses by using cookies. They are, thus, unsuitable for direct marketing techniques like telemarketing and spam.

We feel it is essential for you to be informed about the cookies that our website uses and for what purpose they are used. The purpose is twofold: we want to guarantee your privacy and the userfriendliness of our website as best as we can. The following explanation tells you more about the cookies used on and through our website and for what purposes.

*This cookie statement applies to all websites of Verbrugge.*

### **Cookies that ensure the website can function properly**

Our website uses cookies for:

1. Remembering information you fill in the contact form or when you subscribe for our newsletter
2. Saving preferences, such as the language, location, the desired number of search results to be shown, etc.

3. Saving settings for, e.g., the best video reproduction possible, the desired buffer size and your screen's resolution data
4. Reading your browser settings so that your screen will reproduce our website in the best possible way
5. Evenly spreading the load on the website, so that the website remains accessible at all times
6. Providing the possibility to react to our website

### **Cookies through which we can measure the website's use (Google Analytics)**

We use cookies to continuously try to measure how many people visit our website and what parts of the website they visit most. This tells us what components of the website draw our visitors' interest most.

The information thus gathered is used for statistics. These statistics provide us with insight into how frequently our webpage is visited, where exactly visitors spend most of their time, etc. This enables us to draft the website's structure, navigation and the contents as userfriendly as possible for you. We will never trace any statistics to individuals.

We use cookies for:

1. Recording the number of visitors of our web pages
2. Recording the time each visitor spends while visiting our web pages
3. Setting the order in which a visitor visits the various pages of our website
4. Assessing which parts of our site need adaptation
5. Optimising the website

### **Browser settings**

If you do not want websites to place cookies on your computer at all, you can adapt your browser settings as such that you will be notified before any cookie is placed. You can likewise adapt the settings as such so that your browser refuses all cookies, or only the third party cookies. Likewise, you can remove any of your cookies that have already been placed. Please note that you will have to separately adapt the settings for each browser and computer you use. Each browser has a different method to adapt the settings. If necessary, consult your browser's "help" function.

### **14 Amendments to this Privacy Policy**

No changes to this Privacy Policy are valid or have any effect unless agreed by Verbrugge in writing. Verbrugge reserves the right to vary this Privacy Policy from time to time. Our updated terms will be displayed on the Verbrugge website. It is your responsibility to check this Privacy Policy from time to time to verify such variations.

### **15 Questions in relation to this Privacy Policy**

You should also be aware that you have the right to raise any concerns in relation to how Verbrugge processes your personal data to the Information Commissioner's Office (ICO).

Verbrugge has appointed a data privacy lead (DPL) who is responsible for dealing with any such concerns, in addition to overseeing questions in relation to this Privacy Policy and handling requests in relation to the exercise of your legal rights. If you have any concerns, questions, or requests, please contact the DPL at [info@verbrugge.nl](mailto:info@verbrugge.nl), addressing your email to Mrs. H. Kara