

Privacy statement DeHeng Civil Code N.V.

This statement provides information on how our office handles personal data processed in the context of our activities and services. We adhere to the Code of Conduct and the "guidelines" of the Dutch Royal Notarial Association (L119/16 of 4.5.2016, consideration 81 art. 40.2).

Our contact details

Office name: DeHeng Civil Code N.V.
Address: Koningin Julianaplein 10, 2595 AA The Hague
Postal code and town/city: PO Box 16810, 2500 BV The Hague
Dutch Trade Register Number: 24378067
GDPR contact person: Chrissy van Hoof
Email address: vanhoofc@dehengcc.com

Our services

Our office requests your personal data for the following purposes only:

- to perform advisory engagements or other services;
- to fulfil statutory tasks and obligations;
- for the purposes for which you have specifically granted permission. We do not sell your personal data.

Your personal data will not be processed for any other purposes without your permission.

Personal data are requested for the purpose of legal advice, drawing up an arbitrator or mediator or for performing another engagement.

Rules applicable to the use of personal data in arbitration or mediation

If our office draws up an award using your personal data, the arbitrator or mediator must comply with the legal regulations governing the processing of personal data:

1. The civil-law notary must include certain mandatory data, personal or otherwise, in the deed. Your personal data are therefore processed on a legal basis.
2. The civil-law notary must retain the signed deed containing your personal data for 30 years and after that transfer to the national archive in perpetuity.
3. As soon as the civil-law notary signs the deed, it becomes an official document. This means that no further changes may be made to it, even if the personal data are incorrect. If changes need to be made, the civil-law notary must draw up a new deed in which the change is incorporated.
4. The civil-law notary must perform a mandatory check of certain data, personal or otherwise, in the Persons Database (*Basisregistraties Personen*, BRP), the Commercial Register (*Handelsregister*) and The Netherlands' Cadastre, Land Registry and Mapping Agency (*Kadaster*) or similar registers abroad, or, as the case may be, requests for legal opinions.
5. The civil-law notary must perform a mandatory check of your identity and will therefore request you to present a valid identity document. The civil-law notary is one of the few Dutch persons authorised to photocopy identity documents including all the data contained therein.
6. Your personal data are subject to the arbitrator or mediator's obligation of professional secrecy. Unauthorised parties have no access to your data.

Advisory and other services

The following applies to the processing of personal data for other purposes by our office:

- The purposes and corresponding legal bases for the processing of personal data for legal opinions are as follows:

- The opiniator must include certain mandatory data, personal or otherwise, in the legal opinion. Your personal data are therefore processed on a legal basis.
- The opiniator must perform a mandatory check of certain data, personal or otherwise, in the Persons Database (*Basisregistraties Personen*, BRP), the Commercial Register (*Handelsregister*) and The Netherlands' Cadastre, Land Registry and Mapping Agency (*Kadaster*) or similar registers abroad, or, as the case may be, requests for legal opinions.
- The opiniator must perform a mandatory check of your identity and will therefore request you to present a valid identity document. The opiniator is one of the few Dutch persons authorised to photocopy identity documents including all the data contained therein.
- Your personal data are subject to the opiniator's obligation of professional secrecy. Unauthorised parties have no access to your data.
- The purposes and corresponding legal bases for the processing of personal data for legal advice are as follows:
 - The lawyer must perform a mandatory check of certain data, personal or otherwise, in the Persons Database (*Basisregistraties Personen*, BRP), the Commercial Register (*Handelsregister*) and The Netherlands' Cadastre, Land Registry and Mapping Agency (*Kadaster*) or similar registers abroad, or, as the case may be, requests for legal opinions.
 - The lawyer must perform a mandatory check of your identity and will therefore request you to present a valid identity document. The lawyer is one of the few Dutch persons authorised to photocopy identity documents including all the data contained therein.
 - Your personal data are subject to the lawyer's obligation of professional secrecy. Unauthorised parties have no access to your data.
- The processing of personal data for other services is based on a legitimate professional interest.

Source of personal data processed

If our office processes personal data relating to you, which we have not received from you, this will always take place in the context of the engagement assigned to us. The source of those data will be one of the following:

- Public registries, including The Netherlands' Cadastre, Land Registry and Mapping Agency
- A tax lawyer, accountant, investment banker or real estate agent or other adviser in connection with a (purchase/sale) agreement, to which you are one of the parties
- Donor
- Internet

Forwarding your personal data

Our office will forward your personal data to other parties (third parties) only if this is required by law or if this is actually necessary for the execution of the activities.

Our office does not forward personal data to non-EU countries nor to international organisations without your approval.

Retention of your personal data

Our office will not retain your personal data any longer than necessary for the purpose for which they were collected, for the execution of statutory tasks and compliance with statutory obligations or for the fulfilment of agreements (for instance, due to time limits). The retention periods stipulated in statutory provisions, for instance those of the Dutch Civil-Law Notaries Act (*Wet op het notarisambt*), apply.

Your rights relating to personal data processed by our office

If your personal data are processed by our office, pursuant to the General Data Protection Regulation (GDPR) (EU) 2016/679, you may exercise the rights stated below against when applicable payment of our administrative fees (in practice deposit, published hourly rates, third party expenses and VAT).

To that end, you must submit a request (preferably in writing) to the contact address stated in this privacy statement. Before granting your request, we will confirm your identity on the basis of a valid identity document first.

Right of inspection by the data subject

You can always enquire which personal data our office processes, for which purpose they are used and how long the data will be retained. In the event that there is any legal basis that precludes us from complying with your request, we will assess this and inform you accordingly.

Right to rectification

If you believe that certain data have been incorrectly processed, you have the right to request rectification of the data. This is not possible, however, if the data are used in a notarial deed, in which case a new deed must be drawn up as a ratification or as an addendum to the incorrect deed.

Right to erasure (right to be 'forgotten')

If you wish to have your personal data erased, you may submit a request to that effect. If the data are included in a notarial deed, the civil-law notary is not permitted to erase the data.

Right to restriction of processing

If you wish to restrict the processing of personal data by our office (pending rectification of your personal data at your request, an objection lodged against processing or because you specifically do not wish to have data erased even though processing of the data is unlawful), you may submit a request to that effect.

Right to data portability

If your personal data are not processed for the purpose of a notarial deed and you wish to transfer the personal data to another service provider, you may submit a request to that effect. However, please note that such a transfer may not always be possible due to incompatibility with the statutory notarial duties.

If a request is irregular, the firm is under Dutch law obliged to report this to the Dutch tax and fraud authority.

Possible restrictions in exercising your rights under the General Data Protection Regulation (EU) 2016/679

Our office will make every effort to fulfil your rights under the General Data Protection Regulation (EU) 2016/679. However, in some cases these rights may conflict with other statutory provisions for instance those of the Dutch Civil-Law Notaries Act. Should the civil-law notary for this reason be unable to fulfil a request relating to the rights described above, you will be notified accordingly in writing.

Private Impact Assessment (PIA)

PIA will be held in principle in accordance with our handbook based on best practice principles (Novea) at least annually.

Dataleak

In case of a dataleak, both the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) and the affected clients will be informed by us in principle within 72 hours.

Complaints concerning the processing of your personal data by our office

If you have any complaints concerning the processing of personal data by our office, please let us know by contacting: Chrissy van Hoof <vanhoofc@dehengcc.com>. You also have the right to submit a complaint to the supervisory authority, the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). You can use the website www.autoriteitpersoonsgegevens.nl.