

PRIVACY NOTICE

15-05-2018 - Residence CS

1. Introduction

This Privacy Notice sets out the policy of Residence Corporate Services B.V. including its direct or indirect subsidiaries (hereinafter “**Residence CS**”). Residence CS will protect your privacy and process your personal data in accordance with the European General Data Protection Regulation (GDPR) and other applicable privacy laws. This policy explains how we process personal data. It’s also provides for information on your rights.

2. What kind of personal data do we collect?

In order to provide its services in compliance to laws and regulations, Residence CS processes personal data such as but not limited to names, address, contact details, date and place of birth, nationality, gender, marital status, passports, bank statements, tax returns, utility bills and any other documentation necessary and/or required for the proper performance of its services.

3. What is the purpose of collecting the personal data?

Residence CS collects the personal data mainly for contracting purposes and in order to meet its legal obligations such as compliance and regulatory obligations and finally as required by any authority.

4. How do we collect personal data?

Residence CS collects personal data from various sources:

- a. From its Clients directly, including through client’s employees and/or client’s business relations;
- b. From third parties, such as corporate services providers, banks, tax advisors;
- c. From public available sources such as internet and social media.

5. With whom do we share your personal data?

Residence CS may disclose or transfer personal data to its internal or external compliance officer, auditor and to any other subcontractors for the purpose of the proper performance of the services we provide to our clients. It may, for example, disclose or transfer such personal data to third party service providers who provide legal, accounting, tax, administrative, compliance, audit, IT, payment, data processing, debt collecting or other services. We enter into data processing agreements with such subcontractors to ensure that they process your data, on our behalf, with the same level of security and confidentiality as applied by Residence CS. Also Residence CS may disclose or transfer personal data to agents, advisors, intermediaries and employees engaged by Residence CS’s Clients. In addition Residence CS may disclose or transfer personal data to protect our rights or those of our

clients and/or to prevent fraud. Residence CS can also be obliged to disclose or transfer personal data to competent authorities in order to comply with our legal and/or regulatory obligations.

When sharing your personal data with third parties as set out in this Privacy Notice, it may be transferred outside the European Union. In these circumstances, your personal data will only be transferred on one of the following bases:

- the country that we send the personal data to is approved by the European Commission as providing an adequate level of protection for personal data;
- the transfer is to a recipient in the United States of America who has registered under the EU/US Privacy Shield;
- the recipient has entered into European Commission standard contractual clauses with us; or
- you have explicitly consented to the same.

We will ensure that, where relevant, contractual safeguards are implemented to ensure the protection of your personal data when disclosing your personal data to a third party. For example, we will enter into data processing agreements with relevant parties (providing for restrictions on the use of your personal data and obligations with respect to the protection and security of your personal data).

6 How long do we store your personal data?

We will only retain your personal data for as long as we have a lawful reason to do so. In general the following periods apply:

- where we have collected your personal data as required by Client due diligence and anti-money laundering legislation, including for identification, screening and reporting: retention period of 5 years after the termination of our relationship, unless we are required to retain this information by another law or for the purposes of court proceedings; or
- in most other scenario's: retention period of 7 years after the termination of our contractual or other relationship with you in case any claims arise out of the provision of our services to you.

7. How do we protect your personal data?

We will implement the necessary administrative, technical and organizational measures for ensuring a level of security appropriate to the specific risks that we have identified. We protect your personal data against destruction, loss, alteration, unauthorized disclosure of or access to personal data transmitted, stored or otherwise processed. For the technical security of your data, ETM has engaged an IT service provider, who complies with applicable requirement and standards for IT security in the Netherlands and EU.

8. What are your rights and how you can exercise these?

In general you have the right to:

- Request information about and access to your personal data;
- rectify your personal data;

- erasure of your personal data ('right to be forgotten');
- restriction of processing of your personal data;
- object to the processing of your personal data;
- receive your personal data in a structured, commonly used and machine-readable format and to (have) transmit(ted) your personal data to another organization.

Finally, you have the right to file a complaint with the Dutch Data Protection Authority relating to the processing of your personal data by us.

9. Contact

If you have any questions, comments or complaints in relation to this Privacy Policy or the processing of your personal data by us, please feel free to contact us at: info@residencecs.com and we will connect you to the dedicated person within our firm.