

## **Hereninvest Groep B.V. is responsible for the processing of personal details as set out in the present Privacy Statement**

### **Contact information:**

Diakenhuisweg 17, 2033 AP HAARLEM

[T] +31 (0)23 - 511 22 33 - [www.hereninvest.nl](http://www.hereninvest.nl)

Mrs Marije Willems holds the position of Privacy Officer at Hereninvest Groep B.V.

He can be reached via [marijewillems@hereninvest.nl](mailto:marijewillems@hereninvest.nl).

### **Personal details we process**

Hereninvest Groep B.V. processes personal details pertaining to yourself owing to your making use of our services and/or to your having provided us with the information in question.

The personal details we process can be summarised as follows:

- given name(s) and surname
- gender
- date of birth
- place of birth
- residential address
- telephone number
- e-mail address
- bank account number
- any such other personal details as you purposely make available to us, for example by completing a contact form on our web site or by communicating with us either by e-mail or letter or by telephone
- information pertaining to your activities on our web site.

### **Personal details we process that are of a particular and/or sensitive nature**

Although neither our web site nor our services are deliberately geared to compiling information on under-16s who consult our web site unless they do so with the permission of their parent(s) or guardian(s), we have no way of ensuring that our on-line visitors are of age (i.e. 16 or over).

It is for this reason that we would urge all parents to keep close tabs on their children's on-line activities, in order to prevent information on their offspring being collected without parental authorisation. If as a parent or guardian you are suspicious that we may have compiled personal details on an under-age child without the requisite consent, please notify us accordingly via [marijewillems@hereninvest.nl](mailto:marijewillems@hereninvest.nl) to get the information in question removed.

### **What is our object in processing personal details and what underpins our *modus operandi*?**

As Hereninvest Groep B.V. we process personal details pertaining to yourself for the following reasons:

- we need to be able to contact you by telephone or via e-mail where our service provision so warrants
- we need to be able to bring you up to date on changes to our service and/or product ranges
- we need to be able to deliver the products and services of your choice to your doorstep

- processing of your payment(s)
- dispatch of our newsletter
- Hereninvest Groep B.V. moreover processes personal details where it is under the obligation to do so owing to prevailing legislation. This applies inter alia to information we need for inclusion in our own tax returns.

### **Automated decision-making**

As Hereninvest Groep B.V. we steer clear of automated processing-based decision-making (i.e. decision-making by computer programmes or systems without human intervention, e.g. by one of our own operatives) where it concerns matters that could (critically) impact on individuals.

### **Retention period**

As Hereninvest Groep B.V. we will refrain from retaining your personal details in a format that could render you identifiable as a stakeholder for longer than is strictly necessary in order for the information compilation or subsequent processing objectives to be realised. It goes without saying that we adhere to the specific statutorily defined terms that apply to particular scenarios. An example is the retention period we observe for data having culminated in our rendering advice concerning a complex financial product, to which a statutorily defined retention period applies of at least five years from the date as at which the advice was rendered, in accordance with Section 23 of Chapter 4 of the Financial Supervision Act of the Netherlands. Hereninvest Groep B.V. itself, in its capacity of responsible party, decides on the duration of the retention period for the personal details it has at its disposal.

### **Receipt and sharing of personal details**

As Hereninvest Groep B.V. we may resort to sharing the personal details we have on you with third parties - such as insurance companies, banks, lending institutions, loss adjusters and/or ICT service providers - where the proper performance of our contractual obligations so warrants. Sometimes the legalities are such as to leave us no choice but to disclose certain data in order to comply with our statutory duties. To this end we will where appropriate conclude processor agreements with businesses that process details pertaining to you as part of the service engagement between yourself and us, to make sure that all those involved should adhere to the same level of security and confidentiality where it concerns your personal data. The responsibility for such processings continues to rest with Hereninvest Groep B.V.

### **Consultation, adjustment and/or removal of data**

You have the right to consult and/or rectify any personal details we have on you, or have the information removed altogether. You also have the right to withdraw your consent to our making use of your personal data as well as having the option of lodging objection to Hereninvest Groep B.V. processing personal details pertaining to yourself. Last but by no means least, you have a so-called data transferability right, which authorises you to file a request with us for dispatching such personal details on you as we have saved to our computer system either to you and/or to a third party of your choice.

The e-mail address to be used for requests for consultation, rectification, removal and/or transfer of your personal details or for your withdrawal of consent for, or lodging of objection to, the processing of your personal details by our organisation is as follows: [marijewillems@hereninvest.nl](mailto:marijewillems@hereninvest.nl).

In order for us to ascertain that the request for consultation of your personal details has indeed originated with you, we would ask you to have it accompanied by a copy of your (valid) ID record in which you have blacked out - for privacy reasons - your picture, the MRZ (short for Machine Readable Zone, this being the sequence of numbers at the bottom of the passport page) and your passport and BSN (citizen service) numbers. We will get back to you post-haste (and, in any event,

within four weeks at the most) with an update on your request.

Herenvest Groep B.V. additionally considers it appropriate to alert you to the option you have of filing a complaint with the Dutch Data Protection Authority (the national watchdog organisation) using the following link:

<https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/privacyklacht-indienen>.

#### **Our personal data security approach**

As Herenvest Groep B.V. we take the protection of your details seriously. We apply a continual focus on measures aimed against abuse, loss, unauthorised access, inappropriate publication and unauthorised amendment of information. If it is your impression that the security of the personal details we have on you is wanting or if you are suspicious of actual information abuse, please do not hesitate to get in touch with our Customer Service department or alert us via e-mail [marijwillems@herenvest.nl](mailto:marijwillems@herenvest.nl).