

PRIVACY STATEMENT

REGGEBORGH VASTGOED

SCOPE OF THE PRIVACY STATEMENT

Reggeborgh and its subsidiaries respect your privacy. We process your personal data carefully and in accordance with the law. Our Privacy Statement explains which data we use and how we store, protect and process this data. This Privacy Statement applies to the activities of all companies that are part of the Reggeborgh Vastgoed Group.

PROCESSING OF PERSONAL DATA

Reggeborgh considers it important to inform you about how it handles your personal data, what it uses this data for, and your rights in this regard.

When processing personal data, Reggeborgh adheres to a strict privacy policy. This also means that your personal data is gathered, handled and protected with the greatest of care, and in accordance with statutory and regulatory requirements, including the General Data Protection Regulation (GDPR).

PERSONAL DATA

We have outlined below the personal data about you that Reggeborgh may process.

- first name and surname;
- date of birth;
- place of birth;
- address;
- telephone number(s);
- email address;
- civil status;
- identity document information (including the number, date of issue, and/or period of validity and place of issue);
- bank account number;
- financial situation (including income, assets, and other financial obligations);
- income situation (including type of employment or data from your company, benefit(s), pension(s), assets, etc.);
- energy consumption of tenant(s);
- IP address, log-in details, and information from activities on websites or project websites (if registering as a prospective tenant or purchaser);
- profession and/or job title;
- data from the Trade Register of the Chamber of Commerce and from the Land Registry.
- camera footage (signs in the relevant places indicate where security camera monitoring is used);
- data available through public sources and which have been intentionally disclosed by you, such as on social media and commercial websites;
- information from an email you have sent us;
- if you are applying for a job: information from your CV/information about your employment history.

PURPOSES OF PROCESSING PERSONAL DATA

Reggeborgh processes your personal data during the following activities:

- development of property;
- purchase or sale of property;
- letting of property;
- administration of property;
- financing of property;
- consultancy about or during the aforementioned activities;
- use of our website.

We process personal data in order to keep efficient and effective records of our property portfolios, which includes being able to perform everything necessary to establish an agreement. This includes, for example, the following types of agreements:

- rental agreements;
- purchase agreements;
- contracting agreements;
- administration agreements;
- agreements for services and the provision of services;
- agreements for engagements;
- settlement agreements;
- financing agreements.

Your data will then be processed in order to perform the obligations ensuing from the agreement, such as maintenance of property and installations (or planning maintenance), carrying out inspections and takeovers of rental obligations, making payments and collecting amounts due and entrusting this to third parties, handling disputes, queries, or examinations, including legal proceedings, enabling housing benefit to be checked, applied for, and issued, administration activities (including internal activities), as well as performing or applying the laws and regulations.

Your personal data may also be processed to optimise or improve services, carry out market research and/or activities for optimising or improving products or installations. We do this to evaluate and improve the services we provide so that we can continually optimise our property portfolios. Your data is processed in such a way that it cannot be directly traced back to you as an individual.

GROUNDS FOR PROCESSING PERSONAL DATA

In order to be able to use personal data, we need to have a ground for doing so under the GDPR. We use the following grounds:

- the personal data needs to be used to perform or enter into an agreement with you;
- the personal data needs to be used to meet a statutory duty;
- in emergency situations: the personal data needs to be used to protect a vital interest pertaining to you or someone else;
- we have a legitimate interest to use the personal data, unless this is outweighed by your interest or the interest of a third party to privacy;
- you have given express consent to Reggeborgh.

Reggeborgh may rely on the following legitimate interests:

- the protection of your safety;
- maintenance and improvements to the property and installations;
- the protection of the security of customers and/or others, and the buildings and property belonging to Reggeborgh;
- for quality and training purposes;
- to promote IT management and improve security;
- to analyse and improve the services and content of our websites;
- to supply, improve, adjust, support, examine, and analyse our services;
- to promote the quality and safety of the services we provide;
- to communicate with you and Reggeborgh's other business partners;
- to prevent and combat fraud, unauthorised usage, and breaches of our terms and conditions and policy rules, or other harmful or illegal activities.

SHARING OF PERSONAL DATA

For exercising the activities described above, Reggeborgh may engage third parties (including property managers, third parties for performing maintenance and service on property and/or installations, IT service providers, marketing agencies, banks, prospective tenants, debt collection firms, bailiffs, lawyers and legal authorities for the purposes of payment arrears or disputes, and also service providers such as accountants, auditors, and lawyers. etc.). Where these third parties process your personal data during the performance of the respective activities, Reggeborgh will take the required contractual, technical, and organisational measures to ensure that your personal data is solely processed to the extent that this is required for the activities to be performed and in accordance with the applicable laws and regulations.

In addition to the aforementioned agreements, Reggeborgh also enters into a processing agreement with these third parties to be able to safeguard the processing carried out by the third party on the personal data provided by Reggeborgh.

If Reggeborgh is legally required to do so, your personal data may also be shared with tax authorities, law enforcement agencies (the police and/or the Public Prosecution Service), supervisory authorities (the Dutch central bank (De Nederlandsche Bank), the Netherlands Authority for the Financial Markets) and/or the Dutch Data Protection Authority.

SHARING OF PERSONAL DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA

We may occasionally need to transfer your personal data to third parties located outside of the European Economic Area (EEA). In accordance with the GDPR, Reggeborgh will only transfer your personal data to countries outside of the EEA:

- if the European Commission has ruled that the third country guarantees a suitable level of protection; or
- if appropriate measures are offered and you have enforceable rights and have effective means of redress; or
- the transfer is necessary for the performance of your agreement with Reggeborgh; or
- if you have expressly consented to the transfer, after having been informed of the risks associated with the transfer; or
- if the transfer is necessary due to serious reasons of general importance; or
- if the transfer is ad hoc and necessary for Reggeborgh's compelling interests, Reggeborgh has taken appropriate safeguards, and the Dutch Data Protection Authority has been duly informed.

In situations where Reggeborgh transfers your personal data outside of the EEA, we take measures such as safeguarding the processing and procedures in the form of a processing agreement with the respective third party, to ensure that your personal data remains properly protected.

SECURITY

In order to protect your personal data in the best manner possible, Reggeborgh takes appropriate technical and organisational measures to combat misuse, loss, unauthorised access, or any other form of unlawful processing. These measures include secured servers, our privacy policy, and employee training. Employees of Reggeborgh who are able to access your personal data are under an obligation to maintain confidentiality and solely have access to your personal data if this is necessary for the performance of their role.

RETENTION PERIOD

Reggeborgh retains your personal data for as long as is necessary and in accordance with the applicable laws and regulations for the performance of agreements, to be able to provide services, to enable you to use the websites, to be able to comply with applicable legislation, settle disputes with parties, and otherwise in so far as this is necessary to enable us to perform our business activities.

Reggeborgh retains your personal data in all cases for the period in which you have an agreement with Reggeborgh.

A statutory retention period applies to certain personal data which means that Reggeborgh is also required to retain data after the end of an agreement. Reggeborgh fully complies with this statutory retention period.

In the absence of any form of agreement, consent, or other statutory ground, Reggeborgh will retain the data for a maximum of four weeks, unless it needs to be retained for longer in connection with an incident. Examples include camera footage from security monitoring cameras, or personal details of job applicants.

COOKIES AND SIMILAR TECHNOLOGIES

Reggeborgh uses cookies and similar technologies on its websites. Cookies are small pieces of information that are stored on your computer. We use cookies for the functioning and provision of our services. Cookies enable Reggeborgh to see which visitors use its website. They allow Reggeborgh to adapt its websites to user preferences. These small pieces of information are recognised the next time a person visits Reggeborgh's websites.

For our privacy and cookie policy, please see our website: www.reggeborghvastgoed.nl.

RIGHTS

If your personal data is processed, you have a number of rights, which are explained below. You can exercise these rights by submitting a request in writing to Reggeborgh or by emailing: rv.privacy@reggeborghvastgoed.nl. Reggeborgh has to verify your identity before it can comply with your request.

Reggeborgh will respond to your request as soon as possible, but within a maximum of four weeks. Your requests will be handled electronically, in principle, unless this is not possible or if you request otherwise. If we reject your request we will provide the reasons for this, and your request will not be handled other than in accordance with the current laws and regulations.

Your request may concern one or more of the following rights that you possess:

- Right to access personal data
You may request at any time that we inform you of the categories of personal data about you that Reggeborgh processes, the reasons for processing that data, the source from which the data originates, and the retention periods that are being observed.
- Right to change personal data
You can contact us at any time to add to or correct your personal data. If Reggeborgh has unexpectedly processed personal data about you and/or has provided this to third parties, Reggeborgh will immediately correct this. If Reggeborgh has amended your personal data, Reggeborgh will notify you.
- Right to restrict processing of your personal data
If you disagree with the content of the personal data that Reggeborgh retains about you, in some cases you may submit a request to temporarily restrict the processing of your personal data.
- Right to withdraw consent
You can also withdraw the consent you have given for processing your personal data. Once Reggeborgh has received your letter or email, it will immediately suspend the processing of your personal data for which you have provided consent. However, the withdrawal of consent does not affect processing that has already taken place.
- Right to transfer personal data (right to data portability)
You may request the personal data that Reggeborgh holds about you in a structured, accessible and machine-readable format. Once you have received your personal data, you are free to transfer this data.
- Right to be forgotten
If you no longer wish to use Reggeborgh's services, you can request that we delete all of your personal data.
- Right to object
You have the right to object to the processing of your personal data by Reggeborgh that is based on the grounds of a 'legitimate interest or an interest of Reggeborgh or a third party' and 'performing a task of general importance'. If Reggeborgh relies upon these grounds, Reggeborgh will weigh up these interests with regard to your privacy. The right to object enables you to request that Reggeborgh weighs up these interests once again.
- You also have the right to file a complaint to the supervisory authority. The competent supervisory authority is the Dutch Data Protection Authority (www.autoriteitpersoonsgegevens.nl).

You can send your request or objection to Reggeborgh using the contact details below.

CONTACT DETAILS

The following is responsible for processing personal data within the Reggeborgh Vastgoed Group:

Reggeborgh Vastgoed Management B.V.

Reggesingel 2, 7461 BA Rijssen, the Netherlands

Postbus 319, 7460 AH Rijssen, the Netherlands

T: 0548 – 22 61 00

Chamber of Commerce: 59267569

E: rv.privacy@reggeborghvastgoed.nl

AMENDMENTS AND APPLICABLE LAW

Reggeborgh retains the right to unilaterally amend this Privacy Statement and to inform you in an appropriate manner where necessary.

None of the provisions in this Privacy Statement are intended to create an obligation or agreement between Reggeborgh and you. The laws of the Netherlands apply to the provisions in this Privacy Statement and all ensuing disputes.

QUESTIONS AND COMPLAINTS

If you have any further questions about Reggeborgh's Privacy Statement, please do not hesitate to contact us.

You can also contact the Dutch Data Protection Authority with any questions and/or to submit further complaints (www.autoriteitpersoonsgegevens.nl).