

# PRIVACY STATEMENT

Effective Date: from 25<sup>th</sup> of May 2018.

At AZ Legal, we know you care about how your personal information is used and shared, and we take your privacy seriously. We believe it is important for you to understand when, how and why we collect personal data as you use our websites, utilize our products and services, contact us or interact with us in any manner.

This Privacy Statement explains how AZ Legal Services B.V. collects, uses and discloses your personal data, and your rights in relation to the personal data it holds. This Privacy Statement applies to the processing activities of AZ Legal Services B.V., who is the (individual) data controller of your personal data and as such subject to the EU General Data Protection Regulation 2016/679 (the "GDPR").

You can reach us at the following email address: [info@azlegal.nl](mailto:info@azlegal.nl) or by phone: +31 624 168 318.

## Your rights

Under the GDPR you have the following rights:

- To obtain access to, and copies of, the personal data that we hold about you;
- To request that we cease to process your personal data if the processing is causing you damage or distress;
- To request us not to send you marketing communications;
- To request us to erase your personal data;
- To request us to restrict our data processing activities in relation to your personal data;
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and
- To require us to correct the personal data we hold about you if it is incorrect.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. You can learn more about your rights at <https://autoriteitpersoonsgegevens.nl/en>. If you have any questions about how we use your personal data, or you wish to exercise any of the rights set out above, please contact us.

## How we collect your data

We collect your personal data in a number of ways, for example:

- From the information you provide to us when you meet us;

- From information you provided to us by your company or via an intermediary;
- When you communicate with us by telephone, fax, email or other forms of electronic communication. In this respect, we may monitor, record and store any such communication;
- When you complete (or we complete on your behalf) client on-boarding or application or other forms;
- From your agents, advisers, intermediaries, and custodians of your assets;
- From publicly available sources or from third parties, most commonly where we need to conduct background checks about you;
- From visits to our website ([www.azlegal.nl](http://www.azlegal.nl)).

As is typical of most websites, we use cookies, pixel tags and other similar technologies on our Website to automatically collect certain information about the way you use our services. These tools help us improve the quality, usability and performance of the services we offer to you through aggregate information that does not reveal your specific identity and cannot reasonably be used to identify any particular individual user. To learn more about the cookies we use, [click here](#).

Examples of the data we automatically collect include:

- Device information. We collect specific information about the device you use to access our Website, including device type, model, screen size, operating system, IP address and network carrier.
- Usage information. We collect data about each visit to our Website such as your IP address, geographical location, browser type, pages viewed, length of session, time of visit and referring website.
- Other information. We collect demographic information, interests' information (like market affinity categories) and other information.

### **The categories of personal data we collect**

We collect the following categories of personal data about you:

- Your name and contact information such as your home or business address, email address and telephone number (where relevant);
- Biographical information which may confirm your identity including your date of birth, tax identification number and your passport number or national identity card details, your BSN, country of domicile and/or your nationality (where relevant);
- Information relating to your financial situation such as income, expenditure, assets and liabilities, sources of wealth, as well as your bank account details (where relevant);
- Information about your knowledge and experience in the investment field (where relevant);
- An understanding of your goals and objectives in procuring our services (where relevant);
- Information about your employment, education, family, your (criminal) background or personal circumstances, and interests, (where relevant);

- Information to assess whether you may represent a politically exposed person or money laundering risk (where relevant).

### **The basis for processing your personal data (other than with your consent), how we use that personal data and whom we share it with**

We will never sell or rent your personal information to anyone. We process your information, in case it is necessary for the following reasons:

#### *(i) Performance of a contract with you*

We process your personal data because it is necessary for the performance of an agreement to which you are a party to or in order to take steps upon your request prior to entering into a contract.

In this respect, we use your personal data for the following purposes:

- To prepare a proposal for you regarding the services we offer;
- Onboarding/ KYC (Know Your Client) purposes;
- To provide you with the services as set out in the Agreements that we have concluded with you, or as otherwise agreed upon with you from time to time, and to assess whether we can onboard you as a client;
- To deal with any complaints or feedback you may have;
- For any other purpose for which you provide us with your personal data.

In this respect, we may share your personal data with, or transfer it to, the following:

- Your agents, advisers, intermediaries, and custodians of your assets who you tell us about;
- Third parties whom we engage to assist in delivering the services to you;
- Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers;
- Other third parties such as intermediaries who we introduce to you. We will wherever possible tell you who they are before we introduce you; and
- Our data storage providers.

#### *(ii) Legitimate interests*

We also process your personal data because it is necessary for our legitimate interests, or sometimes necessary for the legitimate interests of another person.

In this respect, we use your personal data for the following purposes:

- For marketing to you. In this respect, see the separate section on Marketing below;
- Training our staff or monitoring their performance;
- For the administration and management of our business, including recovering money you owe to us, and archiving or statistical analysis;

- Seeking advice on our rights and obligations, such as where we require our own legal advice;
- Handling legal claims and proceedings; and
- For the safety and integrity of AZ Legal Services B.V. and its employees and visitors.

In this respect we will share your personal data with:

- Our advisers or agents where it is necessary for us to obtain their advice or assistance;
- Third parties and their advisers where those third parties are acquiring, or considering acquiring, all or part of our business;

### *(iii) Legal obligations*

We also process your personal data for our compliance with a legal obligation that applies to us.

In this respect, we will use your personal data for the following purposes:

- To meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws which may include the fact that we conduct a(criminal) background check;
- As required by tax authorities or any competent court or legal authority.

In this respect, we will share your personal data with:

- Our advisers where it is necessary for us to obtain their advice or assistance;
- Our auditors where it is necessary as part of their auditing functions;
- Third parties who assist us in conducting background checks;
- Relevant regulators or law enforcement agencies where we are required to do so.

### **How can you review, correct or remove your personal data?**

If you would like us to correct, review or remove your personal data at any time, please send an email to: [info@azlegal.nl](mailto:info@azlegal.nl)

We will require you to confirm your identity when you contact us to exercise your rights by sending us a copy of the data page of your valid passport. Please black out the passport number and your BSN number (if applicable).

Please note that while we will strive to meet your request regarding your rights to your personal data, there will be instances where local laws and regulations will require us to maintain your records despite your request.

### **Marketing**

We might send you marketing about similar services we provide, as well as other information in the form of alerts, newsletters and invitations to events or functions which we believe might be of interest to you.

We would communicate this to you in several ways including by post, telephone, email, SMS or other digital channels. You can object to receiving marketing from us at any time by sending an email to [info@azlegal.nl](mailto:info@azlegal.nl).

### **Transfer and processing of your personal data outside the European Union**

When sharing your personal data with third parties as set out in this Privacy Statement, 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.

To find out more about transfers by us of your personal data outside the European Union and the countries concerned, please send an email to [info@azlegal.nl](mailto:info@azlegal.nl).