

Privacy statement MK Adviesgroep (AVG)

In our privacy statement we explain which personal data we collect and how we process them.

Purpose from this privacy statement

This protocol is meant to explain in a clear and simple way which personal data we collect referring to you and how we use them. This statement applies to the following persons:

- All former, existing and potential customers of MK Adviesgroep. Under the 'Know Your Customer' rules, we are required by law to retain personal data about you, even for a certain period of time after you are no longer a customer.
- Persons who are not a client from MK Adviesgroep, like contacts from business partners.
- Netherlands: Are you self-employed or do you have a sole proprietorship, general partnership or partnership? Then you are seen as a natural person and this also concerns data that directly or indirectly tell something about you.

What are personal Data?

With personal data we mean all the information you told us we can link directly at you. For example your name, address, date of birth, account number or IP-Address

What does processing data mean?

With processing we mean everything we can do with your data, like collecting, fixing, saving, adjusting, organizing, use them, declaring or removing.

How do we get these personal data?

When you become one of our clients, sign a contract or uses on of our products or services you share your personal data with us.

We process the data that legally allow us to ask for at public sources like a credit register, cadastre, Business Register, Association register and the media.

Which Personal data do we?

We can process the following personal data:

- **identification data**, such as your name, surname. Date of birth, place of birth, identification number and e-mail.
- **Transaction data**, such as your bank account number, credits, deprecation and transfers that involve your bank.
- **financial data**, such as (life)insurance, invoices, credit notes, pay slips, the value of your home or other assets, you credit history or loan capacity and if you are registered at a credit register with your income.
- **Sociodemographic data**, such as being married of having children.
- **Data about your needs and interests** that u share with us, for example when you contact us.

Extra for the Netherlands :

- **Audio visual data**, such as surveillance images made by MK Adviesgroep offices or recordings from chat- and phone conversations with our customer service. We use these recordings for when something goes wrong. In this case we can watch these images or listen to your

previous made investment order. We also preserve these conversations for future analyses, coaching and anti-fraud.

- **Your reaction on**, about MK Adviesgroep on social media: we are active on social media via LinkedIn. We follow the messages made about MK Adviesgroep accessible for everyone.

Particular personal data

We do not record any special personal data related to your health, criminal law, ethnicity, religious or political beliefs, unless absolutely necessary. We are legally required to identify you when you become a customer. We will make a copy of your identity proof and it will contain your citizen service number

Data about children

We only collect information about children, when you give us information about your own children in connection to the product you purchase from MK Adviesgroep.

What do we do with personal data?

We only use your personal data based on the following legal bases:

- To conclude a contract with you;
- To comply with legal obligations;
- For our “legitimate business interest”. We process data to maintain good commercial relations with all our customers and other parties involved;
- Based on your consent. You can always revoke this permission.

We may process your data for the following purpose:

Administration

When you purchase a service from MK Adviesgroep, we are legally obliged to collect your personal data in order to establish your identity (such as a copy of you identity card or passport) and to determine whether you can become a customer with us. We also need your postal address. Email address or telephone number to contact you.

Delivery of products and services

We use information about you to determine whether a specific product or service, for example a life insurance is suitable for you.

Customer relationship management

We could ask you for your opinion about our products and services and share this with certain employees to improve our offer. We can also use notes that are made following conversations we did online, per phone or personally, so that we can improve or adjust our products and services to your situation .

Preventing and recognizing fraud and data protection

We have a duty to protect your personal data and to prevent, detect and mitigate security breaches. We are also obligated to collect the information we are required to collect about you. For example, to comply with laws and regulations against money laundering, terrorist financing and tax fraud.

Who do we share this information with and why?

To provide you with the best possible service and stay competitive, we share certain information within and outside MK Adviesgroep. This is about the following subjects:

- MK Adviesgroep components
- Intermediaries
- Government agencies
- Financial institutions
- Companies we work with
- Finact en Figlo Software

We always ensure that third parties only have access to personal data that are necessary for their specific work.

When we share your personal data internally or with third parties in other countries, we always put appropriate safeguards in place to protect this data. MK Adviesgroep bases this on: Binding corporate rules as referred to in Regulation (EU) 2016/679. These regulations are collectively referred to as the ING Global Data Protection Policy (GDPP) and are approved in each EU Member State by the authority in charge of protection in that Member State.

EU standard contracts. These contain standard clauses used in agreements with service providers to ensure that transfers of data to countries outside the European Economic Area comply with European data protection laws and regulations.

Privacy Shield , an agreement to protect personal data that were given by the United States.

Exercise your rights (Netherlands)

When your personal data is being used, you also have your privacy rights. Of course we respect these. The more specific you are with your application, the better we can handle your question. We can ask you for a copy of your identity proof. We do this to ensure no one else is exercising your rights. Our goal is to respond to your request as soon as possible. This can take up to a month (within legal time). If we need more time to process your request, we will let you know how much extra time we need and the reason for the delay

In some cases we can reject your request. If allowed by law we will inform you about the reason.

It's about the following rights:

- Right of access
- The right of correction
- The right to object to processing due to personal circumstances
- The right to object to personal offers
- The right to object to automated decision-making
- The right to restriction of processing
- The right to data portability: transfer your data
- The right to erasure data and the right to be forgotten
- The right to make a complaint

Your obligation to provide data

We need certain information about you to fulfil our obligations as a financial services provider and our associated contractual obligation. There is also information that we are required to collect by law. Without this information we may not be able to provide advice or close a product.

How do we protect personal data?

Within MK Adviesgroep we use a internal policy framework and minimum standards to protect your data. The policies and standards are regularly adapted to new regulations and developments in the market. More specifically and in accordance with applicable laws and regulations, we take appropriate technical and organizational measures (policies and procedures, IT security, etc.) to ensure the confidentiality and integrity of your personal data and the way in which it is processed.

In addition, MK Adviesgroep employees are obliged to maintain confidentiality and they may not provide your personal data unlawfully or unnecessarily.

What can you do to protect you personal data?

We will do anything to that is in our power to protect your personal data, but there are some things you can do yourself:

- Instal antivirus software, anti-spy software and a firewall and keep this up-to-date.
- Never leave your equipment unattended.
- Log out when an online portal is not being used.
- Keep your password strictly confidential and use save passwords, so no obvious combinations with letters and numbers.
- Be alert when you go online and make sure you can recognize unusual activities. For example a new web address or phishing emails where they ask for your personal data.

How long do we keep personal data?

We may keep your personal data for as long as it is necessary for the purpose for which it was originally collected. After this period, we look at feasible solutions such as archiving it. The law obliges us to keep your data. How long we keep your personal data varies. From a few months to many years.

Contact and questions about privacy (Netherlands)

Do you still have questions about how we use your personal data after reading this protocol? Then send us an e-mail. The address is info@mkadviesgroep.com.