

Privacy Statement

I. What is personal data?

Personal data, is any information relating to you or can be used to identify you.

As a client of Fund Management B.V. (hereafter “FundShare”) you provide us with some of your personal data, this includes your name, telephone number, email address. It can also include IP addresses which in some circumstances can be used to identify you.

In the event that a corporate or professional party intend on becoming a client, we will also collect personal data which relates to the interested individuals of the company for example, directors, UBO, authorised representatives etc.

II. What do we mean by processing?

Processing is a concept from law. It is very broad concept which covers actions taken in respect to your personal data such as: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Whenever FundShare carries out any processing of personal data, we do so in line with the relevant privacy regulation.

III. Why do we collect personal data?

FundShare collect personal data for the following reasons:

- To comply with the law;
- Marketing activities; and
- Execution of contractual obligations.

FundShare as an investment firm has a number of regulatory obligations which require the processing of client data; customer identification is one of the main reasons we collect and process personal data. Next to this, when people contact FundShare to ask for additional information or to become a client of FundShare, FundShare needs to be able to contact that client or potential client or you request us to send you our periodical newsletters. FundShare may also have contractual obligations which mean that they need to process the data of their clients to fulfil these obligations.

But rest assured, when FundShare process the personal data of its clients, it does so by using the minimal amount of data possible to ensure that aim is met.

IV. What do we use personal data for?

FundShare may for example do the following with your personal data:

Client acceptance

It is required by law for us to verify the identity of our clients, and without this information FundShare could not provide its services to you. With your personal data we can for example,

- Contact you.
- Perform the relevant checks to ensure that you are eligible to become a client of FundShare.
- Review and check your request to become our client or to change your profile.
- Keep your details in our administration and update them when there are changes.
- Manage your profile(s).

Reduce risks

We share the responsibility for the safety and stability of the financial sector. We also have a responsibility to you and all our clients. We will therefore use your personal data to reduce risks.

You might not notice much of the below but it is also done to protect you:

- We keep your IP address when you visit our site. This can be used in the event that there is a dispute as to who accessed your account or for the security of the company for example preventative measures against DDoS attacks.

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- Ensure good levels of security and invest in resources that protect both you and ourselves against all kind of crimes.
- Internal quality checks, to ensure determine possible issues, risks and testing to ensure that legislation has been properly implemented.
- Carry out the relevant regulatory reporting.
- Ensure that we remain a healthy company (risk management).

Legal obligations

There are a variety of legal obligations which FundShare as a fund manager must follow.

- Provide your personal data to specific organisations which are authorised to request this information, for example the tax authorities, financial supervisors, or when we are legally obliged to share this information for example during a criminal investigation.
- We also have a number of obligations under anti money laundering legislation.

Marketing activities

At FundShare we like to keep you informed. For example, with emails, newsletters, offers or updates..

- We can for example collect your searches within the website of FundShare to ensure that our FAQ are up to date with the information clients need. This information is anonymised, so no one is able to ascertain which client is asking the question.
- We use anonymised data to ensure that our marketing campaigns are effective.

If you would prefer not to receive some of this information, please feel free to contact us.

Improve and innovate

We may also use personal data for analytical research, this allows us to find better solutions and ensure that we continue to be innovative.

When we are carrying out these research activities, we use the minimal data required and do this in a way where your information is either pseudonymised or anonymised.

V. Who do we have personal data from?

We can have (some) personal data of anyone who has contact with FundShare. If you request additional information we will store the information which is provided during that request.

We are required by law to have personal information surrounding all of our clients. This information is gathered during the registration and requested when necessary.

VI. What personal data is collected?

Data about you

This includes your name, address, telephone number and email address. In the event you are a corporate client we will also collect information surrounding your company or foundation. If you open a minor account or a joint account, the information surrounding the secondary account holders will also be collected. We will also ask for copies of your ID and personal numbers such as your tax identification number or relevant identifiers.

Transaction history

In addition to personal data which FundShare have in relation to clients, we also keep a historic log concerning transaction and order history.

Contact history

We keep record of the times when you have contacted FundShare, this includes telephone recordings, emails or other ways you have communicated with us.

Website visits

In the event that you visit the website of FundShare, we may also collect the IP address which is used. Should your IP address be used, for example via Google Analytics this will be done in an anonymised way.

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External data sources

There are times where FundShare will use external data providers, such as checking with the relevant chamber of commerce or in the event a credit check is required.

In the event that FundShare carry out credit checks (BKR) they apply the strictest confidentiality on this information. Any individual who has access to this information does so only in the performance of their duty and the relevant data protection regulation is fully complied with. In the event you have questions of when BKR checks are carried out please contact FundShare.

Sensitive personal data

Sensitive personal data include things such as tax identification number, criminal history, biometric data, political beliefs, sexuality or ethnic origin, etc. If processing sensitive personal data is necessary, there are stricter rules applied to this.

At FundShare we never use sensitive data related to health, religious beliefs, political or philosophical beliefs, sexual orientation or ethnic origin.

We have a legal obligation to identify our clients, therefore we require the tax identification number to do this.

VII. Who do we share your personal information with?

In principle we do not share your information with others. It is possible that we may share personal data within the Group which FundShare is a part of. All members of the Group which FundShare is a part of have the same strict Privacy Policy. The police, judiciary, regulators and the tax authority can also request information from us on the grounds of law. However, we follow procedures which ensure that any sharing of information is both legitimate and proportionate.

Service providers

In the event we use a service provider to assist FundShare, we will aim to inform you about the use of a third party and limit the sharing of personal information strictly to what is required for that specific assignment.

With other companies when you ask

There are times when we will only share your personal data with other companies when you specifically ask. When this is done, we will specify this in the agreement to share the information.

Government and regulatory bodies

As an investment firm regulated within the Netherlands, there are times when we receive requests for information surrounding our clients. We are obliged under law to provide the regulators with this information. Additionally, we have legal obligations which require us to share information with governmental bodies and competent legal authorities. The data protection regulations which cover FundShare are also applicable to these bodies.

VIII. How do we protect your personal data?

Security

We spend a lot of time and resources to ensure our systems and your personal data have the relevant security measures in place. In the case that there is a breach of our systems we will report this to the relevant authorities and ensure that our clients are aware.

Confidentiality

Our employees have all signed a confidentiality agreement, agreed to an internal code of conduct and follow the Dutch Banker's Oath. Further to this, only authorised personnel may view and process your personal data.

Supervision

- We are supervised by the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) to ensure we comply with the Personal Data Protection Act.
- FundShare operates under behavioural supervision of The Netherlands Authority for Financial Markets (AFM) and the prudential supervision of the Dutch Central Bank (DNB).

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Viewing, erasure, portability or modification of your personal data

If you want to know what personal data FundShare has recorded about you, it is possible to contact us to exercise your 'Right of access'. Please contact us and we will respond with the relevant information within 4 weeks of the request.

If you want to modify your personal data, it is possible us and we will inform you about how to modify this information.

We are a financial institution which have legal obligations that require us to store the data of our clients for 5 years, under Dutch law. This 5-year period begins when you terminate the client agreement. Should you request your data to be erased, we will firstly check if this is possible given the applicable legal requirements. If we have an obligation to keep this data we will inform you about this and that we are unable to erase it at this time and let you know when this will be erased. In the event it is possible to erase this data we will do so and inform you that it has been done.

In the event that you would like to request a restriction to your personal data being processed, please contact the Service Desk of FundShare who will be able to deal with this request or provide you with further information.

Control of communication

Naturally we want to keep all our clients and interested parties up to date with FundShare and any changes we have upcoming. If you would prefer not to have these emails it is possible to change this by notifying us. Please be aware that for some communication we are required to inform you and for these it will not be possible to unsubscribe while you are a client, this includes changes to the prospectus for example.

Our view on privacy

At FundShare, our clients trust is fundamental to our relationship. We therefore strive to ensure that our clients have faith in the way we deal with their personal data. We take great care in ensuring that your data is safe and only processed when authorised to do so.

Our privacy policy is updated regularly, as law and regulations are continuously subjected to change, we will review the policy to ensure that it is kept up to date.

Questions about privacy

In the event you have some additional questions in relation to privacy or your personal data you can contact the service desk of FundShare where they will answer all questions.

In the event that you wish to complain about the way we have handled your personal data please contact the data protection officer via privacy@fundshare.nl. Please note when contacting the data protection officer this communication will be answered in Dutch or English. The DPO will then look into your complaint and work towards a resolution.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact Autoriteit Persoonsgegevens and file a complaint with them.