

## PRIVACY AND COOKIES STATEMENT

### IBS CAPITAL ALLIES

June 2022



Our services are based on trust. Trust that we will listen to you carefully, trust that we will use your information to provide you with the best possible service, and trust that we will process your personal data in such a way that your privacy is guaranteed. This is inextricably linked to our mission: to be the best possible ally.

This Privacy and Cookies Statement explains everything you need to know about how we handle your personal data. When you use our services or visit our websites [www.ibsca.nl](http://www.ibsca.nl) or [www.ibsfm.nl](http://www.ibsfm.nl), we collect different types of personal data from you. Below, we specify – per purpose – what personal data we collect from you, the reason we process this data and how long the data is stored. If you have any questions or want to know exactly what we keep, please contact us via the contact details at the bottom of this Privacy and Cookies Statement.

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#### **Our Privacy and Cookies Statement in brief**

When processing personal data, we comply with privacy laws. This means that we:

- **Clearly define our purposes** before we process your personal data, and we do so via this Privacy and Cookies Statement.
- **Store as little personal data as possible** and only the data that is necessary for our purposes.
- **Explicitly request permission** for the processing of your personal data, if permission is required.
- **Take the necessary security measures** to protect your personal data. We also impose these obligations on parties that process personal data for us.
- **Respect your rights**, such as the right to access, correct or erase your personal data held and processed by us.

## **What is personal data?**

Personal data is all the information that clearly relates to, or can identify, you in any way. For example: your name, telephone number or your e-mail address. But your identification number(s) (for example: BSN / Dutch Citizen Service Number or social security number; hereafter referred to as 'identification number(s)') or your bank account number are also personal data. In short, it concerns all data that enables us to establish who you are.

## **What are special categories of personal data and which ones do we process?**

Certain types of personal data are sensitive data, and are listed as 'special categories' of personal data. These relate to criminal data, biometric and genetic data, identification number(s), and data relating to health, religious or philosophical beliefs, political opinions, trade union membership, sexual orientation, or racial or ethnic origin.

These special categories are subject to extra protection and additional strict rules apply to the processing of this data. The only special category personal data that we record by default is your identification number(s) when you enter into a personal agreement with us. We need your identification number(s) to comply with our legal obligation to establish your identity and to provide information to the tax authorities. In addition, we record any data relating to fraud in order to determine to what extent we (still) want to, or can, maintain a relationship with you.

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We do not use and process any data relating to the other special categories of personal data, unless these are necessary for us to be able to carry out our business operations in the correct manner. If that is the case, we will only do this after you have given us explicit permission to do so.

## **How do we get your data?**

We receive a large part of this information from you when you are a client of ours or when you otherwise have contact with us. In addition, we also process data that comes from other parties, for example from Google or the Chamber of Commerce, if it is necessary in the context of our services.

## **What do we use your personal data for?**

We process your personal data for various purposes. These purposes are described below.

### **Providing our services**

As a wealthy individual, entrepreneur or institution, you can use our Asset Management, Fiduciary Management, Fund Management and Corporate Finance services.

For this reason, we process the following personal data:

- (Company) name
- (Business) e-mail address

- (Business) telephone number
- (Business) address details
- Contact person's first name and surname
- Contact person's job title
- Financial situation
- Information relating to identification, verification and fraud prevention
- Identification number(s)
- Invoice details
- Payment details
- Details regarding the role of the person involved in the agreement being entered into, such as director, legal representative, proxyholder and Ultimate Beneficial Owner (UBO)

We process this personal data in order to be able to carry out the agreement we enter into with you. We keep this information for a maximum of one year after the agreement has ended, unless we are legally obliged to keep data for longer.

### **Do we share personal data?**

We will only share personal data with third parties when this is permitted under current legislation. It is possible that we will provide your personal data to third parties because:

- we have hired them to process certain data;
- it is necessary for the optimal execution of the service;
- you have given explicit permission for this;
- we have a legal obligation to do so.

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The parties with whom we would share personal data are:

- IT suppliers and service providers;
- Cookie providers;
- Hosting service provider;
- The tax authorities;
- Government bodies;
- Regulators;
- Depositary banks;
- Event organisers.

If we have to share personal data in order to be able to carry out the agreement, we will only do so if a data processing agreement has been entered into with the third party in question, in which they apply the same level of security and confidentiality as we do. This remains our responsibility.

When it comes to complying with a legal obligation, this falls under the umbrella of sharing your data with government bodies, regulatory authorities, regulators, the tax authorities and

judicial authorities. These authorities must of course comply with the requirements that the law imposes on the use of this data.

We ensure that these third parties only have access to the personal data that is necessary for their specific work.

### **LinkedIn social media button**

On our website we use the LinkedIn social media button, which redirects you to the social media platform. This gives you the option to follow us and to share content within the network. The button works using strings of code generated by the social media network. If you want to know what LinkedIn does with your personal data, please read LinkedIn’s privacy statement, which you can find [here](#).

### **Cookies**

On our website, we use cookies and similar technologies, such as pixels (hereinafter collectively referred to as ‘cookies’) that are ours and those of third parties. Cookies are small files that are automatically placed on your device (such as your computer, mobile phone and tablet) when you visit our website. They are stored by the device’s web browser and are mainly used for statistics and to remember the user’s preferences.

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We and third parties use cookies to:

- enable the website to provide enhanced functionality (Technical and Functional cookies).
- analyse the use of the website and, on that basis, make the website more user-friendly (Analytics cookies).

These cookies collect the following information from you:

- IP address
- Cookie ID
- Website and click behaviour
- Referrer URL

When you visit our website for the first time, a Cookie Notice will pop up explaining the cookies and asking for your consent to the use of cookies.

In the table below you will find an overview of the cookies we use.

| <b>Cookie Type</b> | <b>Cookie; Entity; Safeguard</b> | <b>Purpose</b> | <b>Retention period</b> |
|--------------------|----------------------------------|----------------|-------------------------|
|--------------------|----------------------------------|----------------|-------------------------|

|                   |   |  |               |
|-------------------|---|--|---------------|
| <b>Functional</b> | <b>Google Tag Manager</b><br><br><b>Google LLC, USA</b><br><br><a href="#">Privacy Statement</a>  | Cookies from Google Tag Manager make it possible to load scripts from other cookies. Google Tag Manager is purely functional and is not used for the collection of personal data.  | Session       |
|                   | <b>Cookiebot</b><br><br><b>Usercentrics A/S, Denmark</b><br><br><a href="#">Privacy Statement</a> | Stores the user's cookie status for the IBSCA and IBSFM domains  | Up to 1 year  |
|                   | <b>Miscellaneous:</b><br><br>First-party cookies with strictly functional purposes.               | These cookies enable the necessary functionality of the website, such as remembering the chosen language and whether permission has been given for cookies, displaying the cookie banner, etc.   | Up to 2 years |
| <b>Analytics</b>  | <b>Google Analytics</b><br><br><b>Google LLC, USA</b><br><br><a href="#">Privacy Statement</a>    | These cookies are used to gain insight into visitor behaviour and, on the basis of this information, to improve the user experience. We have set these cookies in a privacy-friendly way. This means that we: <ul style="list-style-type: none"> <li>• have entered into a data processing agreement with Google;</li> <li>• only give Google masked IP addresses;</li> <li>• do not share any other data with Google; and</li> <li>• do not use other Google services in combination with analytics.</li> </ul> | Up to 2 years |

If you want to know what the cookie providers do with your personal data, please read the Privacy Statement of the relevant company. If you click on 'Privacy Statement' in the cookie table above, you will be redirected to the relevant Privacy Statement.

### Enabling and disabling cookies

You can set your web browser to accept the storage of cookies only with your consent. For more information about this, please refer to your browser's instructions. Please note: many websites will not function optimally if you disable cookies.

## Erasing cookies

Most cookies have an expiration date. If an expiration date has been set, the cookie is automatically erased after the expiration date. You can also choose to erase the cookies manually before the expiry date. Please refer to your browser's instructions.

## Do we protect your personal data?

The security of your data is of the utmost importance to us. Therefore we invest in the security of the systems that record personal data and also in our employees within this context.

All our employees have taken the Banker's Oath. In addition, we ensure that only authorised personnel can view and process your data.

The way in which we process your personal data is also monitored by the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). Please visit the Dutch Data Protection Authority website for general information about the new privacy rules and to report any possible complaints you may have via their online complaint form, which you will find [here \[in Dutch only\]](#).

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## What rights do you have under data protection?

You have the following rights:

- **Right of access:** You have the right to view the personal data that we process about you.
- **Right to rectification:** You have the right to correct or supplement the personal data that we process about you, if it is incorrect or incomplete.
- **Right to object:** You can object to the processing of your personal data for direct marketing.
- **Right to erasure:** You can request that we delete your personal data.
- **Right to withdraw your consent:** If you have given us permission to process personal data, you can withdraw this consent at any time.
- **Right to data portability:** If it is technically possible, you have the right to have the personal data we process about you transferred to a third party.
- **Right to restriction of processing:** In some cases, you can ask us to restrict the processing of your personal data (temporarily or otherwise).

For the above matters, you can reach us via our Data Protection Officer using the contact details provided at the bottom of this Privacy and Cookies Statement.

For the sake of your safety, the Data Protection Officer may ask you to identify yourself before responding to your request. In the substantive assessment of your request, we will weigh your and our interests and inform you of the results as soon as possible, in any case within one

month. However, this period may be extended by two months for reasons related to the specific privacy rights or the complexity of the request. If we extend this period, we will inform you in good time.

### **Changes to this Privacy and Cookies Statement**

When our website or our services change, we must of course also adjust the Privacy and Cookies Statement. So please be sure to always look at the date given at the top of this document and to check regularly for any new versions. We will do our best to communicate changes to you.

### **Questions and contact details**

If you have any questions about our Privacy Policy, please contact us or our Data Protection Officer at:

IBS Capital Management B.V. or IBS Fund Management B.V.  
attn.: Data Protection Officer

De Cuserstraat 87  
1081 CN Amsterdam

Tel: +31 (0)20 5141 1780  
Data Protection Officer e-mail address: [privacy@ibsca.nl](mailto:privacy@ibsca.nl)

Chamber of Commerce numbers:  
55039987 (IBS Capital Management B.V.)  
57806497 (IBS Fund Management B.V.)

[privacy@ibsca.nl](mailto:privacy@ibsca.nl)

### **IBS Capital Allies. Your financial ally.**

IBS Capital Allies is the trade name of all IBS companies combined. For more information, see <https://ibsca.nl/contact/disclaimer/>.