

Privacy Statement website (external) HLB Witlox Van den Boomen

1. Introduction

We value your privacy, respect it and are committed to protecting it and ensuring the proper use of personal data. We process personal data of visitors to our website and in the context of our services to clients. In this privacy statement we inform you about how we handle your personal data.

We inform you of the following:

- What personal data we collect from you;
- For what purpose this data is used by us;
- On what basis we use your data;
- Which parties we may share your information with;
- How we protect your personal data; and
- What rights you have regarding your personal data.

2. Who is responsible for your personal data?

This privacy statement applies to all personal data collected by the following companies (hereinafter: "HLB Witlox van den Boomen"):

1. HLB WVDB Adviseurs & Accountants B.V.
2. HLB WVDB Belastingadviseurs B.V.
3. HLB WVDB Salaris- & HRM Advies B.V.
4. HLB WVDB Corporate Finance B.V.
5. HLB Witlox Van den Boomen Audit N.V.
6. HLB WVDB Legal B.V.
7. HLB WVDB Services B.V.
8. HLB WVDB IT Adviseurs B.V.
9. Witlox Van den Boomen Belastingadviseurs B.V.
10. HLB WVDB Bedrijfsadviseurs B.V.
11. Witlox Van den Boomen Pensioenadviseurs B.V.
12. HLB Fiscal Rep B.V.

In this privacy statement, "we", "us" and "our" refers to HLB Witlox van den Boomen.

3. From whom are personal data processed?

We process personal data of persons with whom we have (had), wish to have, or have had direct or indirect contact. This includes personal data relating to:

- Prospects, if natural persons;
- Clients, if natural persons;
- Client Representatives;
- Employees, directors or beneficial owners of clients, for example in the context of issuing a UBO statement;
- Persons from whom HLB Witlox Van den Boomen purchases services or (contact) persons employed by suppliers to HLB Witlox Van den Boomen;
- Everyone who has shown an interest in HLB Witlox Van den Boomen, for example by filling in a contact form on our website or by attending HLB Witlox Van den Boomen (recruitment) events;
- Recipients of newsletters and event invitations;
- Visitors to our websites www.hlb-wvdb.nl, www.groeingroets.nl and <https://cc.hlb-van-daal.nl/>;
- Individuals who otherwise contact us or whose personal data we otherwise process as part of our services;
- Applicants and students, a different privacy statement applies to applicants and students.

Collection of personal data

We receive personal data directly from you if you leave data on our websites or use our services.

In addition, we may receive data from others.

We may receive your information from third parties in connection with assignments we perform.

We also use public sources such as public records, newspapers, and the Internet.

5. What personal data are processed, for what purpose, and on what basis?

We may only process personal data for a lawful purpose and if there is a legal basis for doing so. We therefore only process personal data if:

1. the processing is necessary for the performance of your agreement with us, e.g. for the performance of our services, the provision of advice etc (hereinafter: "Performance of Agreement");
2. processing is necessary in order to comply with a legal obligation to which HLB Witlox Van den Boomen is subject, such as our obligation to ascertain your identity and to conduct a client investigation within the meaning of the Wwft (hereinafter: "Legal obligation");
3. processing is necessary in order to promote the legitimate interests of HLB Witlox Van den Boomen or another party. In doing so, we will always assess whether those interests outweigh the interests or the fundamental rights of you. This is the case, for example, when using your contact data for sending unsolicited commercial messages or for maintaining our business relationships (hereinafter: "Legitimate Interest");
4. You have given consent to the processing (hereinafter "Consent").

In the tables below we explain what kind of personal data we process, for what purpose we process these personal data and on what basis we do this.

If you are a (potential) client:

Type of personal data	Purpose of personal data use	Basis of processing
Identification and contact information such as: <ul style="list-style-type: none"> • Name and address • Phone number, email address • Date and place of birth • Citizen service number • Gender • Passport photo/copy of ID • Camera images (when visiting our office) 	To identify and verify and carry out the Wwft client survey	<ul style="list-style-type: none"> - Legitimate interest - Legal obligation - Execution of agreement

	Contact Us	- Execution of agreement - Legitimate interest
	Drafting of agreements	- Execution of agreement
	Establish and manage a client database	- Legitimate interest
	Sending of declarations	- Legitimate interest - Execution of agreement
	Recording of data in the context of the Wwft	- Execution of agreement - Legal obligation
	For relationship management, promotion and marketing	- Legitimate interest - Permission
	Securing and managing our properties and systems	- Legitimate interest
Data about and for our services such as: <ul style="list-style-type: none"> • Business data, such as excerpt from the commercial register and VAT numbers; • Company name and position contact and/or representative; • Bank and payment information; • Reporting of discussions; • Your financial situation; • BSN number (for returns etc); • Contents of records, such as correspondence, opinions, and miscellaneous documents related to an engagement given to us to advise and/or audit your organization; • Content of communication by 	Client services	- Execution of agreement - Legal obligation - Legitimate interest

email, letter or other means.		
<p>Data that says something about your preferences regarding our services, including surveys and data about and for the use of our website such as:</p> <ul style="list-style-type: none"> • IP address • login details • your interests and preferences • information about your browsing and viewing habits other cookie information 	Improvement of our services and our websites	<ul style="list-style-type: none"> - Legitimate interest - Permission
	To make your personal client environment available, improve and personalize the user experience.	<ul style="list-style-type: none"> - Execution of agreement - Legitimate interest - Permission

If you are a job applicant (a different privacy statement applies to job applicants and students):

Type of personal data	Purpose of personal data use	Basis of processing
<p>Identification and contact information such as:</p> <ul style="list-style-type: none"> • Name and address • Email address • Phone number • Gender • Date of birth • Resume • Motivation Letter • Photo • References • Availability • Certificate of good conduct, if any • Assessments 	Assessing your suitability for a position that is or may become vacant	<ul style="list-style-type: none"> - Legitimate interest - Permission
	Share personal data with manager(s) or other officials within the	<ul style="list-style-type: none"> - Legitimate interest

	organization in charge of the selection process.	
	Contact us for a further introduction.	- Legitimate interest
	Where applicable, contacting specified references/ training institutions.	- Legitimate interest - Permission
	Communicating information about other job opportunities for which you may be eligible.	- Permission
	Screening	- Legitimate interest
	To send general information about HLB Witlox van den Boomen	- Legitimate interest
	If you are hired for the execution and drafting of the employment contract and introduction within HLB Witlox van den Boomen	- Execution of agreement

If you are a visitor to HLB Witlox Van den Boomen websites:

Type of personal data	Purpose of personal data use	Basis of processing
Browsing history, such as visited pages, date of visit, and location from which the websites are visited	To maintain and improve our websites and monitor the performance of our websites	- Legitimate interest
IP address	To enable you to access our websites	- Legitimate interest
Contact information, such as your name and email address	To contact you in response to a request from you	- Permission
	To send you a newsletter	- Permission
	To fulfill a request for information from you	- Permission

If you do not provide us with the information we need for these purposes, it may affect your relationship with us, for example, we may not be able to respond to your requests or we may not be able to perform the contract with you.

If personal data is processed on the basis of consent, consent will be requested separately. The consent granted may be withdrawn at any time. However, the processing of personal data is lawful until the time of withdrawal of the consent granted.

6. Use of personal data for other purposes

If we process personal data for a purpose other than that for which we obtained it, we may do so only if there is a close connection between the two purposes.

If there is insufficient kinship between the purpose for which the data was obtained and the new purpose, we will ask for your consent prior to processing

7. How long do we keep your personal data?

We do not keep your personal data longer than we need it for the purposes for which we collected it or the purposes for which we reuse it.

The retention period is, in most cases, 7 years after the end of the agreement or the relationship between you and HLB Witlox Van den Boomen, unless we are required to retain your personal data for a longer period in connection with statutory or behavioural obligations or HLB Witlox Van den Boomen has another legitimate reason to retain the personal data for a longer period.

We do not keep camera images for longer than 4 weeks, unless there is an incident that requires the images to be kept for a longer period.

8. With whom do we share your personal data?

Your personal data may, subject to applicable law, be exchanged between parts of the HLB Witlox Van den Boomen group. The companies that are part of this group are listed above in paragraph 2. In addition, subject to applicable law, HLB Witlox Van den Boomen may provide and share information with HLB Member Firms, HLB employees and associates, and HLB's external service providers, who may then collect, use, transfer, store or otherwise process (collectively Process) such information in the various countries in which they operate for purposes related to:

- i. the work;
 - ii. to comply with supervisory requirements and legal obligations to which HLB Witlox Van den Boomen is subject;
 - iii. avoiding conflicts of interest;
 - iv. risk management and quality assessments;
 - v. internal financial-administrative purposes, IT purposes and other support services of an administrative nature of HLB Witlox Van den Boomen;
- ((i) through (v) collectively the Processing Purposes).

For the processing purposes referred to in the previous paragraph, HLB Witlox Van den Boomen and service providers may process the information, insofar as it contains personal data, in the various countries where HLB Member Firms are active. The transfer of personal data within the network of HLB Witlox Van den Boomen is subject to this privacy statement. If we share your data with VDB Advocaten Notarissen, with whom HLB Witlox Van den Boomen maintains a strategic alliance, we will do so on your behalf. In other cases you will be asked for permission. The processing of personal data by VDB Advocaten Notarissen is subject to the [privacy statement](#) of VDB Advocaten Notarissen.

We must comply with legislation to prevent fraud, money laundering and terrorism, such as the Prevention of Money Laundering and Terrorist Financing Act. Based on this Act, we carry out a customer due diligence. A specialized agency may be engaged by us for this purpose in some cases.

We are required to check the beneficial owner of an organization in the UBO register maintained by the Chamber of Commerce. If the information we have does not match the data recorded in the UBO register, we must report the differences to the Chamber of Commerce.

Sometimes we have to share (personal) data - if we are legally obliged to do so - with supervisory bodies such as the AFM, Bft, AP, FIOD, FIU, the Justice Department, the Police and other investigative bodies with legal powers of investigation. We are not allowed to inform you of this.

We sometimes engage third parties to process personal data on our behalf, such as (IT) suppliers. In all cases, an appropriate (processor) agreement is entered into with the third parties, which guarantees, among other things, that the data are processed correctly and securely.

9. Transfer of personal data to third parties not covered by European data protection rules

If we share personal data with parties in countries outside the EEA that are not covered by the European Commission adequacy decision or otherwise provide an adequate level of protection, we will protect your personal data through European Commission standard contractual clauses, ensuring that third parties with whom we share your personal data adhere to the same standards of protection as those within the EEA.

10. Security of your personal data

We make every effort to protect personal data about you for which we are responsible from loss, misuse or unauthorized alteration.

We have taken appropriate technical and organisational measures to protect your personal data. For example, we have implemented access control, we use appropriate system and network security measures such as firewalls, encryption and patches, we protect portable devices with appropriate passwords and all employees of HLB Witlox Van den Boomen are obliged to treat your personal data confidentially.

11. Cookies

On our websites www.hlb-wvdb.nl , www.groeigroots.nl and <https://cc.hlb-van-daal.nl/> we make use of cookies. A cookie is a simple small file that is stored on your hard drive in order to recognize the visitor in the future and to improve and simplify access to this website. If you do not want cookies to be placed on your hard drive, most browsers offer you the possibility to refuse the use of cookies. If you make use of this possibility, it is possible that the website does not function optimally. If you allow our website to place a cookie on your hard drive, you can remove it after ending your visit to our website. If you have given your permission, we place functional and analytical cookies as well as other cookies, such as tracking and social media cookies.

12. Your Rights

Based on the privacy legislation, you have several rights regarding the processing of your personal data that you can exercise at any time.

We may ask you to identify yourself or visit us if you are invoking any of the rights below, as we want to be sure we are providing your information to the right person.

You may exercise the rights set forth below by submitting a request to us using [the privacy request form](#).

We will respond to you within one month after we receive your request. However, your rights are not absolute; they do not apply in all circumstances. Applicable regulations provide for the necessary exceptions. If we do not comply with your request, we will explain why, unless this is not permitted under laws and regulations.

- You have the right to request access to the data we process about you;
- You have the right to have data changed or deleted;
- You have the right to request that we restrict the processing of your data;
- You have the right to object to the processing of your data;
- You have the right to portability of your data;
- Where processing is based on your consent, you have the right to withdraw that consent at any time;
- You have the right to file a complaint with the Personal Data Authority, if you believe that we are not complying with the law and we have not satisfactorily resolved your complaint or request.

13. Third party websites

This privacy statement does not apply to third party websites referenced on our websites.

The website of HLB Witlox Van den Boomen contains links to third-party websites. If you use such a link to go to another website, please be aware that the privacy statement of HLB Witlox Van den Boomen is not applicable there. HLB Witlox Van den Boomen is not responsible for the content of those websites, nor for the actions of those third parties and others. We advise you to read the privacy statements of those websites before providing any (personal) data.

Amendments 14.

Our privacy statement can be modified from time to time, for example when there are new data processing activities. We therefore advise you to read the privacy statement regularly. You can always find the most up-to-date version of our privacy statement at www.hlb-wvdb.nl/privacy-statement

Contact details for questions or complaints

For questions and complaints, please contact us at:

HLB Witlox Van den Boomen

Attn: Data Protection Officer

PO Box 120

5580 AC Waalre

avg@hlb-wvdb.nl

31 (0)40 - 221 58 05