



Privacy statement suppliers and other business relationships

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1 INTRODUCTION

The Blauwtrust Group (**BTg**) consists of the holding company Blauwtrust Groep B.V. (**BTG**) and its subsidiaries, De Hypothekers Associatie, Quion Groep B.V. (Quion Hypotheekbemiddeling BV, Quion Hypotheekbegeleiding B.V., Quion Services B.V. and Quion Business Continuity B.V.), Blauwtrust Tunisia, BTR Services Holding ('Romeo') and Dutch Mortgage Portfolio Management B.V.¹ (*hereinafter collectively*: the Business Units). These Business Units provide services across the Dutch mortgage chain and have different stakeholders. Within BTg, personal data are processed from suppliers and other business relations *hereinafter collectively*: suppliers.

BTg and the business units handle personal data with care, acting within the limits of the law, including the General Data Protection Regulation (AVG). Within the meaning of the AVG, BTg is a data controller for the processing of suppliers' personal data.

In this Privacy Statement, we provide information on the purposes for which BTg and the business units process personal data and on exercising privacy rights.

2 OUR PRIVACY POLICY

BTg values the privacy of suppliers. We handle personal data in a proper and careful manner. The processing of personal data takes place in accordance with the AVG.

This means that within BTg:

- The purposes for processing personal data are clearly defined before data are collected and processed. One way this is done is by recording processing activities in the processing register;
- Only those data are processed that are necessary for the predetermined purposes;
- As little personal data as possible is stored and no longer than necessary;
- The necessary security measures are in place to protect personal data. These obligations are also imposed on other parties processing personal data for BTg (sub-)Processors;
- The rights of suppliers are respected, such as the right to access, correct or delete personal data processed by BTg;
- As little special personal data as possible is processed, unless necessary. In that case, the exception set out in Article 9 AVG is substantiated. The same applies to the processing of biometric data for the purpose of uniquely identifying a person.

3 WHOSE PERSONAL DATA DO WE PROCESS?

BTg processes personal data of (contact persons of) all suppliers and other business relations performing work for or on behalf of BTg.

3.1 WHAT IS THE BASIS FOR PROCESSING PERSONAL DATA?

We process personal data only on one of the following bases:

- From a certain legal obligation, such as tax administration.
- Because this is necessary for the performance of the agreement.
- From a legitimate interest, such as our visitor records.
- Without the aforementioned legal basis, only on the basis of explicit consent. Think of processing personal data in connection with marketing purposes or sending surveys. Consent can be withdrawn at any time.

¹ Including regulated entities of Business Units, such as Elan, IQWoon or Romeo Servicing BV.
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4 FOR WHAT PURPOSES ARE PERSONAL DATA PROCESSED?

We process personal data in our records and use it for:

- Ordering and having services and products delivered;
- Maintaining contact with our suppliers and other business relations;
- The financial settlement of a service or product purchased;
- Regular business communications relating to our services and products;
- Compliance with legal obligations arising from Dutch, European and/or international law (in addition to the AVG, including the Financial Supervision Act, the Money Laundering and Terrorist Financing Act, the Sanctions Act, tax legislation, etc.);
- To provide personalised offers based on the data provided to us;
- Being able to perform the contract entered into with us;
- To improve our products and services by performing risk and behavioural analyses. In the process, personal data are pseudonymised so that they cannot be traced, To conduct (customer) satisfaction surveys;
- To protect our interests;
- To assess risks;
- To protect our premises and employees.

Depending on the purpose of processing, BTg processes, among other things, contact data (such as name, address, place of residence, e-mail address and telephone number), the data on contact moments (such as letters and e-mails we send and receive, website visits (which pages, duration, frequency of visits and time spent on the website), camera images from around our premises and, finally, billing data.

5 HOW DO WE OBTAIN PERSONAL DATA?

In most cases, these are provided by suppliers themselves. In addition to the information we receive from suppliers, we may also receive supplier data from third parties, such as (former) clients, the screening agency or other third parties. We may also consult public sources to protect BTg and its business units.

6 WITH WHOM DO WE SHARE PERSONAL DATA?

BTg and/or the business units provide personal data of suppliers to third parties when there is a legal obligation or an agreement. For example, consider the Tax Office (legally required in the context of tax administration).

We also provide personal data to any parties (processors) who perform work for us. When we provide personal data to third parties for a specific assignment, we use a processor agreement. In the processor agreement, we make arrangements with this party regarding the use and security of personal data.

For the performance of operations and keeping of business records, personal data may also be processed by other business units within BTg. In doing so, personal data will only be shared if necessary for the performance of these activities. Furthermore, only personnel authorised to do so will view and process personal data.

7 HOW LONG DO WE KEEP PERSONAL DATA?

Personal data is not kept longer than necessary for the purpose of processing. In doing so, we follow the BTg retention period policy. For example, we keep supplier invoices for up to seven years after the end of the financial year. Personal data of debtors and creditors are deleted two years after payment of the invoice.

Upon expiry of the retention period, personal data are deleted or pseudonymised. Pseudonymisation means that personal data are stripped of all potentially identifying characteristics so that they can no longer be traced back to

a person.

8 HOW DO WE SECURE PERSONAL DATA?

We treat personal data entrusted to us with care and pay great attention to the security of personal data in our systems. Consider, for example, measures to use our IT systems securely and prevent misuse. But also security of the physical spaces where personal data is stored. We have an up-to-date Information Security Policy and employees are periodically trained in handling and securing personal data.

We have a Data Protection Officer who oversees how personal data is processed within BTg and the business units. We also have a fully equipped IT department supervised by a CISO and Privacy Officers who oversee the proper handling of personal data processing in relation to information security.

8.1 Employees of BTg and the business units

All our employees have signed a confidentiality agreement and taken the financial sector oath or pledge. We handle personal data with care and only authorised staff can view and process personal data of suppliers.

These authorised persons are employed or supervised by BTg. BTg may outsource the processing of personnel data to authorised employees of BTg and/or its business units abroad. Supplier data may also be processed outside the EEA by employees of BTg for reporting and administrative support tasks.

9 WHICH PRIVACY RIGHTS APPLY?

Inspection

The right to inspect one's own personal data. Generally, within one month of the request to us, access to the personal data we process is provided.

Correction

The right to have inaccuracies in one's personal data corrected.

Remove

The right to delete personal data under certain circumstances. In this case, we will take all reasonable steps to inform other processors processing personal data on our behalf of the request to delete links to and copies of their own personal data.

Objection to processing

The right to object to certain processing of personal data.

Limiting processing

The right to request, under certain circumstances, to restrict the processing of personal data, for example if the accuracy of personal data is disputed.

Portability

The right to obtain from us, in a structured, common and machine-readable form, the personal data provided to us digitally, which we store automatically, for example, in order to subsequently send it to a third party. This is called 'data portability'.

Withdrawal of consent

The right, where consent has been given to use personal data, to withdraw that consent, which means we will no longer process the personal data for which consent has been given.

Exceptions

When exercising these rights, exceptions may apply, meaning that certain rights cannot be (fully) exercised in all cases. For example, on the basis of a legal obligation or a more weighty legitimate interest, we may not (yet) delete personal data or not delete it completely. We will send notification of this.

Requests can be sent to: Privacyofficer@blauwtrustgroep.com

10 QUESTIONS, COMPLAINTS AND EXERCISE OF RIGHTS

Questions, complaints and exercise of rights

Any questions about how we handle personal data? If so, please send a message to the Data Protection Officer fg@blauwtrustgroep.com

Suppliers wishing to exercise their privacy rights, or lodge a complaint about the use of their personal data, can do so via the contact addresses listed. A response will be sent within four weeks of receipt.

Written communication can also be made with the Data Protection Officer via:

Blauwtrust Group B.V.
Attn: Data Protection Officer
PO Box 280
3000 CX Rotterdam

If we do not come to an agreement on a complaint together, a privacy complaint can be reported to the Dutch Data Protection Authority (DPA) or choose to go to court.

This can be done via the form on the DPA's [website](#), if the criteria they have set are met. If in doubt about whether a complaint may be filed, call the DPA: 088 1805250.

11 COOKIE STATEMENT

Within BTg, different cookies are used by the Business Units on the respective websites. The cookie statement on the respective website explains what cookies are, what they do and which cookies are applicable or can be refused.

12 MODIFICATION OF PRIVACY STATEMENT

If legislative or other relevant changes take place or changes occur in our services and products, they may affect the way we process personal data. In that case, the privacy statement will be updated and published on our website. This can be identified by the version number and date.

In case of ambiguity, the Dutch version prevails.