



# PRIVACY STATEMENT

## WHO ARE WE?

Dutch Mortgage Portfolio Management B.V. (hereafter referred to as 'DMPM') builds, manages and services mortgage portfolios for its clients and provides services related to all aspects and complexities of the Dutch residential mortgage market among which price setting, product development and advisory services.

DMPM subsidiaries such as Robuust Hypotheken BV, HollandWoont BV, Clarian Wonen B.V. and IQWOON Hypotheken 1 BV originate mortgages and offer mortgages to consumers.

DMPM is part of Blauwtrust Groep. We are registered with the Dutch Chamber of Commerce under number 65442253 and located at:

Fascinatio Boulevard 1302  
2909 VA Capelle a/d IJssel  
The Netherlands

Under the General Data Protection Regulation (GDPR) DMPM is a controller in respect of the personal data it processes for which it is authorized to determine the purpose and means of processing, sometimes together with others, such as her subsidiaries.

There are also activities which include the processing of personal data that DMPM carries out, for which DMPM acts as a 'processor', in these cases, DMPM will only process personal data upon the explicit instruction of the controller. This is for example the case when DMPM is hired as a portfolio manager, for example for ELAN Woninghypotheken BV. For these processes you will need to check the privacy statement of the controller for more details on the processing of your personal data.

DMPM values the protection of your privacy and will handle your personal data with due care. With this Privacy Statement DMPM aims to clarify how it handles your personal data.

## WHO'S PERSONAL DATA DO WE PROCESS?

DMPM processes personal data from:

- persons visiting this website and those providing information via the contact form;
- investors visiting the DMPM investor portal that requires authentication (hereafter referred to as investor portal);
- contact persons of suppliers, parties involved in establishing and/or processing of mortgage loans and clients;
- persons who have applied for (whether or not granted) a mortgage of one of DMPM's subsidiaries;





- applicants & employees;
- persons who have applied for (whether or not granted) a mortgage of one of DMPM's clients for which DMPM performs Portfolio Management services.

We do so in accordance with the General Data Protection Regulation (GDPR) and the Dutch GDPR Implementation Act (UAVG).

## FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA?

DMPM will use the personal data of website visitors for the following purposes:

- For the development, security and improvement of our website;
- To provide you with information about, and the development and improvement of our products and services;
- To answer any questions asked via the contact form on our website.

DMPM will use the personal data collected through the secured investor portal for the following purposes:

- To monitor the number of login attempts and
- To ensure that only authorized persons can access the investor portal.

DMPM will use the personal data of contact persons for suppliers and clients for the following purposes:

- Normal business-related communication with regards to our services and products;
- To comply with legal obligations related to Dutch, European and International Law.

DMPM will use the personal data of persons who have applied for (whether or not granted) a mortgage of one of DMPM's brands for the following purposes:

- To establish whether an individual meets the mortgage requirements;
- To carry out any (pre)contractual obligations;
- To comply with legal obligations of DMPM or its clients related to Dutch, European and International Law;
- To improve products and services by performing credit risk and behavior analysis;
- To send personalized offers;
- Customer satisfaction surveys.

DMPM will use the personal data of applicants and employees for the following purposes:

- To contact applicants and evaluate their applications;
- To carry out obligations stemming from the employee contract;
- To comply with legal obligations related to Dutch, European and International Law.



## WITH WHOM DO WE SHARE YOUR PERSONAL DATA

Your personal data may also be processed for the aforementioned purposes by selected third parties, for example for screening purposes or complying with legal obligations.

In addition we will share your information with customers, investors or suppliers when necessary to comply with legal obligations of these customers, investors or suppliers. Personal data will not be sold or used for commercial purposes by third parties, unless permitted by law or with your explicit consent.

The parties with whom we share this data are:

THIRD PARTY	PURPOSE	KIND OF DATA
<b>Bureau Krediet Registratie (BKR)</b>	<p>In order to be able to assess whether we could give you a loan, we also use information from BKR.</p> <p>In addition, we also provide data to BKR, for example when you are 3 months overdue in your payments obligations. This is registered by BKR.</p>	<p>Name and address details.</p> <p>BKR registration data (negative registrations)</p>
<b>Nationale Hypotheek Garantie (NHG)</b>	<p>If you have a mortgage under the National Mortgage Guarantee of the Home Ownership Guarantee Fund (WEW), the Privacy Statement of the Home Ownership fund foundation also applies to the processing of your personal data, which you can find at: <a href="http://www.nhg.nl/privacy">www.nhg.nl/privacy</a></p>	<p>In the context of the guarantee under NHG, we exchange your personal data with WEW for the purpose of management and possible remission of residual debts.</p>
<b>Quion Security affairs department</b> (in the context of the Protocol Incident Warning System Financial Institutions (PIFI protocol)).	<p>In order to assess the integrity and prevent fraud, Quion's Security department conducts an investigation after a mortgage application. Quion can also contact you directly for this.</p>	<p>Name and address details.</p> <p>Financial research data.</p> <p>Registration in internal and external reference registers such as the register of the 'Stichting Fraudebestrijding Hypotheken' (SFH).</p>
<b>Tax authorities</b>	<p>Payroll tax</p>	<p>Citizen service number</p> <p>Mortgage details (principal and interest paid)</p>

For carrying out the work and conducting the business administration, your personal data may also be processed by different entities within 'Blauwtrust Groep' (Quion, Conneqt and Blauwtrust Groep). Personal data is only shared if this is necessary for the performance of these activities and only with authorized employees.

## WHAT PERSONAL DATA DO WE PROCESS?

DMPM processes different kinds of personal data, depending on the purpose of the processing.

### Website visitors

- General browsing information such as browsing behaviour, visiting time and frequency;
- If the contact form is used: name, email and (if provided) telephone number;

Where relevant, you may request more information about these safeguards.

### Contact persons for suppliers and clients

- General contact information, such as name, address, email and telephone number;
- Occasionally more extensive information is necessary to meet legal requirements, including date and place of birth, identification documents, financial information and national identification number (BSN).

### Individuals applying for a mortgage with a DMPM brand

- All personal information as provided (or collected by us) to assess the application for and the processing of the mortgage loan, including for example contact information, birth date, nationality, national identification number (BSN), bank account details and copies of identification documents;
- More extensive information can be found on the respective websites of the DMPM labels.

### Applicants & employees

- Name, address, email and telephone number;
- Date and place of birth;
- Curriculum Vitae, including information about prior positions and education history; (Financial) information needed for the execution of the employment contract such as bank
- account numbers.

An extensive privacy statement for suppliers and for applicants and employees is available upon request.

We do not process any personal data related to your race or ethnic origin, political opinion, religious or philosophical beliefs, trade union membership, genetic data or data related to your sexual life or sexual orientation.

## ON WHAT LEGAL GROUND DO WE PROCESS YOUR PERSONAL DATA?

DMPM uses several different legal grounds as included in article 6 of the GDPR to process personal data.

### Execution of a contract

- This includes obligations arising from employee contracts as well as contracts with suppliers and clients;
- This includes processing of personal data required in the pre-contractual phase.



### Meeting legal obligations

- DMPM is obligated to comply with several different laws and regulations, such as the Dutch Financial Supervision Act and the Anti-Money Laundering and Anti-Terrorist Financing Act;
- In order to meet these obligations DMPM may collect, use and store information, as well as share it with different supervisory bodies;
- It may also be necessary to share personal information with suppliers or clients in order for them to meet their legal obligations.

### Legitimate interest of DMPM or a third party

- DMPM may process personal data based on its legitimate interests, such as ensuring the security of its systems, preventing fraud, improving its services and maintaining business relationships.
- In doing so, DMPM carefully balances its interests against your fundamental rights and freedoms.

### Consent

- This ground is used only for those processing activities for which we have no other legal basis;
- Where processing is based on consent, you have the right to withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

On an incidental basis, DMPM might also need to use 'vital interest of the data subject or others' as grounds for the processing of personal data (E.g. If an employee suffers a medical emergency and immediate processing of personal data is necessary to save their life).

DMPM does not process personal data for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Additionally, DMPM will only process special categories of data if it meets an exception included in Article 9 of the GDPR. (E.g. Medical data of a person who needs immediate medical attention.)

### HOW LONG WE KEEP YOUR PERSONAL DATA

We do not keep your data longer than necessary. In some cases, the law determines how long we may or must keep data. In other cases, we ourselves have determined on the basis of laws and regulations how long we need your data.

- We delete rejected mortgage applications after 24 months.
- Your mortgage file (and personal data) will be kept for a minimum of 7 years after the mortgage has ended.

When your personal data is no longer necessary for a process or activity for which it was originally collected, we delete it or render it anonymous and dispose of it in accordance with the applicable laws and regulations.

Anonymization means that personal data is stripped of all possible identifying characteristics, so that no one can see that it is about you.





## HOW DO WE SECURE YOUR DATA

We do our best to protect your personal data as best we can. We take both technical and organizational measures to secure the personal data that we process. We do this in accordance with the applicable legal requirements and guidelines and implement this in the following way:

- We invest in our systems, procedures and people.
- We ensure that our way of working is in line with the sensitivity of your personal data.
- We train our people to handle your personal data securely.
- Our online services are secured.

## AUTOMATED DECISION-MAKING AND PROFILING

DMPM may use automated processes, including profiling, for purposes such as credit risk assessment, fraud prevention and product improvement. Where such processing produces legal effects or similarly significant effects, DMPM ensures appropriate safeguards are in place. This includes the right to obtain human intervention, to express your point of view and to contest the decision.

- Where relevant, you may request additional information about the logic involved and the expected consequences of such processing.

## WHAT RIGHTS DO YOU HAVE?

1. **Access:** You have the right of access to your personal data and you will in general receive access to the personal data we process about you within one month of your request to us.
2. **Rectification:** You may request us to correct any inaccuracies in your personal data.
3. **Erasure:** You may ask us to erase personal data under certain circumstances. We will assess your request in accordance with Article 17 GDPR and applicable legal obligations.
4. **Restriction of processing:** You may request us to restrict the processing of personal data, for example if you dispute the accuracy of your personal data.
5. **Data portability:** You have the right to obtain the personal data you have provided to us and which we store in an automated manner. You will receive this data in a structured, commonly used and machine-readable form, for example to send it to a third party.
6. **Objection: you have the right to object to the use of your personal data.**
7. **Withdrawal of consent:** For processing of personal data that occurs based on your consent, you have the right to withdraw this consent, as a result of which we will no longer process the personal data in question.
8. **Submitting a complaint:** You may submit a complaint about the processing of your personal data to the Dutch Data Protection Authority, if you are unhappy with the handling of your request by DMPM.

When exercising these rights, exceptions may apply, meaning that not all requests can be met with a positive response, for example when we are required by law to keep your personal data on file. We do not store your personal data longer than is necessary for the purpose for which we process your data.





## DO YOU WISH TO EXERCISE YOUR RIGHTS, MAKE A COMPLAINT OR ASK A QUESTION?

To exercise your rights, please send us a letter or an email specifying your request. Depending on the request submitted we may need to verify your identity through a request for additional information, in some cases this might include asking for a copy of your ID or passport. In case we require a copy of your identification, please make sure you cover your national identification number (BSN) and passport photo to avoid fraud.

DMPM will respond to your request without delay, and always within one month following the receipt of your request.

If you have any further questions or want to exercise any of your rights please contact us via post or e-mail:

e-mail: [privacy@dmpm.nl](mailto:privacy@dmpm.nl)

DMPM

To the attention of the Privacy Officer

P.O. Box 306

3000 AH Rotterdam

The Netherlands

If you would like to submit a complaint with regards to how DMPM handles your data, or with regards to how DMPM handled a Data Subject Request you submitted, please contact:

e-mail: [FG@blauwtrustgroep.com](mailto:FG@blauwtrustgroep.com)

DMPM

To the attention of the Data Protection Officer

P.O. Box 306

3000 AH Rotterdam

The Netherlands

You may also submit a complaint to the Autoriteit Persoonsgegevens at any time. This is possible via their [website](#).

## COOKIE STATEMENT DMPM

uses various cookies on this website. Our Cookie Statement explains what cookies are, what they do and what cookies we use for our website. Where required, cookies are only placed after obtaining your consent in accordance with applicable laws.

## MODIFICATION OF THE PRIVACY STATEMENT

Changes in the law or changes to our services and products may affect the way we use your personal data. In that case, the privacy statement will be adjusted and we will inform you about this through the version number and date under this privacy statement.

