

PRIVACY STATEMENT

The European General Data Protection Regulation, GDPR (Algemene verordening gegevensbescherming (2016/679), AVG) specifies the rights of persons whose data is used and what the duties are of the authorities or companies using data. The GDPR/AVG also applies to any data collected through this website.

CONTACT DETAILS

JTC Institutional Services Netherlands B.V. is data controller and located at Locatellikade 1, 1076 AZ, Amsterdam, the Netherlands, (registration number Chamber of Commerce: 34292344), <https://www.jtcgroup.com/offices/netherlands/>.

JTC Institutional Services Netherlands B.V. is part of JTC Group of entities, www.jtcgroup.com.

PERSONAL INFORMATION

JTC Institutional Services Netherlands B.V. treats any personal information it receives through its website with due care, operating fully within the framework of the GDPR/AVG. This Privacy Statement explains the type of information that JTC Institutional Services Netherlands B.V. collects through its website and what this information is used for.

This privacy statement can be amended from time to time if new developments make it prudent to have it revised.

PERSONAL DATA

Personal information comprises data that is traceable to an identified or identifiable natural person, i.e. the name of a person to whom the data relates is known or that that person can be traced. An example of personal data is a name, address or email address.

THE TYPES OF COLLECTED PERSONAL INFORMATION

JTC Institutional Services Netherlands B.V. collects personal information, for example, if you request information, request for services. JTC Institutional Services Netherlands B.V. may ask to provide information such as your name, address, phone number, email address. We may also collect and process personal data regarding people connected to you, either by way of professional (or other) association or by way of family relationship.

We collect your personal information from the following sources, as not all of the personal information JTC Institutional Services Netherlands B.V. holds, will always originate directly from you.

- > personal information which you give to us;
- > personal information we receive from third party sources.

It may, for example, originate from your intermediary or representative, other organizations which belong to you, or a professional service provider such as your tax or accounting professional or legal adviser.

THE USE OF PERSONAL INFORMATION

JTC Institutional Services Netherlands B.V. collects personal data for the following reasons:

- > Service agreements with you / client and client entities;



- > Obligations ensuing from applicable law, and regulations that apply to services provided, such as.
 - > Trust Office Supervision Act (Wtt);
 - > The Act on Prevention of Money Laundering and Financing of Terrorism (Wwft);
 - > Sanctions regulations
 - > Tax regulations
- > Administration;
- > Communicating with you as necessary in connection with our services
- > Marketing (newsletters, updates, invitations and requested information);
- > Internal purposes such as management information, development of services, development of staff;
- > Monitoring and recording telephone and electronic communications and transactions:
 - > for quality, business analysis, training and related purposes in order to improve service delivery; and
 - > for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution of any unlawful act (or omission to act).
 - > Liaising with or reporting to any regulatory authority (including tax authorities) with whom we are either required to cooperate or report to, or with whom we decide or deem it is appropriate to cooperate in relation to tax matters.
 - > Hosted services.

LEGAL GROUNDS FOR THE PROCESSING

We process personal data based on one of the following legal grounds:

- > Approval;
- > Based on an agreement or for the conclusion of an agreement;
- > A legal obligation.

SHARING PERSONAL INFORMATION

Depending on the circumstances, JTC Institutional Services Netherlands B.V. needs to share your personal data with third parties. This may be necessary to handle your file. There are also legal obligations that require us to disclose personal data to third parties. And, JTC Institutional Services Netherlands B.V. may share your personal information with JTC group companies.

JTC Institutional Services Netherlands B.V. can share information for the purposes mentioned above with:

- > Within JTC Institutional Services Netherlands B.V.;
- > With group entities of JTC, www.jtcgroup.com;
- > Business partners or representatives;
- > Third-party service providers, (including banks, financial institutions or other third party lenders, IT service providers, auditors and legal professionals) to facilitate the running of our business;
- > Third parties for fulfilment of legal requirements.

Sharing personal information with other trust offices pursuant to article 68 Wtt

JTC Institutional Services Netherlands B.V. shares information about integrity risks regarding Client or Client entity that materialised after 1 January 2019, pursuant to the obligations as set out in article 68 of the Supervision of Trust Offices Act 2018, at the request of a service provider that Client or Client Entity wishes to engage for providing service. This may include data that could relate to criminal liability. Information will be shared without prior consent of the Client or UBO being required.

Your personal data will not be shared with third parties for commercial purposes.

THE RIGHT TO ACCESS AND CORRECT YOUR PERSONAL INFORMATION

You have the right to view your details, you may amend them or have them deleted. You may oppose the handling of your personal information and revoke your consent at any time. If you wish to modify or delete your personal data, or want to know what personal data is stored on your behalf, please send us a message to the address mentioned above or email at Netherlands@jtcgroup.com.

COMPLAINTS

For any complaint about how we handle your personal data, please send us an email to Netherlands@jtcgroup.com. We will make efforts to you find a solution. If this is not possible, you can always contact the Dutch Personal Data Protection Authority through <https://autoriteitpersoonsgegevens.nl/>.

Amsterdam, October 2019