

# Privacy and Cookie Policy

This Policy describes the processing purposes, the data categories, the retention periods, the use of cookies by Hoofbosch and the way in which you can exercise your rights with regard to your personal data.

## 1. Who is responsible for your data?

Hoofbosch Investment Fund (hereafter "Hoofbosch") is responsible for the processing of your personal data as described in this Privacy and Cookie Policy (hereafter Policy).

Hoofbosch believes it is important to ensure that its services are transparent, personal and reliable. Hoofbosch handles your data with care and ensures that every processing of your data complies with the applicable laws and regulations. This Policy may change from time to time if new developments so require. Hoofbosch advises you therefore, to consult this Policy regularly on our website / web portal, so that you are aware of changes. The date of the last change is specified in this Policy.

This policy was last amended on 28 May 2019.

## 2. Cookie settings Mijn Hoofbosch.nl (hereafter: My Hoofbosch)

This website only uses functional cookies that are necessary for this site to function as well as possible. Before you use the site you are asked to accept that we use functional cookies:

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This website makes use of cookies to enhance browsing experience and provide additional functionality.

Allow cookies

## 3. When does this policy apply?

This Policy covers data processing by Hoofbosch of its participants and users of the websites of Hoofbosch, such as [www.hoofbosch.nl](http://www.hoofbosch.nl) and My Hoofbosch. (hereinafter Hoofbosch Websites).

In accordance with the General Data Protection Regulation (GDPR), Hoofbosch has included the processing of personal data in this Privacy Statement. This Privacy Statement states, among other things, which personal data Hoofbosch processes, for which purposes and to which persons or bodies the data (can) be provided.

## 4. Which data do we process?

Hoofbosch uses personal and technical data of its participants and the users of the Hoofbosch Website.

### 4.1 Participants

If you are or become a participant in Hoofbosch, we will process a number of personal data from you to implement the agreement with you, for the following purposes:

#### 4.1.1 In order to be able to assess and accept you as a (potential) participant and to offer you an agreement to invest

##### What does this goal entail?

Before Hoofbosch can accept a participant, a number of obligations must be met. For example, Hoofbosch must confirm your identity in accordance with legal obligations. If you qualify as a participant of Hoofbosch, then Hoofbosch uses personal data in order to establish and implement the agreement that we have with you.

##### Which data does Hoofbosch process for this purpose?

Hoofbosch processes your salutation, name, address and place of residence, country where you live, country of which you are a resident, nationality, date of birth, citizen service number (or international TIN number), e-mail address, telephone number(s) and place and country of birth. Hoofbosch also processes these data from a minor child, from a second account and UBO and legal representatives of companies or institutions for which you are applying.

##### How long does Hoofbosch keep this information?

If you do not become a participant, Hoofbosch will keep your data for a maximum of one year. If you do become a participant, then Hoofbosch will keep your personal data for this purpose for the duration

of the relationship with you. When the relationship is terminated, Hoofbosch will retain your personal data for up to seven years after the relationship ends based on legal obligations.

#### **4.1.2 To provide access to your Hoofbosch account via the internet (My Hoofbosch)**

##### **What does this goal entail?**

If you are a Hoofbosch participant, you will have access to your Hoofbosch account via the internet (My Hoofbosch). Hoofbosch gives you the possibility of a secure log in to My Hoofbosch. In My Hoofbosch you can monitor your investments and give orders or register changes in personal data.

##### **Which data does Hoofbosch process for this purpose?**

To make My Hoofbosch available, we process your e-mail address, password, username and Hoofbosch account number.

##### **How long does Hoofbosch keep this information?**

Hoofbosch stores the data for My Hoofbosch for this purpose for the duration of the relationship with you.

#### **4.1.3 To make the delivery of agreed financial services and products possible**

##### **What does this goal entail?**

Hoofbosch delivers the agreed products and services to you, such as the settlement of transactions and payment transactions to and from your Hoofbosch account.

##### **Which data does Hoofbosch process for this purpose?**

To deliver the agreed products and services, Hoofbosch processes data such as your name, account number, payment and investment data, data on purchased products and services and correspondence.

##### **How long does Hoofbosch keep this information?**

Hoofbosch keeps this information for up to seven years after the end of the relationship with you on the basis of legal obligations.

#### **4.1.4 To inform you about the execution of your orders to Hoofbosch**

##### **What does this goal entail?**

Hoofbosch informs you about the execution of your orders with regard to our services or products.

##### **Which data does Hoofbosch process for this purpose?**

For this purpose Hoofbosch processes data such as your name, address, telephone number and / or e-mail address, and the data relating to transactions and investments that have taken place.

##### **How long does Hoofbosch keep this information?**

Hoofbosch keeps this data for as long as you are a participant with us for seven years after the end of the relationship on the basis of legal obligations.

#### **4.1.5 To guarantee the safety and integrity of the financial sector**

##### **What does this goal entail?**

Hoofbosch is a financial institution and therefore contributes to the safety and integrity of the financial sector. This includes, among other things, combating, preventing and detecting criminal or unlawful conduct (or attempts thereto), directed against the financial sector, Hoofbosch and its group companies, its participants and employees, as well as the use of and participation in warning systems.

##### **Which data does Hoofbosch process for this purpose?**

For this purpose Hoofbosch can process your name, your contact details and data with regard to alleged unlawful or punishable conduct, such as fraud.

#### **How long does Hoofbosch keep this information?**

Hoofbosch retains the data for up to seven years after the end of the relationship with you on the basis of legal obligations.

#### **4.2 Use of the Hoofbosch Websites and the My Hoofbosch app**

When you use a Hoofbosch website or My Hoofbosch app, then Hoofbosch collects and processes data for the following purposes:

##### **4.2.1 To offer and manage the functionalities of the Hoofbosch Website, including through the use of cookies. For more information about cookies see paragraph 5 below.**

#### **What does this goal entail?**

When you visit a Hoofbosch Website, we process a number of technical data related to the use of the Hoofbosch Websites, in order to provide you with the functionalities of the Hoofbosch Website. With the help of this data Hoofbosch manages the Hoofbosch Website, among other things to improve the user-friendliness and to solve technical malfunctions. In this way Hoofbosch ensures that you can use the Hoofbosch Website easily. Hoofbosch uses cookies for this purpose. View paragraph 5 if you want to receive more information about cookies.

#### **Which data does Hoofbosch process for this purpose?**

For this purpose Hoofbosch processes technical data, such as your IP address, the type of connection, the browser you use, the operating system of your computer and the pages that you have visited via the Hoofbosch Websites.

#### **How long does Hoofbosch keep this information?**

Hoofbosch does not keep the technical data for longer than necessary for the purpose.

##### **4.2.2 To be able to answer your questions or process comments, if you ask us questions or leave comments with us via e-mail or a contact form.**

#### **What does this goal entail?**

When you ask questions or leave comments via e-mail or a contact form, Hoofbosch processes the personal data below to handle your question or comment as adequately as possible. Hoofbosch also uses this data to evaluate and improve its services.

#### **Which data does Hoofbosch process for this purpose?**

Hoofbosch wants to approach you correctly and asks you to mention in the contact form your gender, initials and surname, address and e-mail address. Optionally, you can also specify your country, telephone number or account number.

#### **How long does Hoofbosch keep this information?**

Hoofbosch keeps this personal data for a maximum of seven years.

#### **4.3 Save e-mails with Hoofbosch**

If you e-mail with Hoofbosch, then Hoofbosch can save these messages.

#### **What does this goal entail?**

Hoofbosch can store e-mails for verification and investigation (given) orders and more generally the services provided. Hoofbosch also stores e-mails if it considers this necessary for fraud prevention purposes.

#### **Which data does Hoofbosch process for this purpose?**

Hoofbosch processes the personal data you provide in e-mails and interviews, such as your name, address, date of birth and your question or complaint.

#### **How long does Hoofbosch keep this information?**

Saved messages are kept for a period of seven years after contact. If an investigation or legal claim has been filed, this information will be retained, unless this is contrary to legislation and regulations. Saved messages for the purpose of fraud prevention are not kept longer than seven years

after the contact. If data are part of a legal case, then these data are stored unless removal is required under laws and or regulations.

## **5 Use of cookies**

### **5.1 General**

The Hoofbosch websites use cookies. Cookies are small text files that are placed on your computer when you visit our Hoofbosch Website. Cookies may collect data associated with the use of our website, such as which web pages you have visited and the duration of a user session. When you use the Hoofbosch website, the cookie sends information back to us or to a third party on behalf of whom we have placed the cookie.

If you do not wish to receive cookies, you can adjust your internet browser settings to blocking cookies completely. You may then not be able to make optimum use of all parts of the Hoofbosch Website.

### **5.2 Types of cookies**

Hoofbosch uses necessary cookies.

**Necessary cookies are cookies that Hoofbosch always places because they are necessary for providing the functionalities of the Hoofbosch Website or its services. This allows you, for example, to remain logged in to My Hoofbosch.**

These cookies can be subdivided into:

(a) session cookies; a session cookie can be used to keep track of which web pages you visit and which options you use. A session cookie is only stored for the duration of your internet visit, so during one internet session. When you close your internet browser, the session is ended and the cookie is deleted; and

(b) persistent cookies: using a permanent cookie the Hoofbosch website can recognize you when you visit the website again and remember your favorite pages. A permanent cookie is stored for longer than a session.

## **6. Access to data**

Only if Hoofbosch is legally obliged to do so, personal data will be provided to supervisors, tax authorities and investigative bodies. Your personal data can be passed on to recipients in countries outside the European Economic Area. Hoofbosch takes adequate measures in such cases to ensure that your data is protected as well as possible. Hoofbosch does not provide your data to third parties for commercial purposes.

## **7. Your rights**

You have various rights that relate to your personal data.

### **You have the right to view**

You have the right to view which of your personal data we store. You can request access to this data at any time and have it corrected or deleted by sending a request to our service department via [info@hoofbosch.nl](mailto:info@hoofbosch.nl). We will then contact you. If you have access to My Hoofbosch, you can view and change data there.

### **The right to be forgotten (and to delete your data)**

By order of tax authorities we are required to keep account information up to seven years after the termination of the account. Then we automatically delete your data. We will therefore not be allowed to "forget" you before that time. If you are not an (ex) account holder, we will delete your data 12 months after your data has been recorded, or if you request this from us earlier.

### **The right to data portability**

The right to data portability offers you the possibility to easily retrieve your data in a readable file format in order to possibly transfer it to another party. You can request your transaction data from Hoofbosch.

To learn more about this topic or if you have a complaint about abuse of your personal information please contact the Dutch Autoriteit Persoonsgegevens (Authority for Personal Data (AP)).