



Privacy Statement

Privacy Statement Keeyns

Keeyns B.V.¹ hereinafter Keeyns considers it important to keep confidential and protect information entrusted to us. As part of this fundamental obligation, Keeyns takes measures to properly protect and use 'personal data' (personal information) collected online.

In principle, we only collect personal data voluntarily provided by website visitors for the purpose of offering those individuals information, job opportunities and/or services. This "Privacy Statement" tells you how we collect, use, share and protect personal data obtained by us.

Acquisition and use of personal data

We obtain personal data about you when you choose to provide it - for example, by contacting us by e-mail or by filling in our contact form on our website (www.keeyns.com). Your personal data will not be used for purposes other than the purposes for which you have provided it to us, unless we obtain your consent or it is otherwise required or permitted by legal provisions, professional standards or quality rules, or for optimising the quality of our services.

Two examples: If you send us a CV online to apply for a position at Keeyns, we will use the data you provide to determine whether there are any suitable vacancies for you at Keeyns. If you send us an email requesting information about Keeyns, we will use your email address and other information you provide to respond to your request.

Keeyns generally collects only the personal data necessary to fulfil your request. If additional, optional data is requested, you will be notified at the time of collection.

In the Netherlands, the law allows us to process personal data for as long as we have reason to do so in accordance with the law. The law also requires us to inform you what that reason is. When processing your personal data, we therefore act on one of the following processing grounds:

- Performance of an agreement: when the processing of personal data is necessary to fulfil our obligations under an agreement.
- Legal obligation: when we are required to process your personal data to fulfil a legal obligation, such as keeping records for tax purposes or providing information to a government or law enforcement agency.
- Legitimate interest: we may process data about you where this is necessary to pursue our legitimate interest, provided that your interests are not overridden.
- Your consent: if necessary, we will seek specific consent to process certain personal data about you. We do not collect more personal data than strictly necessary than you have consented to. You may withdraw your consent at any time by contacting Keeyns at policies@keeyns.com.

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Keeyns collects special personal data only where the individuals concerned provide such data to us voluntarily or where the collection of such data is necessary or permitted under laws or regulations. Special personal data includes personal data relating to race, ethnicity, political opinions, trade union membership, religious or philosophical beliefs, health, sexual life, criminal conviction or criminal offences. Please exercise caution when providing special personal data to Keeyns, and only provide special personal data to Keeyns if you expressly consent to Keeyns processing this information for legitimate purposes. If you have any concerns about whether the provision of special personal data to Keeyns is or may be necessary or relevant for specific purposes, please contact Keeyns at policies@keeyns.com.

Cookies, IP addresses and Google Analytics

A "cookie" is a small piece of text that a website places in the browser of the device (e.g. computer or smartphone) you use to visit the website. The cookie allows the website to recognize your device and is also used to make the website function properly. Examples include resolving compatibility issues e.g. to recognize your browser type, improving website performance (e.g. to load page content faster).

An "IP address" is a number assigned to your computer when you access the internet. IP addresses allow computers and servers to recognize and communicate with each other. IP addresses associated with visitors may be stored for IT security and system diagnostic purposes.

Besides the functional nature of IP addresses and cookies, it is also possible to use both to retrieve personal data from website visitors. However, it is Keeyns's policy to set up its websites in a privacy-friendly manner. We therefore do not track personal data via cookies and/or IP addresses of our website visitors.

Social media

Keeyns's website may have functionalities that redirect you to Social media (Twitter and LinkedIn). Personal data you provide through these social media may be collected and used by other members of that social media application. These interactions are subject to the privacy policies of the companies providing that application. We have no control over and are not responsible for these companies or how they use your data.

Personal data you provide via a social media functionality of Keeyns may be shared with other users of that social media functionality (unless otherwise stated at the time of collection), over which we have limited or no control.

Sharing and international transfer of personal data

We do not share personal data with third parties, except to the extent necessary for our legitimate professional and business needs or to process your requests, and/or except to the extent required or permitted by law or professional standards. This includes the following:

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- Our service providers: Keeyns works with partners, service providers or agencies in good standing to allow them to process your personal data on our behalf.
- Keeyns only transfers personal data to them if they meet our strict data processing and security standards. We will only transmit personal data that enables them to provide their services.
- In case of reorganization of our business or sale of our business to another organization: Keeyns may also provide personal data in connection with the sale, assignment or other transfer of the business activities of the website to which the data relates.
- Courts, tribunals and law enforcement or regulatory authorities: Keeyns may provide personal data to comply with requests from courts, tribunals and government or law enforcement agencies, or when necessary or prudent to comply with applicable laws, orders or rulings of courts or tribunals, or government regulations.
- Audits: disclosure of personal data may also be necessary for data protection or data security audits and/or to investigate or respond to a complaint or security risk.

In some cases, Keeyns may exchange personal data about you with various third-party companies or service providers or suppliers acting on our behalf to help fulfil your requests.

In addition, Keeyns may transfer certain personal data across geographical boundaries to third-party companies that cooperate with us or act on our behalf. Keeyns may also retain personal data in a jurisdiction other than the jurisdiction in which you are domiciled. Any transfer of personal data by Keeyns will always be done in accordance with applicable (privacy) laws and regulations.

Keeyns may also provide personal data in order to comply with requests from governmental or law enforcement authorities, or when necessary to comply with applicable laws, court orders or government regulations. This may also be necessary for data protection or data security audits and/or to investigate or respond to a complaint or security risk. Keeyns does not sell personal data to third parties. Keeyns will also not transfer personal data provided by you to third parties for their own direct marketing purposes.

Choices

Generally, you will not be asked to provide personal data to Keeyns online, but we may ask you to provide certain personal data in order to provide you with additional information about our services and events. Keeyns may also ask for your consent to use your personal data in a particular way, and you have the choice whether or not to provide such consent. If you choose to opt-in to certain services or messages, you may opt-out at any time by following the instructions included in each message. If you decide to unsubscribe from a service or message, we aim to delete your data immediately, but we may require additional data before we can process your request.

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Retention of your personal data

Your personal data will not be retained by our firm for longer than necessary for the purpose for which it was collected, for the performance of statutory duties and the fulfilment of legal obligations or the performance of agreements (think of limitation periods). Retention periods from statutory provisions such as the Notary Act and the Archives Act apply. Notarial deeds are kept in perpetuity.

Your rights

When your personal data is processed by our office, you can exercise the rights below under the General Data Protection Regulation.

Please email your request policies@keeyns.com. Before we grant your request, we will first identify you by means of a valid identity document.

- **Data subject's right of inspection**
You can always ask which personal data our office processes, for what purpose and for how long they are kept. There may be a legal basis preventing us from fulfilling your request, we will assess this and inform you accordingly.
- **Right to rectification**
If you believe that certain data has not been processed correctly, you have the right to request rectification of this data. If this concerns data in a notarial deed, this is not possible and a new deed will have to be drawn up to supplement the incorrect deed.
- **Right to data erasure (right to 'oblivion')**
If you want your personal data to be deleted, you can submit a request to this effect. If the data is contained in a notarial deed, the notary may not delete it.
- **Right to restrict processing**
If you wish to restrict the processing of personal data by our office (pending rectification of your personal data requested by you, objection to processing made or because you do not want data to be deleted despite the processing being unlawful) you can submit a request to this effect.
- **Right to data portability**
If your personal data are not processed for a notarial deed and you want to transfer the personal data to another service provider, you can submit a request for this. However, such a transfer is not always possible as legal notarial duties may oppose it.

Data security and integrity

Keeyns has appropriate security measures and procedures in place to protect personal data from unauthorized forms of loss, misuse, alteration or destruction. Despite Keeyns's extensive efforts, no absolute guarantee can be given for protection against all threats. To the best of our ability, we ensure that access to your personal data is only provided to persons for whom it is necessary. Persons who have access to the data are obliged to keep it confidential. We also make reasonable efforts to retain personal data only as long as

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necessary to comply with a data subject's request or until that person requests the deletion of the data.

Links to other websites

Please note that Keeyns websites may contain links to other websites, including websites maintained by other companies, that are not covered by this Privacy Statement, but other privacy statements that may differ. We encourage users to read the privacy policy of each website before providing personal data.

Amendment of this statement

Keeyns may amend this Privacy Statement from time to time to bring it in line with our current data protection practices. When the statement is changed, we will update the date at "Last updated" at the top. We encourage you to periodically review this Privacy Statement to be informed of how Keeyns is protecting your information.

Privacy and enforcement questions

Keeyns is committed to protecting your personal information online. If you have any questions or comments about our management of your personal data, please send an e-mail to policies@keeyns.com. You can also use this e-mail address if you have any doubts about compliance with our Privacy Statement. In any case, you always have the right to lodge a complaint with the Personal Data Authority.

¹ In this document, "Keeyns B.V." ["we", "us", "we", "us" and "our"] refers to Keeyns B.V., its legal successor(s) and/or the (legal) persons appointed by it, as well as the (group) companies belonging to this company within the meaning of section 2:24b of the Dutch Civil Code. Keeyns B.V is registered with the Chamber of Commerce under number 67450202.

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