



# Waterland Private Equity Privacy Statement

## Our contact details

This notice informs you how Waterland Private Equity Investments B.V. and its advisors (please refer to: <https://waterland.nu/contact/> for contact information of the Waterland advisors) (“Waterland”), as data controller, takes care of your personal information.

If you require more information in relation to Waterland’s use of your personal information or file a complaint about Waterland’s use in its first instance, please contact our data protection officer at: Waterland Private Equity Investments B.V., Brediusweg 31, 1401 AB Bussum, The Netherlands or by e-mailing the Data Protection Officer at: [confilegal@waterland.nu](mailto:confilegal@waterland.nu)

## What type of information we have

We collect and hold personal information through our website and via other processes within Waterland. We collect the personal information that can be used to identify a living person. Including but not limited to basic personal information (name, address, date of birth, nationality), occupation, email addresses, photo’s, copy passport or identity card, source of funds, financial information, job title, employee data, information to comply with legal obligations, website user stats and where we are required or you have requested other individuals to be included in the process, personal information about those individuals. If such information about other individuals is provided, you agree that you have their permission to do so.

## How we get the information and why do we have it

We collect and process personal information that you give us by e-mail, phone, filling in forms, via our website. We also collect personal information via online sources and our service providers, including our hosting provider, administrators/depositaries and advisers.

We will only collect the personal information that we require to fulfil our contractual or legal requirements and obligations or if you have consented to provide (additional) information.

## What we do with the information

We and our selected third parties will only collect and use your personal information (i) where the processing is necessary in connection with the execution of an agreement; (ii) to meet our legal or regulatory obligations; or (iii) for our "legitimate interests". It is in our legitimate interests to collect your personal information as it provides us with the information that we need to provide our services to you more effectively including providing you with information about our products and services. We will always ensure that we keep the amount of information collected and the extent of any processing to the absolute minimum to meet this legitimate interest. Examples of the purposes for which we will collect and use your personal information are:

1. to identify you when you contact us;
2. to deal with administration and assess claims;
3. to make and receive payments;
4. to obtain feedback on the service we provide to you;
5. to administer our site and for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes;
6. for anti-money laundering, sanction, and fraud prevention and detection purposes.

We will contact you to obtain consent prior to processing your personal information for any other purpose, including for the purposes of targeted marketing unless we already have consent to do so.

Where necessary, we will share the personal information you gave us for the purposes of providing you with the services you requested or complying with a legal or regulatory obligation with the types of organisations described below:

- associated companies including advisers, suppliers and service providers;
- introducers and professional advisers;
- regulatory and legal bodies;
- insurance companies

or, in order to meet our legal or regulatory requirements, with the types of organisations described below:

- regulatory and legal bodies;
- central government or local councils;
- law enforcement bodies, including investigators

## How we store your information

Waterland will only retain the (personal) data for as long as is necessary to meet the purposes for which it was collected and will be subject to contractual, legal, tax and regulatory requirements.

As an organisation with IT systems in the countries where Waterland has offices, the collection of Personal Data collected by Waterland may be routed, stored, or transferred internationally throughout Waterland's organisation in accordance with data privacy laws. All servers are located within the EU and our IT services/hosting provider (DLP) is ISO 27001 certified for protection of IT systems and relevant procedures. The third party compliance service providers that are engaged have confirmed storage of personal data remains in the EU.

For the purposes of defending itself in legal disputes, Waterland will retain Personal Data in e-mail boxes under a 'litigation hold' principle on its servers for a restricted period. Such information will not be used for any other purposes than as may be necessary in legal disputes.

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please refer to the contact details on the top of this statement if you wish to make a request.

## Anti-Money Laundering, Sanctions and Fraud prevention and detection

In order to prevent and detect fraud and violations of Anti-Money Laundering and Sanctions legislation we may at any time:

- check your personal data against counter Anti-Money Laundering, Sanctions and fraud systems
- use your information to search against various publicly available (including “bad news” checks) and third party resources
- use industry tools
- share information about you with other organizations including but not limited to the police, the authority of financial markets and other interested parties.

If you provide false or inaccurate information and a violation is identified, the matter will be investigated and appropriate action taken. This may result in your case being referred to the police forces and anti-money laundering, sanction and/or fraud prevention agencies. You may face fines or criminal prosecution.

We make use of the following type of service providers in relation our program to prevent and detect Money Laundering, breach of Sanctions and Fraud prevention and detection:

- Service providers  
Service providers will provide administration, legal, tax or other services to the fund or fund manager and they processes the data and perform the duties as listed above.
- Depositories  
Each regulated fund entity is under the obligation to appoint a depository. The depository of such fund entity has legal obligations to maintain certain KYC/AML information.
- Software providers  
We use software providers to processes personal data and perform checks as listed above (including regular monitoring). These providers also perform verification of identity of natural persons, using EU approved software method of identification with liveness check and selfies and the administration of such data.

## How to complain

If you like to make a complaint to Waterland in respect of its processing of your personal data you can contact Waterland via de contact details listed on page 1 of this Privacy Statement. You can also lodge a complaint with the competent data protection supervisory authority in the relevant jurisdiction.