



PRIVACY STATEMENT

August 2022

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1. INTRODUCTION

1.1 General

This is the Privacy Statement of NIBC Bank N.V. and the legal entities and branch offices on behalf of which NIBC Bank N.V. acts, which are listed in paragraph 4.1.1 of this Privacy Statement (collectively "**NIBC**" or "**we**").

Please note that this Privacy Statement also covers the Processing of Personal Data related to our labels/products including (without limitation) NIBC Direct (a label of NIBC Bank N.V. and NIBC Direct Hypotheken B.V.), Hypinvest (a label of Hypinvest B.V., Hypinvest Hypotheken B.V. and Hypinvest Finqus Hypotheken B.V.), Wooncollect (a trade name of B.V. NIBC Mortgage Backed Assets), Lot Hypotheken (a label of Lot Hypotheken B.V.), Vastgoedhypothek (a label of NIBC Bank N.V. and NIBC Direct Hypotheken B.V.) and Oimio (a product of NIBC Bank N.V.) and certain of our affiliate companies. NIBC Bank N.V. is ultimately responsible for the Processing of Personal Data of (potential) clients, employees, job applicants, contact persons of suppliers or other third parties acting on behalf of/engaged by NIBC Bank N.V., its branch offices and all its subsidiary companies and on their respective websites.

This Privacy Statement also covers Personal Data about you which may be Processed by NIBC's direct holding company NIBC Holding N.V. and/or by one or more subsidiaries of NIBC Holding N.V. (with the exception of NIBC Bank N.V. and any of its own subsidiaries) in the event that you have a relationship with those companies (which companies are listed in paragraph 4.1.2 of this Privacy Statement). Such Personal Data may be shared by them with us either for us to process it as a Data Processor upon their instructions, or by us as an independent Data Controller.

This Privacy Statement describes how we (as a Data Controller) use your Personal Data in our business and when you visit our websites. We collect, use, disclose and otherwise Process Personal Data that is necessary for the purposes identified in this Privacy Statement or as permitted by law. NIBC values and respects the privacy of our customers and business partners. We strive to protect the privacy and the confidentiality of Personal Data that NIBC Processes in connection with the services it provides. NIBC will Process your Personal Data carefully and in accordance with applicable rules and regulations.

In this Privacy Statement we use a number of terms that have a specific meaning under applicable privacy rules (such as "Personal Data" or "Data Controller"). Paragraph 1.2 of this Privacy Statement contains an overview of these defined terms.

For the Processing of your Personal Data in the context of an application for an employment (or equivalent) position at NIBC, please refer to our Job Applicant Privacy Statement.

NIBC may from time to time implement changes to this Privacy Statement. The most recent version will at all times be available on NIBC's websites. NIBC will inform you (such as via NIBC's websites or other means of communication usually used by us with you) if there are substantial changes to this Privacy Statement.

1.2 Definitions

| | |
|---|---|
| Criminal Personal Data | Any Personal Data that provides information on a person's criminal convictions, offences, or related security measures. |
| Data Controller | The legal person or body which, alone or in conjunction with others, determines the purposes of and means for Processing of Personal Data. |
| Data Processor | The legal person or body which Processes Personal Data on behalf of the Data Controller without being subject to the Data Controller's direct control. |
| Data Protection Officer or DPO | The officer for the protection of Personal Data within NIBC. |
| DPO Office | The group of Employees engaged on a regular basis in the oversight, provision of advice and monitoring of data protection matters within NIBC. |
| GDPR | The European General Data Protection Regulation, EU 2016/679. |
| Personal Data | Any information relating to an identified or identifiable natural person. By way of example but not limitation, video and voice recording is also Personal Data if the video images or the voice recording is identifiable to an individual. If financial data (such as bank statements) relate to an individual, such data is considered Personal Data. |
| Processing of Personal Data (or Process) | Any operation or any set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. |
| Special Categories of Personal Data | Any Personal Data that provides information on a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. |
| UK GDPR | The Data Protection Act 2018, together with the Retained Regulation (EU) 2016/679 by which the GDPR was brought within the laws of the United Kingdom following the United Kingdom's departure from the European Union. |

2. WHAT DO WE DO WITH YOUR PERSONAL DATA?

2.1 Wat is Personal Data?

Personal Data is defined above. In summary, it includes any information relating to an identified or identifiable natural person, such as a name, address, e-mail addresses and e-mails, voice recordings, or a copy of a passport but also financial data and information in contracts, provided that such information relates to a natural person.

2.2 Which Personal Data may we Process about you?

The Personal Data that we Process about you may include some or all of the following, depending on the circumstances and nature of your relationship with us:

- a. Your contact information** ► including your name, address (and proof of address), gender and other contact details (e.g. e-mail and telephone details);
- b. Your identification information** ► citizen identification numbers issued by government bodies or agencies (e.g., depending on the country you are in, social security, citizen service or national insurance number, passport number, ID number, tax identification number, driver's licence number), a copy of your ID, and your date and place of birth (to the extent permitted by law);
- c. Identification information of your family members, proxyholders and inheritors** ► contact information, ID copies, and other identification information (to the extent permitted by law);
- d. E-mail and voice communications with NIBC** ► your e-mail correspondence and voice recordings of communications with NIBC (to the extent permitted by law);
- e. Your financial data** ► including Personal Data on the financial instruments you trade in, securities, savings accounts and/or mortgages provided by NIBC to you. Income details, details in relation to property, and any other financial data required for the provision of our services;
- f. Personal Data on Ultimate Beneficial Owners** ► including their name, financial data (e.g. details on their capital and/or voting rights and interests), contact details, ID copies, and citizen identification numbers issued by government bodies or agencies (to the extent permitted by law);
- g. Criminal Personal Data** ► NIBC may, under certain circumstances and if and to the extent legally permissible, also collect Personal Data relating to criminal convictions, offences or related security measures;
- h. Personal Data concerning health and religious data** ► NIBC will not request you to provide any information in relation to your current or previous medical condition or data concerning religious and philosophical beliefs. Only if you pro-actively provide such information and provide your explicit consent to Process such information, may this information be Processed by NIBC;
- i. Personal Data relating to your use of our websites** ► our websites may use cookies. When you visit one of our websites, we will ask you to provide your consent for the use of non-functional cookies to the extent required by law.

Cookies are used e.g. in order to analyse your use of the website, to share certain content, to offer chat functionality and for advertising and/or other marketing purposes. The use of cookies may lead to the Processing of your IP-address. Furthermore, we may receive information on how you use and interact with our website, the preferred language used to display our website as well as on the amount of time that you spend on it. We also collect basic information that relates to the request that is made from your browser when you visit the website. This may include information such as your device and browser type, your device screen resolution, the operating system that you use, your last visit date and time, the duration of your visit, the timestamp of the browser request, your company name, basic HTTP header information (like referral URL and user agent), cookie identifiers and cookie content, client identifiers, information about the website you have previously visited as well as demographic and geographic information. The use of cookies on our websites may change over time. For more information we refer to the Cookie Policies on our websites;

j. Login credentials for NIBC’s portals ► when you log in to one of NIBC’s client portals your username and password will be Processed;

k. Camera surveillance and license plate registration ► camera images, their time, date and place and if and when applicable, your license plate number when you visit one of NIBC’s offices.

2.3 What legal basis do we have for Processing your Personal Data>

NIBC only Processes your Personal Data for legitimate purposes. The use of your Personal Data will also be justified on the basis of one or more legal “Processing grounds” that are provided for in the GDPR and/or, as applicable, the UK GDPR.

The table below contains an explanation of the scope of the various legal Processing grounds available under the GDPR and/or, as applicable, the UK GDPR, for Processing of Personal Data on which NIBC relies:

| |
|---|
| Contract performance: where NIBC requires your Personal Data in order to enter into a contract with you and provide our services to you. |
| Legitimate interests: where the Processing of your Personal Data is necessary in order to achieve legitimate interests of NIBC or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of your Personal Data. |
| Our legal obligations: where we are required to Process your Personal Data under a statutory obligation, primarily as a result of our status as a regulated financial institution. |
| Consent: where you have consented to our use of your Personal Data (in which case you will have been presented with the opportunity to actively give your consent (or refuse to do so) in relation to any such use and you may withdraw your consent at any time by the method explained in the communication with you or, and in any event, by giving notice to our DPO). |

Under limited circumstances, NIBC also Processes Criminal Personal Data, Personal Data concerning health and/or religious Personal Data.

NIBC shall only Process Criminal Personal Data when the Processing is authorised by applicable law that provides for appropriate safeguards for your rights and freedoms.

Personal Data concerning health and religious Personal Data qualify as Special Categories of Personal Data. NIBC shall only Process Personal Data concerning health and/or

religious Personal Data when you pro-actively provide such information and always with your explicit prior consent.

NIBC Processes citizen identification numbers issued by government bodies and agencies to the extent permitted by and in accordance with applicable national legislation.

For more information, we refer to paragraph 2.4. below.

2.4 For what purposes does NIBC collect your Personal Data and what are our justifications of uses?

This paragraph specifies the purposes for which NIBC Processes the various categories of Personal Data. As mentioned above, the exact nature and scope of Personal Data we collect from you will depend on the circumstances and type of relationship you have with us. For each purpose, we note the applicable legal Processing grounds by which we justify the relevant use of your Personal Data:

- a. To conduct certain checks on you and/or a company you represent or with which you are connected, such as know your customer (KYC) checks, anti-money laundering (AML) checks, and anti-fraud checks before we establish a relationship, and where required, during our relationship with you or such company** ► we and other organisations engaged by us may access and use your Personal Data to conduct credit checks, make credit registrations in the relevant registers and checks to prevent fraud, money laundering and terrorist financing. If false or inaccurate information is provided and fraud is identified or suspected, Personal Data may be passed to the relevant authorities including credit reference agencies and fraud prevention agencies. We will always record this properly. Law enforcement agencies may access and use this information. We, and other organisations that may access and use information recorded by such agencies, may do so from other countries. Furthermore, we actively participate in incident registers and early warning systems for the financial sector (insofar as this is permitted by applicable law), including EVR (Extern Verwijzingsregister) of the SFH (Stichting Fraudebestrijding Hypotheken) and of the NVB (Nederlandse Vereniging van Banken)¹, as well as the incident register and IVR (Intern Verwijzingsregister) of NIBC²; for more information, please see below under: "For what purposes does NIBC Process Criminal Personal Data".
 - **Use justification:** legal obligations, legitimate interests (to assist with the prevention of crime and fraud and for risk management purposes). For the Processing of Criminal Personal Data, please see below under "For what purposes does NIBC Process Criminal Personal Data?".
- b. To prepare quotations and assess relevant risks for NIBC, third parties and for you** ► NIBC needs your Personal Data for acceptance procedures (for you as a private client, or for the company you are representing or with which you are connected), to prepare quotations and for risk-assessment of you and our risks. In the Netherlands, we participate in the Central Credit Information System (Centraal Krediet Informatiesysteem) of the Office for Credit Registration (Bureau Krediet Registratie).

¹This is an external register approved by the Autoriteit Persoonsgegevens which includes information on persons who have engaged in conduct that has posed/may pose risks to the financial sector. All financial institutions may access this register on a hit/non-hit basis.

²This is an internal register, where NIBC registers certain information of persons who have engaged in conduct that has posed/may pose risks to NIBC, its clients or to the integrity of NIBC.

- **Use justification:** (preparation of) contract performance, legitimate interests (to help managing our and your risks, including prevention of over-indebtedness), legal obligations.

c. To manage our relationship with you and provide our services and products to you ► NIBC requires your Personal Data for the performance of our contract with you or the company you represent or with which you are connected. This includes use of your Personal Data to ensure that we can provide our services to you, including executing transactions, funds transfers, mortgages, savings accounts and credits (for our corporate and retail customers).

- **Use justification:** contract performance, legal obligations, legitimate interests (to enable us to provide our services and share Personal Data between NIBC entities where appropriate).

d. To comply with our legal obligations and cooperate with regulators

► we may Process and disclose your Personal Data (i) to comply with our legal obligations as a regulated financial institution (for instance by Processing phone recordings or e-mails), and (ii) to cooperate with requests from regulators (including financial supervisory authorities), including, but not limited to, the Dutch Data Protection Authority (AP), the Netherlands Authority for the Financial Markets (AFM), the Dutch Central Bank (DNB), the Information Commissioner's Office (ICO), the Financial Conduct Authority (FCA), the Prudential Regulation Authority (PRA), the National Bank of Belgium (Nationale Bank van België), the Belgian Financial Services and Markets Authority (FSMA), the Belgian Data Protection Authority (Gegevensbeschermingsautoriteit), the various German State Data Protection Authorities, the German Central Bank (Deutsche Bundesbank) and the Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht).

- **Use justification:** legal obligations, legitimate interests (for NIBC's interests and to ensure the integrity and security of the financial sector). For the Processing of Criminal Personal Data, please see below under "*For what purposes does NIBC Process Criminal Personal Data?*".

e. For security purposes and to analyse and continuously improve the services we provide to our customers ► we may Process camera images and your license plate number when you visit one of NIBC's offices in order to ensure the security of buildings, grounds and goods, protecting the safety and security of persons and recording and handling of incidents. We may also Process your name and contact details for the purposes of our visitor registration. We may also use Personal Data to optimise and improve our IT infrastructure and the services we provide to you.

- **Use justification:** contract performance, legal obligations, legitimate interests (to enable us to ensure the security of our buildings, grounds and goods and systems, protecting the safety and security of persons, to handle incidents and to further improve our services).

f. For marketing purposes ► we may use Personal Data to contact our existing clients by e-mail for marketing purposes or when you actively sign up to one of our newsletters. You may opt-out at any time from marketing communications. In respect of existing clients, we will only market our own products and services to you provided that such products and services are similar

to products and services you already receive and you are given the opportunity to object. NIBC will not provide your contact details to any third party (with the exception of third parties as described in paragraph 2.12). We may also use non-functional cookies on our websites for marketing and advertising purposes ("marketing cookies"), as explained in paragraph 2.2 under (i).

- **Use justification:** legitimate interests regarding existing clients and potential job applicants (to enable us to promote our financial services and products or potential employment opportunities), consent (as obtained from prospective clients or clients who e.g. decide actively to sign up to newsletters which include content relating to products and services which are not similar to the products and services they already receive or clients who actively sign up for a newsletter in respect of which they have previously opted out or from website visitors in respect of marketing cookies that apply to them), legal obligations.

g. To defend our legitimate interests and to change our business structure ► we may disclose Personal Data in connection with legal proceedings or investigations anywhere in the world to third parties, such as public authorities, notaries, lawyers, liquidators, law enforcement agencies, regulators and third party litigants (these third parties are not Data Processors on behalf of NIBC and will Process Personal Data for their own purposes). NIBC may also provide your Personal Data to any potential acquirer of or investor in any part of NIBC's business for the purpose of that acquisition or investment.

- **Use justification:** contract performance, legal obligations, legal claims, legitimate interests (to enable us to cooperate with law enforcement and regulators and to allow NIBC to change its business). For the Processing of Criminal Personal Data, please see below under "*For what purposes does NIBC Process Criminal Personal Data?*"

h. In order to offer and to provide you with an optimised website experience ► By using cookies which may lead to the Processing of Personal Data as described above, we can secure our websites and analyse the frequency of our webpage views and general navigation. Cookies also enable the chat functionality which is offered at some of our websites and enable us to share certain content. By doing so, we can offer you an optimised website experience.

- **Use justification:** consent to the extent required by law in respect of Personal Data Processed via the use of non-functional cookies and legitimate interests in respect of Personal Data Processed via the use of functional cookies and privacy-friendly analytical cookies (to enable us to offer a functioning, optimised and secure website).

i. To enable you to manage your NIBC product(s) and/or services ► NIBC offers several client portals to enhance your client experience and to enable you to manage your NIBC product(s) and/or services. For security reasons, access to these portals is protected with two-factor authentication. Two-factor authentication adds an extra layer of security to your account in case your password is stolen.

- **Use justification:** contract performance, legitimate interests (to enhance your client experience and to enable you to manage your NIBC product(s) and/or services as well as to secure access to your information).

j. To deal with questions, requests, comments, concerns and/or complaints ► NIBC may Process Personal Data in order to deal with questions,

requests, comments, concerns and/or complaints from clients, website visitors or others accordingly.

- **Use justification:** contract performance, legitimate interests (to enable you to raise your questions, requests, comments, concerns and/or complaints with NIBC and for NIBC to be able to address them accordingly and subsequently strengthen our relationship with you), legal obligations and rights (e.g. if you exercise your data protection rights).

More information on the balancing of interest test performed when we base a Processing of Personal Data on our legitimate interests is available upon request (please see paragraph 4.2 below for our contact details).

2.5 For wat purposes does NIBC Process Criminal Data?

NIBC actively participates in incident registers and early warning systems for the financial sector (insofar as this is permitted by applicable law), including the EVR (Extern Verwijzingsregister) of the SFH (Stichting Fraudebestrijding Hypotheken) and of the NVB (Nederlandse Vereniging van Banken), as well as the incident register and IVR (Intern Verwijzingsregister) of NIBC. For this purpose, NIBC may, if and to the extent necessary, Process Criminal Personal Data. The purpose of an incident register or early warning system is, among other things, to protect the interests of the financial sector as a whole, as well as NIBC's customers, by, for example, uncovering fraud. NIBC may further Process Criminal Personal Data to conduct certain checks on you, such as know your customer (KYC) checks, anti-money laundering (AML) checks, and anti-fraud checks before we establish a relationship, and where required, during our relationship with you. Please note that NIBC has a licence from the Autoriteit Persoonsgegevens (the Dutch data protection authority) to Process Criminal Personal Data according to the Protocol Incidentenwaarschuwingssysteem Financiële instellingen (PIFI), which enables NIBC to exchange data on incidents, such as fraud and deception, with other financial institutions which take part in the PIFI.

- **Use justification:** NIBC shall only Process Criminal Personal Data when such Processing is authorised by applicable law. NIBC participates in incident registers and early warning systems that are under the control of an official authority.

2.6 For what purposes does NIBC Process Special Categories of Personal Data?

NIBC will not request you to provide any information in relation to your current or previous medical condition or your religious and philosophical beliefs. Only if you deem such information relevant (for example if changes in your medical condition prevent you from fully complying with your obligations or, for example, when you indicate a dietary requirement from which this information can be derived, when you want to participate in a specific NIBC event) and pro-actively provide it to us and provide your explicit consent to Process such information, may this information be processed by NIBC.

- **Use justification:** NIBC may only Process the abovementioned Special Categories of Personal Data with your prior explicit consent.

NIBC will never ask for any other Special Categories of Personal Data unless it is required through a legal obligation.

2.7 Monitoring and recording of e-mails and (phone) communication

For the purposes described above, in particular in order to comply with our legal obligations as a regulated financial institution, NIBC's systems may monitor and record telephone, e-mail, voicemail, Internet and other communications. In certain areas of the bank incoming telephone calls may also be recorded for training purposes and to ensure the quality of advice given by telephone. In such instances NIBC will inform you at the start of the conversation about the fact that a telephone call may be recorded and for which purposes the call will be recorded. Monitoring and recording is only carried out when necessary and justifiable for business purposes.

2.8 How long is Personal Data retained?

Our retention periods for Personal Data are based on business needs and legal requirements. We retain Personal Data for as long as is necessary for the purpose(s) for which the Personal Data was collected, and any other permissible, related purpose. For example, we retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, to comply with regulatory requirements regarding the retention of such Personal Data or in the event of ongoing (potential) legal claims. After the expiry of a retention period, Personal Data will be deleted as quickly as possible. In practice, this may mean that Personal Data is retained for a short period after the retention period has expired.

2.9 From where do we collect your Personal Data?

We may obtain Personal Data from you directly or from third parties such as intermediaries, other financial institutions, credit reference and anti-fraud agencies, sanctions and politically exposed person screening lists and public registers.

2.10 Where do we keep your Personal Data?

We primarily store your Personal Data on IT systems located in the Netherlands, the UK, Belgium and Germany. Some of these IT systems are outsourced to third parties. We have also engaged IT service providers who are situated outside the European Economic Area (EEA). All IT service providers act as Data Processors on behalf of NIBC. When we engage such Data Processors, we will ensure that data processing agreements are in place. For more information, please see below under "Do we share your Personal Data?".

If your Personal Data is transferred outside of the EEA we will, if and when necessary, use the EU model contractual clauses or other suitable data transfer mechanisms in order to ensure an appropriate level of protection. Furthermore, NIBC will assess whether any additional measures are necessary to guarantee an appropriate level of protection of your Personal Data. Please do not hesitate to contact our DPO if you wish to receive more information about the appropriate or suitable safeguards in place for data transfers outside of the EEA.

2.11 How does NIBC protect my Personal Data?

NIBC has implemented appropriate technical and organisational measures to secure the Processing of Personal Data. These safeguards will vary depending on the sensitivity, format, location, amount, distribution and storage of the Personal Data, and include measures designed to keep Personal Data protected from unauthorized access. If appropriate, the safeguards include the encryption of communications via SSL, encryption of information during storage, firewalls, access controls, separation of duties, and similar security protocols. We restrict access to Personal Data to personnel and third parties that require access to such information for legitimate, relevant business purposes.

All our staff members, contractors and third parties who will have access to Personal Data on NIBC's instructions will be bound to confidentiality and we use access controls to limit access to individuals that require such access for the performance of their responsibilities and tasks.

NIBC has information security policies in place and its security policies and systems are frequently audited. As a regulated financial institution, NIBC has to comply with strict security requirements. NIBC takes the security of its IT infrastructure very seriously.

2.12 Do we share your Personal Data?

NIBC has engaged various Data Processors for the Processing of your Personal Data on our behalf, including IT service providers, marketing agencies and other business service providers.

Service providers accessing NIBC Personal Data act as Data Processors on behalf of NIBC. Where we engage Data Processors, we will ensure that data processing agreements are in place.

We may also share your Personal Data with other third parties as described in paragraph 2.4 *"For what purposes does NIBC collect your Personal Data and what are our justifications of use?"* and 2.5 *"For what purposes does NIBC Process Criminal Personal Data?"* who act as Data Controllers.

Some of these third parties are situated outside the EEA. If Personal Data is transferred outside of the EEA, this will take place in accordance with the applicable data protection legislation. If and when necessary, we will implement additional legal safeguards governing such transfer, such as the use of EU model contractual clauses (or, if so required, equivalent protections required to comply with the UK GDPR), or other suitable data transfer mechanisms in order to ensure an appropriate level of protection. Furthermore, NIBC will assess whether any additional measures are necessary to guarantee an appropriate level of protection of your Personal Data. Certain (sectors in) countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections as EEA data protection laws. The GDPR and the UK GDPR allow NIBC to freely transfer Personal Data to such countries: as at the date of this Privacy Statement the UK has also approved those same (sectors in) countries as providing essentially equivalent protections as UK data protection laws. Furthermore, NIBC will assess whether any additional measures are necessary to guarantee an appropriate level of protection of your Personal Data. Please do not hesitate to contact our DPO Office if you wish to receive more information about the appropriate or suitable safeguards in place for data transfers outside of the EEA.

Where NIBC discloses Personal Data in response to requests from regulators and law enforcement or security agencies, these regulators and law enforcement or security agencies will be acting as a Data Controller. NIBC will always assess the legitimacy of such requests before disclosing any Personal Data and disclose only the Personal Data required to comply with the request.

3. WHAT ARE YOUR RIGHTS?

Under the GDPR and/or (if applicable to you) the UK GDPR, you have the following rights in relation to your Personal Data.

- a) **Subject Access:** You have a right to be provided with access to any Personal Data held about you by NIBC and to receive certain information about the Processing of your Personal Data.
- b) **Rectification:** You can ask us to have inaccurate or incomplete Personal Data corrected or completed.
- c) **Erasure:** You can ask us to erase Personal Data in certain circumstances and we will take reasonable steps to inform Data Controllers with whom we have shared your Personal Data that you have requested the erasure of any links to, copies or replication of your Personal Data.
- d) **Restriction:** Under certain circumstances, you can ask us to restrict the Processing of (certain) Personal Data.
- e) **Portability:** Under certain circumstances, you can ask us to transmit the Personal Data that you have provided to us and we still hold about you to you in a structured, commonly used and machine-readable format, e.g. to be able to send it to a third party.
- f) **Raise a complaint:** If you have a complaint about the Processing of your Personal Data by NIBC, we will do our utmost to resolve it with you. You can raise a complaint about our Processing with the data protection authority in your jurisdiction. In the Netherlands, this is the Dutch Data Protection Authority (Autoriteit Persoonsgegevens), in the UK, the Information Commissioner's Office (ICO), in Belgium, the Data Protection Authority (Gegevensbeschermingsautoriteit), and in Germany the respective German State Data Protection Commissioner responsible for your complaint. For relevant contact details, please see paragraph 4.2. below. If you live or work in another country of the European Union, you can file a complaint with the competent supervisory authority in that country.

In addition, under certain conditions, you have the right to:

- where Processing is based on consent, **withdraw your consent.** Please note that the withdrawal of your consent does not affect the lawfulness of the Processing of your Personal Data prior to the withdrawal of your consent;
- object to any Processing of Personal Data that NIBC justifies on the **legitimate interests** legal Processing ground, unless our reasons for undertaking that Processing outweigh any prejudice to your interests, rights and freedoms; and;
- **object to direct marketing** at any time

Please be aware that certain exceptions apply to the exercise of these rights and so you may not be able to exercise these in all situations. Exceptions may include safeguarding the public interest (e.g. the prevention or detection of crime), our interests (e.g. the maintenance of legal privilege) and possible third party interests. If we refuse your request, we will explain the reasons for the refusal.

Please contact our DPO Office should you wish to exercise any of your rights. Depending on the nature of the relationship you have with, or services you receive from, NIBC, you may also be able to exercise these through or as directed by the account portal to which you have access; however you will always also have the right in any event to contact our DPO for this purpose. More generally, any questions regarding NIBC's Privacy Statement can be directed to our DPO.

Please be aware that in order to prevent fraud and misuse, we may need to request specific information from you to help us confirm your identity. We may also contact you to ask you for further information in relation to your request.

We will deal with your request without undue delay and ultimately within a month after receipt of your request, we will inform you whether we can comply with it. This period may be extended by two months in specific cases, for example when a complex request is made. We will inform you of such an extension within one month of receipt of your request.

4. NIBC ENTITIES AND CONTACT DETAILS

4.1 NIBC entities

4.1.1 NIBC Bank N.V. entities

| | Entity name | Registered office | Corporate registration number |
|----|---|---|--------------------------------------|
| 1 | NIBC Bank N.V. | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 27032036 |
| 2 | NIBC Direct Hypotheken B.V. | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 53084179 |
| 3 | Hypinvest Hypotheken B.V. | Fascinatio Boulevard 1302, 2909 VA, Capelle aan den IJssel, the Netherlands | 27258412 |
| 4 | Hypinvest Finqus Hypotheken B.V. | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 83961151 |
| 5 | Hypinvest B.V. | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 27169419 |
| 6 | Lot Hypotheken B.V. | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 75194015 |
| 7 | Quion 30 B.V. | Fascinatio Boulevard 1302, 2909 VA, Capelle aan den IJssel, the Netherlands | 27169414 |
| 8 | B.V. NIBC Mortgage Backed Assets | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 27130339 |
| 9 | NIBC Bank N.V. Brussels branche office | Rue Royale 71, 1000 Brussels, Belgium | 0456.775.869 |
| 10 | NIBC Bank N.V. London branche office | 26 th Floor, 99 Bishopsgate, London EC2M 3XD, United Kingdom | 27032036 |
| 11 | NIBC Bank N.V. Frankfurt branche office | Main Tower, Neue Mainzer Straße 52, D – 60311 Frankfurt am Main, Germany | 75230 |

4.1.2 NIBC Holding N.V. entities

| | Entity name | Registered office | Corporate registration number |
|---|---|---|--------------------------------------|
| 1 | NIBC Investment Management N.V. | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 27253909 |
| 2 | NIBC Credit Management, Inc. | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 108677 |
| 3 | NIBC European Real Estate Partners I B.V. | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 27297845 |
| 4 | NIBC IM Management B.V. | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 27329892 |
| 5 | NIBC Infrastructure Partners I B.V. | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 27298176 |
| 6 | NIBC Private Equity Fund of Funds Management I B.V. | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 27297787 |

| | | | |
|---|-----------------------------------|---|----------|
| 7 | NIBC Investments N.V. | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 27198480 |
| 8 | NIBC Principal Investments I N.V. | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 32050445 |
| 9 | Vijlma B.V. ³ | Carnegieplein 4, 2517 KJ The Hague, the Netherlands | 54149592 |

³ Including Vijlma B.V.'s subsidiaries

4.2 Contact details of the relevant data protection authorities

NIBC has appointed a data protection officer for its legal entities and branches (a DPO). Please do not hesitate to contact our DPO in case you have any questions in relation to the Processing of Personal Data by NIBC:

| | |
|------------------------|--|
| Contact details | <p>Vikki Greatorex T: (+31) (0)70 342 5623 M: (+31) (0)620549370 E: dpo@nibc.com</p> <p>If your query does not concern a privacy/data protection matter, we would invite you to liaise with your usual NIBC contact or to visit our website(s) for appropriate contact details.</p> |
| Regular mail | <p>NIBC Bank N.V. Attn. Data Protection Officer At the address for the relevant NIBC entity listed above in paragraph 4.1.1</p> |

Clients of NIBC Direct Belgium can also submit queries to the following email addresses:

- privacy@nibcdirect.be
- klachten@nibcdirect.be

4.3 Contact details of the relevant data protection authorities

Country: The Netherlands, Autoriteit Persoonsgegevens
Address: Postbus 93374
2509 AJ Den Haag
Nederland
Contact details: (+31) (0)70 888 85 00
Website: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/informatie-en-meldpunt-privacy>

Country: United Kingdom, Information Commissioner's Office
Address: Wycliffe House
Water Lane, Wilmslow
Cheshire, SK9 5AF
United Kingdom
Contact details: (+44) (0)303 123 1113
Website: <https://ico.org.uk/global/contact-us/postal-addresses/>

Country: Belgium, Gegevensbeschermingsautoriteit
Address: Drukpersstraat 35
1000 Brussel
Belgium

Contact details: (+32) (0)2 274 48 00

Website: <https://www.gegevensbeschermingsautoriteit.be/contact>

Country: Germany, Der Hessische Datenschutzbeauftragte für Datenschutz und
Address: Informationsfreiheit
Postfach 3163
65021 Wiesbaden
Germany

Contact details: (+49) (0)611 1408 0

Website: <https://datenschutz.hessen.de/%C3%BCber-uns/kontakt>
