

# Privacy Statement

Huub Hypotheken

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## Privacy Statement

### Huub Hypotheken

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#### Who we are

Huub Hypotheken B.V. is engaged in (facilitating) the guidance of clients through the process of purchasing a home, advising clients on (mortgage) credit and insurance, and acting as an intermediary in the establishment of (mortgage) credit and insurance agreements. We do this under the trade name Huub Hypotheken.

For these activities, we process personal data. We would like to inform you clearly and transparently about this. In this privacy statement, we answer the most important questions about the processing of personal data.

Huub Hypotheken B.V. is registered in Amsterdam and listed in the trade register under number 93685580. Huub Hypotheken processes personal data of individuals with whom it maintains a (potential) client relationship.

Huub Hypotheken B.V. aims with this 'Privacy Statement Huub Hypotheken' to provide clarity on how it handles personal data. Huub Hypotheken B.V. is the controller responsible for processing personal data of (potential) clients of Huub Hypotheken. You are considered a (potential) client of Huub Hypotheken B.V.

#### Our Privacy Policy

Huub Hypotheken B.V., operating under the name Huub Hypotheken attaches great importance to protecting the privacy of (potential) clients. We will handle your personal data in a proper and careful manner. Personal data is processed in accordance with the General Data Protection Regulation (GDPR). In addition, our privacy policy is based in part on the Code of Conduct for the Processing of Personal Data by Financial Institutions.

The key basic concepts regarding the processing of personal data:

#### What is personal data?

Personal data is any information that directly or indirectly says something about you. Think for example of your name, address details and telephone number. But also your Citizen Service Number (BSN), your IBAN number and the IP address of your computer fall under this.

#### What is the processing of personal data?

This covers everything that can be done with personal data. For example, collecting, as well as storing, modifying, using, transferring and deleting your data from our records.

#### Who is responsible for your personal data?

Huub Hypotheken B.V. is responsible for the processing of your personal data.

### 1. How do we collect personal data?

We collect your personal data in the following ways:

- i. You share your personal data with us when you become a client, register for our online services, complete an online form, sign a service agreement (OTD), use our products and services, contact us via one of our communication channels, or visit our website.
- ii. We may also have obtained personal data from other available sources, such as debtor registers, other financial institutions, external marketing agencies or trade information agencies.

### 2. Which personal data do we process?

We may process the following types of personal data:

- i. Ordinary personal data:
  - a. Your contact details (such as: name, address, city of residence, email address, telephone number)
  - b. Other relevant data (such as: occupation or company, marital status and family composition, contract details)
  - c. Contact moments (such as: letters and emails we send to and receive from you, what you do and view on our websites, our contact via social media such as Facebook and Twitter)
- ii. Sensitive personal data:
  - a. Identification data (such as: Citizen Service Number (BSN), passport number, ID number, date of birth, gender, copy of identity documents)
  - b. Financial data (such as data on loans, real estate, income, financial obligations and your IBAN number)
- iii. Special personal data: These include, for example, data relating to health or criminal history. In order to properly fulfil our role as an insurance intermediary, we sometimes process special personal data. For example, when you wish to take out a term life insurance policy. We only process special personal data when strictly necessary for our services and only if you have given explicit consent, or when legislation requires or permits us to do so.

### 3. What valid legal basis do we have for processing?

We may only use personal data for a reason specified in privacy legislation. Such a reason is called a legal basis. For its processing activities, Huub Hypotheken B.V. relies on the following legal bases:

- i. For the conclusion and performance of the loan agreement, we need data from you.
- ii. For the pursuit of a legitimate interest of Huub Hypotheken B.V. or a third party, unless your interests override. For example: the protection of your and our property and data and that of others, the protection of our own financial position and the interests of other clients, marketing, carrying out efficient administration such as centralising or replacing systems, use of service providers, the security of systems and networks, conducting statistical and scientific research. Others may also have a legitimate interest for which we need to use your data.

iii. To comply with a legal obligation. Laws that require us to retain your data, such as the Dutch Civil Code, the Financial Supervision Act (Wft), or specific provisions of the Anti-Money Laundering and Anti-Terrorist Financing Act (Wwft).

iv. With your consent, where you have given it, and which you may withdraw at any time.

#### **4. For what purposes do we use personal data?**

We only collect personal data that is necessary for the following purposes:

- i. To enter into and perform an agreement, i.e. to provide you with products and services. Without your data, we would not be able to advise you on, for example, taking out a mortgage.
- ii. For promotional and marketing purposes, for example to inform you about a new product that may be of interest to you.
- iii. To handle complaints and disputes
- iv. To assess your and our risks.
- v. For customer satisfaction surveys to develop and improve our products and services, and also to research possible trends, problems, causes of errors and risks. For example, to check whether new regulations are being properly complied with. This allows us to prevent complaints and damage.
- vi. To comply with our legal obligations and to be able to cooperate with supervisory authorities.
- vii. To ensure that the financial sector remains safe and reliable and to protect your and our interests, for example in relation to fraud prevention and investigation, for which we consult, among other sources, incident registers and warning systems of the financial sector, newspapers and the internet. For example, by reporting unusual transactions or identifying, stopping and, if necessary, verifying with you possible fraudulent transactions. We always first verify whether this is permitted.

#### **5. What if we do not receive data from you?**

Do we need data from you in order to advise you on taking out a mortgage? And do you refuse to provide it, while the law requires it or because we simply need it to perform the agreement? In that case, we regrettably cannot enter into a service agreement with you, or we may need to terminate an existing agreement. In the (online) forms you are sometimes required to complete, you can see which data is mandatory. Would you like us to delete your data from our systems? Unfortunately, this is not possible for mandatory data. We need that data. For example, for the performance of the agreement you have with us, because we are legally required to retain it, or due to a legitimate interest of Huub Hypotheken B.V.

#### **6. With whom do we share your data?**

We may share your data within the group of companies to which Huub Hypotheken B.V. belongs for internal administrative purposes or to improve services, or because the law requires it. This allows us to build a more complete picture of your financial situation. For example, it may be relevant to know that you already have a loan with a company within the group if you apply for a loan with us. Companies within the group may also approach you with offers.

Your personal data may also be shared with other parties outside Huub Hypotheken B.V. if we are legally required to do so, for example with the Tax Authority, or because we need to perform an agreement with you, for example with lenders, insurance companies or notaries. For any complaints and disputes, we may also share personal data with external parties such as complaints authorities, advocates, (liability) insurers and law firms.

We also engage third parties to carry out our services, such as marketing and communication agencies, IT companies and data centres. Where these third parties have access to your data in the course of providing the relevant services, we have taken the necessary contractual and organisational measures to ensure that your data is only processed for the purposes stated above.

Huub Hypotheken B.V. makes use of external language models from third parties to enable natural language processing in the context of its services. In some cases, limited personal data – such as questions or contextual data relevant to mortgage advice – may be transmitted to these providers via a secure API connection. This processing takes place on the basis of a legitimate interest (Art. 6(1)(f) GDPR), namely the provision of interactive and context-specific support to users. Huub Hypotheken B.V. ensures that only strictly necessary data is shared, and that it is pseudonymised or anonymised in advance wherever possible. Where technically feasible, Huub Hypotheken B.V. uses servers located within the European Economic Area (EEA) to further safeguard the protection of personal data and to limit the risks of international transfers.

Huub Hypotheken B.V. does not in principle share personal data with organisations outside the European Economic Area (EEA). When this is nevertheless necessary, we ensure that appropriate safeguards have been put in place that meet the requirements of the GDPR, so that the data receives the same level of protection as within the EEA.

We do not share your data with third parties for marketing or sales activities.

## **7. How do we protect personal data?**

Our website, portal and IT systems are well secured, and we do our utmost to protect your personal data as effectively as possible by implementing so-called appropriate technical and organisational measures. Our employees and those of our suppliers have also been instructed to handle your data with care and to keep it confidential. In this way, we aim to prevent unauthorised persons from gaining access to your personal data.

To achieve this protection, we have an appropriate security policy that is periodically evaluated and updated where necessary.

### **7.1 Employees of Huub Hypotheken B.V. and affiliated companies**

All our employees have signed a confidentiality agreement. We handle personal data carefully and only authorised personnel can access and process personal data from suppliers.-

These authorised persons work in the employ of or under the supervision of Huub Hypotheken B.V. and/or its affiliated companies. Huub Hypotheken B.V. may outsource the processing of personnel data to authorised employees of Huub Hypotheken B.V. and/or business units abroad.

Supplier data may also be processed outside the EEA by employees of Huub Hypotheken B.V. and its affiliated companies for reporting and administrative support tasks.

## 8. How long do we retain personal data?

We retain your data for as long as we are legally required to do so, for as long as we need it for the purposes for which we process it, for as long as you give your consent, and for as long as we are permitted to retain it in relation to claims (until any claim has become time-barred) against which we must be able to defend ourselves.

Retention periods may vary per purpose and may, in the event of complaint handling, be extended by up to 7 years after the matter has been resolved.

If you have obtained a product or service through Huub Hypotheken B.V., such as financial advice, a mortgage or an insurance policy, we retain your data for up to 5 years after the termination of the product.

If you have signed a service mandate, we retain your data for a minimum of 1 year and a maximum of 3 years after the date of signing.

If you have had an appointment with us and have not previously obtained a product or service through Huub Hypotheken B.V. or signed a service mandate, we retain your data for a minimum of 6 months and a maximum of 3 years.

## 9. What do we do with your data after the retention period?

After the retention period has expired, your personal data will be deleted or anonymised. Anonymisation means that personal data is stripped of all potentially identifying characteristics, so that it is no longer possible for anyone to see that the data relates to you.

## 10. What rights do you have?

Huub Hypotheken B.V. uses your personal data to be able to serve you. We handle this with great care. Of course, you remain in control of this information.

You have the right to:

- i. Access: which personal data we process about you.
- ii. Rectification: the correction of inaccurate data.
- iii. Erasure: under certain conditions.
- iv. Objection: for example, against marketing.
- v. Restriction: of the processing.
- vi. Portability: data portability.
- vii. Withdrawal of consent.
- viii. Submitting a complaint to the Dutch Data Protection Authority.

### 11. How can you exercise your rights? Question or complaint?

You can exercise the right of access and the right to data portability through your account on the client portal. To exercise the other rights, please send us a letter or email. Please include a copy of your passport or ID card, with the BSN and photograph made illegible. We will respond within four weeks of receiving your letter.

If you have questions or complaints about the way in which we handle your personal data, you can contact:

#### **Huub Hypotheken B.V.**

Privacy Office  
Tolstraat 199  
1074 VJ Amsterdam  
[privacy@Huub Hypotheken.nl](mailto:privacy@HuubHypotheke.nl)

### 12. The use of the websites and apps of Huub Hypotheken B.V.

When you use our website, we collect click data to improve user-friendliness. We may also display targeted information and offers.

### 13. Cookie policy

We use cookies to automatically recognise you on your next visit. You can refuse the use of cookies through your browser settings. We use, among other tools, Google Analytics for the analysis of website usage.

### 14. Amendment of this Privacy Statement

We may amend this Privacy Statement. The most recent version is always published on our website.

**Questions? Contact us at [privacy@smartfaster.com](mailto:privacy@smartfaster.com)**

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