



# Privacy Statement

Internal use only

## Content

1. Scope of the Privacy statement.....	3
2. Processing of personal data .....	3
3. Personal data – Property Website visitors.....	3
4. Purposes of processing personal data – Property Website visitors.....	4
5. Grounds for processing personal data.....	4
6. Sharing of personal data – Property Website visitors.....	4
7. Sharing of personal data outside of the European economic area.....	5
8. Security .....	5
9. Retention period .....	5
10. Cookies and similar technologies .....	5
10.1.Types of cookies .....	6
11. Data Subject Request Procedure .....	6
1. Data Subject Rights .....	6
2. Contact details. ....	8
2. Amendments and applicable law .....	8
3. Questions and complaints .....	8

## 1. Scope of the Privacy statement

DW Property B.V. (“**DW Property**”) and its subsidiaries respect your privacy. We process your personal data carefully and in accordance with the law. We process your personal data carefully and in accordance with the law. Our Privacy Statement explains which data we use and how we store, protect, and process this data. This Privacy Statement applies to the activities of all companies, including DV Aquis VIII B.V., that are part of the DW Property Group and party to the Intra-Group Data Protection Agreement.

## 2. Processing of personal data

DW Property considers it important to inform you about how it handles your personal data, what it uses this data for, and your rights in this regard. When processing personal data, DW Property adheres to a strict privacy policy. This also means that your personal data is gathered, handled, and protected with the greatest of care, and in accordance with statutory and regulatory requirements, including the General Data Protection Regulation (GDPR).

## 3. Personal data – Property Website visitors

We have outlined below the personal data about you that DWP may process.

- a) Identity Data means your full name (first- and surname), username or similar identifier, date of Birth, place of Birth.
- b) Contact Data means your (private) e-mail address(es) for communication with you, address (street, postal code, city), (private) phone number.
- c) Correspondence Data means records of written correspondence and phone calls with us including the email address, the number you contacted us from and the time, date and duration of that call or other contact.
- d) Financial related data means data provide by you on your financial situation relevant to conduct a tenant check regarding rental standards (including income, assets, and other financial obligations including type of employment or data from your company, profession and/or job title, benefit(s), pension(s), assets, etc.).
- e) Social Media Data means your profile data on social media such as LinkedIn and other information you make public on or otherwise share with us from social media.
- f) Marketing Communications Data means information about how you respond to email, SMS, Whats app, phone, and other marketing campaigns.
- g) Feedback Data means your feedback about us and our services or (to be constructed) properties and their surroundings through our satisfaction surveys or through any other way of communication, feedback, and survey responses.
- h) Technical Data internet protocol (IP) address from which you access the Portal and our or others products and services, cookies (as set out in our Cookies Policy, your login data (such as the time, date and duration), the browser type and version you use to access the Portal and our or others websites, apps and products and services, weblogs, traffic data, time zone settings of your device and its location, browser plug-in types and versions that you use, other communication data, resources that you access on the Portal, our apps, websites, products and services, the operating system and platform type of the device you use, and details of other technology on the devices you use to access

the Portal or our websites, apps, products or services, and also information about your use of our IT systems and premises and door entry systems.

#### 4. Purposes of processing personal data – Property Website visitors

DW Property processes your personal data during the following activities:

- To send communications in the performance of our services and for marketing purposes, such as emails, announcements, newsletters.
- To further develop, test and improve our Website/Portal, or other existing or new systems/processes to better serve you, our clients, other staff and third parties.
- To tailor the range of products and services we offer or may develop or enhance.
- To perform market analysis related (but not limited) to target groups, market demand, property characteristics and surroundings,

#### 5. Grounds for processing personal data

To be able to use personal data, we need to have a ground for doing so under GDPR. We use the following grounds:

- the personal data needs to be used to perform or enter into an agreement with you;
- the personal data needs to be used to meet a statutory duty;
- in emergency situations: the personal data needs to be used to protect a vital interest pertaining to you or someone else;
- we have a legitimate interest to use the personal data, unless this is outweighed by your interest or the interest of a third party to privacy;
- you have given express consent to DW Property.

DW Property may rely on the following legitimate interests:

- maintenance and (sustainability-) improvements to the property and installations;
- the protection of your safety, the security of customers and/or others, and the buildings and property belonging to DW Property;
- for quality and training purposes;
- to promote IT management and improve security;
- to analyse and improve the services and content of our websites;
- to supply, improve, adjust, support, examine, and analyse our services;
- to promote the quality and safety of the services we provide;
- to communicate with you and DW Property's other business partners;
- to prevent and combat fraud, unauthorised usage, and breaches of our terms and conditions and policy rules, or other harmful or illegal activities.

#### 6. Sharing of personal data – Property Website visitors

For exercising the activities described above, DW Property may engage third parties, including suppliers (fitout), energy suppliers, property managers, sales agents or brokers, IT service providers, website providers and marketing agencies, lawyers, notaries and judicial authorities.

Where these third parties process your personal data during the performance of the respective activities, DW Property will take the required contractual, technical, and organisational measures to ensure that your personal data is solely processed to the extent that this is required for the activities to be performed and in accordance with the applicable laws and regulations.

If DW Property is legally required to do so, your personal data may also be shared with the authorities, not restricted to tax authorities, law enforcement agencies (the police and/or the Public Prosecution Service), supervisory authorities (the Dutch central bank (De Nederlandsche Bank), the Netherlands Authority for the Financial Markets) and/or the Dutch Data Protection Authority

## 7. Sharing of personal data outside of the European economic area

We may occasionally need to transfer your personal data to third parties located outside of the European Economic Area (EEA). In accordance with the GDPR, DW Property will only transfer your personal data to countries outside of the EEA:

- if the European Commission has ruled that the third country guarantees a suitable level of protection;
- if appropriate measures are offered and you have enforceable rights and have effective means of redress.
- the transfer is necessary for the performance of your agreement with DW Property;
- if you have expressly consented to the transfer, after having been informed of the risks associated with the transfer;
- if the transfer is necessary due to serious reasons of general importance;
- if the transfer is ad hoc and necessary for DW Property's compelling interests, DW Property has taken appropriate safeguards, and the Dutch Data Protection Authority has been duly informed.

In situations where DW Property transfers your personal data outside of the EEA, we take measures such as safeguarding the processing and procedures in the form of a processing agreement with the respective third party, to ensure that your personal data remains properly protected.

## 8. Security

To protect your personal data in the best manner possible, DW Property takes appropriate technical and organisational measures to combat misuse, loss, unauthorised access, or any other form of unlawful processing. These measures include secured servers, our privacy policy, and employee training. Employees of DW Property who can access your personal data are under an obligation to maintain confidentiality and solely have access to your personal data if this is necessary for the performance of their role.

## 9. Retention period

DW Property retains your personal data for as long as is necessary and in accordance with the applicable laws and regulations for the performance of agreements, to be able to provide services, to enable you to use the websites, to be able to comply with applicable legislation, settle disputes with parties, and otherwise in so far as this is necessary to enable us to perform our business activities.

DW Property retains your personal data in all cases for the period in which you have an agreement with DW Property. A statutory retention period applies to certain personal data which means that DW Property is also required to retain data after the end of an agreement. DW Property fully complies with this statutory retention period. In the absence of any form of agreement, consent, or other statutory ground, DW Property will retain the data for a maximum of four weeks, unless it needs to be retained for longer in connection with an incident.

## 10. Cookies and similar technologies

DW Property uses cookies and similar technologies on its websites. Cookies are small pieces of information that are stored on your computer. We use cookies for the functioning and provision of our services. Cookies enable DW Property to see which visitors use its website. They allow DW Property to adapt its websites to user preferences. These small pieces of information are recognised the next time a person visits DW Property's websites.

Our website and/or service does not intend to collect data on website visitors who are under 16 years of age. Unless they have parental or guardian consent. However, we cannot verify whether a visitor is older than 16. We therefore advise parents to be involved in their children's online activities to avoid collecting data on children without parental consent. If you are convinced that we have collected personal data about a minor without such consent, please contact us on the contact details stated below.

## 10.1.Types of cookies

Cookies can be necessary, but they don't have to be. In addition to functional cookies, which make our website more effective, we also use analytical cookies. For these cookies no consent is needed. We also use cookies that require your consent. We use two types of cookies on our website, Functional/Analytics.

Functional cookies are necessary required cookies. They ensure that our website works properly and prevent you from having to repeatedly enter your login details. We also use functional cookies to identify instances of abuse of our website and services, for example by registering the number of consecutive failed login attempts.

We use analytical cookies to track visits to our website. This gives us an idea of which sections of our website appeal most to our visitors and allows us to improve our website.

We process IP addresses for our functional and analytical cookies. The resulting statistics and reports can't be traced back to individuals. On your first visit to our website, we have already informed you about these cookies and asked your permission to set them.

You can opt out of cookies by setting your internet browser to stop storing cookies. In addition, you can also delete any information previously stored via your browser's settings.

## 11. Data Subject Request Procedure

If your personal data is processed, you have several rights, which are explained below. You can exercise these rights by submitting a request in writing to DW Property or by emailing: [rv.privacy@dwproperty.com](mailto:rv.privacy@dwproperty.com). DW Property may have to verify your identity before it can comply with your request.

DW Property will respond to your request as soon as possible. Your requests will be handled electronically, in principle, unless this is not possible or if you request otherwise. If we reject your request, we will provide the reasons for this, and your request will not be handled other than in accordance with the current laws and regulations.

### 1. Data Subject Rights

Your request may concern one or more of the following rights that you possess:

[Right to access personal data](#)

You may request at any time that we inform you of the categories of personal data about you that DW Property processes, the reasons for processing that data, the source from which the data originates, and the retention periods that are being observed.

#### Right to change personal data

You can contact us at any time to add to or correct your personal data. If DW Property has unexpectedly processed personal data about you and/or has provided this to third parties, DW Property will immediately correct this. If DW Property has amended your personal data, DW Property will notify you.

#### Right to restrict processing of your personal data

If you disagree with the content of the personal data that DW Property retains about you, in some cases you may submit a request to temporarily restrict the processing of your personal data.

#### Right to withdraw consent

You can also withdraw the consent you have given for processing your personal data. Once DW Property has received your letter or email, it will immediately suspend the processing of your personal data. However, the withdrawal of consent does not affect processing that has already taken place.

#### Right to transfer personal data (right to data portability)

You may request the personal data that DW Property holds about you in a structured, accessible, and machine-readable format. Once you have received your personal data, you are free to transfer this data.

#### Right to be forgotten

If you no longer wish to use DW Property's services, you can request that we delete all your personal data.

#### Right to object

You have the right to object to the processing of your personal data by DW Property that is based on the grounds of a 'legitimate interest or an interest of DW Property or a third party' and 'performing a task of general importance'. If DW Property relies upon these grounds, DW Property will weigh up these interests regarding your privacy. The right to object enables you to request that DW Property weighs up these interests once again.

#### You also have the right to file a complaint to the supervisory authority.

The competent supervisory authority is the Dutch Data Protection Authority ([www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)).

## 2. Contact details.

The following is responsible for processing personal data within the DW Property Group:

**DWP Management B.V.**

Reggesingel 2, 7461 BA Rijssen, the Netherlands  
Postbus 228, 7460 AE Rijssen, the Netherlands

T: 0548 – 22 61 00

Chamber of Commerce: 59267569

E: [rv.privacy@dwproperty.com](mailto:rv.privacy@dwproperty.com)

## 2. Amendments and applicable law

DW Property retains the right to unilaterally amend this Privacy Statement and to inform you in an appropriate manner where necessary. None of the provisions in this Privacy Statement are intended to create an obligation or agreement between DW Property and you. **The laws of the Netherlands apply to the** provisions in this Privacy Statement and all ensuing disputes.

## 3. Questions and complaints

If you have any further questions about DW Property's Privacy Statement, please do not hesitate to contact us. You can also contact the Dutch Data Protection Authority with any questions and/or to submit complaints ([www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)).

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