

# PRIVACY STATEMENT SUSTAINABLE DIVIDENDS VALUE FUND

## PROCESSING OF PERSONAL DATA

Last changed: November 24 2020

The Sustainable Dividends Value Fund ("the Fund") is managed by Sustainable Dividends BV, located at Spaarnzichtlaan 8, 2101 ZM Heemstede.

Sustainable Dividends BV, as manager, is responsible for the processing of personal data as shown in this privacy statement.

### 1. WHICH PERSONAL DATA DO WE PROCESS?

Sustainable Dividends BV ("The Manager" ) processes your personal data if a) you have registered via the website [sustainabledividends.nl](https://sustainabledividends.nl) via an email to the Manager for further information, b) if you have registered for the newsletter of the Fund, or c) if you register as a participant in the Fund.

#### a. Subscription to the newsletter

Registration for the newsletter takes place via MailChimp, where interested parties enter their data themselves. When you click the "Newsletter" button, you will be redirected to MailChimp where you enter the following data, which the Manager will then process:

- Name (first and last name)
- E-mail

[Mailchimp](#) uses cookies. The manager does not have influence or authority on the use of [cookies](#) by Mailchimp.

#### b. Further information by email to [info@sustainabledividends.nl](mailto:info@sustainabledividends.nl)

If you send a request for further information to the Manager via [info@sustainabledividends.com](mailto:info@sustainabledividends.com), the Manager will process your name and email address (and if applicable: your telephone number). The Manager uses cookies on their website (click [here](#) for an explanation).

#### c. Registration as a participant in the fund

See section 8 of this Privacy Statement

### 2. WHY WE NEED THE DATA

The Manager process your personal data for these purposes:

1. General information about the Fund
2. Sending of newsletters and other reports about the Fund.
3. To be able to call or e-mail you if this is necessary to be able to perform the services of the Manager.
4. To offer you the opportunity to create an account on the Fund's website
5. Invite interested parties to investment seminars regarding the Fund.
6. Registering for the meetings mentioned under point 5.

7. Creating lists of participants for the meetings mentioned under point 5. These participant lists are only produced for the organization of the event by the Manager himself. Furthermore, the Manager analyzes (anonymous) generic data for the analysis of the use of the website. See under the relevant paragraph 5.

### **3. HOW LONG DO WE KEEP THE DATA?**

The Manager keeps your data from the moment that you have registered with your email address. When you ask us to delete your data, your data will be deleted as soon as possible. The Fund itself has a legal obligation to keep the data for a certain period of time.

### **4. SHARING YOUR DATA WITH THIRD PARTIES**

The Manager will only share your personal data with various third parties if this is necessary for the performance of the services after registration in the Fund (see point 8.) and to comply with any legal obligation. With companies, as mentioned under point 8, that process your data on behalf of the Manager, the Manager concludes a processing agreement to ensure the same level of security and confidentiality of your data. The Manager remains responsible for these processing operations.

### **5. ANALYSIS OF WEBSITE TRAFFIC**

The Manager uses Google Analytics to analyze the website traffic. This service is used to keep track of how often and how visitors use the website. We have not allowed Google to use the obtained Analytics information for other Google services. The Manager does not collect IP addresses. The information that Google collects is anonymized as much as possible. Google could provide information to third parties if required to do so by law.

### **6. REVIEWING OF DATA. MODIFY OR DELETE**

You have the right to view, correct or have your personal data deleted. You can do this by means of a request by e-mail to: [info@sustainabledividends.com](mailto:info@sustainabledividends.com)

If you want to exercise your right to object and/or right to data portability or if you have other questions/comments about data processing, please send a specified request to [info@sustainabledividends.com](mailto:info@sustainabledividends.com). To ensure that the request for access has been made by you, we ask you to enclose a copy of your ID with the request.

Make your passport photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), passport number and Citizen Service Number (BSN) black in this copy. This is to protect your privacy.

The Manager will respond to your request as soon as possible, but in any case within 2 working days.

### **7. SECURITY**

The Administrator takes the protection of your data very seriously and has taken appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized changes. MailChimp (which is used for registering and recording e-mail addresses) has its own security system.

## 8. SPECIAL AND / OR SENSITIVE PERSONAL DATA THAT WE PROCESS

### a. DATA PROCESSING WHEN PARTICIPATING IN THE FUND

If you are going to invest in the Fund, please register via the "Private Persons" registration form or the "Legal entities" registration form.

The information you provide will then be processed by the Fund's administrator, AssetCare BV. The Manager has concluded a management agreement with AssetCare BV.

AssetCare BV is located at WTC Tower B, 14th floor, Strawinskylaan 1425, 1077 XX Amsterdam.

AssetCare BV has its own privacy policy that you can request from the Data Protection Officer of AssetCare BV. He can be reached via +31 (0) 20 4703550 or via the following email address: [bram.schrijver@assetcare.nl](mailto:bram.schrijver@assetcare.nl)

### b. MINIMUM AGE

Our website is aimed at professional and non-professional investors. An initial investment in the Fund of the latter category must be at least € 100,000. The Administrator therefore does not intend to collect data about website visitors who are younger than 16 years of age. Apart from providing a (business) e-mail address, we cannot check whether a visitor is older than 16. If you are convinced that we have collected information about a minor without parental (or legal representatives) consent, please contact us by e-mail and we will delete this information.

## 9. CHANGES IN THIS PRIVACY STATEMENT

The Manager reserves the right to make changes to this statement if new circumstances make this necessary. You can keep yourself informed of these changes by regularly consulting the Statement. The date of the last update is shown at the top and bottom of this Privacy Statement.

## 10. QUESTIONS OR COMPLAINTS?

If you have any questions, or if you have the impression that your data is not properly secured and there are indications of misuse, please contact the Administrator:

- Mail: [compliance@sustainabledividends.com](mailto:compliance@sustainabledividends.com)
- Call: +31 (0) 20 244 36 54
- In writing: Sustainable Dividends BV, Spaarnzichtlaan 8, 2101 ZM Heemstede

The Manager would also like to point out that you have the opportunity to file a complaint with the national supervisory authority, the Dutch Data Protection Authority.

(<https://autoriteitpersoonsgegevens.nl/>)

## CONTACT DETAILS OF THE RESPONSIBLE ENTITY AND PERSON FOR DATA PROCESSING

Sustainable Dividends B.V.

Chamber of Commerce number: 69701121

The duties of the Data Protection Officer of Sustainable Dividends B.V. are carried out by the compliance officer. He can be reached via [compliance@sustainabledividends.com](mailto:compliance@sustainabledividends.com) or via 06-30110171.

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