

## **n/p notarial partners N.V. – privacy statement**

This statement provides information on how n/p notarial partners N.V. handles personal data processed in the context of our activities and services.

### **Our services**

n/p requests your personal data for the following purposes only:

- to perform advisory engagements or other (legal) services
- to fulfil statutory tasks and obligations
- those purposes for which you have specifically granted n/p permission
- for marketing purposes and activities in the area of business development
- when applying for employment with n/p.

Your personal data will not be processed for any other purposes without your permission. Personal data are requested for the purpose of providing notarial services, or carrying out another engagement, or for marketing purposes and/or activities in the area of business development.

### **Processing personal data in notarial deeds**

n/p must comply with statutory rules pertaining to processing personal data when drawing up notarial deeds.

- Pursuant to law, n/p must determine what personal data to include in a notarial deed so that this data processing is done on a legal basis.
- n/p is required to retain the original notarial deed containing your personal data in perpetuity.
- The original notarial deed is an official evidentiary document. This means that no further changes may be made to it, even if the personal data are incorrect. If changes need to be made, these need to be set out in a separate notarial deed.
- n/p must perform a mandatory check of certain data, personal or otherwise, among others in the Municipal Database (Basisregistraties Personen, BRP), the Chamber of Commerce (*Handelsregister*) and The Dutch Land Registry (*Kadaster*).
- n/p must perform a mandatory check of your identity and will therefore request you to present a valid identity document. n/p is authorised to photocopy the identity document including all the data contained in that document.
- Your personal data are subject to the professional secrecy of the employees of n/p. Unauthorised parties have no access to your data.

### **Advisory and other (legal) services**

n/p, in the context of providing advisory or other (legal) services, may only process personal data for the purposes and related legal bases as described in n/p's data processing register. These legal bases are always founded in the engagement assigned to n/p and n/p's statutory obligations. If you would like more information, please contact n/p at [privacy@np.nl](mailto:privacy@np.nl).

n/p is, in all engagements, required to verify your identity. You will be requested to present a valid identity document and n/p is authorised to make photocopies of that document, including any data contained in that document.

### **Marketing and business development**

n/p is pleased to update you on developments in the field of law. We, for example, send newsletters and organise workshops, seminars and other meetings and activities. We use your data in this context to, for example, send n/p's newsletter, provide information, extend invitations, and confirm your participation in n/p workshops, seminars, and other meetings and activities. n/p will only use your data where you have consented to this use, for example when subscribing to n/p's newsletter or signing up for a workshop/meeting. The personal data you have provided to n/p for sending n/p's newsletters will be retained by n/p only until such time that you indicate you no longer wish to receive the newsletter.

### **Source of personal data processed**

n/p may perhaps process personal data of yours that we did not receive from you. This processing will always take place in the context of the engagement assigned to us or a statutory duty. The source of those data will for example be one of the following:

- public registers, including the Dutch Land Registry (*Kadaster*), the Central Will and Testament Registry (*Centraal Testamenten Register*), the Chamber of Commerce (*Handelsregister*), Matrimonial Property Registry held by the Court (*Huwelijksgoederenregister*), and the Municipal Database (*Basisregistraties Personen, BRP*)
- advisers (e.g. an estate agent or an accountant) in connection with a transaction to which you are one of the parties
- a donor/testator/donee
- a financial institution
- your contracting party.

### **Providing your personal data to third parties**

n/p will provide your personal data to other (third) parties if you request this, where n/p is required to by law, or this is necessary for carrying out the activities of the engagement. Where and to the extent applicable, n/p will transfer data outside the EU or to an international organisation only in a secure manner.

n/p provides personal data to recipients/parties only in the context of services that we carry out: the Dutch Land Registry (*Kadaster*), the Central Will and Testament Registry (*Centraal Testamenten Register*), the Central Living Will Registry (*Centraal Levenstestamentenregister*), the Chamber of Commerce (*Handelsregister*), the UBO Register, the Dutch Tax Authority (*Belastingdienst*), as well as other registries.

### **Email addresses**

n/p will only use your email address, when providing services, in emails where these involve relevant third parties providing services ("CC messages"), for example your contracting party, adviser or other interested parties.

### **Retention of your personal data**

n/p will not retain your personal data any longer than necessary for the purpose for which they were collected, for the execution of statutory duties and compliance with statutory obligations or for the fulfilment of agreements (for instance, due to time limits). The retention periods stipulated in statutory provisions, for instance those of the Dutch Civil-Law Notaries Act (*Wet op het notarisambt*) and the Archives Act (*Archiefwet*) apply. Notarial deeds are retained in perpetuity.

## Your rights

If your personal data are processed by n/p, pursuant to the General Data Protection Regulation (GDPR) (EU) 2016/679, you may exercise the following rights.

- **Right to inspect your data.** You have the right to request and inspect which personal data of yours n/p processes, the purpose for which they are used and how long the data will be retained. n/p under certain circumstances may not by law be able to respond to your request.
- **Right to rectify your data.** You have the right to have your data rectified if you decide your data have been incorrectly processed. Data in a notarial deed may only be changed/rectified by means of a separate notarial deed.
- **Right to erasure (right to be 'forgotten').** You have the right to request that your personal data be erased. According to law, n/p may not erase or change data in a notarial deed.
- **Right to restrict processing.** If you wish to restrict the processing of your personal data by n/p (pending rectification of your personal data at your request, an objection lodged against processing or because you specifically do not wish to have data erased even though processing of the data is unlawful), you may submit a request to that effect.
- **Right to have your data transferred.** You have the right to request that your personal data be transferred to another service provider. n/p under certain circumstances may not by law be able to respond to your request.
- **Right to object.** You have the right to object to the use of your data for direct marketing purposes.

A request needs to be in writing via [privacy@np.nl](mailto:privacy@np.nl). To process your request, n/p is required to first identify you on the basis of a valid identity document.

## Possible restrictions in exercising your rights

Although n/p wishes to protect your rights under the General Data Protection Regulation (EU 2016/679) as carefully as possible, in some cases these rights may conflict with rules applicable to Dutch civil law notaries, their profession, and their code of conduct.

## Cookies

n/p makes use of cookies, with your prior consent, on our website. These are only used to optimise the website. Our website also uses Google Analytics. This is an analytical tool that makes use of your IP address. We have arranged this technologically that IP addresses may only be used on an anonymous basis. n/p makes no use of tracking cookies or advertising cookies. As a result, n/p, Google and any other parties involved with our website are unable to link your name or other personal data with your use of the website.

## Questions or complaints

If you have any questions or complaints concerning the processing of your personal data by n/p, please contact n/p via [privacy@np.nl](mailto:privacy@np.nl). You also have the right to lodge a complaint with the supervisory authority, the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). You can do this via their website [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl).

n/p / privacy statement / September 2022