

**PRIVACY POLICY KARMIJN KAPITAAL**  
**KARMIJN KAPITAAL MANAGEMENT BV**

Last update: July 2024

## INTRODUCTION

Karmijn Kapitaal (Karmijn), founded in 2010, is an independent private equity fund manager and offers its services as such (the Service). You can find more information about us and our Services on our website ([www.karmijncapital.nl](http://www.karmijncapital.nl)): [www.karmijncapital.nl](http://www.karmijncapital.nl) (the "Website").

This Privacy Policy applies to our Services and to the use of our Website and newsletter.

We find your privacy very important. In this Privacy Policy we explain which personal data we collect through our Website and Services. We also explain for what purposes we use personal data, how we protect them and how long we store them.

## PRIVACY AND RELEVANT LEGISLATION

We comply with applicable privacy regulations, including the General Data Protection Regulation ("GDPR")<sup>1</sup>, which replaced the various privacy laws in the European member states as of May 25, 2018. We also comply with other relevant legislation in the field of personal data protection, such as the Dutch GDPR Implementation Act and the Telecommunications Act. All referenced and related legislation hereinafter will be collectively referred to as the "Relevant Legislation".

## PERSONAL DATA

The term "personal data" in this Privacy Policy means all information with which you can be directly or indirectly identified. This definition is in accordance with the Relevant Legislation. This is a broad definition: under certain circumstances, even a dynamic IP address is considered personal data.

## WHAT PERSONAL DATA DO WE COLLECT AND FOR WHAT PURPOSES DO WE USE THEM?

We may collect different types of personal data from the users of our Website and/or Services, from our employees and from applicants. We can obtain your personal data in various ways; directly from you, from your employer or from recruiters, via cookies, social media, databases or public sources. Below we have broken down the personal data we collect.

### **DATA OF OUR PERSONAL CLIENTS:**

| <b>(Personal)data</b>  | <b>Purpose(s)</b>   |
|--|---|
| <i>Contact details of existing clients:</i><br>First and last name, e-mail address and telephone number of the contact person. | We use this information to: <ul style="list-style-type: none"><li>• approach our clients correctly in our correspondence;</li><li>• to establish and maintain contact with our clients;</li><li>• send commercial communications (only if it concerns a client who has not exercised the right to object or if we have received permission to do so).</li></ul> |

|   |   |
|---|---|
| <p><i>Tax information of our clients:</i><br/>Client name and address, invoice details, BSN, shareholder relationship and all other financially relevant information</p>  | <p>We use this information to:</p> <ul style="list-style-type: none"> <li>• prepare invoices or other financial documentation for our clients;</li> <li>• to include in our administration for the tax authorities;</li> <li>• communicate with the Tax Authorities;</li> <li>• be able to provide services to our clients.</li> </ul>                |
| <p><i>Bankgegevens van onze cliënten:</i><br/>Rekeningnummer, IBAN en BIC.</p>  | <p>Wij gebruiken deze gegevens om betalingen van onze cliënten af te handelen en te administreren.</p>  |
| <p><i>Gegevens in documentatie cliënten:</i><br/>Persoonsgegevens die cliënten aan ons verstrekken in hun documentatie, zoals namen, contactgegevens, bedrijfsgegevens, btw-nummer, BSN, aandeelhoudersrelatie en alle overige financieel relevante informatie.</p> | <p>Wij gebruiken deze gegevens om onze Dienstverlening te leveren aan onze cliënten.</p>  |
| <p><i>Gegevens m.b.t. eerdere Dienstverlening aan onze cliënten:</i><br/>Historie van reeds verleende Dienstverlening aan de cliënt.</p>  | <p>Wij gebruiken deze gegevens om:</p> <ul style="list-style-type: none"> <li>• te inventariseren welke Dienstverlening door cliënten is afgenomen;</li> <li>• commerciële uitingen te versturen over Dienstverlening die mogelijk interessant is voor de cliënt, op basis van eerder verleende Dienstverlening aan de betreffende cliënt.</li> </ul> |
| <p><i>Identification data of our clients:</i><br/>Copy of passport</p>  | <p>We use this data to identify our clients, if we are obliged to do so under the Money Laundering and Terrorist Financing (Prevention) Act (Wwft).</p>   |
| <p><i>Contact details potential clients by subscribing to the newsletter on the website:</i><br/>First and last name, email address</p>   | <p>We use this information to:</p> <ul style="list-style-type: none"> <li>• contact you on the basis of your message;</li> <li>• send commercial communications (only if you have given permission to do so).</li> </ul>  |

**APPLICANT DATA:**

| <b>(Personal)data</b>  | <b>Purpose(s)</b>  |
|--|--|
| <p><i>Applicant's contact details:</i> First and last name, e-mail address and telephone number.</p> | <p>We use this information to contact and maintain contact with the applicant.</p> |

|   |   |
|---|---|
| <p><i>Applicant application data:</i><br/>Information on the CV (such as qualifications, work experience and education), from the cover letter and from other application documents such as references.</p> | <p>We use this data to estimate which applicant is a suitable candidate to work at Karmijn.</p> |
| <p><i>Application Process Details:</i><br/>Interview notes, and (if applicable) results of assessments and psychological tests.</p>   | <p>We use this data to estimate which applicant is a suitable candidate to work at Karmijn.</p> |
|   |   |

#### **WHY ARE WE ALLOWED TO PROCESS YOUR PERSONAL DATA?**

There are several bases in the Relevant Legislation on the basis of which we may or must process your personal data:

##### **EXECUTION OF THE AGREEMENT:**

Some data is necessary to conclude and/or execute the agreement with our clients. In any case, these are the contact and bank details of our clients and the personal data included in the documentation that our clients send us before we enter into a contract. If this information is not provided, in many cases we will not be able to conclude an agreement with a client.

##### **LEGAL OBLIGATION:**

We are obliged to keep a number of data in our records for the Tax and Customs Administration, namely your contact and bank details and your country of residence. In some cases, we have to process a copy of the passport and/or identity card on the basis of the Money Laundering and Terrorist Financing (Prevention) Act (Wwft).

##### **LEGITIMATE INTEREST:**

For the processing of other data, we have a legitimate interest in the processing, namely our interest in being able to carry out our work in a correct and high-quality manner, to exercise, analyse and improve our business operations, to be able to tailor our services to your needs and/or to carry out marketing activities.

##### **PERMISSION:**

We need permission to send newsletters and invitations to events via e-mail to relations who do not purchase a paid service from us. This consent can also be easily revoked via the unsubscribe link in

each newsletter or invitation. Furthermore, the withdrawal of your consent does not affect the lawfulness of the processing we carried out on the basis of your consent before your withdrawal of it.

#### HOW LONG DO WE KEEP THE PERSONAL DATA?

We keep the personal data for as long as we need it for the purposes mentioned above:

#### PERSONAL DATA IN OUR RECORDS FOR THE TAX AND CUSTOMS ADMINISTRATION:

We store this data for 7 years, unless we are legally obliged to preserve the data for a longer period of time;

#### PERSONAL DATA OF JOB APPLICANTS:

We store this data for up to 4 weeks after the application procedure, unless we have permission from the applicant to keep the data for one year;

#### PERSONAL DATA OF PERSONNEL:

We keep the personal data in the personnel file for 2 years, unless we are legally obliged to the data can be kept for a longer period of time;

#### PERSONAL DATA OF CLIENTS:

We store this data for as long as we have worked with the client for a maximum of 5 years after the has been terminated, unless we are required by law to retain the data for a longer period;

#### OTHER INFORMATION:

We only store other personal data for as long as it is necessary for the purposes, we will delete your personal data as soon as it is no longer necessary for the purposes for which we collect it.

#### DO WE SHARE YOUR PERSONAL DATA WITH OTHERS?

We use "Processors" to assist us in providing our Services. In this context, these Processors receive personal data from us, which they process on our behalf. For example, we use Processors to store login details and handle payments from our relations.

The Processors we engage for the processing of personal data are:

| <b>Purpose</b>                 | <b>Location</b>           | <b>Explanation</b>  |
|--------------------------------|---------------------------|---|
| <b>Archive destruction</b>     | Netherlands               | This organisation is based within the EU and must therefore comply with the Relevant Legislation. |
| <b>CRM-software</b>            | Established United States | This organization is based in the USA and is on the Privacy Shield List.                          |
| <b>(Payroll)administration</b> | Netherlands               | This organisation is based within the EU and must therefore comply with the Relevant Legislation. |

|                      |   |  |
|----------------------|---|--|
| <b>Cloud hosting</b> | Established in the United States (storage possible in the US) | This organization is based in the USA and is on the Privacy Shield List. |
| <b>Email hosting</b> | Established in the United States (storage in the EU)          | This organization is based in the USA and is on the Privacy Shield List. |

These Processors must strictly follow our instructions, as laid down in a Data Processing Agreement. They will therefore not use the personal data for their own purposes. We ensure that all our Processors comply with the Relevant Legislation.

Apart from the above, we will not share your personal data with others – unless we are legally obliged to do so.

#### EXPORT OF PERSONAL DATA OUTSIDE THE EUROPEAN UNION

We may transfer personal data to parties outside the EU, if one of our Processors is located outside the EU. The transfer of data outside the EU will always be done in accordance with the Relevant Legislation (such as Chapter 5 of the GDPR).

#### HOW DO WE PROTECT PERSONAL DATA?

We protect all personal data we process from unauthorized and unlawful access, alteration, disclosure, use and destruction. To this end, we have taken appropriate technical and organisational measures.

#### THIRD-PARTY WEBSITES

You may find (hyper)links on our Website that link to the websites of partners, suppliers, advertisers, sponsors, licensors or other third parties. We have no control over the content or links that appear on these websites and we are not responsible for the practices of websites linked to or from our Website. In addition, these websites, including their content and links, may change constantly. These websites may have their own privacy policies, terms of use and client policies. Browsing and interaction on any other website, including websites linked to or from our Website, are subject to the terms and policies of that website.

#### NEWSLETTER FORM

With the newsletter form you can ask us to stay informed of developments of Karmijn by receiving our newsletter. You will need to fill in your name and e-mail address. We will keep this until you withdraw your consent or ask us to be unsubscribed.

#### COOKIES

We use cookies on the Website. A cookie is a simple small text file that can be placed on your computer when you visit the Website. This text file identifies your browser and/or computer. For example, when you visit our Website again, the cookie allows our Website to recognise your browser or computer.

We use the following types of cookies:

#### FUNCTIONAL COOKIES:

Functional cookies are essential for the operation of our Website. They allow us to provide you with navigate through our Website and use the functions incorporated therein.

#### ANALYTICAL OR STATISTICAL COOKIES:

Analytical cookies are used to investigate the quality and effectiveness of the Website. For example, we can see how many users visit the Website and which pages are visited. We use this information to improve our Website and Services. We do this by means of Google Analytics cookies. In this context, we have entered into a data processing agreement with Google, and protect your data as optimally as possible, including by masking the last octet of your IP address, by not sharing data with Google and by not using other Google services in combination with these cookies.

If you do not want cookies to be sent to your computer, you can change this by changing the cookie settings on your browser. Please note that some features or Services of our Website may not function or may not function as well without cookies.

#### CHANGES TO THIS PRIVACY POLICY

We want to constantly improve our Website and Services. We may therefore update this privacy policy from time to time. If we change our privacy policy in a significant way, we will notify you and post the updated privacy policy on our Website.

#### YOUR RIGHTS AND OUR CONTACT DETAILS

As defined in the Relevant Legislation, you have the right to:

- Request that we inspect and/or obtain a copy of the personal data we process about you, including the location where your data is processed, who receives your personal data, how long we keep your data and for what purposes we process the data. We may also forward this copy to another data controller at your request;
- Request that we correct, amend, or delete your personal data from our systems;
- Request that we restrict the processing of your personal data;
- Object to the processing of your personal data with us;
- Submit a complaint to the Dutch Data Protection Authority if you believe that we are processing your personal data unlawfully.

If you have any questions, comments or concerns about how we handle your personal data, please contact us using the contact details below:

Karmijn Kapitaal

also trading under the name Karmijn Kapitaal Management B.V.

Koningin Wilhelminaplein 56

1062 KS Amsterdam

Netherlands

Chamber of Commerce number: 50143166

VAT number: 8225.76.326.B02

Phone: 020 223 5678 / Email: [info@karmijnkapitaal.nl](mailto:info@karmijnkapitaal.nl)