

Privacy statement BNCL

This statement provides information on how our office handles personal data processed in the context of our activities and services.

Our contact details

Office name: Bosse Notaris Corporate Law (BNCL)
Address: Kabelweg 37
Postal code and town/city: 1014 BA Amsterdam
Contact person: Wessel Bosse
Email address: w.bosse@bncl.nl

Our services

Our office requests your personal data for the following purposes only:

- to perform advisory engagements or other services;
- to fulfil statutory tasks and obligations;
- for the purposes for which you have specifically granted permission.

Your personal data will not be processed for any other purposes without your permission.

Personal data are requested for the purpose of drawing up a notarial deed or for performing another engagement.

Rules applicable to the use of personal data in notarial deeds

If our office draws up a notarial deed using your personal data, the civil-law notary must comply with the legal regulations governing the processing of personal data:

1. The civil-law notary must include certain mandatory data, personal or otherwise, in the deed. Your personal data are therefore processed on a legal basis.
2. The civil-law notary must retain the signed deed containing your personal data in perpetuity.
3. As soon as the civil-law notary signs the deed, it becomes an official 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, the civil-law notary must draw up a new deed in which the change is incorporated.
4. The civil-law notary must perform a mandatory check of certain data, personal or otherwise, in the Persons Database (*Basisregistratie Personen*, BRP), the Commercial Register (*Handelsregister*) and The Netherlands' Cadastre, Land Registry and Mapping Agency (*Kadaster*).
5. The civil-law notary must perform a mandatory check of your identity and will therefore request you to present a valid identity document. The civil-law notary is one of the few authorised to photocopy identity documents including all the data contained therein.
6. Your personal data are subject to the civil-law notary's obligation of professional secrecy. Unauthorised parties have no access to your data.

Advisory and other services

The following applies to the processing of personal data for other purposes by our office:

- The purpose and corresponding legal base for the processing of personal data concerning requesting, collecting, consulting, using and saving for the purpose of passing and storing the notarial deeds, are as follows:
 - Passing the notarial deeds (legal obligation)
- The purpose and corresponding legal base for the processing of personal data concerning requesting, collecting, consulting, using and saving for the purpose of the preparation and to settle the notarial deeds (file), are as follows:
 - Passing the notarial deeds (legal obligation)
- The purpose and corresponding legal base for the processing of personal data concerning providing by means of forwarding: concepts and file pieces to third parties with permission of the client, are as follows:
 - To inform third parties on request of the client (permission)
- The purpose and corresponding legal base for the processing of personal data concerning requesting, collecting, consulting, using and saving for the purpose of services to which no authentic instrument is attached, like advisement, private deeds and settlement legacy, are as follows:

- To perform the engagement of the client (performance of the agreement)
- The purpose and corresponding legal base for the processing of personal data concerning providing by means of forwarding for the purpose of the registration of data or deeds in the register, are as follows:
 - Knowability (legal obligation by CLTR permission)
- The purpose and corresponding legal base for the processing of personal data concerning settling and consulting for the purpose of the legalization of signatures, are as follows:
 - To confirm the authenticity of the signature on request (performance of the agreement)
- The purpose and corresponding legal base for collecting, consulting and using data concerning construction registration for the purpose of acquisition and / or newsletters etc., are as follows:
 - Marketing and acquisition (permission)
- The purpose and corresponding legal base for the processing of personal data concerning collecting, fixing and using data for the purpose of relationship management business contact in the chain, are as follows:
 - To inform and to facilitate collaboration in the chain (permission)
- The purpose and corresponding legal base for the processing of personal data concerning collecting, fixing, using etc. data for financial administration, are as follows:
 - Knowability financial rights and obligations (legal obligation)
- The purpose and corresponding legal base for the processing of personal data concerning collecting, fixing and using etc. for the purpose of construction and management of the personnel file; the legitimization of an employee, to save the payroll tax declaration, are as follows:
 - Personnel management (legal obligation)
- The purpose and corresponding legal base for the processing of personal data concerning collecting, fixing, using and to provide by means of forwarding etc. like construction and management of salary administration, are as follows:
 - Legal duty, execution of the agreement (legal obligation)
- The purpose and corresponding legal base for the processing of personal data concerning collecting, fixing and to save job application data, are as follows:
 - Selection personnel (permission)
- The purpose and corresponding legal base for the processing of personal data concerning requesting, collecting, fixing and using for the purpose of the quotation, are as follows:
 - To inform (permission)

Source of personal data processed

If our office processes personal data relating to you, which we have not received from you, this will always take place in the context of the engagement assigned to us. The source of those data will be one of the following:

- Public registries, including The Netherlands' Cadastre, Land Registry and Mapping Agency, BRP, Commercial Business Register, etc.
- A real estate agent or other adviser in connection with a purchase agreement, to which you are one of the parties
- Donor

Forwarding your personal data

Our office will forward your personal data to other parties (third parties) only if this is required by law or if this is actually necessary for the execution of the activities.

Our office provides personal data to the following recipients:

- KNB
- Tax authority
- Register holders
- Chain partners who are hired by the client, like real estate agents, mortgage consultants, etc. if permission is granted by the client

Our office does not forward personal data to non-EU countries nor to international organisations.

Retention of your personal data

Our office will not retain your personal data any longer than necessary for the purpose for which they were collected, for the execution of statutory tasks 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*), apply. Notarial deeds are retained in perpetuity.

Your rights relating to personal data processed by our office

If your personal data are processed by our office, pursuant to the General Data Protection Regulation (GDPR) (EU) 2016/679, you may exercise the rights stated below.

To that end, you must submit a request (preferably in writing) to the contact address stated in this privacy statement. Before granting your request, we will confirm your identity on the basis of a valid identity document first.

Right of inspection by the data subject

You can always enquire which personal data our office processes, for which purpose they are used and how long the data will be retained. In the event that there is any legal basis that precludes us from complying with your request, we will assess this and inform you accordingly.

Right to rectification

If you believe that certain data have been incorrectly processed, you have the right to request rectification of the data. This is not possible, however, if the data are used in a notarial deed, in which case a new deed must be drawn up as an addendum to the incorrect deed.

Right to erasure (right to be 'forgotten')

If you wish to have your personal data erased, you may submit a request to that effect. If the data are included in a notarial deed, the civil-law notary is not permitted to erase the data.

Right to restriction of processing

If you wish to restrict the processing of personal data by our office (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 data portability

If your personal data are not processed for the purpose of a notarial deed and you wish to transfer the personal data to another service provider, you may submit a request to that effect. However, please note that such a transfer may not always be possible due to incompatibility with the statutory notarial duties.

Possible restrictions in exercising your rights under the General Data Protection Regulation (EU) 2016/679

Our office will make every effort to fulfil your rights under the General Data Protection Regulation (EU) 2016/679. However, in some cases these rights may conflict with other statutory provisions for instance those of the Dutch Civil-Law Notaries Act. Should the civil-law notary for this reason be unable to fulfil a request relating to the rights described above, you will be notified accordingly in writing.

Complaints concerning the processing of your personal data by our office

If you have any complaints concerning the processing of personal data by our office, please let us know by contacting: w.bosse@bncl.nl.

You also have the right to submit a complaint to the supervisory authority, the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

You can use the website www.autoriteitpersoonsgegevens.nl.