



Privacy Statement Schut Notarissen B.V.

This statement provides information on how Schut Notarissen B.V. (**Schut, we or us**), as the controller within the meaning of the General Data Protection Regulation (**GDPR**), handles personal data that we process in the context of our work and services, and when you apply for a job with us or otherwise show interest in employment with Schut, and in connection with your visit to our website (www.schutamsterdam.nl) (**Privacy Statement**).

Our contact details

Name of firm: Schut Notarissen B.V.
Address: Jollemanhof 18A
Postcode / City: 1019 GW Amsterdam
Contact: Aitri Claus
email address: aitri.claus@schutamsterdam.nl

Personal data that we process

We may process the following personal data:

Personal data you provide to us:

- **Identity data:** including name, surname, date of birth, copy and/or identity document number, signature and Citizen Service Number (if there is a legal basis for this);
- **Contact details:** including address, telephone number and email address;
- **Notarial data:** including data obtained for the purpose of our notarial services, such as information about your immovable property, family ties (such as marital status) and companies;
- **Invoice information:** data for the purpose of calculating and recording fees and expenses, making payments and collecting receivables;
- **Application data:** information that you provided to us when you applied, such as CV, cover letter, lists of marks, diplomas, information resulting from assessments and personality questions that we obtain as part of the application procedure, information that we receive in the context of a pre-employment screening;
- **Video footage and images** captured by the security cameras (CCTV) in our office building.

In the context of our services, Schut will be allowed to use your email address in email messages in which the third parties relevant to these services are also involved (known as Cc messages), such as your contracting party or parties, adviser(s) or other interested parties.



Personal data obtained from other sources:

If Schut processes your personal data that we have not obtained from you, this will always be done in the context of the assignment given to us. These data can be obtained from one of the following sources:

- public registers, including the Land Registry Office, Central Register of Wills, Commercial Register, Matrimonial Property Register, and the Key Register of Persons (Dutch: **BRP**);
- advisers (for example, a lawyer, broker or accountant) in connection with a transaction in which you are a party;
- a donor/testator/donee;
- a financial institution;
- your contracting party.

If you are a (contact person of a) supplier, we may also obtain your data from your employer or client (our supplier) or from a reference.

If you are a job applicant, we may obtain your personal data from references you have provided or (if applicable) from a recruitment or assessment agency.

Personal data automatically obtained through means of communication, such as the website and email:

If you contact us via the website www.schutamsterdam.nl, we may collect information sent to us by your computer, mobile phone or other access device. This includes, for example, the pages you visit, the IP address of your device, the type of operating system you use, your location, network information, your browser type and traffic to and from our website.

Rules on personal data in notarial deeds

When drawing up notarial deeds, Schut must comply with statutory rules for the processing of personal data:

1. Pursuant to applicable legislation, the civil-law notary is required to include certain (personal) data in the deed. This data processing ensues from a legal obligation.
2. The civil-law notary is obliged to keep the original signed deed containing your personal data (or have it kept) in perpetuity.
3. The original notarial deed is official documentary evidence. This means that no changes may be made to this document, even if the personal data are incorrect. If changes are necessary, these



must be recorded in a separate notarial deed.

4. The civil-law notary is obliged to verify certain (personal) data in public registers, such as the BRP, Commercial Register and Land Registry Office.
5. The civil-law notary is obliged to verify your identity. For this purpose, a valid identity document must be requested from you and the civil-law notary is authorised to make a copy of this document with all the information it contains.
6. The civil-law notary has a professional duty of confidentiality with regard to your personal data. Unauthorised individuals will not have access to the data, subject to statutory exceptions.

Purposes for the processing of your personal data

Schut collects, uses, stores or otherwise processes your personal data only for one or more of the following purposes:

- performing assignments for advice or legal and other services (explained in more detail in the section **Advice and other (legal) services**);
- to comply with statutory duties and obligations;
- to manage and secure access to our office and website (www.schutamsterdam.nl);
- for marketing purposes and business development activities, for example by providing relevant information such as newsletters, legal updates, and informing, sending invitations for and confirming participation in workshops, seminars and other meetings and activities;
- being able to answer and process queries, complaints or other contact;
- to assess your suitability and inform you in connection with an application procedure.

Legal basis of the processing

A legal basis is required for the processing of personal data. Schut processes your personal data on one or more of the following legal bases:

- you have given your consent;
- the processing is necessary for the performance of a contract in which you are involved (this also includes pre-contractual arrangements);
- the processing is necessary for us to comply with our statutory obligations;
- the processing is necessary to promote the legitimate interests of Schut or a third party, except where those interests are outweighed by your interests or fundamental rights and freedoms.



For example, Schut has a legitimate interest in the following processing purposes: to manage and secure access to our office and website, for marketing purposes and business development activities, and to answer and process queries, complaints or other contact.

For further information on the legitimate interests in relation to a specific processing, please contact us using the contact details provided in this Privacy Statement.

Further explanation of the processing purpose advice and other (legal) services

Schut's main activities consist of advising and providing other services, including legal services. This section therefore specifically discusses the manner in which personal data are processed by Schut in this context:

The purposes and legal bases for the processing of personal data for the purpose of executing and keeping notarial deeds are as follows:

- Purposes: execution of notarial deeds;
- Legal bases: legal obligation; retention period at the office is 20 years; after 20 years, deeds may be moved to the general depository and after 30 years they must be moved.

The purposes and legal bases for the processing of personal data for the purpose of preparing and/or finalising notarial deeds are as follows:

- Purposes: execution of notarial deeds;
- Legal bases: legal obligation; retention period is 20 years, with the exception of data under the Money Laundering and Terrorist Financing (Prevention) Act (Dutch: WWFT), which are subject to a retention period of 5 years.

The processing of personal data through the transmission of drafts and file documents to third parties has the following purposes and corresponding legal bases:

- Purposes: provide information to third parties regarding the execution of assignments from clients;
- Legal bases:
 - If you are our client: performance of a contract;
 - If you are not our client (but your employer is, for example, or you are (employed by) a counterparty, business contact or other third party): legitimate interest of Schut or our client, as the case may be (in both cases: execution of the assignment/instructions of the client).



The purposes and legal bases for the processing of personal data relating to services that do not require a notarial deed, such as advising, private instruments and/or settlement of an estate are as follows:

- Purposes: performance of an assignment from clients;
- Legal bases:
 - If you are our client: performance of a contract;
 - If you are not our client (but the heir, for example, or another affected party): legitimate interest of Schut (execution of the assignment/instructions of the client) or our client, as the case may be (execution of the assignment/instructions of the client, disclosure of existence of living will).

The purposes and legal bases for the processing of personal data for the purpose of authenticating signatures and copies of identification documents and/or other documents are as follows:

- Purposes: confirm authenticity of signature or authenticity of the document on request;
- Legal bases:
 - If you are our client: performance of a contract;
 - If you are not our client (but your employer is, for example): legitimate interest of Schut (execution of the assignment/instructions of the client) or our client, as the case may be (execution of the assignment/instructions of the client, obtain confirmation that the signature or document is genuine).

The retention period in both cases is 5 years.

The purposes and legal bases for the processing of personal data for the purpose of managing business relationships with contact persons in the chain are as follows:

- Purposes: to inform and facilitate collaboration in the chain;
- Legal bases: legitimate interest of Schut or our client, as the case may be (in both cases: referral to business contacts in the chain, execution of the assignment/instructions of the client).

Recipients of your personal data

Schut only provides your personal data to others (third parties) if this is required by law or if it is necessary for the purposes described in this Privacy Statement, such as:

- references mentioned in your application letter or CV to verify your competences;
- suppliers: for example, an assessment agency or experts engaged in the performance of our services;
- processors: for example, our IT supplier; and/or
- if you have given your consent or if this arises from a statutory provision or court order: other third parties, such as courts or supervisory authorities.



Schut also provides personal data to the recipients according to the services we have provided, such as:

- advisers or estate agents designated by you;
- the Royal Dutch Association of Civil-law Notaries;
- the Land Registry Office;
- the Tax and Customs Administration;
- the Commercial Register;
- the Central Register of Wills;

Schut's website also contains links to third-party websites and social media buttons. If you click on these links or social media buttons, you will leave our website. This Privacy Statement does not apply to the use of your personal data by third parties, as Schut has no influence on the way in which these third parties handle your personal data. We cannot guarantee, and therefore do not take responsibility, that these third parties will handle your personal data in a reliable and secure manner. Please refer to the privacy statement (on the website) of these third parties for more information on how these third parties handle your personal data.

Where your personal data are processed

When processing your personal data for the purposes set out above, in some instances we may transfer your personal data to a recipient in a country outside the European Economic Area. In such cases, we will ensure appropriate safeguards that provide an adequate level of protection for your rights and freedoms as a data subject in accordance with the GDPR. We do this, for example, by concluding a model data transfer contract drawn up and approved for that purpose by the European Commission. For questions regarding the transfer of your personal data and, if applicable, to obtain a copy of the appropriate or suitable safeguards we apply, please contact us using the contact information provided in this Privacy Statement.

Retention of your personal data

Your personal data will not be retained by Schut any longer than necessary for the purpose for which they are processed, for the performance of statutory duties and the fulfilment of statutory obligations or performance of contracts (e.g. prescription periods).

In addition to the retention periods for personal data that we process when providing advice and other (legal) services, as explained above, the following retention periods apply:



Personal data that you provide to us as an **applicant** will, in principle, be retained for four weeks after the end of the application procedure. However, if you have given your consent, your data will be deleted after no more than 12 months, so that we can keep you in mind for future vacancies.

Data that we collect about you as a **website visitor** will not be retained longer than necessary. The retention period differs for each cookie, as indicated in our Cookie Statement.

With regard to **video footage and images** (CCTV) that we collect about you if you have visited our office building, we will retain this for no more than 4 weeks. After this period, these data will be deleted automatically, unless we have a legal basis to do otherwise.

We may retain your personal data for longer period of time if this is necessary to comply with a legal obligation. For example, in the case of our accounting records, certain tax-related personal data must be retained for at least 7 years after the end of a tax year. Retention periods pursuant to statutory provisions such as the Civil-Law Notaries Act, WWFT and the Public Records Act apply. Notarial deeds are retained in perpetuity.

If you like to receive more information about our retention period policy, please contact us using the contact details provided at the top of this Privacy Statement.

Your rights with regard to personal data processed by us

If your personal data are processed by Schut, you can invoke the rights below under the GDPR. You may do this by submitting a request (preferably in writing) using the contact details provided at the top of this Privacy Statement. Before we grant your request, we will first identify you, for example on the basis of a valid identity document that has been partly redacted, if this is necessary.

Data subject's right of access

You can always ask whether Schut processes personal data about you, and if so, what personal data, for what purpose, and for how long these data are retained.

Right to rectification.

If you believe that certain data have not been processed correctly, you have the right to request rectification of these data. Data in a notarial deed can only be changed by a separate notarial deed.

Right to erasure (right to be forgotten)

If you want your personal data to be deleted, you can submit a request for this. This is the case, for example, if the data have been processed in violation of the law or if the data are no longer necessary



for the purpose for which they were collected and retained. If the data are in a notarial deed, the civil-law notary is not permitted to remove the data.

Right to restriction of the processing of your data;

If you wish to restrict the processing of personal data by Schut (in anticipation of the rectification of your personal data requested by you, an objection to processing or because you do not want data to be deleted despite the processing being unlawful), you can submit a request for this.

Right to data portability

If your personal data are not processed for a notarial deed and you wish to transfer the personal data to another service provider, you can submit a request for this. This right may be exercised when you have provided us with the personal data and when we process that data automatically based on your consent or to perform our obligations under a contract with you. Incidentally, such a transfer is not always possible, as it may be precluded by statutory notarial obligations.

Right of objection

If Schut uses your data for data processing in connection with our legitimate interests (e.g. in direct marketing), you may object to this processing for reasons related to your specific situation. In some cases, we will no longer process your personal data, unless we have a compelling legitimate interest in doing so.

Right to withdraw consent

We may request your consent for the processing of your personal data in specific cases. When we do this, you have the right to withdraw your consent at any time. Where appropriate, we will cease processing as soon as possible from the time of this withdrawal. However, the withdrawal of your consent will not affect the processing that took place before the withdrawal.

Possible restrictions on the exercise of your rights

Schut will make every effort to respect your rights under the GDPR. Please note, however, that Schut may not be required to comply with your request. We will always assess on a case-by-case basis whether we are under any obligation to do so. For example, these rights may conflict with other statutory provisions such as the Civil-Law Notaries Act. If we are unable to comply with one of the aforementioned requests, you will be informed of this in writing.

Cookies



Schut uses functional, analytical and tracking cookies on the website, as well as similar technologies. For more information, or to change or withdraw your consent to cookies, please consult our Cookie Statement at www.schutamsterdam.nl/nl/cookies/.

Security

As the security and protection of your personal data is very important to us, Schut has taken appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against loss, destruction, damage, modification, and disclosure. Our employees will have access to your personal data only if they need to access these data in order to do their job;

If you have any questions about the security of your personal data, or if you suspect or have evidence of misuse, please contact us using the contact information provided in this Privacy Statement.

Complaints about the processing of your personal data by Schut

If you have any complaints about the processing of your personal data by Schut, please let us know by contacting Aitri Claus, aitri.claus@schutamsterdam.nl.

You also have the right to lodge a complaint with the competent supervisory authority, the Dutch Data Protection Authority. To do so, please visit the website www.autoriteitpersoonsgegevens.nl.

Changes

This Privacy Statement was last amended in November 2023. We may update this Privacy Statement from time to time. In the event that a change has a material impact on the processing of your personal data, we will try to actively inform you of such a change.