

## **Privacy Statement**

SMEI Agency B.V., with its business address at Schiphol and listed in the Commercial Register of the Chamber of Commerce under number 24382211, hereinafter referred to as 'SMEIA' attaches great importance to the protection of personal data and privacy. This privacy statement explains how SMEIA deals with data on identified or identifiable natural persons, as described in the General Data Protection Regulation (GDPR).

### **1. Applicability**

This privacy statement applies to the following categories of natural persons whose personal data SMEIA processes:

- (potential) (contact persons of) customers of SMEIA;
- contractors of SMEIA;
- participants in SMEIA's training courses;
- all other persons whose personal data SMEIA processes.

### **2 Processing of personal data**

SMEIA processes the personal data that (the authorised representative of) a data subject personally provides (during a conversation or meeting), on the telephone, in writing or digitally (by e-mail), such as contact details and - according to the nature of the event - other personal data.

### **3. Purposes of processing**

SMEIA processes personal data for the following purposes:

- the performance of an agreement concerning an order to render services and the invoicing of the services provided;
- complying with statutory obligations;
- maintaining contact, for example regarding invitations to participate in training courses and with respect to information that a data subject may request;
- evaluating a training course based on evaluation forms completed by participants.

### **4. Legal grounds**

SMEIA processes personal data based on the following legal grounds:

- to perform or conclude an agreement to render services;
- a statutory obligation;
- a legitimate interest, such as using contact details to send out invitations for a training course;
- the data subject's consent, which may be withdrawn later at any time, without impairing the lawfulness of processing on the basis of the consent given prior to any withdrawal of consent.

### **5. Processors**

SMEIA may engage service providers (processors) to process the personal data, which may only process the personal data according to SMEIA's instructions. In such cases, SMEIA will enter into a processor agreement with processors that meet the GDPR requirements.

## **6. Sharing personal data with third parties**

SMEIA may share personal data with third parties if this is necessary for the provision of services or for complying with a statutory obligation. SMEIA will not share personal data with third parties for commercial purposes.

## **7. Transfer outside the EEA**

In principle, SMEIA does not transfer personal data to countries outside the European Economic Area (EEA). Should this be necessary, SMEIA will ensure that this transfer only occurs if the European Commission has indicated that the country in question provides an adequate level of protection or if there are appropriate safeguards within the meaning of the General Data Protection Regulation (GDPR).

## **8. Storing data**

SMEIA will not keep the personal data for longer than necessary. For (financial) administrative data, SMEIA applies a period of seven years from the date the data is recorded.

## **9. Changes to the privacy statement**

SMEIA may change this privacy statement at any time. A new version of this will be provided if changes are made.

## **10. Requests, questions and complaints**

A data subject may ask SMEIA to make available, correct, delete, transfer and limit the processing of his/her personal data or object to its processing. A data subject may make such requests by sending an e-mail message to [deltaforce@securemove-eu.com](mailto:deltaforce@securemove-eu.com) and these requests will, in principle, be assessed within one month of their receipt. Any questions or complaints regarding the way in which SMEIA processes personal data should be sent to SMEIA by sending an e-mail message to [deltaforce@securemove-eu.com](mailto:deltaforce@securemove-eu.com). SMEIA will then try to satisfactorily resolve each complaint. If unsuccessful, please contact the Dutch Data Protection Authority (Dutch DPA).

## **11. Ultimate Beneficial Owners (UBOs)**

In the Netherlands, organisations must have their UBOs registered in the UBO register since 27 March 2022. Ultimate Beneficial Owners (UBOs), are the people who ultimately own, or control, an organisation. The Chamber of Commerce registers UBOs in the register. SMEI Agency B.V. ensures, that the CoC is informed in the best possible way.

### **UBO register**

All EU countries have their own UBO register because it is mandatory under European regulations: the fourth anti-money laundering directive (EU Directive 2015/849). In the Netherlands, the UBO register is regulated by law in the Wwft 2018 Implementation Decree, the Trade Register Act 2007 and the Trade Register Decree 2008. The UBO register is hosted by the Trade Register and is one of the basic registries of the Netherlands.

The UBO register helps prevent money laundering and terrorist financing. For example, financial institutions must check in the UBO register who the UBO of an organisation is

before making a sales transaction, carrying out a brokerage assignment or entering into a business agreement. In addition, the UBO register helps investigative authorities to trace criminal activities such as money laundering, tax evasion and fraud.

**Chamber of Commerce and UBO register.**

SMEI Agency B.V. performing the UBO disclosure itself is responsible for a timely, accurate and complete submission of data to the Dutch Trade Register.

**12. Acquisition**

Requests for acquisition will not be taken in consideration as such by SMEI Agency B.V..