



## Privacy Statement

### 1. Introduction

At Kwynt, we care about the protection of your data and privacy and how it applies to you, as a user of our website and mobile application. In this privacy statement we explain why we collect, record, and process certain personal data. The processing of your personal data complies with the General Data Protection Regulation (GDPR), the Dutch GDPR Execution Act and the Dutch Telecommunications Act.

### 2. About Us

The data controller for the processing of your personal data is Kwynt Management B.V. registered at the Dutch Chamber of Commerce with registration number 76966526 (**'Kwynt'**). Our address is Laarderhoogtweg 18, 1101 EA Amsterdam, the Netherlands.

If you have any questions about the processing of personal data after reading our Privacy Statement, you can contact us at [privacy@kwynt.com](mailto:privacy@kwynt.com)

### 3. Types of Personal Data we collect

We collect and process the following personal data you provide to us when you use our online services (e.g. your online onboarding to participate in our fund). We may also obtain personal data from third parties when we perform a customer due diligence check. However, the categories of personal data we collect depend on the purpose for which we process it.

Personal data category	
Name, address and contact information	Name, address, postal code, country of residence, email address, phone number
Identification information	Social security number and/or tax identification number
Personal attributes	Gender, date of birth
Electronic identification	Username, password and IP address
Customer- and product related information	Client ID, IBAN (bank account number), balance and transaction data, information on source of funds, whether you qualify as a politically exposed person, annual income statements, salary, US tax payer
Communication information	Correspondence with Kwynt: emails, phone conversations, app or chat messages, complaints, requests or inquiries, uploaded documentation

### 4. Legal basis of processing your data

Processing shall be lawful only if and to the extent that at least one of the following applies:

- a. processing of your personal data is necessary to enter into, administrate, and implement an agreement with you.
- b. comply with legal obligations.
- c. protect our legitimate interests as a fund manager.





We are legally allowed to process and use your personal data without being required to ask for your consent in case of 4a, 4b or 4c. In any other case, we require your consent for the processing of your personal data.

## **5. Purpose of processing your personal data**

Kwynt processes your personal data in accordance with laws and regulations. Therefore, personal data is processed to:

- a. enter into, administrate, and implement an agreement with you.  
We assess on the basis of your online application on our website whether you are eligible to participate in the fund.
- b. provide our services in a secure, legal and transparent manner.
- c. comply with legal obligations.
- d. care of customer questions, inquiries or complaints.  
We process personal information after you may have contacted us by email, chat or phone. We store this information to improve our customer service, to verify and investigate customer assignments, to comply with legal obligations and/or for fraud prevention purposes.
- e. carry out promotional or (direct) marketing activities.  
You shall have the right to revoke or object at any time to the processing of personal data for (direct) marketing purposes.
- f. improve and develop our products and online service to optimize your user experience.

## **6. Automated decision-making and profiling**

We may use automated decision-making based on your personal information if this is necessary to fulfil a contract with you, or if you gave us consent to do so.

To safeguard your rights, freedoms and legitimate interests, you have the right to object to an automated decision. We will then process your application manually.

## **7. Sharing data with third parties**

Kwynt will share personal data if necessary to comply with our legal obligations, to protect your and our security, to prevent fraud, to combat money laundering and terrorist financing, and also to perform essential work. We could thus share your data with:

- a. Other financial institutions, for example, when we carry out payment transactions.
- b. Authorised (public) authorities: De Nederlandsche Bank, the Netherlands Authority for the Financial Markets, the Dutch Data Protection Authority, the Dutch Tax and Customs Administration, or other bodies or persons that have legal authority to data (like bailiffs etc).

To be able to provide our services, we share certain personal data with third parties that provide services to us such as (cloud) hosting, payment services or performing customer due diligence checks. We only share personal data if it complies with our privacy statement and/or if it is necessary to carry out work. Data processing agreements are signed and in place with third party service providers that process personal data on behalf of Kwynt.





## 8. Security

Kwynt has appropriate technical and organizational measures in place to protect your personal data and privacy. Our employees are under a confidentiality obligation that applies to your data, and employees only have access to data to the extent necessary to carry out their work.

Other measures include but are not limited to: encryption of personal data and other sensitive information, encryption of devices, (IT) facilities protected by appropriate security measures, training and awareness programmes, enablement of intrusion detection, logging of access.

In order to help maintain the security of your information, you should protect the confidentiality of your user name and password.

## 9. How long do we keep your personal data?

We do not keep your personal data longer than is necessary to achieve the purposes mentioned in this Privacy Statement. This will be dependent on the specific data and purpose(s) for which we process your data.

We are legally obliged to retain a sizable amount of data after ending the client relationship. For these personal data, the retention period is usually five or seven years.

## 10. Your Rights

You have the following rights regarding your personal data:

- a. right to access your personal data
- b. right of rectification
- c. right to be forgotten / erasure  
You can ask us to erase any personal data we may hold about you where such data is unnecessary, where the processing is unlawful or where you have withdrawn your consent to the processing.
- d. Right to restriction  
You can ask us to restrict the processing of any of your personal data if you think the data is inaccurate, the processing is unlawful or you think we no longer need the data
- e. Right to object to a processing on the basis of our legitimate interests,  
You can object to the processing of your personal data on grounds relating to your particular situation. You have the absolute right to object to the processing of your personal data for direct marketing purposes.
- f. Right not to be submitted to automated decision  
If a decision is made through a solely automated process, and that decision affects you significantly, you have the right to object to such a decision.
- g. Right to lodge a complaint with the Dutch Data Protection Authority.

To exercise your right(s), please send us an email at [privacy@kwynt.com](mailto:privacy@kwynt.com)

## 11. Changes to this Privacy Statement

We may change this privacy statement, for instance if laws and regulations change. This Policy is effective as of March 3, 2023. When changes are made to this policy we will notify you by email or by posting notice of such change on our website.



## **12. Questions and Complaints**

If you have any questions or complaints regarding this privacy statement, please send an email to [privacy@kwynt.com](mailto:privacy@kwynt.com). You may also make a complaint with Autoriteit Persoonsgegevens, the Dutch Data Protection Authority ([www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)), if you think your rights have been violated.

## **13. Cookies**

We use cookies on our website. A cookie is a small text file that is stored on your computer, tablet, phone or other device when you visit a website. By using cookies, we can save information about our website visitors. Such information may include your IP address and the device you use. We use session cookies, which are erased when you close your browser, and persistent cookies which remain on your device for a pre-defined period.

We only use functional cookies. These cookies are necessary so you can view and use our website and application properly and to make sure our website and mobile application are secure and stable (e.g. by using load balancing cookies) and to store your user preferences (e.g. your language preferences). Functional cookies are essential for the use of our website, and they may be placed on your device without your consent. If you block this type of cookie, our website may not work properly, and you may not be able to use all features.