

1. Introduction

In this privacy statement, we explain why and under what conditions we collect, record and process certain personal data. It also explains how we protect your privacy and outlines the rights you have with regard to the processing of personal data by Brand New Day.

2. To whom does this privacy statement apply?

This privacy statement applies to the processing of personal data of:

- » existing and former customers who have an investment, savings or insurance product;
- » existing and former policyholders and beneficiaries of insurance products;
- » members and former members, and other persons with pension entitlements in group pension schemes that we administer;
- » persons who are associated with a company with which we have a business relationship, i.e. employees, representatives, directors, visitors, UBOs, and those who want to have or have had a business relationship;
- » anyone who visits our website, logs in to our website, requests a quote or brochure, or contacts us;
- » anyone who shows an interest in Brand New Day and who is not yet a customer, an insured person or member.

There are specific privacy statements for job applicants and Brand New Day staff members.

3. Do we have a data protection officer?

We have appointed a data protection officer. This officer supervises the application of and compliance with the General Data Protection Regulation (GDPR) at our organisation. If you have questions or comments about this privacy statement or the processing of personal data by

Brand New Day, you can contact the data protection officer by sending an e-mail to privacy@brandnewday.nl.

4. Who is responsible for processing personal data?

The following companies within Brand New Day group process personal data as part of their service and therefore qualify as controllers.

- » Brand New Day Bank N.V. (Brand New Day Bank);
- » Brand New Day Vermogensopbouw N.V. (Brand New Day VO);
- » Brand New Day Levensverzekeringen N.V. (Brand New Day Leven);
- » Brand New Day Premiepensioeninstelling N.V. (Brand New Day PPI);
- » Brand New Day Diensten B.V. (Brand New Day Diensten).

In this privacy statement, these companies are referred to jointly as 'Brand New Day' or 'us' or 'we'.

5. Which personal data do we process?

Ordinary personal data

We may process the following kinds of personal data, among others. The kind of personal data we process depends on the purpose for which we process it.

Personal data category	Example
Name and address information	Name, address, place of residence, postal code, e-mail address, telephone number
Identification information	Copy of identity document with passport photo, signature, citizen service number, municipal personal records database number, camera images
Personal attributes	Age, gender, date of birth, place of birth, marital status, job, family composition, relationships
Customer and product information	Customer number, BND account number, bank account number, knowledge and experience in the financial sector, risk profile, retirement date, information about disabilities, investment portfolio, balance and transaction data, assets and asset trends, information about the origin of assets, information on securities (for instance for pledging), annual income statements, salary, country where tax is levied, tax ID number, products and services purchased, interest in products and services
Electronic identification information	User ID and password, IP address, cookies
Communication information	Telephone conversations, e-mails, letters, app or chat messages, complaints, forms completed online, quotations, calculations
Contract information	Company name, job

Special personal data

In addition to the personal data listed above, we also process special personal data. This is data that is so sensitive that processing it may constitute a serious infringement of the data subject's privacy. For this reason, we only process special personal data if it is necessary.

Health data

For the acceptance and/or implementation of life insurance, Brand New Day Leven needs information about the health of the insured person(s). If Brand New Day Leven requires information from a doctor, it can only obtain this information with the permission of the insured person(s). The processing of health data takes place under the responsibility of a medical consultant, i.e. a doctor. The medical consultant is responsible for the correct processing of health data.

Criminal records data

Through participation in incident registers and warning systems in the financial sector, we may process criminal records. The purpose of an incident register or warning system is to protect the interests of financial institutions and their customers, for instance, by investigating fraud.

Citizen service number

Brand New Day uses citizen service numbers for several of its financial products. We use citizen service numbers because we are required by law to pass on information to the tax authorities.

6. From whom do we get personal data?

- » From you yourself, for instance when you become a customer, log in to our website, make a calculation, leave your details on our website or contact us via e-mail, telephone or some other communication channel.
- » Via other entities in the Brand New Day group.
- » From public sources, like the internet, the chamber of commerce and the Credit Registration Office.
- » From people and organisations that we work with, for instance, your employer if it has taken out a pension scheme for you, or a broker who has bought a Brand New Day product for you.
- » From people and organisations that you have authorised or who are authorised to disclose your personal data on other grounds, for instance, your partner, a receiver, administrator, the police or judicial authorities and the municipal personal records database.
- » From other financial institutions, for instance, in the context of transferring accrued benefits (without any tax implications) or to prevent fraud, money laundering or terrorist financing.

7. On what grounds are we permitted to process your personal data?

We are not permitted to process your personal data without a good reason. We may only process your personal data on one of the following legal grounds:

- a. If processing your personal data is necessary for entering into, administrating and implementing an agreement to which you are a party.
- b. If the processing of personal data is necessary for the fulfilment of legal obligations.
- c. If the processing of personal data is necessary to protect our legitimate interests. If that is the case, we are obliged to demonstrate that our interest in using your personal data outweighs your right to privacy.
- d. We are allowed to use your personal data without being required to ask permission in the cases listed above in a to c. In all other cases, we require your permission for processing your personal data. You can withdraw this permission at any time.

8. For what purposes do we process your personal data?

We only process your personal data for the following purposes:

A. Processing data to be able to start a customer relationship or to enter into an agreement.

If you would like to become a customer, we have to investigate and assess whether we can accept you. We need your personal data to be able to conduct this customer screening and we process it.

We get this data directly from you, but we also use external sources, for instance, the internet, the chamber of commerce or the municipal personal records database (for members of a pension scheme).

We are legally obliged to identify customers and beneficiaries, and to verify their identity. We do this, among other things, based on a copy of an identity document which we then keep.

In this respect, we may process the following information: name and address information, identification data, personal attributes, financial information and criminal records.

Grounds: If the processing of personal data is necessary for entering into an agreement or because we have to fulfil a legal obligation.

B. Processing data to be able to implement an agreement.

If you enter into an agreement with us, we are legally obliged to collect your personal data. We need this personal data for our administration, and to be able to contact you while we have a customer relationship with you. If you have an account, if you take out insurance or if you are a member of a pension scheme with us, then we also process your personal data, for instance, to make a payment or pay out a benefit, to monitor your transactions, carry out an investment order or to respond to a complaint.

We may process the following personal data for this purpose: name and address information, electronic identification data, personal attributes, product and customer information, financial information and communication information.

Grounds: If the processing of your personal details is necessary for administrating and implementing an agreement to which you are a party or because we have a legal obligation to do so.

C. Processing data after contacting Brand New Day

We collect your personal data if you contact us by telephone or e-mail. We need this information to respond to a request or to answer a question.

We may store e-mail correspondence, recordings of incoming and outgoing telephone conversations or chat-sessions and/or notes on telephone conversations that we have had with you. We store this information, on the one hand, to ensure that you don't have to tell us your story twice and, on the other hand, to verify and investigate customer assignments, to train employees or if we consider it necessary from a fraud prevention or investor protection perspective. We only use the recordings internally and they are not kept longer than is strictly necessary for the aforementioned purposes.

Grounds: If we have a legitimate interest in the processing of this data. After all, if we don't have this information we

can't contact you, answer your question or e-mail, refer you, or improve our services. Your data may also be required to be able to implement an agreement, or because we have a legal obligation to do so (recording telephone conversations in the context of providing investment services).

D. Processing data to comply with applicable laws and regulations.

We are subject to various legal obligations that require us to process personal data. Here we have in mind the obligation to identify customers and to ensure that we have sound business practices. We are also obliged to disclose personal data to third parties, like the police, the judicial authorities, intelligence services, supervisory authorities such as De Nederlandsche Bank, the Netherlands Authority for the Financial Markets and the Dutch Data Protection Authority, and the Dutch Tax and Customs Administration (among other things, your citizen service number and account balances). These organisations may share the personal data that we have provided with other domestic or foreign authorities.

Grounds: If the processing of personal data is necessary for the fulfilment of legal obligations.

E. Processing data for fraud prevention and for the security and integrity of the financial sector.

As a financial institution, we have a duty to ensure that we have ethical and safe business practices. This means that we have to take precautions to prevent crime, terrorist financing and fraud. We process your personal data for this purpose. For instance, we do fraud detection to help prevent damages due to fraud. For that purpose, we keep a history of your financial transactions.

To prevent and combat money laundering and financing of terrorism, we subject new customers to customer screening and we verify their identity based on identity documents. In addition to this, we are obliged to monitor transactions and to check whether an individual is on a sanctions list.

In this context, we process financial information, name and address information, identification information and customer

and product information.

Grounds: If the processing of personal data arises from a legal obligation or is necessary to protect our legitimate interests or those of our customers.

F. Processing data for carrying out promotional, direct marketing and other marketing activities.

We process data to carry out promotional, direct marketing and other marketing activities. This is how we recruit new customers and promote new products or services. For this, we use the information that you gave us because you are our customer or because you entered data on our website. We may also use information that we did not get directly from you. This could include, for instance, information from public registers like the chamber of commerce, public sources like the internet and LinkedIn, or information that we got from third parties, for instance, employer organisations.

In this context, we may also use your personal data to contact you if you made a calculation or requested documentation via our website, or to draw your attention to our new products or services.

Grounds: If the processing of personal data is necessary to protect our company's interests. Promotional, direct marketing and other marketing activities support our business operations.

If you want us to stop using your data for direct marketing purposes, you can object to this (see Right to object in Section 13. What are your rights?).

G. Sharing your personal data with other companies in the Brand New Day group.

We do this in the context of an efficient and responsible acceptance policy. We also do this if it is necessary for providing you with good and efficient services, and to get a comprehensive overview of the products and services that we offer you within the group.

Grounds: If the processing of personal data is necessary to protect our legitimate interests.

H. Processing data to improve and develop our products and services.

We believe it is important that our products and services meet the needs of existing and potential customers as much as possible. This is why we constantly work on the development and improvement of our products and services. For example, we may analyse the use of our website (for example by using cookies), we may ask you to participate in a customer satisfaction survey, or we may aggregate data that we have from you. In some cases, we process personal data to this end (for example an IP address).

Grounds: If the processing of personal data is necessary to protect our legitimate interests. Ultimately, it is in our interest to improve our products and services and to serve our customers as best we can.

I. Processing data for archiving purposes, or for historical or scientific research, or for statistical purposes.

We process your personal data if it is necessary to archive information in the public interest, for scientific or historical research, or for statistical purposes. For instance, to get an idea of the number of customers over the years by product. This is done anonymously or it is pseudonymised as much as possible.

Grounds: If the processing of personal data is necessary to protect our legitimate interests.

J. Processing data to enter into and implement agreements with partners.

If you contact us for your work, we may process your personal data, for instance, to establish whether you are authorised to represent your company, or to give you access to our office and/or our systems.

Grounds: If the processing of personal data is necessary to be able to implement the agreements we have entered into, because we have a legal obligation or because we have a legitimate interest to do so.

K. Processing data for management purposes

In this context, we process personal data to generate management information and reports, to identify risks, to carry out internal and external research into, for instance, compliance with laws and regulations and to improve our business processes.

Grounds: If the processing of personal data is necessary because we have a legal obligation to do so or to protect a legitimate interest.

9. Special processing

On various pages on our website, we ask you to enter personal data, for instance, when you fill out a web form, request a brochure or schedule a call-back appointment. In that case, we process your personal data to attend to a request or to answer a question.

Cookies

We use cookies on our websites. Cookies are small text files that may be placed on your computer, telephone or tablet when you visit one of our websites. Some of these cookies are needed to run our websites or to use MijnBND. Other cookies help us to improve our websites, offer you a better user experience or to show you targeted advertisements or banners. Our cookie statement provides more information about the use of cookies.

CCTV surveillance

To protect our interests and property and those of our employees and visitors, we use permanent camera surveillance in our office in Amsterdam. CCTV is limited to the common areas such as reception, corridors and workplaces. The camera images are not stored longer than 4 weeks unless longer storage is necessary to investigate and handle an incident or theft.

Grounds: If the processing of personal data is necessary to protect our legitimate interests.

Automated decision making

When you take out a financial product or service with Brand New Day Bank, VO or Leven, the decision-making of this application is partially automatic. An automated system uses the data you have entered to analyse whether you or the company for which you want to take out the financial product meets our acceptance criteria (e.g. on the basis of age or (tax)residence) and in which risk class you are classified. No people are involved in this part of the application process. If you do not agree with the outcome, you can always inquire about the reasons.

10. With whom do we share personal data?

If there is a legal or other obligation to do so, or if we have other justification, then we share personal data with:

- » Other companies who are part of the Brand New Day group. For instance, we share data to pursue a responsible acceptance policy and to prevent fraud. We also do this if it is necessary for providing you with good and efficient services, and to get a comprehensive overview of the products and services that we offer you within the group.
- » Your employer if it has taken out a pension scheme for you.
- » Your financial consultant or the person you have authorised to have access to your personal data.
- » A third party with whom you wish to make an appointment via our website, for instance via 'Find your consultant'.
- » Other financial institutions, for instance, if we carry out a payment transaction or transfer of accrued benefits (without any tax implications) for you or for a pledge.
- » Authorised (public) authorities, for instance the Dutch Tax and Customs Administration, the police, judicial and supervisory authorities, but also with bailiffs, debt collection agencies, receivers, and administrators.
- » Third parties who support us in our provision of services or carry out work for us, for instance, hosting and storage services, telephone and internet service providers, IT providers, postal companies, research agencies and reinsurance companies. We only do this

if it complies with this privacy statement and only if the processing of the personal data by the third party is necessary to carry out the work or assignment.

We select these third parties carefully and we have clear agreements with them about how they must handle your personal data. If this party processes your personal data on our instructions, as the processor, then we enter into a data processing agreement with them, which meets all the requirements of the GDPR, and in which their obligations with respect to the processing of personal data are laid down, for instance, the appropriate organisational and technical security measures that they must take to protect your personal data. The party that we give your personal data to may not necessarily be the processor, but instead may be responsible for the processing of that data and for compliance with the GDPR.

Brand New Day does not allow third parties to use your personal data for their own purposes.

11. How do we protect your personal data?

Brand New Day has taken appropriate organisational and technical security measures to protect your privacy. Our employees are under a confidentiality obligation that also applies to your data. Furthermore, they can only access data that is necessary for their work. We also ensure the best possible security of the access systems, computer networks, servers and our buildings.

Your data is generally processed within the European Economic Area (EEA). In certain cases, personal data is processed outside the EEA, for instance, because a party with whom we work is based outside the EEA or provides services outside the EEA. In that case, we ensure that processing takes place in accordance with the GDPR.

12. How long do we keep your personal data?

We do not keep your personal data for longer than is necessary. How long that is exactly may be laid down by law and depends on the specific data and purpose for which we process your data.

If we no longer need the data for the purposes described in Section 8, we may still store the data for archiving, legal proceedings or for historical or scientific research or statistical purposes.

13. What are your rights?

With respect to your personal data, you have:

- » The right of access to your personal data that we have recorded.
- » The right to submit a request for the rectification of your data. You can request this if the data is not correct or is incomplete.
- » The right to submit a request for the erasure of your data. You can request this if this information is not required or no longer required or if we process it unlawfully. In some cases, we cannot or are not permitted to change or erase data, for instance, if this is in conflict with the law.
- » The right to restriction of our use of your data.
- » The right to object to the processing of your data if we process data based on legitimate interest. We then weigh up the interests again, and stop the processing of your data if your interest outweighs our interest. If you want us to stop using your data for direct marketing purposes, then we stop the processing regardless, without weighing up the interests.
- » The right under certain circumstances to transfer the personal data you have provided to us to a third party. This only applies to data that we process based on your permission or based on an agreement that we have entered into with you.
- » The right to withdraw your permission if the processing of your personal data is based exclusively on your permission.
- » It goes without saying that you also have the right to lodge a complaint with the Dutch Data Protection Authority if you believe that we have infringed your rights with respect to your personal data.

If you would like to exercise any of these rights, then you can send an e-mail to privacy@brandnewday.nl or a letter to:

Brand New Day attn the Data Protection Officer
P.O. Box 12550
1100 AN Amsterdam Zuidoost.

Please send a copy of a valid identity document with your request, so that we can be sure that it is you who has sent the request. The data protection officer will respond to your request as soon as possible, but in any event within one month.

14. Changes

We may change this privacy statement, for instance if laws and regulations change. This version applies from 18 August 2020 onwards. The most recent version of the 'Brand New Day Privacy Statement – General' is on our website.

15. Questions

Should you have any questions concerning this privacy statement, you can always send an email to privacy@brandnewday.nl or call our customer service department on +31 (0)20 – 75 85 310.

Brand New Day

Physical address: Hoogoorddreef 15, 1101 BA Amsterdam Zuidoost
Postal address: P.O. Box 12550, 1100 AN Amsterdam Zuidoost
Telephone: +31 (0)20 75 85 300.