

The Point and your Privacy

The Point Business Solutions B.V. (The Point), having its registered address at de Boelelaan 7, 7th floor, 1083 HJ, Amsterdam, The Netherlands. The Point is the data controller of the personal data of its Clients. The Point recognizes the importance of protecting your privacy and this Privacy Statement describes how we process the personal data of our Clients.

Scope: What personal information do we collect?

We collect personal information that is required to enable us to provide a broad range of services to our clients and related parties ("Clients"). The kinds of personal information and sensitive personal information that we may collect include:

- contact details, such as name, address, email address and telephone numbers;
- date of birth;
- gender;
- occupation;
- identity information (government ID, driver's license);
- bank account information;

The Point we may also collect other information that is relevant to our functions or activities.

2. How we collect information?

We collect information in various ways, including:

- client due diligence enquiries and on-boarding documentation;
- third party service providers/suppliers engaged by the Clients or us to perform functions or activities in relation of our services;
- questionnaires and other forms and agreements; and
- correspondence, which may include written, telephone or electronic communications.

In some circumstances, we may collect personal information about the Client from a third party or from publicly available sources, such as Chamber of Commerce, Regulatory Data Corp or the internet.

3. Why we collect information?

We only collect, hold, use and disclose personal information for purposes related to our functions or activities, including for the purposes of:

- Entering into and executing service agreements regarding the Clients;
- Verification of the identity of clients and key persons related to the Clients;
- Employment of personnel;
- complying with (domestic or foreign) legal requirements.

4. Legal Basis for Using Your Personal Information

There are different legal bases that we rely on to use your personal information, namely:

- **Performance of a Contract** – The use of your personal information may be necessary to perform the contract that you have with us so that we can provide the services and products that you have engaged us to provide to you.
- **Consent** – We will rely on your consent to use (i) cookie data and geolocation data (if applicable) and if it is necessary to process sensitive data. You may withdraw your consent at any time by contacting us at the address at the end of this Privacy Statement.
- **Compliance with legal obligations** – The use of your personal information may be necessary to comply with legal and regulatory obligations such as those set out under anti-money laundering and counter terrorist financing laws.
- **Legitimate interests** – We may use your personal information for our legitimate interests to improve our products and services, quality assurance, training and for administrative purposes.

If we do not collect this personal information, we may not be able to provide our Clients with the services or assistance requested.

5. How do we disclose personal information?

We may disclose your personal information to the following parties:

- our staff for the purposes of their work responsibilities;
- third party service providers/suppliers engaged by us to perform functions or activities on our behalf;
- regulators or government authorities as required to comply with our legal and regulatory requirements; and
- other entities identified at the time of collecting your personal information or to which we are legally required to disclose your personal information.

This list of possible disclosures is not intended to be exhaustive and there may be other legitimate purposes for holding, disclosing or otherwise processing your personal information. Where the law so requires, you will be notified of any additional purposes and where required your consent will be sought.

6. Third Countries

To provide services to our Clients, your personal information may be transferred and/or stored in various jurisdictions, outside the EU/EEA, in which the Point has a presence, including to jurisdictions that may not offer a level of personal data protection equivalent to your country of residence. A list of countries and territories in which the Point companies are located can be accessed at <https://www.thepoint.business>. We ensure that all data transfers comply with applicable legal requirements (for example under intercompany agreements with appropriate contractual protections). Should you wish to know more about how your personal information is protected please contact our Privacy Officer, using the details below.

7. Security

We implement and maintain physical, electronic and procedural safeguards and security measures which are reasonably designed to protect your personal information. For example, we implement:

- security measures for access to our business premises;
- security procedures within our offices; and
- IT security measures, including password protection, firewalls, intrusion detection and site monitoring.

These measures are in place to protect your personal information that we hold from misuse, interference and loss, and from unauthorized access, modification or disclosure. However, such measures are never completely secure.

8. Accessing and correcting personal information held by us

You may access the personal information we hold about you, and you may make or seek changes to that information, by contacting us using the contact details set out below. You may also ask us to erase, restrict or port your personal information, and you may tell us if you object to our use of your personal information. To exercise these rights please contact us using the details below and send us a copy of your passport. We will promptly investigate your privacy enquiry and provide you with answers or update our records, as appropriate.

9. Retention of your personal information

The retention period shall not be longer than the time necessary to achieve the purposes for which the personal data have been collected and further processed by The Point. In practice, it means that The Point will need to retain all data for a period of 10 years after ending of the relationship between The Point and the Client.

10. Questions or Complaints

You may make a complaint about an alleged breach by us of applicable Privacy laws in relation to our handling of your personal information. Your complaint should be in writing and addressed to our Privacy Officer. Alternatively, you have a right to complain to your local data protection authority (if one exists in your country). For questions about our Privacy Statement, to exercise your rights regarding your personal information held by us or to make an enquiry, please contact our Privacy Officer:

C/O The Point Business Solutions B.V.

De Boelelaan 7

7th Floor

1083 HJ Amsterdam

The Netherlands

Phone Number: +31 20 708 57 79

E-mail Address: info@thepoint.business

We reserve the right, at our discretion, to modify or remove any part of this Privacy Statement at any time, if the moderation is significant, The Point will inform you in advance.

9. How do we use Cookies?

We don't collect information from you through the use of "cookies" and similar online tracking tools across our websites and online services.