

# Privacy statement MN 02-2023

Under the editorship of: Folkert Harmsen (DPO)



## **Table of contents**

1	General	3
2	When may we use your data	3
3	What do we use your personal data for	3
4	Which personal data do we process	3
5	Who do we share your data with	4
6	How long do we keep your data	4
7	Your rights	4
8	Protection of your personal data	4
9	Data Protection Officer (DPO)	5
10	Cookies	5
11	Version	5

#### 1 General

Mn Services N.V. and its subsidiaries Mn Services Vermogensbeheer B.V. and Mn Services Fondsenbeheer B.V., collectively referred to as MN, are located at Prinses Beatrixlaan 15, 2595 AK in The Hague.

We are a (financial) service provider, an employer, and asset manager. As a (financial) service provider, we manage various pension schemes and perform (fiduciary) asset management on behalf of pension funds (hereafter: clients). We process personal data of participants received from our clients in order to carry out these tasks. Furthermore, when carrying out asset management, we process personal data of tenants as well as personal data from third parties involved in asset management.

Personal data is all information that can be traced back to a person or with which a person can be directly or indirectly identified. More information about how our clients handle your personal data can be found on their websites.

As an employer, we also receive and process personal data from all MN employees. Furthermore, we may process personal data of (employees or ultimate beneficiaries of) third parties with whom we conduct business and engage with to carry out our business operations.

### 2 When may we use your data

We may use your personal data if we have a specific purpose to do so with the condition being that there is a necessity to process the personal data in order to achieve that purpose. Furthermore, there must be a legal basis for the processing of your personal data. In general, we process your personal data to fulfill a legal obligation that rests upon us, to carry out an agreement with you, or to represent our legitimate interests.

## 3 What do we use your personal data for

We process your personal data for the following purposes:

- To be able to assess responses to vacancies;
- To screen future employees;
- To be able to perform obligations under the employment contract between MN and the employee;
- To be able to comply with legal obligations from, for example, Tax Law, Sanctions Act or the Money Laundering and Terrorist Financing Prevention Act;
- To protect your and our interests (for example through camera surveillance or monitoring of network traffic);

## 4 Which personal data do we process

We may process the following categories of personal data:

- Information detailing your name and address;
- Contact information;
- Date of birth;
- Gender;
- Citizen Service Number (BSN);
- Income data;
- Employment data (e.g. number of working hours);
- Type(s) of scheme(s) in which you participate (e.g. pension, insurance or collective labour agreement scheme);
- Financial data (e.g. IBAN);
- IP addresses;
- Passport details and passport copies;

- · Disability data;
- Data on the household composition;
- Information about your partner and/or children

### 5 Who do we share your data with

We never disclose your personal information with third parties unless it is absolutely essential to carry out our business activities at MN. Furthermore, we may be required by law to provide your personal information to an authorized body, such as the Tax and Customs Administration, the Social Insurance Bank, the Financial Intelligence Unit, or regulators.

In general, we process your data within the European Economic Area (EEA). If your data is processed outside the EEA, it will only be processed if appropriate safeguards are in place to guarantee the security of your personal data.

### 6 How long do we keep your data

We do not retain your personal information any longer than is required to fulfill the purposes for which it was initially collected. If the law requires us to retain data for an extended period of time, we must abide by this requirement (e.g. tax legislation or the Pension Act). For archiving reasons, we may also keep personal information on file for longer periods of time. In that case, we will ensure the implementation of the necessary organizational and technical safeguards to guarantee the protection of your personal data.

- Personal data that we use for the execution of the employment contract with our own employees will be deleted 2 years after termination of employment.
- If authorization has been granted, application data will be deleted after 4 weeks or after 1 year.
- The data gathered and processed by camera surveillance is stored for 4 weeks.
- Data that has been processed for analyzing network activity and monitoring network traffic is stored for 4 days.
- UBO data is stored on file for at least 5 years following the termination of the relationship.

## 7 Your rights

Under the General Data Protection Regulation (GDPR), you have a number of rights when we process your personal data. You always have the right to access and be informed about the information we process about you. If the data turns out to be inaccurate, you have the right to have the data rectified. Additionally, if you believe that we should no longer process your data, you have the right to request for the data to be erased. You have the right to object if we process your data, in order to fulfill our legitimate interest, against your wishes. You can also submit a request to transfer your personal data to another entity and can submit a request to restrict how your personal data is processed.

Upon receiving your request to exercise one of these rights, we will provide a response to your request within one month.

You have the right to file a complaint if you believe that your data is not being treated with care. If you believe that this complaint was not handled correctly, you may file a complaint with the Dutch Data Protection Authority.

## 8 Protection of your personal data

We handle your data with the greatest possible care. This entails that we implement adequate and appropriate organizational and technical safeguards to ensure the security of your personal data. Only our employees, who have the authority required for their line of work, and who have been given authorization to do so, can access the personal data we process. All of our employees have signed a

confidentiality agreement and are periodically trained and assessed on how to handle personal data correctly.

### 9 Data Protection Officer (DPO)

MN has a designated Data Protection Officer who oversees MN's compliance with privacy regulations. If you would like to voice any concerns, comments, or complaints regarding the way MN processes your personal data, you can always contact the Data Protection Officer.

You can contact the Data Protection Officer at: Mn Services N.V. Attn. Data Protection Officer P.O. Box 30025 2500 GA The Hague Email: privacy@mn.nl

#### 10 Cookies

We use functional and analytical cookies on our website. We do not use tracking cookies that process personal data. A cookie is a piece of text that is placed on your computer, tablet or mobile phone when you visit the website.

#### Functional cookies

Functional cookies are technically necessary for the website to function correctly and to work as well as possible. You do not have to provide consent and cannot give permission for these cookies.

#### Analytical cookies

Analytical cookies allow us to keep track of information with regards to your visit on our website. This allows us to improve the ease of use of the website. These cookies do not process personal data, so you do not have to provide consent and cannot give permission for these cookies.

#### 11 Version

This privacy statement was last modified on 01-04-2023