

HCS D Tax B.V. ("HCS D"), located at Pieter Cornelisz. Hooftstraat 135-1 (1071 BT) in Amsterdam, is responsible for the processing of personal data as described in this privacy statement.

The contact details of HCS D are:

- <http://www.hcsd.tax.com>
- Pieter Cornelisz Hooftstraat 135-1 (1071 BT), Amsterdam
- T: +31 (0)20 303 0750

Erik Swaving Dijkstra is the Data Protection Officer of HCS D and can be reached via swavingdijkstra@hcsd.tax.com

Personal data that we process

HCS D processes your personal data because you make use of our services and/or because you provide them to us yourself. Below you will find an overview of the personal data we process:

- First name and surname;
- Date of birth;
- Birthplace;
- Data legal person;
- Address details;
- Phone number;
- E-mail address;
- Other information in the context of our identification obligation;
- VAT number; and
- Bank account number.

HCS D may also process the following special and/or sensitive personal data about you:

- Social security number (BSN); and
- Tax identification number (RSIN).

Where do we get this personal information?

We can only obtain this personal information if you provide it to us, or if it is provided to us by another party with your consent.

For what purpose and on what basis do we process personal data?

HCS D processes your personal data for the following purposes:

- Send newsletter and news updates (after subscription);
- Submit fee proposals (following a request to that effect);
- Billing;
- Opening files for data storage;
- Providing tax and legal advisory services, including tax returns; and
- Answering questions (on request);

HCS D also processes personal data if we are legally obliged to do so, for example under a tax return obligation, identification obligation under the Money Laundering and Terrorist Financing (Prevention) Act (Wet ter voorkoming van witwassen en financieren van terrorisme (Wwft)) or any mandatory exchange of information arising from the International Tax Assistance Act (WIBB) or the Council Directive (EU) 2018/822.

How long do we retain personal data

HCS D does not retain your personal data longer than is strictly necessary to achieve the purposes for which your data are collected. We apply the following retention periods for the following (categories of) personal data:

- We store personal data for seven years in accordance with the statutory retention period under the Dutch General Tax Act (Algemene Wet inzake Rijksbelastingen, AWR). After seven years, data will be destroyed on request;
- We store contact information for business contacts for three years, unless the statutory retention period under the Dutch General Tax Act (AWR) is longer;

- We retain employee data for seven years in view of the statutory retention period under the Dutch General Tax Act (AWR); and
- We keep details of job applicants for six weeks.

On what grounds do we process personal data?

HCSD processes personal data on the following grounds:

- *Consent*: you have given permission to process personal data, for example in the context of our legal and tax services;
- *Agreement*: we enter into an agreement with you in order to give shape to our services. We are obliged to comply with our obligation to identify ourselves before starting our services;
- *Legal obligation*: we are obliged to retain certain information of the purchasers of our services as well as persons from whom we obtain services during the legal retention period.

In view of the nature of our work, you are obliged to provide the necessary personal data so that we can comply with our legal obligations. If you do not provide the required information, we are obliged to end our legal relationship. We will - if permitted under the applicable legislation - subsequently remove your personal data.

Sharing personal data with third parties

HCSD does not sell your details to third parties and only provides them if this is necessary for the performance of our engagement with you or to comply with a legal obligation. We enter into an agreement with companies who process your data on our behalf, such as declaration software and secure storage, to ensure the same level of security and confidentiality of your data. They will also not use your data for purposes other than the services we have agreed with you. HCSD remains responsible for these processing operations.

HCSD may be required by law to transfer data, for example under the aforementioned the Money Laundering and Terrorist Financing (Prevention) Act (Wet ter voorkoming van witwassen en financieren van terrorisme (Wwft)), the International Tax Assistance Act (WIBB) or the Council Directive (EU) 2018/822. In that case, we will inform you about this transfer of data - to the extent permitted under these legal obligations.

Cookies, or similar techniques, that we use

HCSD only uses technical and functional cookies and analytical cookies that do not infringe your privacy. A cookie is a small text file that is stored on your computer, tablet or smartphone the first time you visit this website. The cookies we use are necessary for the technical operation of the website and for your ease of use. They ensure that the website works properly and remember, for example, your preferred settings. They also enable us to optimise our website.

You can unsubscribe from cookies by setting your Internet browser in such a way that it no longer stores cookies. In addition, you can also delete all information previously stored via your browser's settings.

View, modify or delete data

You have the right to view, correct or delete your personal data. In addition, you have the right to withdraw your possible consent to data processing or to object to the processing of your personal data by HCSD and you have the right to data transfer.

This means that you can submit a request to us to send the personal data we have in a computer file to you or another organisation designated by you. You can send a request for inspection, correction, deletion, data treating of your personal data or a request to withdraw your consent or objection to the processing of your personal data to swavingdijkstra@hcsdtax.com

To ensure that the request for inspection has been made by you, we ask that you enclose a copy of your proof of identity with the request. In this copy, we recommend that you make your passport photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), passport number and social security number (BSN) black. This is to protect your privacy.

We will respond to your request as soon as possible, but within four weeks. HCSD Tax Advisors would also like to point out that you have the option of submitting a complaint to the national regulator, the Personal Data Authority. This can be done via the following link: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>



How we secure personal data

HCS D takes the protection of your data seriously and takes appropriate measures to prevent misuse, loss, unauthorised access, unwanted disclosure and unauthorised modification. All data received by us will only be stored in a secure and certified environment, and not on local hard drives or similar data carriers.

If you have the impression that your data is not properly secured or there are indications of misuse, please contact our customer service or via swavingdijkstra@hcsdtax.com
