

# PRIVACY STATEMENT TCF ADVISORY

## Introduction

TCF Advisory takes your privacy very seriously and shall handle your personal data with the utmost security and care. In this Privacy Statement you will learn how we handle your data as well as learn about your rights concerning our processing of your data. We advise that you read this Privacy Statement thoroughly. Should you have any questions or remarks, please contact us at [shosha.melkman@tcfadvisory.com](mailto:shosha.melkman@tcfadvisory.com).

## Who is TCF Advisory ?

TCF Advisory is the besloten vennootschap TCF Advisory BV, with registered office at (1081 JN) AMSTERDAM listed at the Traderegister of the Dutch Chamber of Commerce under 61105104.

TCF Advisory is as the controller ultimately responsible with regard to the processing of your personal data.

## How does TCF Advisory use your personal data?

Underneath you will find an overview of the purposes for the processing of your personal data. You will also find a specification of which data TCF Advisory uses for that specific purpose, the legal justification, and the amount of time TCF Advisory keeps this data. For clarity's sake, we have categorised the purposes.

### *Services, customer management and financial administration*

Purpose:	Financial administration
Information:	Company name, Billing address, Bank details, Outstanding balance
Legal basis:	Legal obligation
Storage period:	maximum 7 years

Purpose:	Services
Information:	Home address, Email, Data necessary to provide the service, Data generated by the service
Legal basis:	Necessary for the performance of a contract
Storage period:	maximum 7 years

Purpose:	Invoicing
Information:	Home address, Email, Data necessary to provide the service, Data generated by the service
Legal basis:	Necessary for the performance of a contract
Storage period:	maximum 7 years

Purpose:	CRM
Information:	Name, Username, Email, User ID, Phone, Profile photo
Legal basis:	Legitimate interests
importance:	Username and password in benefit of use online portal to exchange information & documentation

Storage period: maximum 7 years

### *Marketing*

Purpose: Direct marketing  
Information: Name, Home address, Email, Phone, Click behaviour, Online behaviour Legitimate interests  
Legal basis: Legitimate interests  
Interest concerned: Commercial interests  
Storage period: As long as necessary for this purpose

### *Website*

Purpose: Website analytics  
Information: Online behaviour, Location  
Legal basis: Legitimate interests  
Interest concerned: Commercial interests  
Storage period: As long as necessary for this purpose

### *Security and fraud prevention*

Purpose: ID verification  
Information: Phone, Name, Address  
Legal basis: Legitimate interests  
Interest concerned: Commercial interests  
Storage period: As long as necessary for this purpose

## **How did we obtain your personal data?**

TCF Advisory has obtained your data because you have provided this data to us, and because TCF Advisory has obtained your information from third parties. These third parties are: Data Collectief Groep B.V. te Nieuwegein.

## **What are your rights?**

Under the European General Data Protection Regulation you have a number of rights with regard to your data and the processing thereof:

### **Access**

You may access your personal information and make any necessary changes in your account. If you would like to see which personal data TCF Advisory has obtained about you, you may exercise your right of access by submitting a request to TCF Advisory .

### *Making changes*

If you wish to make changes to the personal information that you have seen as a result of a request for access and you are unable to make the changes yourself in your account, you may

request that TCF Advisory makes these changes for you. You may request that TCF Advisory modifies, corrects, supplements, erases or shields your information.

#### *Restriction of processing of personal data*

You also have the right, under certain conditions, to ask TCF Advisory to restrict the processing of your personal data.

#### *Right to object*

If processing of your data takes place on the grounds of 'legitimate interest' by TCF Advisory or a third party, you have the right to object to that processing.

#### *Portability of data*

You have the right to obtain your personal data from TCF Advisory . TCF Advisory will provide this in a structured and commonly used format, which can easily be opened using commonly used digital systems.

#### *Withdrawing consent*

When the legal basis for a particular processing is your explicit consent, you have the right to withdraw that consent. This does not affect past processing, but does mean that we will no longer be allowed to process this data in the future. It may also result in TCF Advisory no longer being able to provide you with certain services.

#### *Response from TCF Advisory*

A request can be sent to [shosha.melkman@tcfadvisory.com](mailto:shosha.melkman@tcfadvisory.com). TCF Advisory will comply with your request as soon as possible and in any case no later than one (1) month after TCF Advisory has received such a request. If TCF Advisory rejects your request, we will indicate in our reply why the request was rejected.

#### *Recipients of your personal data*

Your data may be transmitted to:

- Data processors
- Parties that are involved in the execution or fulfilment of an agreement between you and TCF Advisory
- External consultants

It is possible that TCF Advisory is required to submit your data to a third party, for example to fulfil a legal obligation.

#### **Transfer to third countries or international organisations**

It may be necessary, for instance for technical and operational reasons, to transfer your

(personal) data to affiliates of TCF Advisory located outside the European Economic Area. Due to the possibility that the regulations in the area of privacy protection do not offer the same protection as within the European Economic Area, TCF Advisory will use the Privacy Shield or the EU Model Clauses to protect your privacy as much as possible. If that is not possible, TCF Advisory will ask your consent to transfer your (personal) data to countries that do not maintain an adequate protection level. You may withdraw your consent at any time.

### **What are cookies and how does TCF Advisory use them?**

Cookies are small pieces of (text) information that are sent to your browser when you visit the website of TCF Advisory and then stored on the hard disk or in the memory of your device. The cookies placed via TCF Advisory 's website cannot damage your device or the files stored on it. With 'cookies', we also mean comparable techniques collecting information, such as device fingerprinting.

### **Can changes be made to this Privacy Statement?**

This Privacy Statement is subject to changes. We therefore advise you to regularly read the Privacy Statement for any such changes.

### **Questions, remarks, and complaints**

If you have any questions regarding this Privacy Statement or the way in which TCF Advisory uses your data, you can send an e-mail to [shosha.melkman@tcfadvisory.com](mailto:shosha.melkman@tcfadvisory.com). If you have a complaint about the way your data is processed, please send an e-mail to [shosha.melkman@tcfadvisory.com](mailto:shosha.melkman@tcfadvisory.com). Furthermore, you always have the right to contact the competent national data protection authority. In The Netherlands, this is the [Autoriteit Persoonsgegevens](#).