



Pan-Invest

Pan-Invest Group Privacy Statement

May 2018

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Introduction

This statement is addressed to any person from whom Pan-Invest collects personal data in the course of providing its services. This will include our clients and, where our client is not a natural person, the owners, controllers and personnel of our clients. Pan-Invest is the controller of that data and is therefore required to provide you with this statement. Any data that relates to you, or from which you can be identified, is known as “personal data”. Pan-Invest respects your privacy and is committed to protecting your personal data. This statement will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This statement is effective from 25 May 2018. We will post any material changes that we may make to this statement in the future on our website and, where appropriate, we will notify you of the change by email.

It is important that the personal data we hold about you is accurate and current. Please keep us informed of your personal data changes during your relationship with us.

Pan-Invest is made up of different legal entities, details of which can be found [here](#). This statement is issued on behalf of the Pan-Invest Group so when we mention “Pan-Invest, “we”, “us” or “our” in this statement, we are referring to the relevant company in the Pan-Invest Group that has collected your data.

1 Contact details

For any questions, comments or complaints about the way we process personal data, you can contact us through the contact details below:

Privacy Department	
Email address	privacy@pan-investgroup.com
Telephone number	+31 850700300
Postal address	Prinses Margrietplantsoen 88 2595 BR The Hague The Netherlands

2 Personal data we process

Pan-Invest processes your personal data because you use our services or because you have provided us the information. Below is an overview of the types of information that we process:

- **Identifying information** (i.e. information used to identify a specific individual, such as: given name(s), preferred name(s), nickname(s); date of birth/ age; place of birth; nationality; race; passport details).
- **Contact information** (e.g. postal address, telephone number, email address).
- **Family information** (e.g. family structure, siblings, offspring, marriages, divorces, relationships).
- **Financial information** (e.g. source of wealth, personal assets, bank account numbers and income details).
- **Professional information** (e.g. job titles, employment history).
- **Transaction information** (e.g. details about payments to and from you and other details of services you have requested from us).

In certain circumstances Pan-Invest will also process special categories of personal data about you. In particular, as part of our due diligence processes, we might collect information as to:

- **Your political opinions** and affiliations, so that we can identify that you are, or are connected to, a politically exposed person; and
- **Your criminal records** or alleged criminal activity.

2.1 If you fail to provide personal data

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services) and we may have to terminate the provisions of services or decline the requested performance of a task (such as entering a name into a register of shareholders).

3 Purpose and justification of the processing of personal data

Pan-Invest will only process your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where we need to comply with a legal or regulatory obligation that we are subject to.

Please note that we may process your personal data without knowledge or consent, in compliance with the above mentioned circumstances where this is required or permitted by law.

3.1 Automated decision making

Pan-Invest does not take decisions based on automated processes on issues that could have (significant) consequences for individuals. Such decisions are taken by computer programs or systems, with intervention of a human being (such as an employee of Pan-Invest).

4 Retaining personal data

Pan-Invest will only retain your personal data as long as strictly necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

The Netherlands

By law we are required to keep your personal information that we have collected for the purpose of discharging our anti-money laundering obligations for at least 5 years from the end of the relevant client relationship.

With regard to any of your information forming part of our tax records, those records are required to be kept 10 years from the end of the year of assessment.

With regard to other records maintained by us, unless they relate to AML or tax they must be kept for: the duration of the relevant client relationship in Netherlands plus 7-10 years.

For more information about our document retention policies and or retention periods of Pan-Invest Cyprus and Luxembourg please contact your client relationship manager.

4.1 Requests after the retention period has past

Pan-Invest will erase the data from its systems once the retention period for the data has past, and the data is not required in an ongoing investigation and Pan-Invest has no legal or contractual obligation to hold the data any longer. Where this is the case, it will not be possible to request the data anymore. Ensure you hold your own copies of the data if you wish to retain the data for a longer period of time.

5 Sharing personal data with third parties

Pan-Invest will not sell your personal data to third parties and will provide it only if this is required for the provisioning of the services we've agreed to provide or to comply with legal obligations. Organizations processing your data on our behalf are bound by a processor agreement to ensure that they provide the same level of security and confidentiality. Pan-Invest remains responsible for the processing. Upon request, Pan-Invest can give you details on which third parties we use to process your personal data.

6 Cookies, or similar techniques that we use

Pan-Invest uses functional cookies. A cookie is a small text file that is stored in the browser of your computer, tablet or smartphone during your first visit to our website. Pan-Invest uses cookies with a purely technical functionality. These ensure that the website works as intended and that your preferences are remembered. The cookies are also used to let the website work properly and to optimize it.

7 Your rights as a data subject

7.1 Reviewing, adjusting or removing data

You have the right to review your personal data, to correct it and to remove it. Additionally, you have the right to revoke your consent to process your personal data or to object against the processing of your personal data by Pan-Invest. You also have the right to data portability. That means that you can request us to transfer the personal data we have on you in computer files to you or another party appointed by you. You can send your request to review, adjust, remove, transfer your data, your consent withdrawals and processing objections to privacy@pan-investgroup.com.

7.2 Identity verification

To make sure that the request to review your personal data was done by you, we ask you to send a copy of your personal identity along with the request. In this copy of your identity card or passport, please mark your picture, the MRZ (machine readable zone, the lines with numbers at the bottom of a passport), passport number and social security number black and illegible. This is to protect your privacy. We will respond as soon as possible, but within four weeks, to your request. Occasionally it may take us longer than four weeks if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. Pan-Invest would also like to point out that you have the possibility to file a complaint with the national personal data supervisory authority.

In some cases, we may not be able to verify your identity adequately based on the information you have provided. We will then contact you for additional verification. All information you provide us with for the verification will solely be used for this verification.

7.3 Removing data from archives and backups

Pan-Invest uses a number of technologies to optimize the availability of your data. One way we do this is by making daily copies of the data on our systems. Removing individual data elements from these copies is infeasible. Based on the guidance provided by the supervisory authorities on this topic, we keep a record of all requests to have data removed. In response to a request, we will remove the data from the active systems. The data will stay on the backup copies. We have implemented a procedure that ensures that your data on these copies (that was required to be removed) will not be recovered anymore to active systems. For our archives we have implemented a similar approach.

7.4 Contractual or legal obligations

It may happen that we cannot comply with your request to review, adjust or remove personal data because we have a contractual or legal obligation that prohibits us from doing so. In such cases Pan-Invest will let you know the reason we cannot help you.

8 How we protect personal data

Pan-Invest takes the protection of your personal data very seriously and has taken a number of measures to prevent abuse, loss, unauthorized access, unintentional publication and unauthorized adjustments. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

If you are under the impression that your personal data is not sufficiently protected or you have reason to believe that your data has been abused, please reach out to our Privacy Department or email us at privacy@pan-investgroup.com.

8.1 Encryption

If personal data is stored on a source outside Pan-Invest's network, we will encrypt the data or data source. Encryption is a method that makes data illegible, unless the correct code is known and available to make the data readable. The complexity of this code determines how strong the encryption is. Pan-Invest will use encryption that is strong enough that it is nearly impossible to replicate the key or make the data legible without the use of a key.

9 How we will contact you

From time to time, Pan-Invest may contact you for any number of reasons. We will never ask you to provide us with your login details. If you ever receive a communication from us and you doubt the authenticity, please contact your relationship manager, or reach out to us on email at privacy@pan-investgroup.com. A good general practice is to type any web link that you receive by email or other electronic form manually into the address bar of your Internet browser.

10 Additional information

You can reach out to our Privacy Department at any time if this statement is not clear to you, if you find errors, if you are missing clarification on specific processing or if you have questions in general about the protection of your personal data. The contact details of the Privacy Department can be found in chapter 1. You can also reach out to us through your relationship manager, or by emailing us at privacy@pan-investgroup.com.