

# **Data Protection & Privacy Policy**

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Truncus Partners BV ("Truncus Partners") collects personal data about you. Truncus Partners as the controller processes your personal data in compliance with the provisions under the Data Protection Act ("DPA") and the General Data Protection Regulation ("GDPR"), as amended from time to time (collectively "Regulation"). This Data Protection & Privacy Policy ("Policy") explains how we use any personal data we collect about you.

#### 1. What personal data do we collect?

"Personal Data" is any information relating to you or that we can otherwise link to you. The Personal Data we collect include your name, postal address, e-mail address, phone and fax number, company name, company structure, job title and business affiliations.

#### 2. How do we collect your Personal Data?

We collect personal data that you voluntarily provide to us, for example when (i) you communicate with us via e-mail or other channels, (ii) when you sign up for or ask us to send you fact sheets, newsletters or other (non- marketing) materials and/or (iii) when you sign up for an event. In some cases, your Personal Data has been supplemented by information retrieved from other sources, including searches via publicly available search engines, sector-specific newsletters, social media and your employer's website, for the purpose of confirming your current professional position.

#### 3. How do we use your Personal Data?

We use the Personal Data we collect for communication purposes, including: (i) to send you fact sheets, newsletters and other information about Integra; (ii) to send you invitations to events and conferences; and (iii) to maintain our list of contacts. We do not make your Personal Data available to any third party.

# 4. Why do we process your Personal Data and on what legal basis?

As set out above we process your Personal Data for communication purposes. We rely on our legitimate interests in maintaining business relationships and communicating with you as a business contact, about Integra's activities and events. We consider that our legitimate interests are in compliance with the Regulation and your legal rights and freedoms.

## 5. Where is your Personal Data stored?

Truncus Partners BV is a Belgian legal entity and all your Personal Data is processed and stored on servers in Belgium.

#### 6. With whom do we share your personal data?

In the context of the purposes mentioned above, we may store your personal data with third parties, such as parties that provide CRM services; email providers and file storage systems. The GDPR sets forth certain conditions for the transfer of personal data outside the EU. We will ensure that, where relevant, contractual safeguards are implemented to ensure the protection of your Personal Data when disclosing your Personal Data to a third party. For example, we will enter into data processing agreements with relevant parties (providing for restrictions on the use of your Personal Data and obligations with respect to the protection and security of your Personal Data).

As a general rule, we do not share your Personal Data as set out above with other parties located in countries outside the European Union, which countries may offer a lower level of data protection. This may, however, be different in the event that there is a legitimate reason for providing data to parties located in such country.

In such case, it shall be ensured that adequate measures are taken to ensure adequate protection of your Personal Data in accordance with applicable data protection legislation. Generally, we will enter into the standard contractual clauses with the recipient of your Personal Data.

#### 7. How long do we keep your Personal Data?

Your Personal Data will be saved for the specified purposes mentioned above for as long as you are a business contact to us. Your personal data will be deleted when it is no longer reasonably required for the specified purposes mentioned above or you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data. You can unsubscribe at any time, if you no longer wish to receive communications and invitations from Truncus Partners (and the mother company Truncus Wealth NV). If you choose to unsubscribe, we will cease to send you such communication and invitations as mentioned above.

# 8. Data Security

Truncus Partners has implemented appropriate technical and organizational security measures to help protect your Personal Data against loss and to safeguard against access by unauthorized persons.

### 9. Your Rights

You have the right to know what Personal Data we process about you and may request a copy. You are also entitled to have incorrect Personal Data about you corrected and you may in some cases ask us to delete your Personal Data. You can also object to certain Personal Data about you being processed and request that processing of your Personal Data be limited. Please note that the limitation or deletion of your Personal Data may mean we will be unable to provide the communications and invitations described above. You also have the right to receive your Personal Data in a machine-readable format and have the data transferred to another party responsible for data processing. If you disagree with how we process your Personal Data, you are also entitled to report this to the Federal Data Protection

and Information Commissioner (FDPIC) and/or to other competent supervisory authorities in the European Union.

# 10. Updates to this Data Protection & Privacy Policy

This Data Protection & Privacy Policy was last updated in October 2023. We reserve the right to update and change this Policy from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. In case of any such changes, we will post the changed Data Protection & Privacy Policy on our website or publish it otherwise. The changes will take effect as soon as they are posted on this website.

#### 11. How to contact us

If you have any questions about how we process your Personal Data, please feel free to contact us at <a href="mailto:truncuspartners@truncus.eu">truncuspartners@truncus.eu</a> or <a href="mailto:truncus.eu">truncuspartners@truncus.eu</a> or <a href="mailto:truncus.eu">truncus.eu</a> or <a href="mailto:trunc

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