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Privacy Statement

Brand New Day Privacy Statement

1. Introduction

In this Privacy Statement, Brand New Day explains why and under what conditions Brand New Day collects, records and processes certain personal data. It also explains how Brand New Day protects your privacy and what rights you have with regard to the processing of personal data by Brand New Day.

2. When is this Privacy Statement applicable?

This Privacy Statement applies to all personal data that companies within the Brand New Day Group collect, record and process. This Privacy Statement also applies to all companies within the Brand New Day Group that are responsible for processing personal data.

3. Who is responsible for processing personal data?

The following companies within Brand New Day Group process personal data as part of their service and therefore qualify as controllers.

- Brand New Day Bank N.V. (Brand New Day Bank);
- Brand New Day Vermogensopbouw N.V. (Brand New Day Wealth Creation);
- Brand New Day Levensverzekeringen N.V. (Brand New Day Life Insurance);
- Brand New Day Premiepensioeninstelling N.V. (Brand New Day PPI);
- Brand New Day Diensten B.V. (Brand New Day Services).

In this Privacy Statement, these companies are referred to jointly as 'Brand New Day'.

4. Does Brand New Day have a data protection officer?

Brand New Day has appointed a data protection officer. This officer supervises the application of and compliance with the General Data Protection Regulation (GDPR) at Brand New Day. If you have questions, comments or complaints about the processing of personal data by Brand New Day, you can contact the data protection officer by sending an e-mail to privacy@brandnewday.nl.

5. For what purposes does Brand New Day process personal data?

Brand New Day only processes your personal data for the following purposes:

- to enter into and maintain a relationship with you;
- to prevent and combat money laundering, financing of terrorism and fraud;
- to be able to comply with legal obligations;
- to be able to conduct marketing activities;
- to protect your and our interests;
- for statistical purposes.

6. On what grounds may Brand New Day process personal data?

Brand New Day may only processes your personal data on one of the following grounds:

- If the processing of personal data is necessary for the preparation or implementation of an agreement to which the data subject is a party.
For instance, if you take out a product with us, we require certain personal information from you.
- If the processing of personal data is necessary for the fulfilment of Brand New Day's legal obligations.
For instance, we are required by law to identify you and verify your identity if you take out a product.
- If the processing of personal data is necessary for attending to Brand New Day's or a third party's legitimate interests.
Brand New Day has a legitimate interest in sharing personal data of direct customers with other companies within the Brand New Day Group for marketing purposes, fraud prevention and to pursue a responsible acceptance policy.
- If the data subject has given Brand New Day permission to process personal data.
For instance, if you are not yet a Brand New Day customer, you give Brand New Day permission to process your personal data so that we inform you about Brand New Day products.

If none of the above grounds applies, we are not permitted to process personal data.

7. Which personal data does Brand New Day process?

The data we process depends on the service that you are using. Brand New Day processes the following categories personal data:

- Name, address, town/city, telephone number, e-mail addresses, i.e. contact and address details
- Date of birth and gender
- Employment information
- Passport details
- Marital status
- Financial information
- Information about family composition
- Health data
- Education and job application information

Brand New Day only processes this data if it is necessary for one of the purposes mentioned under Section 5.

8. When is Brand New Day allowed to process special personal data or other sensitive personal data?

Special personal data is data that is so sensitive that processing it may constitute a serious infringement of the data subject's privacy. For this reason, a stricter regime applies to the processing of this kind of data than for ordinary personal data.

Health data

For the acceptance and/or implementation of life insurance, Brand New Day Life Insurance needs information about the health of the insured person(s). If Brand New Day Life Insurance requires information from a doctor, it can only obtain this information with the permission of the insured person(s). The processing of health data takes place under the responsibility of a medical consultant, i.e. a doctor. The medical consultant is responsible for the correct processing of health data.

Criminal records data

Through its participation in incident registers and warning systems in the financial sector, Brand New Day may process criminal records. The purpose of an incident register or warning system is to protect the interests of financial institutions and their customers, for instance, by investigating fraud.

Citizen service numbers

Brand New Day uses citizen service numbers for several of its financial products. We use citizen service numbers because we are required by law to pass on information to the tax authorities.

Copy of ID document

Brand New Day is legally obliged to establish and verify the identity of its customers. To be able to prove that this obligation has been met, BND keeps a copy or scan of your identity document.

9. Whose personal data do we process?

Brand New Day processes the personal data of the following categories of people:

- Brand New Day customers with an investment, savings or insurance product, and their interested parties and representatives, such as parents of minors;
- policyholders and beneficiaries of term life insurance;
- deferred and other members and other persons with pension entitlements in group pension schemes administered by Brand New Day PPI;
- potential customers who request information about Brand New Day products.

In addition, Brand New Day also processes the personal data of applicants, former and existing employees and individuals who are connected to a company or organisation with whom we have a relationship or who have contacted us.

10. From whom does Brand New Day get personal data?

Brand New Day gets personal data from data subjects themselves, their intermediaries, employers, representatives or from persons, institutions or organisations authorised by data subjects or otherwise authorised to provide the data subjects' personal data.

11. Special processing

Recording telephone conversations

Brand New Day may record telephone conversations to verify and investigate customer assignments, to train employees or if deemed necessary from a fraud prevention or investor protection perspective. We only use the recordings internally and they are not kept longer than is strictly necessary for the aforementioned purposes.

Recording chat sessions

Brand New Day may use chat software to offer you the best possible service. By starting a chat, you give us permission to record the chat session. For this we may check the history at a later stage. We also assess the quality of this service so that we can improve it. We only use the information collected internally and it is not kept longer than is strictly necessary for the aforementioned purposes.

12. With whom do we share personal data?

In certain cases, we also share your personal data with other companies within the group.

If you are a direct customer of one of these companies, we also consider you to be a customer of the Brand New Day group of companies. For instance, we share data to pursue a responsible acceptance policy and to prevent fraud. We also do so if it is necessary for the processing of your application or to get an overall view of the products and services that you have within the Group.

Brand New Day may share your personal data with third parties who carry out work on behalf of Brand New Day. We only do this for the purposes listed in this Privacy Statement and only if processing of the personal data by the third party is necessary to carry out the assignment. We only use contractors who take appropriate organisational and technical security measures to protect personal data. In addition, they must enter into a data processing agreement with Brand New Day in which their obligations with respect to the processing of personal data are laid down. Brand New Day does not allow contractors to use your personal data for their own purposes.

When necessary, Brand New Day also shares personal data with the tax authorities, supervisory authorities or other official bodies. We only do so if we are required by law or if there is some other justification.

We only transfer personal data to countries outside the European Economic Area if this is fully in accordance with the GDPR and other legal guidelines.

13. How do we protect your personal data?

Brand New Day has taken appropriate organisational and technical security measures to protect your privacy. Our employees are under a confidentiality obligation that also applies to your data. Furthermore, they can only access data that is necessary for their work.

We also ensure the best possible security of the access systems, computer networks, servers and our buildings.

14. How long does Brand New Day keep personal data?

Personal data is not kept for longer than is necessary. How long that is exactly may be laid down by law and depends on the specific data and purpose for which we process your data.

15. What are your rights?

With respect to your personal data, you have:

- The right of access to your personal data that we have recorded.
- The right to submit a request for the rectification of your data. You can request this if the data is not correct or is incomplete.
- The right to submit a request for the erasure of your data. You can request this if this information is not required or no longer required, if Brand New Day unlawfully processes it or if Brand New Day was already required by law to process the personal data. In some cases, we cannot or are not permitted to change or erase data, for instance, if this is in conflict with the law.
- The right to restriction of our use of your data.
- The right to object to certain usage of your data. For instance:
 - against receiving commercial offers from Brand New Day;
 - against commercial promotions by telephone;
 - against participation in customer satisfaction surveys.
- The right under certain circumstances to transfer the personal data you have provided to us to a third party.
- The right to withdraw your permission if the processing of your personal data is based exclusively on your permission. For instance, if you have given Brand New Day your personal data for information purposes.
- The right to lodge a complaint with the Dutch Data Protection Authority if you believe that Brand New Day has infringed your rights with respect to your personal data.

If you would like to exercise any of these rights, then please send a request to:

Brand New Day
Attn the Data Protection Officer
P.O. Box 12550
1100 AN Amsterdam Zuidoost
The Netherlands

Please send a copy of a valid proof of identity with your request, so that we can be sure that it is you who has sent the request. The data protection officer will respond to your request as soon as possible, but in any event within one month.

16. Amendments

We may amend this Privacy Statement, for instance, if the law or our policy changes. There is a link to the latest version of our Privacy Statement on our website. The most recent amendment was on 25 May 2018.

17. Questions

Should you have any questions concerning our Privacy Statement, you can always send an email to privacy@brandnewday.nl or call our customer service department on +31 (0)20 - 75 85 310.

Brand New Day

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