

**Privacy Policy MGM Regulatory & Governance
January 2019**

1. General remarks

MGM Regulatory & Governance, processes personal data in the context of rendering its services. MGM Regulatory & Governance respects your privacy and processes personal data as a data controller in accordance with the European General Data Protection Regulation (**GDPR**) and relevant GDPR implementation Act and the provisions of other applicable laws, regulations and rules. In this Privacy Statement MGM Regulatory & Governance addresses how it handles and protect your personal data. Personal data is any information relating to an identified or identifiable natural person.

2. Purposes for processing personal data

MGM Regulatory & Governance processes personal data for the following purposes only:

- a. to process and to respond to requests, enquiries or complaints received from you;
- b. To onboard and execute its services and supporting processes and systems required;
- c. To manage and administer its relationship with you;
- d. To comply with regulatory and policy requirements; To provide services requested by you;
- e. To identify services you may be interested in;
- f. To communicate with you about MGM Regulatory & Governance services;
- g. To provide and improve its website by generating statistics regarding the use of the website;
- h. To monitor and analyse its business processes and systems;
- i. To establish, exercise or defend a legal claim and proceeding against MGM Regulatory & Governance and its staff;
- j. Business development activities.

MGM Regulatory & Governance will continuously check the processing of personal data on its legality in relation to the above-described purposes, whereby data provided to MGM Regulatory & Governance which is not necessary or relevant for the purposes as described will not be processed.

3. Categories of personal data

MGM Regulatory & Governance may process the following categories of personal data:

- a. basic personal information, such as name, title, position, the company you work for, or are liaised with;
- b. contact details;
- c. data that is needed for invoicing;
- d. data relating to your attendance of events;
- e. personal data that MGM Regulatory & Governance needs for compliance purposes;
- f. any other personal data that was provided to MGM Regulatory & Governance in the context of rendering services, which may include special categories of data within the meaning of the GDPR.T
- g. any other personal data relating to you that you provide to us.

4. How does MGM Regulatory & Governance obtains information

MGM Regulatory & Governance obtains personal data in the following situations:

- a. When you provide MGM Regulatory & Governance with your personal data, or when you interact with MGM Regulatory & Governance directly (by e-mail, telephone or letter);
- b. When you enter into an agreement with us)

Thinking Beyond Regulations

- c. When MGM Regulatory & Governance monitors its technology tools and services, including visits of its website and the e-mails which are sent to and from MGM Regulatory & Governance office.
- d. When MGM Regulatory & Governance collects personal data from other sources, such as local counsel, counterparties, commercial databases or when it obtains personal data through public sources such as the Trade Register of the Chamber of Commerce.

5. Basis for processing personal data

MGM Regulatory & Governance will process the above-mentioned personal data solely on the following basis within the meaning of article 6 of the GDPR:

- a. to conclude and perform a contract;
- b. to comply with regulatory and policy requirements;
- c. with your consent;
- d. for a legitimate interest (e.g. managing and administering the relationship with clients and other business relations).

6. Transfer of personal data to third parties

In relation to the provision of services and to regulatory processes MGM Regulatory & Governance may need to share personal data of data subjects with third parties. This will always take place with due observance of the purposes laid down in this privacy statement. Examples include:

- a. sharing personal data with an expert who MGM Regulatory & Governance commissioned in one of its legal files, or;
- b. sharing personal data with another third party on behalf of MGM Regulatory & Governance, such as an IT supplier, regulatory authorities, courts, tribunals, and government agencies for the purposes specified above; or
- c. sharing personal data with another lawyer who looks after the practice.

MGM Regulatory & Governance ensures to conclude a processor agreement with third parties who process personal data on behalf of MGM Regulatory & Governance, whereby the third party is obliged to comply with the GDPR as well. Third parties engaged by MGM Regulatory & Governance who offer their services as controller of the personal data, such as an accountant or a civil-law notary, have their own responsibility for complying with the GDPR.

7. Security of personal data

Taking into account the state of the art and the costs of implementation, MGM Regulatory & Governance has taken appropriate technical and organisational measures to protect personal data against loss or against any form of unlawful processing. In case MGM Regulatory & Governance engages the assistance of third parties for this, such as an IT supplier, it will establish an agreement with such third party to ensure adequate security measures to protect the personal data involved.

8. Personal data storage time

MGM Regulatory & Governance will keep your personal data no longer than is necessary to achieve the purposes of data processing stated in this privacy statement or is required by law and regulation.

9. Privacy rights of the personal data subject

The GDPR and other applicable laws foresee in certain rights for data subjects under the conditions set out therein. You, as a data subject, specifically have the following rights:

- a. Right to access your personal data;
- b. Right to rectification or correction of your personal data;
- c. Right to erasure of your personal data;

Thinking Beyond Regulations

- d. Right to object or to request restriction of processing of your personal data;
- e. Right to data portability;
- f. Right to object to profiling;
- g. Right to lodge a complaint with a supervisory authority;
- h. Right to withdraw your consent for the future to the extent that the processing of your personal data takes place on the basis of your consent.

10. MGM Regulatory & Governance website disclaimer and cookie statement

On the website of MGM Regulatory & Governance you will find a cookie statement as well as a disclaimer in relation to the use of the website. Please refer you to this information on the website: www.mgm-governance.com.

11. Amendment of privacy statement

MGM Regulatory & Governance has the right to change the contents of this privacy statement at any time without prior notice. Amendments to the privacy statement are published on the website of MGM Regulatory & Governance. Therefore, it is recommended to consult the website: www.mgm-governance.com regularly.

12. Questions and Contact

If you have any questions, requests or complaints regarding the processing of your personal data and/or the use of cookies, please contact:
MGM Regulatory & Governance, P.O. Box 129, 3720 AC Bilthoven the Netherlands. Or via the email address secretariaat@mgm-governance.com

To ensure that MGM Regulatory & Governance provides the relevant personal information to the right person following your request, it is kindly asked you to attach to your request a copy of a valid passport, driving license or identity card with a protected passport photo and BSN number. MGM Regulatory & Governance only handles requests that relate to your own personal data. You will receive further notice from MGM Regulatory & Governance within four weeks of receipt of your request.

There may be circumstances in which MGM Regulatory & Governance cannot, or cannot fully, implement your request. These include MGM Regulatory & Governance duty of confidentiality as attorney at law or statutory obligations.