

TCS Group Privacy Statement

This is the Privacy Statement of TCS Group. We need your personal data to provide our services to you. In this Privacy Statement we explain why and how we collect your personal data, what personal data we collect, how we use your personal data and how long we keep your personal data.

This Privacy Statement applies to all information collected or used by TCS-Group. TCS-Group consists of TeslinCS B.V. and its subsidiaries TCS Fund Services B.V., TCS Governance B.V. and TCS Depository B.V.

1. Who is responsible for processing your personal data?

TCS Group processes personal data of employees, customers and other (business) relations. TCS Group determines the purpose and means of processing the personal data. This means that TCS Group can be qualified as the data controller for the processing of your personal data.

At the request of a fund manager, TCS Group also processes personal data of investors in funds of the fund manager. This fund manager then determines the purpose and means of processing the personal data. In that case, the relevant fund manager is the data controller and TCS-Group is the data processor.

2. What personal data does TCS Group process?

TCS Group processes the following personal data, among others:

- First names and surnames and title(s)
- Contact details, including address, e-mail address (work and private), telephone number (work and private)
- Gender
- Date of birth
- Nationality
- Bank account number
- Copy of passport or other identity document
- Social Security Number
- Fiscal residency
- Curriculum vitae
- Origin of assets

It varies per service which and how much personal data we need.

3. For which purposes does TCS Group process personal data?

We collect personal data for:

- Complying with our statutory obligations arising from the Money Laundering and Terrorist Financing Prevention Act ('Wwft'), the Sanctions Act ('Sw'), the Trust Office Supervision Act 2018 ('Wtt') and the Financial Supervision Act ('Wft');
- being able to carry out activities laid down in a service agreement that a fund manager has outsourced to TCS-Group.

4. Legal ground for the processing of your personal data

TCS Group may only process your personal data if there is a legal ground for doing so. TCS Group relies on the following legal grounds for its processing activities:

- Complying with legal obligations: TCS Group processes personal data in order to comply with a legal obligation incumbent upon TCS-Group, among others on the basis of the Wwft, Sw, Wtt and Wft. For example, TCS Group is obliged to request and process certain personal data before the start of, and if necessary during, the provision of services. These are the data for the purpose of the customer due diligence.

- Execution of the agreement: you may decide yourself whether you want to use the services of TCS Group. The services are laid down in a service agreement and TCS Group collects personal data from you and the parties involved (e.g. investors) for the execution of this agreement.
- Consent: if necessary, your consent will be requested to process personal data (such as invitations to certain presentations or the use of a photo on our website) in certain situations.

5. How did TCS Group obtain your personal data?

In general, we obtain your personal data because you provide it to us. However, TCS Group may also request personal data from other sources. These may be public sources and non-public sources.

6. How long does TCS Group retain your personal data?

TCS Group does not retain personal data longer than strictly necessary for the purposes for which the personal data are collected. If the personal data are no longer relevant for the mentioned purposes, then TCS-Group deletes these personal data.

In addition, TCS Group takes into account the following retention periods:

- In accordance with the statutory retention obligation, the data from the customer due diligence will be kept for a maximum of five years after the end of the service.
- Data from financial and fund administrations that are important for tax purposes will be kept by the TCS Group for at least seven years.
- If your personal data are necessary for legal proceedings or disputes, TCS Group will retain these data for as long as necessary for this purpose.
- If you send us a curriculum vitae in connection with an application for a position within the organisation of TCS-Groep, we will use your personal data to investigate which vacancy you could possibly fill. Your curriculum vitae will be destroyed by us within one month of your application (or any interview).

7. Recipients of your personal data

TCS Group does not provide personal data to third parties, unless this is necessary to provide our services. TCS Group may engage other companies for its services, especially in the field of automated information facilities for our clients. TCS Group requires these companies to adequately protect your personal data and not to use your data for purposes other than those for which they were provided to TCS Group. This is laid down in a data processing agreement and a list of these companies is available upon request.

It is also possible that TCS Group is required by law to provide personal data to a supervisor and/or tax authority. In addition, TCS Group may also be obliged to disclose personal data on the basis of a court order.

8. Transfer of personal data outside the EEA

Personal data will not be transferred to countries outside the European Economic Area (EEA).

9. Cookies

On our website we only use the necessary cookies that are necessary for the website to work properly. When you visit our website, we do not collect any 'visitor data'. Our website may contain a link to another website. You should read the privacy policy on that site carefully; it may differ from the Privacy Statement of TCS Group.

9. Security of personal data

We acknowledge our responsibility to protect the personal data you entrust to us. TCS Group has taken appropriate measures to ensure the security of the processing of your personal data on the basis of the available technology and the processing purposes, including firewalls, secure servers and software with passwords and, where possible, two-step verification.

10. Your rights

You have a number of rights with regard to the processing of your personal data by TCS Group. This concerns the following rights: right of access, right of rectification, right to be forgotten, right to limit the processing, right to object to the processing, right to dataportability, right not to be subject to automated decision-making, right to withdraw your consent to the processing of your personal data and right to lodge a complaint with the Personal Data Authority. The contact details of the Authority for Personal Data can be found on the website www.autoriteitpersoonsgegevens.nl.

11. Other

TCS Group takes the protection of your data seriously and takes appropriate measures to prevent misuse, loss, unauthorised access, unwanted disclosure and unauthorised alteration. If you have the impression that your data is not properly secured or that there are indications of misuse, please contact us at info@teslincs.nl.

TCS Group reserves the right to amend this Privacy Statement at any time, for example in the event of changes in the law or jurisprudence. Therefore, please read this Privacy Statement from time to time so that you know what has changed. If we make any substantial changes to the Privacy Statement, we will inform you thereof in an appropriate manner.

This Privacy Statement was last amended on July 10, 2019.