



Privacy Statement Van Lanschot Kempen NV

In this Privacy Statement, we will explain how Van Lanschot Kempen NV, as a listed company, uses, processes, and protects personal data.

1. When do we publish changes to this Privacy Statement?

Van Lanschot Kempen reserves the right to modify this Privacy Statement. We will always inform you about any important changes in advance.

2. What are personal data?

Personal data are all of the details that provide information about a natural person. Examples include their name, address or telephone number. Table 1 shows the categories of personal data that we may process. In this Privacy Statement, we will explain the purposes for which these data may be used and processed, and the rules on which this is based.

3. What does 'processing of personal data' involve?

Processing refers to everything that we can do with personal data, including collecting, storing, viewing, and destroying them.

4. How do we handle personal data?

Your privacy is important to us. We comply with laws and regulations. These include the General Data Protection Regulation (GDPR) of the European Union and the Dutch GDPR Implementation Act. We treat personal data responsibly and carefully. We do not sell personal data to any third parties.

5. Does this Privacy Statement also apply to your personal data?

We process personal data of (representatives of) shareholders, visitors to the website, investors and others who may be interested in Van Lanschot Kempen or their representatives. This Privacy Statement explains the purposes for which Van Lanschot Kempen may process personal data and which personal data we will process, as well as the basis on which we may process them. Table 1 shows the categories of personal data that we may process, depending on the situation.

6. How do we secure personal data?

It is very important to us that your data and ours are safe. Our staff are bound by strict rules. Our security measures are in compliance with the relevant standards. The Nederlandsche Bank, the Netherlands Authority for the Financial Markets, and the Dutch Data Protection Authority supervise our security measures.

7. How do we deal with data leaks?

In the event of a data leak, personal data may be exposed to unauthorized individuals. We will report data leaks to the Dutch Data Protection Authority. We will not do so if you are not exposed to any risk. Furthermore, we will always inform you of such a leak. We will do so if this is necessary in consideration of any risk to which you may be exposed. Risks may include identity theft or fraud. In such an event, we will inform you about what has happened as well as about the possible consequences. In addition, we will inform you about the measures we have taken in order to mitigate any adverse consequences.

8. What can you ask us with respect to your personal data?

Below is a summary of what you can ask us with respect to your personal data. Whether we will be able to accommodate your request will depend on the law. Please bear in mind, therefore, that we will not be able to accommodate every request. We will respond to your request or answer your question as soon as possible. The processing of your request or question is free of charge, unless the process takes an exceptional effort on our part. Repeating the same question over and over within a short period of time would be an example of such an effort. If we do decide to charge a fee, we will inform you in advance.

Rectification of personal data, amendments or additions

You have the right to request rectification of your personal data if they are inaccurate or incomplete.

Inspection of personal data

You have the right to request inspection of your personal data and to request a copy of the data. In addition, you have the right to ask for information as to how we process your personal data (including the purposes for processing the data and the categories of the personal data).

Deletion of personal data

You have the right to request the deletion of your personal data, for instance when it is no longer necessary for us to hold on to your data or if you have withdrawn your consent for us to use your personal data.

Objection to the processing of personal data

You have the right to object to certain types of processing of your personal data. This is only possible if our processing is based on the legal grounds of 'legitimate interest' (under the heading '**Why do we process personal data?**', you can find when this applies), in the event of direct marketing, and if personal data are being used for the purpose of statistics.

Restriction of processing

You can ask us to suspend the processing of your personal data temporarily. You may want to do this, for instance, if we are examining the correctness and completeness of your personal data at your request, or if we are processing personal data without authorization. In addition, you can ask us to do so if you think that you will need the data for legal proceedings or if you have objected to the processing of your data.

Data portability

Under certain circumstances, you can request to obtain the data that you have provided to us for reuse for your own purposes, or ask us to transfer the data to a third party.

9. Why do we process personal data?

Van Lanschot Kempen will process personal data for a variety of different reasons. More information can be found below.

Convening (special) shareholders' meetings

We will process personal data in connection with the annual general or extraordinary meetings of shareholders of Van Lanschot Kempen, for instance in registering the notifications of participation submitted by shareholders prior to the meetings and prior to taking votes during these meetings, as well as in recording the proceedings in minutes. We are allowed to process personal identification data for these purposes as we are complying with a statutory obligation in holding shareholders' meetings.

Nominating and (re)appointing directors and supervisory directors

We will process personal data of directors and supervisory directors of Van Lanschot Kempen within the context of screening programmes by regulatory authorities, notifications of (re)appointments, proposals, and (re)appointments. We are allowed to process personal data, personal identification data, and personal characteristics for these purposes as it enables us to comply with our statutory obligation.

Communication with (potential) shareholders and other interested parties

We will process personal data of existing and potential shareholders and depositary receipt holders of Van Lanschot Kempen in order to be able to communicate with these individuals. In addition, we will process personal data of persons who have expressed an interest in Van Lanschot Kempen (including journalists, for example) in order to be able to send them information from time to time, including media and press releases about Van Lanschot Kempen.

We are allowed to process personal data and personal identification data for these purposes as it is in our legitimate corporate interest to communicate with these individuals. For personal reasons, those concerned may object to the processing of personal data on the basis of this interest.

Promotion and marketing

The activities of Van Lanschot Kempen in the field of promotion and marketing (in the form of road shows, for instance) are predominantly designed to reach potential new shareholders and holders of depositary receipts and to maintain our relationships with existing shareholders and depositary receipt holders, for instance by the Investor Relations department. We are allowed to process personal data for the purpose of such promotion and marketing activities, such as personal identification data and electronic identification data. We have a legitimate corporate interest in promotion and marketing as these activities support Van Lanschot Kempen's corporate activities. For personal reasons, those concerned may object to the processing of personal data on the basis of this interest. Please refer to the section entitled 'Objecting to the processing of personal data' for further details.

Running the secretarial office of the 'Stichting Administratiekantoor' (Administrative Office Foundation) and the 'Stichting Pref C' (Preference Shares C Foundation)

We will process personal data of directors of the Administrative Office Foundation for ordinary shares A in Van Lanschot Kempen and the Preference Shares C Foundation for preference shares in Van Lanschot Kempen in connection with running the secretarial office. We have a corporate interest in the proper functioning of these foundations, which are independent of Van Lanschot Kempen. For personal reasons, those concerned may object to the processing of personal data on the basis of this interest.

Statutory obligations

We will process personal data in order to comply with statutory obligations. More information can be found below.

- **Statutory retention obligations.** We are required by law to retain certain personal data. This applies, for instance, to personal data that are included in the annual report, in documentation with respect to general (and extraordinary) meetings of shareholders, and in documents related to screening programmes of directors and supervisory directors.
- **Obligations to disclose information and requests for information.** Based on statutory obligations, we may be obliged to disclose, on our own initiative or upon request, personal data in our possession to a government institution, tax authority, regulatory authority or the judiciary. Dutch authorities may, in turn, share the personal data that we provided with other foreign or domestic authorities. Also foreign legislation may oblige us to provide information to foreign institutions.

For the safety and integrity of the financial sector and to prevent and mitigate fraud

Fraud investigations into events and incidents are yet another way to ensure the safety and integrity of the financial sector. In conducting these investigations, we may engage the help of third parties, such as lawyers or forensic accountants. For this purpose, we may process personal data as we are obliged to ensure the safety and integrity of our operations and because it is in the legitimate interest of our shareholders, the financial sector, our employees, and ourselves as a company.

10. Do we disclose personal data to third parties

We may disclose your personal data to third parties but only if this is necessary within the context of the performance of the agreement or as part of efforts to improve the efficiency of our business operations. To name one example, Van Lanschot Kempen engages an independent third party to take voting instructions from shareholders and holders of depositary receipts who want to vote during the (annual or extraordinary) meetings of shareholders.

11. How long do we keep personal data?

We observe maximum time periods for the storage of personal data. These periods are specified in table 2. Once the maximum retention period has lapsed, we will delete the personal data.

12. Cookies

Our [cookiestatement](#) explains how we deal with your personal data that are processed by us using cookies.

13. Do you have any questions or complaints?

For general questions or complaints in connection with this Privacy Statement, please contact the data protection officer. E-mail: privacyofficer@vanlanschotkempen.com.

If you feel that Van Lanschot Kempen has violated your rights, you can submit a complaint to the Dutch Data Protection Agency.

For any other questions, you are welcome to contact the Investor Relations department on weekdays between 8.30 a.m. and 5 p.m., telephone +31 20 354 45 90 or e-mail investorrelations@vanlanschotkempen.com.

14. Where can you find more information on privacy?

For more information in general about privacy, please refer to the Dutch Data Protection Agency website: www.autoriteitpersoonsgegevens.nl.

Annexes

Below is a list of categories of personal data that we are lawfully entitled to process. The Privacy Statement explains for which purposes and on which basis we may process these personal data.

Table 1. Categories of personal data that may be processed

Category of personal data	Example
Personal identification details	Name, address, city, postcode, email address, telephone number, signature, user name in social media, account number
Personal characteristics	Age, gender, date of birth, marital status, nationality, profession, formal qualifications
Electronic identification data	IP address, cookies
Special personal data	Data as referred to in Article 9 of the General Data Protection Regulation
Criminal record	Information pertaining to criminal convictions and criminal offences

Table 2. Retention periods

Data type	Retention period
Personal data of shareholders	Seven years following the shareholders' meeting
Personal data of directors and supervisory directors	Ten years after resignation
Personal data of potentially interested individuals who have not yet been contacted	Six months following collection
Personal data of potentially interested individuals who have expressed that they would like to be contacted	Two years following the last contact
Contact details of potentially interested individuals who do not want to be contacted anymore	Two years after these persons have indicated that they do not want to be contacted anymore

The stated retention periods may not be extended unless after expiry of the retention period as mentioned, a complaint is ongoing, or legal or regulatory proceedings or investigations are active in connection with the person concerned. The same retention periods apply to personal data stored at third parties. Our cookie statement specifies the retention periods we have in place for the various types of cookies.