



Privacy Policy

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1. Who are we and what do we do?

We are iLoan B.V., iLoan Operation 1 B.V. and iLoan Operation 2 B.V. (**iLoan**). iLoan provides a customized IT platform that provides highly automated origination and servicing functionality for both lending and leasing, specifically for Personal Loans, Private Lease, Car Finance, Hire-Purchase, Financial Lease, Operational Lease, Sustainability Loan, Self-Employed Loan, Business Loan and Mortgages (the **Services**). More information about us and our Services is available on our website, <http://www.iload.nl> (the **Website**).



2. What is this?

This is our **Privacy Policy**. In this document we explain which personal data we process of our clients (**Clients**) and job applicants (**Applicants**) via our Website and Services. We also explain for which purposes personal data are processed, why we may process them and how long we keep them.

3. Privacy and the Relevant Legislation

We comply with the General Data Protection Regulation (**GDPR**) and other relevant laws and regulations regarding the processing of personal data, such as the Telecommunications Act (*Telecommunicatiewet*) for the use of cookies. This legislation will collectively be referred to as the **Relevant Legislation**.

4. What are 'personal data'?

Personal data refers to all information by which a person can be identified, directly or indirectly. This definition is in accordance with the Relevant Legislation.



5. iLoan as Processor and Controller

iLoan as Processor

Most of the personal data we collect and process, are processed on behalf of Clients who use our Services. Our Clients determine the means and purposes of this processing of personal data, which means they act as **Controller** within the meaning of the Relevant Legislation. We process these personal data strictly in accordance with the instructions of our Clients and we do not process them for our own purposes. In this respect, we act as **Processor** within the meaning of the Relevant Legislation. Our obligations as Processor are laid down in the **Data Processing Agreement** we enter into with our Clients.

In case we are contacted with a question regarding the personal data we process as Data Processor, we will refer the person concerned to the relevant Client who acts as Controller in that respect.

iLoan as Processor

Apart from the processing on behalf of our Clients, we also collect and process personal data on our own behalf. We determine the purposes and means of these processing activities. This means we act as Controller within the meaning of the Relevant Legislation. In this Privacy Policy we explain what personal data we process as a **Controller**.

6 Which personal data do we collect and for which purposes are they used?

Depending on the relationship we have with a person, we process various personal data for different purposes. Below is a breakdown of what personal data of a (potential) Client or Applicant is processed.

Personal data of (potential) Clients:

(Personal) Data:	Purpose(s):	Legal ground:
<p><i>Contact details</i> First name and surname, e-mail address and telephone number.</p>	<p>We use these data to:</p> <ul style="list-style-type: none"> • Get in touch and to maintain contact with our (potential) Clients; • Approach our Clients appropriately in our communications; 	<p>We may process these personal data in order to (possibly) enter into, or to perform an existing contract.</p>
<p><i>Payment and tax details</i> Client name and address, contact details of financial contact person at Client, invoicing details, bank details (account number, IBAN and BIC-code) and an optional VAT identification number.</p>	<p>We use these data to:</p> <ul style="list-style-type: none"> • Send invoices to our Clients; • Process and administer payments; • Include in our (financial) administration to comply with Tax and Customs Administration regulations. 	<p>We may process these personal data, because we need these personal data to perform our contract with our Clients.</p> <p>We are also legally obligated to process and/or share (some of) these data for/with the national tax authorities</p>
<p><i>Services history</i> Information on the history of Services already rendered to the Client. This includes among other things information about earlier correspondence and (technical) reports on rendered Services.</p>	<p>We use these data to:</p> <ul style="list-style-type: none"> • Identify the Clients' history of Services used. 	<p>We may process these personal data because we have a legitimate interest to process these data in order to provide our Services.</p>

<p><i>Technical documentation</i> Information on the device used to access our Services, IP-address and information on the used browser.</p>	<p>We use these data to:</p> <ul style="list-style-type: none"> • Communicate in the same language of the browser; • Adapt our Website to the used device. 	<p>We may process these personal data because we have a legitimate interest to provide a good functioning Website.</p>
<p><i>Contact details of (potential) Clients using a contact form on the Website</i> First name and surname, e-mail address and any personal data included in the message.</p>	<p>We use these data to:</p> <ul style="list-style-type: none"> • Make contact based on the message 	<p>We may process these personal data because we have a legitimate interest to contact the (potential) Client in replay on the message.</p>

Personal data of Applicant:

(Personal) Data:	Purpose(s):	Legal ground:
<p><i>Contact information</i> First name and surname, e-mail address, address and telephone number.</p>	<p>We use these data to:</p> <ul style="list-style-type: none"> • (Keep) contact with the Applicant about the application. 	<p>We may process these personal data, because we have a legitimate interest in processing these data. We need the data to get (and keep) in touch with the Applicant and to process and review the application.</p>
<p><i>Application information</i> Information provided by Applicant, among others: personal data included in the Curriculum Vitae and motivation letter, qualifications, photo, gender and day of birth</p>	<p>We use these data to:</p> <ul style="list-style-type: none"> • Assess whether the Applicant suits the job and/or iLoan and to determine which Applicant is the most suitable candidate. 	<p>We have a legitimate interest to process these personal data as we need them to process and assess the application. We only process the personal data that Applicant provided us.</p>
<p><i>Information retained during application process</i></p>	<p>We use these data to:</p>	<p>We have a legitimate interest to process these personal data as</p>

<p>Notes from interviews, information received from referees and/or training institutions.</p>	<ul style="list-style-type: none"> Assess whether the Applicant suits the job and/or iLoan and to determine which Applicant is the most suitable candidate. 	<p>we need them to process and assess the application.</p>
<p><i>Information from public sources</i></p> <p>Information in public profiles, such as LinkedIn and other social networks (where applicable).</p>	<p>We use these data to:</p> <ul style="list-style-type: none"> Assess whether the Applicant suits the job and/or iLoan and to determine which Applicant is the most suitable candidate. 	<p>We have a legitimate interest to process these personal data as we need them to process and assess the application. We only process information that is relevant for the application and the Applicant get the opportunity to react to our findings.</p>

Personal data made public on our Social Network Pages:

(Personal) Data:	Purpose(s):	Legal ground:
<p>Information of visitors who leave a comment or otherwise post something on our Social Media Pages, including the personal data within these comments and/or posts.</p>	<p>We use these data to:</p> <ul style="list-style-type: none"> Contact the visitors in reply of their post and/or comment via our Social Media Pages; Process the feedback left on our Social Media Pages. 	<p>We may process these personal data, because we have a legitimate interest to process these data and because the visitors voluntarily made public such information.</p> <p>Our Social Media Pages are also controlled by the social medium itself. Please check their own privacy policies, to see how each social medium handles personal data:</p> <ul style="list-style-type: none"> Twitter: Privacy Policy LinkedIn: Privacy Policy

7. How long will we retain the personal data?

We will delete the personal data if they are no longer necessary for the purposes as mentioned above. In any case, we use the following retention periods:

- **Personal data of potential Clients** | These data are stored as long as necessary to determine whether we enter into an agreement with a potential Client and for a maximum period of 24 months after our last contact.
- **Personal data of Clients** | These data are stored as long as we have a contract with our Client and for a maximum period of 24 months after, unless we are legally obliged to retain the data for a longer period.
- **Personal data of Applicants** | These data are stored for a maximum of 4 weeks after the application procedure is finished, unless we obtained the consent of the Applicant to restore its data for a maximum of 1 year after this moment.
- **Personal data in our records for the tax authorities** | These data are stored for seven (7) years, unless we are legally obliged to retain the data for a longer period.
- **Other information** | We store other personal data only for as long as necessary for the purposes. This means that other personal data will be deleted as soon as it is no longer necessary for the purposes for which we processed it.

8. Do we share the personal data with others?

We use the services of several external parties who process the personal data on our behalf. For example, we use third parties for hosting our e-mail and data, for project planning and we share personal data with tax authorities. We only provide such personal data to third party service providers which is necessary for them to execute the services they provide to us. These third party service providers are **(Sub) Processors** within the meaning of the Relevant Legislation. We have established contractual agreements with all our (Sub) Processors in (Sub) Processor Agreements in which - in line with this Privacy Policy - is defined what these parties may do with the personal data, how they must secure it and when it must be deleted.

9. Export of data outside the European Union

We may transfer personal data to parties outside the European Union, if one of our **(Sub) Processors** is located outside the European Union. The personal data will only be transferred to countries and/or parties that provide an adequate level of protection in accordance with the European standards as set out in the Relevant Legislation.

The transfer of personal data outside the European Union will always be in accordance with the Relevant Legislation (chapter 5 of the GDPR).

10. How do we protect the personal data?

We protect all personal data that we process against unauthorized access, loss, destruction, theft or any other unlawful processing. For instance, we take the following technical and organizational measures to protect the personal data:

- (Personal) data can only be accessed via a two-step verification;
- Our employees only have access to the personal data on a need-to-know basis;
- Our employees have their mobile devices, such as laptops, secured with a password, FileVault encryption and VPN-connection;
- A back-up is made regularly of the protected environment containing (personal) data.



11. Websites of third parties

Our **Website** contains hyperlinks to websites of partners, suppliers, advertisers, sponsors, licensors or other third parties. We have no control over the contents or links that appear on these websites and we are not responsible for any practices of websites linked to or from our **Website**. In addition, these websites and their contents and links can change constantly. These websites may have their own privacy policy, user terms, and client policy. Browsing and interaction on any other website, including websites linked to or from our **Website**, are subject to the terms and policy of that website.

12. Cookies

We use cookies on our **Website**. A cookie is a simple small text file that can be stored on the devices of visitors after accessing the **Website**. We use the following types of cookies:

- Functional cookies: Functional cookies are essential to the operation of our Website. They allow our visitors to navigate through our **Website** and to use the functions incorporated in it.
- Analytical or statistical cookies: Analytical cookies are used to check the quality and effectiveness of the Website. For instance, we can see how many users visit our **Website** and which pages are visited. We use this information to improve our Website and Services.
- Tracking cookies: Tracking cookies follow the click and surf behavior of our visitors. We may use these cookies to show our visitors content or ads based on their interests.

Visitors that do not want cookies to be sent to their device can change their cookie settings through their browser. Please note that some of the functions or services of our **Website** may not operate, or not so well, without cookies.



13. Amendments to this Privacy Policy

We aim to constantly improve our **Website** and **Services**. Therefore, we may update this Privacy Policy from time to time. If we change this Privacy Policy in a significant way, we will always send a notification about this.

12. Rights and how to contact us

As set out in the Relevant Legislation, you have the right to:

- request us to correct or update your personal data;
- request us to delete your personal data from our systems, without stating a reason for this, if the Relevant Legislation gives you a ground for such a request;
- request a copy of all personal data we have processed. At your request, we may also forward (a copy of) certain personal data to another Controller;
- withdraw consent for the processing of your personal data. This only applies to processing activities that are based on your consent and does not affect the validity of such processing before the time your consent was withdrawn;
- object to the processing of your personal data by us;
- - file a complaint with the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*), if you think that we process your personal data unlawfully.

If you have any questions, comments or concerns regarding the manner in which we handle your personal data, please contact us through the contact data below:

iLoan B.V. Professor J.H. Bavincklaan 7 1183 AT Amstelveen E-mail address: info@iloan.nl Website: http://www.iloan.nl Chamber of Commerce: 68345518 VAT number: NL857403175B01	iLoan Operation 1 B.V. Professor J.H. Bavincklaan 7 1183 AT Amstelveen E-mail address: info@iloan.nl Website: http://www.iloan.nl Chamber of Commerce: 73663034 VAT number: NL859619618B01	iLoan Operation 2 B.V. Professor J.H. Bavincklaan 7 1183 AT Amstelveen E-mail address: info@iloan.nl Website: http://www.iloan.nl Chamber of Commerce: 84713135 VAT number: NL863328179B01
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