

Privacy Policy – BTW Team B.V.

1. Introduction

BTW Team B.V. (“BTW Team”) respects your privacy and is committed to protecting your personal data. Personal data means any information relating to an identified or identifiable natural person.

With this Privacy Policy, BTW Team fulfils its information obligations under the General Data Protection Regulation (“GDPR” / “AVG”) towards data subjects whose personal data are processed by BTW Team.

2. Data Controller and Contact Details

BTW Team B.V., acting as data controller, processes personal data in order to provide and improve its services. By engaging our services or otherwise providing personal data, you choose to participate in this processing for the purposes described below.

3. Purposes of Processing

BTW Team processes personal data primarily for the performance of agreements under which you have engaged us to provide advisory services. Depending on the nature of the engagement, personal data may be processed for the purpose of handling your case or assignment, including invoicing and collection of payments.

In addition, personal data may be processed:

- to provide you with relevant information;
- to comply with applicable legal and regulatory obligations.

If personal data are to be used for a purpose other than that for which they were originally obtained, BTW Team will assess whether there is a valid legal basis for such processing. Where required, your consent will be requested.

In certain circumstances, BTW Team may share personal data with third parties where this is necessary for the provision of its services (for example in the context of legal proceedings). Personal data are never shared with third parties for commercial or marketing purposes.

4. Categories of Personal Data

For the purposes described above, BTW Team may process the following categories of personal data:

- contact details and other personal data necessary for handling your case or assignment;
- contact details provided during meetings, conversations or introductions;

- personal data obtained from public sources or public registers accessible to BTW Team, such as the Trade Register of the Chamber of Commerce or the Land Registry.

These personal data may have been provided directly by you, obtained in the course of providing our services, received from third parties (including counterparties), or derived from publicly available sources.

5. Legal Basis for Processing

BTW Team processes personal data only where one or more of the legal bases set out in Article 6 GDPR apply, including:

- (a) consent of the data subject;
- (b) necessity for the performance of a contract to which the data subject is a party;
- (c) compliance with a legal obligation to which BTW Team is subject;
- (d) necessity for the purposes of legitimate interests pursued by BTW Team or a third party, except where overridden by the interests or fundamental rights and freedoms of the data subject;
- (e) protection of the vital interests of the data subject or another natural person;
- (f) performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Personal data may be provided or obtained by e-mail, telephone, in writing or orally.

6. Disclosure to Third Parties

BTW Team shares personal data with third parties only insofar as this is necessary for the provision of its services and in accordance with the purposes described above. This may include, for example, the engagement of experts or other third parties acting on behalf of and under the instructions of BTW Team.

Personal data may also be disclosed to competent authorities, supervisory bodies or other public authorities where BTW Team is legally obliged to do so.

7. Security of Personal Data

BTW Team attaches great importance to the security and protection of personal data. Taking into account the state of the art, appropriate technical and organisational measures are implemented to ensure a level of security appropriate to the risks involved.

8. Retention Periods

Personal data are not retained longer than necessary for the purposes for which they are processed, unless a longer retention period is required by law or regulation.

Where you contact BTW Team on your own initiative via a contact form, e-mail, telephone or otherwise with a one-off request for information, personal data will be retained for a reasonable period.

9. Rights of Data Subjects

You may submit a request for access, rectification, restriction of processing, objection, data portability, erasure of personal data, or withdrawal of previously given consent using the contact details provided below.

BTW Team will respond to your request within four weeks of receipt. In certain circumstances, BTW Team may not be able to comply with a request in full, for example due to statutory retention obligations or confidentiality requirements.

10. Cookies and Website Use

BTW Team collects website usage data for statistical purposes. Such data are, in principle, anonymised and are not shared with third parties.

To enhance user experience, BTW Team websites use cookies. A cookie is a small text file placed on your device when you visit the website. You may disable cookies at any time, although this may affect the functionality of the website.

Cookies are used to monitor user behaviour at an aggregate level, identify trends and generate reports, enabling BTW Team to improve the performance and usability of its websites.

Further information about cookies and how to block or delete them can be found on the website of the Authority for Consumers and Markets (ACM).

11. Amendments

BTW Team reserves the right to amend this Privacy Policy at any time without prior notice. Any amendments will be published on the BTW Team website.