

Privacy Statement Rubens Capital Partners

Introduction

Rubens Capital Partners B.V. and RCP Asset Management B.V. (jointly referred to as: “**RCP**”) handle your personal data seriously and with care. In our privacy statement we describe how we collect and use your personal data, we inform you about your rights with regard to the way we handle your personal data and how to exercise them. Before you provide us with your personal data, we advise you to read our privacy statement.

Company identity

RCP is an independent asset and investment management firm with assets under management in The Netherlands, USA and Germany. The main asset classes are residential, office and retail. Our clients are (international) institutional Investors and family offices. RCP seeks to generate returns for our investors over the long term. We add value through hands on management and maximize returns for our clients.

Purpose and legal basis of processing data

We process personal data of persons whom RCP has provided or intends to provide services to or conduct business with, either directly or indirectly. These include our participants and persons associated with a company or organization that participates in one of the RCP funds.

In addition to contact information, RCP collects information concerning identification, bank accounts, transaction and correspondence from the participants, so they can participate in the RCP funds. RCP also collects information with regard to a customer due diligence that RCP must perform based on the Money Laundering and Terrorism Prevention Act (*Wet ter voorkoming van witwassen en financieren terrorisme*). For this, RCP also obtains information via public sources and third party data providers in order to prevent fraud, money laundering and terrorist financing. RCP needs this information for fulfilment of its legal obligations and of the agreement on which participation in a fund is based.

Exchange of personal data

RCP will not sell, lease, distribute or otherwise make your personal data commercially available to third parties. RCP will only provide information to third parties if participants have consented or instructed RCP to do so. In addition, RCP will disclose personal data to third

parties if they are required by court order or any other mandatory laws and regulations. RCP concludes data processor agreements with third parties that process your personal data on behalf of RCP. These agreements comply with applicable privacy legislation. RCP only processes or has your personal data processed by third parties within the EU.

Security of personal data

RCP has taken appropriate technical and organizational measures to protect personal data against loss or any form of unlawful processing.

Retention of personal data

RCP does not store personal data longer than necessary to achieve the purpose of which your data is collected, but in any case for as long as specific regulations require. After termination of participation in the fund RCP is obliged to keep identity data for 5 years and correspondence; bank and transaction data have a statutory retention period of 7 years. After the aforementioned terms have lapsed, RCP will delete this information.

Privacy rights and complaints

Based on the European General Data Protection Regulation you have the right to view your personal data, to have it corrected or to have it removed. You also have the right to withdraw your consent to data provision and you have the right to data portability. You can contact RCP's privacy officer at: info@rubenscapital.nl if you have any concerns, a complaint or questions regarding this topic. You are also entitled to file a complaint about the use by RCP of your data with the Dutch data Protection Authority (<https://autoriteitpersoonsgegevens.nl>).

Cookies

The RCP website does not use cookies.

Adjustment of privacy statement and contact

RCP reserves the right to make changes to this privacy statement. Therefore, RCP suggests to read the statement regularly so that you are aware of these changes. If you think that your personal data is not properly secured or is being misused or you want more information from RCP about the security or the processing of your data, please contact the RCP privacy officer via the contact information below.

Address RCP

Rubens Capital Partners B.V.

RCP Asset Management B.V.

Privacy officer

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1077 DG Amsterdam

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