

PRIVACY POLICY



This privacy policy describes your rights and the measures taken by Fundum Capital to protect your personal data.

Fundum Capital is a controller pursuant to the General Data Protection Regulation (GDPR).

Fundum Capital may evaluate and revise this privacy policy. The current version is always available at www.fundum.capital

Article 1: Definitions

Personal data: Personal data is data that tells you something about a person, either directly or indirectly. This may be any kind of information, such as names, address details or telephone numbers, but also the Citizen Service Number (Dutch BSN), an IP address of a computer, or the details of a bank transfer.

Processing of personal data: The processing of personal data entails everything that can be done with information, such as viewing, collecting, sharing, storing, transferring, or analysing.

Article 2: Processing of personal data

1. Your personal data is retained by Fundum Capital. You can find our contact details and information about the activities of Fundum Capital on the above-mentioned website.
2. When you visit Fundum Capital's website or want to buy Fundum Capital tokens, we process various personal data. Fundum Capital may also retain personal data relating to you during our relationship with you, such as for example the transactions you carry out from your account or information on how you use our website.
3. Fundum Capital processes the following personal data:
 - Name
 - Address
 - Telephone number
 - Email address
 - Login details
 - ID card number
 - Wallet address
 - IP address
 - IBAN number
4. Fundum Capital collects personal data that you yourself provide on our website, by registration of personal data when you use our website, that you provide to us in an email or a telephone conversation, or when you fill in forms and send them to us.
5. We may also obtain your personal data from other companies with which we collaborate, when we have a legal basis for this. In that case, we will inform you about how and why we use the data. This may, for example, concern:

- fraud prevention agencies such as the Financial Intelligence Unit - Netherlands;
- public sources of information;
- government agencies and law enforcement bodies.

6. The personal data is processed by Fundum Capital for the following purposes:

- Maintaining contact: If you contact us using the contact form on our website, you have to state your name and email address. The basis for the processing of your personal data is the consent given by you.
- Creating an account: you can create an account on our website to purchase Fundum Capital tokens. In order to be able to create an account, you will have to fill in the following details: name, email address, password, and country of residence. The basis for the processing of your personal data is the consent given by you and the performance of the agreement.
- Purchasing FND tokens: In order to be able to purchase FND tokens on our website, you have to log in to your account. In addition, you will have to fill in your wallet's address, as well as the payment details. These payment details depend on the method of payment chosen by you and may include: the name details of your bank account, your IBAN number, your password, your wallet address, etc. Depending on the chosen method of payment and depending on whether you purchase FND tokens on our website for the first time, you will have to complete a verification process before being able to purchase FND tokens. The basis for the processing of your personal data is the consent given by you and the performance of the agreement.
- Following the verification procedure: You have to upload a copy of your valid identity document in order to follow the verification procedure. We recommend that you do this using the DigiD app which is available for the most commonly used mobile operating systems. In addition, you have to state your address details. The basis for the processing of your personal data is the consent given by you and the performance of the agreement.

Article 3: Retention of personal data

1. We retain your data for no longer than 20 years after the end of the agreement.
2. We retain the personal data that you provide to us in a contact form for as long as retention is required in view of the content of the message you send using the contact form, but never for longer than 20 years after you sent the contact form.
3. We retain the personal data that you provide to us when creating an account for a period of 10 years.
4. We retain the personal data that you provide to us when purchasing FND tokens for a period of 10 years after the last time you bought FND tokens.
5. We retain the personal data that you provide to us as part of the verification procedure for a period of no longer than 20 years after the last time you bought FND tokens.

Article 4: Cookies

1. Our website uses cookies. Cookies enable us to collect data from your personal devices in order to record your online and mobile activities, offer you the required functionality, improve the quality of our website or mobile services, and optimise your personal experience. We use third-party cookies when you give us permission to do so.

WHAT COOKIES DO YOU USE?

Article 5: Sharing your personal data

1. Fundum Capital only shares your personal data if there is a legal basis or you have given us your permission for this. We treat all your personal data confidentially and in accordance with the law. We do not share any information about you with others, unless:

- we are legally obliged to do so;
- we have to share the information in connection with (possible) legal proceedings;
- we have to share your data with other companies because they perform administrative or other services on behalf of Fundum Capital. When a third party processes personal data on behalf of Fundum Capital, we will ensure that this party follows our instructions for the processing and protection of personal data.

Third parties are obliged to sign an agreement with us in which they make arrangements on the protection of personal data and agree to only use this data for the services described in the agreement.

2. Fundum Capital's starting point is that we do not share any personal data outside the European Economic Area (EEA). If this is nevertheless necessary, we will ensure that the data will have the same level of protection as within the EEA, by using an agreement concluded with the recipient ensuring that this party processes the data with the same level of protection as applicable within the EEA.

Article 6: Your rights

1. Pursuant to the GDPR, you have a number of rights in connection with your personal data:

- The right of access to your personal data and the right to rectification of errors and inaccuracies.
- The right to deletion of your personal data: you have the right to ask us to delete your personal data. A request for deletion of your personal data is possible if:
 - a. your personal data is no longer necessary for the purpose for which it was collected;
 - b. you withdraw your consent and there is no other basis for processing your personal data;
 - c. you object to our processing of your personal data for legitimate purposes of Fundum Capital;
 - d. you feel that your personal data is not processed lawfully; and
 - e. your personal data has to be erased to meet the statutory requirements.
- The right to data portability.
- The right to restriction of the processing operations: for example, if you feel that your personal data that is retained by Fundum Capital is incorrect, not processed lawfully, or is no longer necessary for the purposes for which it was originally collected.
- The right to object to the processing of personal data
- The right to lodge a complaint

2. You also have the right to lodge a complaint directly with the data protection supervisor, the Dutch Data Protection Authority.

Article 7: Security

Fundum Capital has taken appropriate measures to protect your use of its website and to prevent abuse. All persons who have access to your personal data are bound by an obligation to observe the confidentiality of this data.

Article 8: Amendments to the privacy policy

Fundum Capital reserves the right to amend its privacy policy whenever it deems this necessary.

Article 9: Company details

Fundum Capital Holdings B.V.

Bachstraat 15

1077 GE Amsterdam, the Netherlands

+31 (0)20 30 86 166

COMPLAINTS PROCEDURE

Article 1 definitions

In this complaints procedure, the following terms have the following meanings:

- complaint: every expression of dissatisfaction that is received at the email address of Fundum Capital intended for this purpose, by or on behalf of the customer, with regard to the formation and the performance of the agreement.
- complainant: the customer or his/her representative who communicates a complaint through the email address intended for this purpose.

Article 2 scope

1. This complaints procedure applies to every agreement between Fundum Capital and a customer.
2. Fundum Capital ensures that every complaint is handled in accordance with this complaints procedure.

Article 3 objectives

This complaints procedure has as its objective:

- a. recording a procedure for handling a complaint in a constructive manner and within a reasonable period of time;
- b. recording a procedure for establishing the causes of complaints from customers;
- c. retention and improvement of relationships with customers by means of a proper complaint handling;
- d. improvement of the quality of the services through complaint handling and complaint analysis.

Article 4 information on commencement of services

1. This complaints procedure has been published on Fundum Capital's website. Before entering into an agreement, Fundum Capital will draw the customer's attention to the existence of the complaints procedure and its applicability to the agreement.
2. Complaints as referred to in this complaints procedure that have not been resolved after handling may be submitted by any interested party to the court stated in the general terms and conditions of Fundum Capital.

Article 5 the complaints procedure

1. If a complaint is received at the email address intended for this purpose, the complaint will be forwarded to one of the employees of Fundum Capital who have been designated as complaints officers.
2. The complaints officer provides the complainant with the opportunity to give an explanation of the complaint.
3. Together with the customer, the complaints officer tries to reach a solution.
4. The complaints officer handles the complaint within four weeks of receipt of the complaint or informs the complainant about any derogation from this period, with statement of the period within which an opinion on the complaint will be given.
5. The complaints officer informs the complainant in writing of the opinion on the merits of the complaint.
6. If the complaint has been handled satisfactorily, the complaints officer sends the complainant a confirmation of the manner in which the complaint has been handled.

Article 6 complaints registration

1. The complaints officer registers the complaint, including the subject of the complaint.
2. A complaint can be classified in several subjects.
3. At regular intervals, the complaints officer reports internally on the handling of the complaints and make recommendations for the prevention of new complaints, as well as for the improvement of procedures.
4. Once every year, the reports and recommendations are discussed internally within Fundum Capital.