

ANNEX C: GRANTEE PRIVACY STATEMENT

Version 1 September 2018

INTRODUCTION

This Privacy Statement applies to grant applicants and (potential) grantees (**Grantees**) of Stichting Benevolentia (**Benevolentia**).

Benevolentia uses the expertise and services of Porticus Amsterdam CV and its affiliated Porticus group entities (**Porticus**). Porticus is the international organization that manages the philanthropic programs of charitable institutions set up by entrepreneurs from the Brenninkmeijer family, including Benevolentia. Porticus provides these institutions with strategic advice on their donation programs and offers a wide range of services in the field of donation management. Porticus processes personal data of Grantees of Benevolentia in the course of providing its services to Benevolentia. When processing personal data of Grantees, Benevolentia and Porticus are joint data controllers.

With this Privacy Statement, Benevolentia and Porticus aim to be transparent about the way in which personal data relating to Grantees (if any) is processed.

Porticus' entities are located across the globe. Each Porticus entity shall adhere to this Privacy Statement, unless local law requirements demand otherwise.

For the purposes of this Privacy Statement, the following definitions apply:

- Personal data means any information relating to an identified or identifiable natural person (a 'Data Subject'). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier (such as a name, an identification number, location data, or one or more factors specific to the physical, economic, cultural or social identity of that natural person).
- Processing means any (set of) operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, alignment, combination, restriction, erasure or destruction.
- Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- Joint Controller means two or more controllers who jointly determine the purposes and means of processing.

This Privacy Statement may be changed over time. You are advised to regularly review the website of Porticus and/or Benevolentia for possible changes to this Privacy Statement. This Privacy Statement was last amended on 1 September 2018.

HOW WE COLLECT PERSONAL DATA

At Benevolentia and Porticus, we are committed to maintaining the accuracy, confidentiality and security of personal data.

We may process your personal data:

- in order to assess grant applications diligently, when such personal data is included in the information provided to us in the context of a grant application or proposal.
- as part of our relationship management with Grantees, and for Porticus also in the context of developing strategic grant making advice.
- to enter into an agreement, to facilitate a payment, or to fulfil obligations under an agreement.

WHAT PERSONAL DATA DO WE COLLECT

We may, in the context of grant management and depending on the relevant circumstances, collect the following categories of personal data (not limitative, and not always applicable):

- Name and contact details (including title, address, telephone numbers, email addresses)
- Logs of communications with us (including emails)
- Photos (relating to approved projects and grants)
- References
- Financial information (relating to payment details)
- Incident reports

We also collect certain information through our websites, including technical data (such as the IP address, web browsers, click and surfing behaviour). Please refer to the Benevolentia Website Privacy Statement or Porticus Website Privacy Statement for more information.

We process such personal data on the basis of the following grounds:

1. Consent by the data subject
2. Requirement to fulfil contractual obligations
3. Legitimate business purpose (such as relationship management and cross referencing Grantees)
4. Compliance with local laws

WHY WE PROCESS YOUR PERSONAL DATA

We collect and process personal data to enter into agreements and/or to comply with applicable statutory requirements. More specifically, we process personal data for the below purposes:

- Assessing submitted grant applications and proposals
- In respect of Porticus, for developing strategic advice for Benevolentia
- Relationship management with Grantees and co-funders
- Compliance with laws and regulations (identification obligations, fraud prevention, internal controls and company security, tax law, archiving)
- Regular course of business (for example, when you send an email, we process your contact details, the contents of your message, any attachments you add to your message)

Please note that you are not obliged to provide personal data to us. However, in order for us to enter into agreements and / or to comply with statutory requirements, we require personal data to

be provided. If you decide not to provide us with personal data, we may not be able to enter into an agreement with you or the organisation (as applicable) .

HOW WE PROCESS PERSONAL DATA

Benevolentia and Porticus are the joint controllers for your personal data, which means that Benevolentia and Porticus jointly determine what personal data is collected and for what purpose, and is responsible for the protection of such personal data. Benevolentia and Porticus have entered into a joint controller agreement together pursuant to which they have allocated their responsibilities in respect of the protection of personal data.

Porticus comprises of different group companies, located in- and outside the EU. Personal data submitted to one Porticus entity may be shared with other Porticus entities. All Porticus entities have agreed to adhere to the standard model clauses of the European Commission for data transfer.

Depending on the specific circumstances, our affiliated and related entities may be granted access to your data, for example to assess and review Grantees or to execute grant agreements.

In general, we enter into processing agreements with all third party data processors. These agreements include adequate obligations to safeguard that your personal data is being shared with that data processor only for the purpose of providing the agreed services to us.

If it is required that your personal data is transferred to a country that does not provide an adequate level of protection of personal data, we will take measures to ensure that your personal data are adequately protected in accordance with the applicable legal requirements.

HOW DO WE STORE PERSONAL DATA

We may use various systems to collect and store your personal data, such as a management information system.

We have taken adequate safeguards to ensure the confidentiality and security of your personal data. We have, and ensure that our data processors have, implemented appropriate technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access, and against all other forms of unlawful processing (including, but not limited to, unnecessary collection).

The retention period for storing personal data varies, depending on the type of personal data, the purpose for which it was collected, and local laws. We do not store personal data beyond the permitted retention period in accordance with applicable law.

WHAT ARE YOUR RIGHTS?

You can request access, correction, restriction, portability, objection or removal of your personal data at any time by sending a request to Porticus via privacy@porticus.com.

In the event we are processing your personal data on the basis of consent, you have the right to withdraw your consent at any time.

Should you have any questions regarding the collecting or processing of your personal data, or if you are unsatisfied about the way in which we are processing your personal data, please contact privacy@porticus.com.

In the event you are an EU data subject and you are unsatisfied with the response you receive from us in relation to your request or complaint, please be aware that you have the right to submit a complaint with the local data protection authorities in your country. We also have an obligation to report all material data breaches to relevant data protection authorities within 72 hours of the data breach occurring.