

# Privacy Policy

With this Privacy Policy, the Rasile Group wants to inform any visitor of [www.rasilegroup.com](http://www.rasilegroup.com), [www.dasym.com](http://www.dasym.com), [www.dalpha.org](http://www.dalpha.org), [www.freedomlab.com](http://www.freedomlab.com), [www.twayventures.com](http://www.twayventures.com) and [www.nowhereartspace.com](http://www.nowhereartspace.com), which personal data are being processed and why. This Privacy Policy is dated 1 October 2023 and will be updated from time to time to reflect any changing regulatory requirements, processing practices or new functionalities that we might add. Any such changes to the Privacy Policy will be posted on the relevant website and will be effective upon posting. See our Cookie Policy for more information about the usage of cookies.

## Introduction

The privacy policy applies to the processing of personal data of:

- clients;
- suppliers;
- visitors;
- recruitment candidates.

This is the Privacy Policy of the Rasile Group consisting for this policy of the following entities:

1. **Dasym Managed Accounts B.V.**, a company incorporated in the Netherlands, registered with the Chamber of Commerce under number 32147379 whose registered office is located at 1411 KC Naarden, Flevolaan 41A, (hereinafter “DMA”)
2. **Dalpha Real Estate B.V.**, a company incorporated in the Netherlands, registered with the Chamber of Commerce under nummer 80491693 whose registered office is located at 1251 BD Laren, Naarderstraat 48,(hereinafter “Dalpha”)
3. **FreedomLab B.V.**, a company established in the Netherlands registered in the trade register of the Dutch Chamber of Commerce under 34185457 whose registered office is located at 1411 KC Naarden, Flevolaan 41A (hereinafter “FreedomLab”)
4. **TWAY Opportunities B.V.**, established in the Netherlands registered in the trade register of the Dutch Chamber of Commerce under 32156206 whose office is located at 1411 KC Naarden, Flevolaan 41A, (hereinafter “TWAY”).

The Rasile Group will process your personal data in a lawful and fair manner and in accordance with the EU General Data Protection Regulation (‘GDPR’). This policy explains how we process and protect your personal data and provides you with more information on your rights as a data subject.

## The personal data we collect and process

The personal data that we collect and process from you may include the following information (any such data hereinafter referred to as “personal data”):

- **Identity data** including name, surname, date of birth, passport number, etc.
- **Contact data** including billing address, email address, phone number.
- **Usage data** such as information that we derive from your visits to our websites, applications, systems and online platforms, such as your IP address, the pages you visit, the browser you are using, the website you have previously visited and the time and duration of your visit.
- **Marketing data** such as information that you provided to us or that we collected as part of your registration for marketing materials such as newsletters and alerts, attending meetings and events.
- **HR data** including information that you provided to us when applying for a job at Rasile Group in order to assess your profile and skills.

Furthermore we might process personal information based on legitimate requests of relevant authorities according to applicable law in the Netherlands.

## How we collect your personal data

Your personal data might be collected directly from you when you provide us your personal data through a website or social media page.

How do we use your personal data?

The Rasile Group might process your personal data in the following circumstances:

- To comply with a **legal obligation**.
- For its **legitimate interest**: when necessary for the interest of the Rasile Group or a third party and your fundamental rights are not overridden by such interests. These legitimate interests include organizing our internal operations, handling our matters, ensuring proper administration, ensuring appropriate security, and the like.
- **Consent**: where you have provided your consent or explicit consent to the processing of the personal data.

## For which purposes do we process your personal data?

Your personal data will be processed for the following purposes:

- **To communicate effectively with you and conduct our business**: to conduct our business, including to respond to your queries, to otherwise

communication with you, or to carry out our obligations arising from any agreements entered into between you or your company and us.

- **To communicate with you regarding products and services that may be of interest:** amongst others to provide your company and you with updates and offers, where you have chosen to receive these. Where required by law, we will ask for your consent at the time we collect your data to conduct marketing activities. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by visiting Contact.
- **To handle our HR activities,** inform you about job vacancies and opportunities at the Rasile Group, handle your job application and assess your eligibility to work for us.
- **To understand our customers / business partners and to develop our products and services:** we or third service service providers (e.g, Google Analytics) on our behalf may analyze the personal data we hold in order to better understand our business and develop our products and services. In order to ensure that content from our website is presented in the most effective manner for you and for your device, we may pass your data to business partners, suppliers and/ or service providers.
- **Website tracking:** we collect anonymized information about how our website is used. This information is used to optimize the website and to ensure an optimal user experience.
- **To reorganize or make changes to our business:** in the event that we (i) are subject to negotiations for the sale of our business or part thereof to a third party, (ii) are sold to a third party or (iii) undergo a reorganization, we may need to transfer some or all of your personal data to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analyzing any proposed sale or reorganization, certainly limited to what is required for this purpose and only to the extent allowed under applicable laws. We may also need to transfer your personal data to that reorganized entity or third party after the sale or reorganization for them to use for the same purposes as set out in this policy.

We will store your data no longer than necessary as defined by the purposes for which the data is stored.

## **Exchange of your personal data**

Any personal data we collect from you, may also be transferred to third parties both based inside and outside the European Union, in order to execute a processing agreement, based upon your consent or because required by applicable law and regulations.

For data processed outside the European Union or European Economic the Rasile Group applies the standard contractual clauses defined by the European Commission.

## **Security**

The Rasile Group secures your personal data through various technical and organisational measures, such as firewalls, secured servers, and data processing agreements with third parties.

## **Social media and other websites**

If you share content from one of the Rasile Group websites, applications, systems and online platforms via social media, your personal data will be visible to the visitors of your personal pages on these social media websites. We are not responsible or liable for any processing of your personal data via such media platforms.

Rasile Group's websites, applications, systems and online platforms may provide references – including hyperlinks – to websites, channels, social media or other external content from other companies/persons. The Rasile Group is not responsible or liable for any processing of your personal data via these websites, channels or media. This Privacy Policy does not apply to the use of such websites, channels or media.

## **Your rights**

Subject to the terms and conditions provided for by the applicable law, you may contact one of the applicable entities of the Rasile Group to exercise the following rights:

- You have a right to be informed about how we process your personal data.
- You have a right to access your personal data
- You have a right to receive confirmation as to whether or not your personal data is processed, and where that is the case, you can access your personal data.
- You always have the right to have your personal data corrected. This allows you to rectify or correct, inaccurate or incorrect personal data the Rasile Group processes.
- You have the right to have your personal data erased. This allows you to permanently delete personal data which the Rasile Group processes. The Rasile Group is not always obliged to delete your personal data at your request – this right only applies in the situations and to the extent provided for by law.
- You have the right to restrict the processing of personal data related to you. This allows you to freeze the use of your personal data by the Rasile Group,

without deleting it. The Rasile Group is not always obliged to limit your personal data at your request – this right only applies in the situations and to the extent provided for by law.

- You always have the right to withdraw your consent whenever the processing of your personal data takes place on the basis of your consent.
- You always have the right to object to the processing of your personal data for direct marketing purposes. You can withdraw your consent or change your preferences regarding newsletters, alerts and invites at any time by clicking the “unsubscribe” or “change profile” button at the bottom of our newsletters, invitations or through one of our websites or our online platforms.
- You have the right to data portability. This allows you to easily move, copy or transfer your personal data from one controller to another. This right may only be exercised whenever the processing takes place on the basis of an agreement with you.

Should you have any questions or complaints about this Privacy Policy or if you wish to exercise any of your rights in respect of your personal data processed by one of the entities of the Rasile Group, please send your request

- for Rasile Group to [info@rasilegroup.com](mailto:info@rasilegroup.com)
- for Dasym to [info@dasym.com](mailto:info@dasym.com)
- for Dalpha to [info@dalpha.org](mailto:info@dalpha.org)
- for FreedomLab [info@freedomlab.com](mailto:info@freedomlab.com)
- for TWAY to [info@twayventures.com](mailto:info@twayventures.com)
- for Nowhere to [info@nowhereartspace.com](mailto:info@nowhereartspace.com)

or by post to the entity responsible for the processing of your data.

If you believe that your rights as a data subject have been infringed, please be aware that you have the right to lodge a complaint with the relevant supervisory authority. This will be the *Autoriteit Persoonsgegevens* (for the Netherlands).

## Cookie Policy

With this Cookie Policy, the Rasile Group wants to inform any visitors of the Rasile Group entities which cookies are being used and why. This Cookie Policy is dated 1 October 2023 and will be updated from time to time to reflect any changing regulatory requirements, processing practices or new functionalities that we might add. Any such changes to the Cookie Policy will be posted on the relevant website and will be effective upon posting. See our Privacy Policy for more information about our policies regarding the processing of personal data.

## What are cookies?

Cookies are small text files that are placed on your computer or mobile device when visiting one of our websites and which will store certain user information. Cookies are composed of unique codes that will help to recognize you when visiting our website again and may enhance your user experience.

There are different types of cookies, distinguished according to functionality, source and/or storage period.

➤ Regarding their functionality

**Necessary or essential cookies:** are cookies that are necessary for the optimal operation of the website and enable you to use the features of our website.

**Functional cookies:** ensure that the website functions properly. Examples of these are cookies that remember your login details, that ensure the security of your login details, that ensure the uniformity of the layout of the website.

**Analytical cookies:** are used for analytical purposes, i.e. to measure visits to the website. These cookies show how the website is used. For example, we know how many times a particular page is read, how much time someone spends on our website, etc. Statistical analyses are made from the information we receive and these analyses enable us to improve the structure, navigation and content of our website, to enhance the functionality and user experience of our website and associated services. We also use this data to enhance our service offering (by tailoring and adapting the content of our website with topics that are relevant to our visitors).

➤ Regarding their source

**First-party cookies:** are created and managed by the Rasile Group.

**Third-party cookies:** are created and managed by third parties and materialize when visiting the website. The cookies will send information regarding your visit to third parties.

**Social media cookies:** are third party cookies that allow you to directly share content from the website on social media, such as X, Facebook, LinkedIn, YouTube or Spotify by using the respective buttons. Through these buttons, the social media may collect information about you and track your activities across websites to build a user profile, even if you make no use of these buttons. Because the privacy and cookie statements of social media, such as X, Facebook, LinkedIn, YouTube or Spotify are often subject to change, we advise to regularly consult the privacy and cookie policies of the social media in question.

➤ Regarding their storage period

**Session cookies:** the information is only temporarily stored in your browser or application and session cookies expire as soon as you close your browser or application.

**Permanent cookies:** remain on your computer or mobile device, even if you close the browser or the application. Permanent cookies store information between different visits to the website and make it possible to recognise you during subsequent visits to our website. This data allows the website to recognize you as a returning visitor and to respond accordingly, for example by saving your language preferences. Permanent cookies remain on your device until their end date is reached, until a new cookie is installed, or until you delete them in your settings of your browser or application (their lifespan is determined by the website).

## Which cookies do we use?

The Rasile Group uses **essential cookies**. Given the fact that these cookies are essential for the technical functioning of our website, these cookies are placed as soon as you access our website. You cannot disable these cookies if you want to read our website.

The Rasile Group uses **functional cookies**. These cookies are installed if you consent by clicking on our website's cookie notice.

The Rasile Group uses **analytical cookies** for analytical purposes and to enhance the functionality and user-experience of our website. The permission of every visitor is required for the placement of these cookies which implies that you can refuse to place these cookies.

## Managing cookies

You can enable or disable functional or analytical cookies at any time by amending the cookie settings of your browser. How to do this can be found in the help-function of your browser. In your browser you can view and delete the current cookies on your computer or mobile device and choose not to accept them in the future.

**Google Chrome:** browser > Chrome-menu > settings > Privacy and security > Content settings > cookies

**Internet Explorer:** browser > Tools > Internet options > Privacy:

- Set the protection level with the slider
- Click 'advanced' and set the protection level manually

**Microsoft Edge:** browser > menu > settings > site permissions > cookies and site data

**Firefox:** Menu > Options > Privacy & Security > Cookies and Site Data

**Safari:** Preferences > Privacy > Remove all website data or Details

## **Questions or complaints?**

Should you have any questions or complaints about this Cookie Policy, please send your request

- for Rasile Group to [info@rasilegroup.com](mailto:info@rasilegroup.com)
- for Dasym to [info@dasym.com](mailto:info@dasym.com)
- for Dalpha to [info@dalpha.org](mailto:info@dalpha.org)
- for FreedomLab [info@freedomlab.com](mailto:info@freedomlab.com)
- for TWAY to [info@twayventures.com](mailto:info@twayventures.com)
- for Nowhere to [info@nowhereartspace.com](mailto:info@nowhereartspace.com)

or by post to the Rasile Group entity responsible for the processing of your data.