PRIVACY NOTICE VAN PASSE B.V.

Registered office at Ellermanstraat 12, 1114 AK Amsterdam, the Netherlands
Registered with the Dutch Chamber of Commerce under number 94604835

Last updated: 29 October 2026

This notice explains how Van Passe B.V. uses personal data in our accounting services, on our website and in communications with clients and prospective clients. It describes the data we process, why we use it, whom we share it with and your rights.

1. WHO WE ARE

Van Passe B.V. is based at Ellermanstraat 12, 1114 AK Amsterdam and registered with the Dutch Chamber of Commerce under number 94604835. You can contact us at contact@vanpasse.nl or 088 787 87 00.

We act as controller for purposes we determine ourselves, such as client management, our invoicing, disputes and our own client due diligence under the Dutch Anti-Money Laundering and Anti-Terrorist Financing Act (Wwft). This role may also apply to substantive tax work. Where we process data solely on behalf of and under the instructions of a client, we act as processor and the data processing agreement applies. Our actual activities determine our role for each processing operation.

2. THE DATA WE PROCESS

We receive data from you, through our website and communication channels, and when carrying out client assignments. For an assignment, we may receive data from a previous service provider or a competent authority. Where necessary for checks, we consult public sources such as the Dutch Trade Register. We only process data needed for the relevant purpose.

Contact and business details: Such as name, address, email address, telephone number, business name, Chamber of Commerce number and tax identification numbers.

Accounts and tax returns: Such as invoices, bank account numbers, bank transactions, income, expenses, tax data and, where included in the assignment, payroll and employment data. A tax return may also contain information about a partner or family.

Identification and client due diligence: Such as date of birth, identity document details, representatives and ultimate beneficial owners, the purpose of the relationship and relevant transactions. We only process a Dutch citizen service number (BSN) for purposes for which its use is legally permitted, such as certain tax or payroll activities.

Website and communications: Such as IP address, technical usage data, appointment details and the content of messages or documents you share with us.

Special categories of personal data, such as health data, may appear in documents supplied to us. We only process these where necessary, where there is a valid legal basis and where an exception to the statutory prohibition on processing applies. Please do not provide sensitive data that is unnecessary for the assignment.

3. WHY WE USE DATA

Enquiries and services: We use contact, assignment and accounting data to handle your request, the agreed work and our invoicing. Where we have a contract with you, the legal basis is performance of that contract or steps taken at your request before entering into it.

Contact persons and other individuals: If you are not a party to the contract, our legitimate interest in carrying out the assignment and maintaining business contacts may apply. For data we handle solely as processor, the client determines the legal basis.

Legal obligations: We process data for our own records and statutory checks. Where the Wwft applies, this includes client due diligence, monitoring relevant transactions and, where required, reporting to FIU-the Netherlands. The legal basis is the applicable legal obligation. We may not always be permitted to inform you of a report.

Security and disputes: We use necessary technical data and file information for security, preventing misuse, collecting debts and establishing, exercising or defending legal claims. We weigh our legitimate interest against your privacy interests.

Where consent is required, we request it separately. Visiting our website or becoming a client does not in itself constitute consent. When requesting data, we explain which information is required by contract or law. Without that information, we may be unable to carry out the relevant work. Optional marketing is not a condition of our services.

4. WHOM WE SHARE DATA WITH

We only share data to the extent required for a stated purpose. Depending on the processing, recipients include:

Accounting and tax service providers: Providers of accounting, tax return and payroll software and specialists engaged to support the agreed work.

Payments: Banks, payment service providers and parties supporting invoicing, debt collection or payment processing.

Communication services: Providers of email, telephone, messaging, meetings, appointment scheduling and electronic signatures.

Chrome extension for calling via Intercom: Our Chrome extension prepares telephone numbers clicked in Salesforce and, with permission, on other websites for use in Intercom. An optional silent call card notifies staff of incoming calls. After an explicit click, the staff member can answer, decline or go to Intercom. To do this, the extension processes the clicked number, the selected line, settings and relevant tab and call status. It temporarily compares the buttons and text of the incoming call card within Intercom, which may contain a name and telephone number. This card text does not leave the Intercom tab and is not stored. The call card on other websites does not display caller details. Only preferences are stored locally; the extension does not build a call history and has no backend of its own, advertising or usage analytics. Intercom continues to handle the normal processing of calls and contact details. We use these data solely to support calling via Intercom, in accordance with the Chrome Web Store User Data Policy, including Limited Use.

IT and business software: Providers of hosting, security, document storage, backups, client management and connections between systems.

Website, AI and marketing: Providers of calculators, forms and review displays, supporting AI, email marketing, website analytics and advertising. Consent requirements continue to apply.

Competent authorities: The Dutch Tax Administration, Chamber of Commerce, FIU-the Netherlands, supervisory authorities and courts, for tax filings, legal obligations or a lawful demand.

We enter into the arrangements required by the GDPR with our processors. Some recipients act under their own responsibility. We do not sell your personal data. You may ask which specific recipients have received your data. Subprocessors used for client assignments are subject to the information and change provisions in the data processing agreement.

5. DATA OUTSIDE THE EEA

Some service providers may process data outside the European Economic Area. Such transfers must have a valid safeguard, such as an applicable adequacy decision or standard contractual clauses with additional measures where necessary. You may contact contact@vanpasse.nl for information about the relevant safeguards and how to obtain a copy.

6. WEBSITE MARKETING AND AI

Our website includes features such as reviews, calculators and contact options. These may use cookies and similar technologies. Functional technologies and analytics with no or limited impact on your privacy may fall within a statutory exemption. We request prior consent for tracking and other technologies that require it. Withdrawing consent must be as easy as giving it. Please contact us for information about technologies, providers, purposes and durations.

We request consent for commercial emails unless the statutory exception for existing clients applies. This covers our own similar services and requires an opt-out when the email address is collected and in every message. You can always unsubscribe or object to direct marketing.

In addition to the purposes mentioned above, we may use customer data (such as name, email address, and phone number) to display personalized advertisements through advertising platforms such as Google or Meta (Customer Match). We only do this for customers who have entered into an agreement with us, so that we can provide them and similar audiences with more relevant information.

You may object to this at any time by sending an email to contact@vanpasse.nl. In that case, we will no longer use your data for this purpose.

AI may support text processing, automation and the initial handling of messages. The same privacy rules apply. We inform you when you communicate with an automated assistant. For information about our use of AI or to contact a member of staff, you can reach us at contact@vanpasse.nl.

Supporting AI does not in itself provide a legal basis for solely automated decisions that have legal or similarly significant effects on you. If such an application is used, you must receive specific advance information about how it works, its consequences and your applicable rights. This notice does not provide general consent for it.

When you visit an external website or social platform, its privacy information also applies. We remain responsible for our own part in embedded features on our website.

7. HOW LONG WE KEEP DATA

We retain personal data no longer than necessary for the purpose for which it was collected. The period depends on the type of data, the assignment and any legal obligations.

Tax and accounting data: Data subject to the statutory tax retention obligation is generally kept for seven years from the point at which it ceases to have current relevance. Certain data, for example relating to immovable property or the OSS scheme, must be kept for ten years. For accounts we retain on a client's behalf, the client's instructions and the arrangements for availability, return and deletion apply. The client's

retention obligation does not automatically require us to retain their entire accounts ourselves for the same period.

Client due diligence under the Wwft: We retain due diligence data for five years after the end of the business relationship or the relevant transaction, and reporting data for five years after the report. We then delete it unless another statutory provision requires retention.

7. RETENTION PERIODS CONTINUED

Enquiries and introductory meetings: Until the request and agreed follow-up are completed. If an assignment follows, necessary data becomes part of the client file. In a dispute, we only retain the required data until the matter is resolved and the applicable limitation period has expired.

Marketing and technical data: We use marketing data until you unsubscribe, object or the purpose no longer applies. Minimal opt-out records may remain necessary to respect your choice. Cookies have the durations stated for the relevant technology. We retain security data for as long as necessary to investigate an incident or manage a security risk, then delete or anonymise it.

At the end of an assignment, we distinguish returning or deleting client data from retaining our own legally required file. Backups have a limited recovery cycle; deleted data still present in them must not be reused for ordinary business purposes.

8. HOW WE PROTECT DATA

We take appropriate technical and organisational measures, reflecting the sensitivity of the data and the risks. These include limited access for employees and service providers, system security and confidentiality arrangements. Confidential treatment continues after the assignment ends. You may ask us for more information about these measures.

In the event of a personal data breach, we assess the necessary measures and notifications. When acting as processor, we inform the client without undue delay. When acting as controller, we notify the supervisory authority and affected individuals where required by the GDPR.

9. YOUR PRIVACY RIGHTS

You may request access to, correction, erasure or restriction of your personal data. In the cases provided for by the GDPR, you may receive data in a portable format or object to processing. You may withdraw consent at any time; this does not affect the lawfulness of earlier processing. You may always object to direct marketing.

Where processing is based on legitimate interests, you may object on grounds relating to your situation. Email your request to contact@vanpasse.nl. We respond within one month. If a necessary and permitted extension of up to two further months applies, we explain why within the first month. We only verify your identity to the extent necessary; do not send a full copy of your identity document without being asked. A statutory retention obligation or another applicable exception may mean we cannot yet erase data or provide certain information.

You may also lodge a complaint with the Dutch Data Protection Authority at autoriteitpersoonsgegevens.nl. If your request concerns data we process solely on a client’s instructions, we help ensure it is handled by the appropriate controller.

10. CHANGES AND CONTACT

We may update this notice when our services or the rules change. The current version is available at vanpasse.nl/en/terms/. We inform affected individuals appropriately about significant changes.

Questions about privacy? Email contact@vanpasse.nl, call 088 787 87 00 or write to Van Passe B.V., Ellermanstraat 12, 1114 AK Amsterdam, the Netherlands.