



## Privacy policy for the COG Makelaars BV

### Real estate agency

#### **Privacy policy for the COG MAKELAARS BV estate agency**

**You are dealing with the COG MAKELAARS BV estate agency. COG MAKELAARS BV estate agency is a member of the NVM. This privacy policy explains how your data is handled. Wherever this policy says 'NVM estate agent', the COG MAKELAARS BV estate agency is meant. This policy also explains what data is shared with NVM and brainbay B.V. - a subsidiary of NVM - and what NVM/brainbay does with this data. Brainbay was incorporated by the NVM to develop products and services for NVM members based on the data supplied by members and non-NVM members, as well as to conduct research into the real estate market.**

#### **Which services of the NVM estate agent/valuer are you using?**

**You can contact the NVM estate agent/valuer in one or more ways.**

#### **For residential properties:**

*You want to sell or let your residential property and you have given instructions to the NVM estate agent:*

- **You want to sell your residential property. [See 1.](#)**
- **You want to let your residential property. [See 2.](#)**

*You want to buy or rent a residential property and you have given instructions to the NVM estate agent:*

- **You want to buy a residential property. [See 3.](#)**
- **You want to rent a residential property. [See 4.](#)**

*You want to have a residential property valued, and you have given instructions to the NVM valuer:*

- **You want to have a residential property valued. [See 9.](#)**

*If you are looking for a residential property and you have not given instructions to the NVM estate agent for this, the following situations are possible:*

- **You want to be kept informed of the properties listed via the NVM estate agent without obligation. [See 8.](#)**
- **You want to view a residential property that is for sale or to let, that is listed via the NVM estate agent. [See 5.](#)**
- **You want to buy a residential property listed via the NVM estate agent. [See 6.](#)**
- **You want to rent a residential property listed via the NVM estate agent. [See 7.](#)**

#### **For commercial properties or agricultural holdings:**

*You want to sell or let your commercial premises or agricultural holdings and you have given instructions to the NVM estate agent for this:*

- **You want to sell your commercial premises or agricultural holdings. [See 10.](#)**
- **You want to let your commercial premises or agricultural holdings. [See 11.](#)**



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*You want to have commercial premises or agricultural holdings valued, and you have given instructions to the NVM valuer:*

- **You want to get a valuation for commercial premises or agricultural holdings.** [See 9.](#)

*You want to buy or rent commercial premises or agricultural holdings and you have given instructions to the NVM estate agent for this:*

- **You want to buy commercial premises or agricultural holdings.** [See 12.](#)
- **You want to rent commercial premises or agricultural holdings.** [See 13.](#)

*If you are looking for commercial premises or agricultural holdings and you have not given instructions to the NVM estate agent for this, the following situations are possible:*

- **You want to be kept informed of the properties listed via the NVM estate agent without obligation.** [See 8.](#)
- **You want to view commercial premises or agricultural holdings listed via the NVM estate agent, that are either for sale or to rent.** [See 5.](#)
- **You want to buy commercial premises or agricultural holdings that are listed via the NVM estate agent.** [See 14.](#)
- **You want to rent commercial premises or agricultural holdings that are listed via the NVM estate agent.** [See 15.](#)

#### **Other services:**

*You would like to be assisted by an NVM estate agent as part of other services:*

**You can engage an NVM estate agent to assist you with property management, urban planning such as integrated environmental permits, zoning plan changes, designing and/or outsourcing new-build and renovation plans, lease matters, compulsory purchase matters and suchlike.** [See 16](#)

**16. You can engage an NVM estate agent to assist you with property management, urban planning such as integrated environmental permits, zoning plan changes, designing and/or outsourcing new-build and renovation plans, lease matters, compulsory purchase matters and suchlike.**

#### **Data controller**

**For all these processing operations, the COG MAKELAARS BV estate agency is the data controller. The contact details are:**

**COG Makelaars BV**

**27181227**

**Scheveningseweg 50**

**info@cogmakelaars.nl**

**070-3066050**



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#### Sharing data with NVM/brainbay

For certain services, data is also shared with NVM/brainbay. The NVM/brainbay uses your data for the following purposes:

- to ensure that all NVM estate agents have up-to-date listings of residential properties, commercial premises and agricultural holdings that are listed via NVM estate agents.
- to ensure that current listings are published on Funda and other (property) websites.
- to create a database that can be used to create valuation reports, and to spot trends in the residential housing market, commercial real estate market and agricultural holdings market. The data in this database are kept for an indefinite period of time.

[Read here what NVM/brainbay does with the data provided.](#)

NVM/brainbay is the controller for these data. The contact details are:

|                            |                                     |
|----------------------------|-------------------------------------|
| <b>NVM</b>                 | <b>brainbay B.V.</b>                |
| <b>Chamber of Commerce</b> | <b>Chamber of Commerce 71551034</b> |
| <b>30102683</b>            |                                     |

|  |  |
|--|--|
| <b>PO Box 2222</b>   | <b>Fakkelseste 1</b>   |
| <b>3430 DC Nieuwegein</b>  | <b>3431 HZ Nieuwegein</b>                                    |
| <a href="mailto:privacyhelpdesk@nvm.nl">privacyhelpdesk@nvm.nl</a> | <a href="mailto:support@brainbay.nl">support@brainbay.nl</a> |

NVM/brainbay has appointed a data processing officer. This person can be reached via [fg@nvm.nl](mailto:fg@nvm.nl).

#### We take your privacy seriously

The NVM estate agent and NVM/brainbay take your privacy very seriously and see the data protection rules as logical standards of decency. The NVM estate agent processes your data carefully and according to the regulations set out in the legislation. NVM estate agents ensure there is adequate security so that your data is protected against unauthorised use, unauthorised access, modification and unlawful destruction. All NVM estate agents continuously invest in providing a good service. The NVM-wide privacy guidelines form part of this service. If you have any questions, please do not hesitate to contact your NVM estate agent.

#### View, change or delete data

If you want to find out what personal data is held about you by the NVM estate agent, then please send your request to the estate agent by letter or email.

NVM/brainbay does not process names or any other directly identifying data. If you want to know what data is processed by NVM/brainbay, please contact the NVM estate agent who will then ensure that you are informed.

Likewise, if you wish your data to be changed or deleted, then please send a letter or email together with reasons to the NVM estate agent. Your request will be met as quickly as possible, unless there are legal obligations to keep the data or if there are



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(other) compelling reasons preventing your data from being amended or deleted. ow to file a complaint

If you have any questions or if you have a complaint about the way your data is being handled by the NVM estate agent, please contact the NVM estate agent in the first instance. If you do not agree with the NVM estate agent, you can contact the complaints coordinator of the NVM via: [klachtencoordinator@nvm.nl](mailto:klachtencoordinator@nvm.nl). The NVM Data Processing Officer may then also consider the complaint. You also have the right to file a complaint with the Dutch Data Protection Authority.

#### For how long does the NVM estate agent store the data?

The NVM estate agent will not keep the data longer than necessary. However, some data is kept by the NVM estate agent for a long period of time:

- The NVM estate agent keeps some data regarding the service that was provided for 20 years, because this is the period in which the NVM estate agent can still be held liable for professional errors.
- Any documentation proving that the NVM estate agent carried out the obligatory check in the context of the Money Laundering and Terrorist Financing (Prevention) Act (Wwft) must be kept by the NVM estate agent for 5 years.

#### 1. You are selling your residential property and you have given instructions to the NVM estate agent for this

The purpose of this contact is to promote on your behalf your residential property, to gain an understanding of the value of and interest in your residential property, to arrange viewings, to negotiate on your behalf and to support the transaction. The NVM estate agent also verifies your identity. You may also be approached for an estate agent evaluation and you will receive sales statistics from funda. The following data may be processed:

| Data   | Data-sharing possible with | Retention period of the NVM estate agent |
|--|----------------------------|--|
| Your name, address and other contact details such as your telephone number and email address.  | b                          | 20 years                                 |
| The reason for selling, for example, upsizing or a change of work.   | a                          | 3 years                                  |
| The date when the residential property came onto the market and how long the residential property has been or was for sale.  | a                          | 20 years                                 |
| The description and characteristics of the residential property such as the asking price, the year of construction, the surface areas and layout, data held with the Land Registry, municipality-assessed value of the property for the purpose of calculating local property tax, as well as photos and videos of the residential property. | a, d, e                    | 20 years                                 |



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|   |             |                 |
|---|-------------|-----------------|
| <b>If this has been agreed with the NVM estate agent, the above information will be published on Funda, other property websites and on the website of the NVM estate agent. The reason for doing this is to promote your residential property; the listing is shown there up to 1 year after the transaction.</b> |             |                 |
| <b>If the estate agency agreement is cancelled, the reason for cancellation.</b>  | <b>a</b>    | <b>3 years</b>  |
| <b>Data required if a statutory check is necessary within the legislative framework of the Money Laundering and Financing of Terrorism (Prevention) Act (Wwft).</b>   | <b>c</b>    | <b>5 years</b>  |
| <b>Data necessary to draw up the purchase and sale agreement.</b>   | <b>b</b>    | <b>20 years</b> |
| <b>Once the residential property has been sold: the transaction details such as the sales price and the transaction date.</b>   | <b>a</b>    | <b>20 years</b> |
| <b>Your name and email address will be passed on to funda to facilitate an estate agent evaluation for customer satisfaction and marketing purposes. You will also receive sales statistics for your home from funda.</b>   | <b>e</b>    | <b>2 years</b>  |
| <b>Other information that you provide to the NVM estate agent.</b>  | <b>none</b> | <b>3 years</b>  |

|          | <b>Data recipients</b>  |
|----------|---|
| <b>a</b> | <b>NVM/brainbay (data is stored for an indefinite period)</b>   |
| <b>b</b> | <b>Notary, valuer, analytics department, photographer, sales stylist, buyer, the buyer's estate agent</b> |
| <b>c</b> | <b>FIU (Financial Intelligence Unit - the Netherlands)</b>  |
| <b>d</b> | <b>Party viewing the property, seller, buyer, buyer's estate agent</b>                                    |
| <b>e</b> | <b>funda</b>  |



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#### 2. You are letting your residential property and you have given instructions to the NVM estate agent for this

The purpose of this contact is to promote on your behalf your residential property, to arrange viewings, to gain an understanding of the reliability of any potential tenant and to draw up a tenancy agreement. The NVM estate agent also verifies your identity. You may also be approached for an estate agent evaluation and will receive letting statistics from funda. The following data may be processed:

| Data   | Data-sharing possible with | Retention period of the NVM estate agent |
|--|----------------------------|--|
| Your name, address and contact details such as your telephone number and email address.  | b                          | 20 years                                 |
| The reason for letting.  | a                          | 3 years                                  |
| The description and characteristics of the residential property such as the amount of rent, the year of construction, the surface areas and layout, information held with the Land Registry, as well as photos and videos of the residential property.<br><br>If this has been agreed with the NVM estate agent, the above information will be published on Funda, other property websites and on the website of the NVM estate agent. The reason for doing this is to promote your residential property; the listing is shown there up to 1 year after the transaction. | a, c, d                    | 20 years                                 |
| If the estate agency agreement is cancelled, the reason for cancellation.  | a                          | 3 years                                  |
| The requirements you need the tenant to meet.  | c                          | 20 years                                 |
| Data necessary to draw up the tenancy agreement, including verification of your identity.  | c                          | 20 years                                 |
| Once the residential property has been let: the rent and rental conditions.  | a                          | 3 years                                  |
| Your name and email address will be passed on to funda to facilitate an estate agent evaluation for customer satisfaction and marketing purposes. You will also receive the letting statistics for your home from funda.   | d                          | 2 years                                  |
| Other information that you provide to the NVM estate agent.  | none                       | 3 years                                  |

|   | Data recipients  |
|---|--|
| a | NVM/brainbay (data is stored for an indefinite period) |
| b | Tenant , analytics department, photographer,           |



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|          |  |
|----------|--|
| <b>c</b> | <b>Party viewing the property, renter, letting agent</b> |
| <b>d</b> | <b>funda</b>   |

**3. You are looking to buy a residential property and you have given instructions to the NVM estate agent for this**

The purpose of this contact is to find a suitable residential property for you, to carry out negotiations on your behalf and to support the transaction. The NVM estate agent also verifies your identity. You may also be approached by funda for an estate agent evaluation. The following data may be processed:

| <b>Data</b>   | <b>Data-sharing possible with</b> | <b>Retention period of the NVM estate agent</b> |
|---|-----------------------------------|---|
| <b>Your name, address and contact details such as your telephone number and email address.</b>  | <b>a</b>                          | <b>20 years</b>                                 |
| <b>The search profile showing what you are looking for in a property.</b>   | <b>none</b>                       | <b>3 years</b>                                  |
| <b>Data about your current residential property, such as the purchase price and amount of rent. The reason for buying, for example, upsizing or change of work.</b> | <b>none</b>                       | <b>3 years</b>                                  |
| <b>Your age and income categories and family composition.</b>   | <b>none</b>                       | <b>3 years</b>                                  |
| <b>If agreed with you, data to determine your financing options.</b>  | <b>none</b>                       | <b>3 years</b>                                  |
| <b>Data required if a statutory check is necessary within the legislative framework of the Money Laundering and Financing of Terrorism (Prevention) Act (Wwft).</b> | <b>b</b>                          | <b>5 years</b>                                  |
| <b>Data necessary to draw up the purchase and sale agreement.</b>   | <b>c</b>                          | <b>20 years</b>                                 |
| <b>Once the residential property has been sold: the transaction details such as the sales price and the transaction date.</b>                                       | <b>none</b>                       | <b>20 years</b>                                 |
| <b>Your name and email address will be passed on to funda to facilitate an estate agent evaluation for customer satisfaction and marketing purposes.</b>            | <b>d</b>                          | <b>2 years</b>                                  |
| <b>Other information that you provide to the NVM estate agent.</b>  | <b>none</b>                       | <b>3 years</b>                                  |

|          | <b>Data recipients</b>  |
|----------|---|
| <b>a</b> | <b>Seller, seller's estate agent</b>  |
| <b>b</b> | <b>FIU (Financial Intelligence Unit - the Netherlands), seller's estate agent</b> |
| <b>c</b> | <b>Notary, seller, the seller's estate agent</b>                                  |
| <b>d</b> | <b>funda</b>  |





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#### 4. You are looking for a rental residential property and you have given instructions to the NVM estate agent for this

The purpose of this contact is to find a suitable residential property for you to rent, to carry out negotiations on your behalf and to provide assistance with the conclusion of the tenancy agreement and make the final arrangements. The NVM estate agent also verifies your identity. You may also be approached by funda for an estate agent evaluation. The following data may be processed:

| Data  | Data-sharing possible with | Retention period of the NVM estate agent |
|---|----------------------------|--|
| Your name, address and contact details such as your telephone number and email address.   | a                          | 20 years                                 |
| The search profile showing what you are looking for in a property.  | none                       | 3 years                                  |
| Data about your current residential property, such as the purchase price and amount of rent. The reason for renting, for example, upsizing or change of work. | none                       | 3 years                                  |
| Your age and income categories and family composition.  | none                       | 3 years                                  |
| If this has been agreed with you, data to determine your ability to pay your rent.  | none                       | 3 years                                  |
| Data that is required if the landlord requires a tenant check (e.g. NVM Woontoets). This check is in the legitimate interests of the landlord.                | a                          | 3 years                                  |
| Data necessary to draw up the tenancy agreement, including verification of your identity.   | a                          | 20 years                                 |
| Your name and email address will be passed on to funda to facilitate an estate agent evaluation for customer satisfaction and marketing purposes.             | b                          | 2 years                                  |
| Other information that you provide to the NVM estate agent.   | none                       | 3 years                                  |

|   | Data recipients         |
|---|-------------------------|
| a | Landlord, letting agent |
| b | funda                   |





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**5. You want to view a residential property that is for sale or to rent or you want to view commercial premises or agricultural holdings listed via the NVM estate agent**  
**In this contact, the NVM estate agent arranges viewings, the NVM estate agent provides you with a good picture of the residential property, the commercial premises or the agricultural holdings and the NVM estate agent records what you think about this property. The following data may be processed:**

| <b>Data</b>   | <b>Data-sharing possible with</b> | <b>Retention period of the NVM estate agent</b> |
|---|-----------------------------------|---|
| <b>Your name, address and contact details such as your telephone number and email address.</b>                          | <b>a</b>                          | <b>1 years</b>                                  |
| <b>Date of viewing and what you think about the residential property, commercial premises or agricultural holdings.</b> | <b>a</b>                          | <b>1 years</b>                                  |
| <b>Other information that you provide to the NVM estate agent.</b>  | <b>a</b>                          | <b>1 years</b>                                  |

|          | <b>Data recipients</b>                               |
|----------|--|
| <b>a</b> | <b>Seller or landlord of the commercial property</b> |

**6. You want to buy a residential property listed via the NVM estate agent**  
**For this contact, the NVM estate agent is in contact with you and possibly your own estate agent in connection with the bidding process. The NVM estate agent then carries out the preparatory activities for the purchase and sale agreement and transfer of ownership. In this contact, the NVM estate agent also verifies your identity. The following data may be processed:**

| <b>Data</b>  | <b>Data-sharing possible with</b> | <b>Retention period of the NVM estate agent</b> |
|--|-----------------------------------|---|
| <b>Your name, address and contact details such as your telephone number and email address.</b>   | <b>b</b>                          | <b>20 years</b>                                 |
| <b>Your opinion about the residential property.</b>  | <b>b</b>                          | <b>3 years</b>                                  |
| <b>Data about the offers made.</b>   | <b>b</b>                          | <b>3 years</b>                                  |
| <b>Data required if a statutory check is necessary within the legislative framework of the Money Laundering and Financing of Terrorism (Prevention) Act (Wwft).</b>  | <b>d</b>                          | <b>5 years</b>                                  |
| <b>If this has been agreed with the seller, data to determine your ability to pay the purchase price or to meet other requirements set by the seller. This is in the legitimate interests of the seller.</b> | <b>b</b>                          | <b>3 years</b>                                  |



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|   |          |                 |
|---|----------|-----------------|
| <b>Data necessary to draw up the purchase and sale agreement.</b>   | <b>c</b> | <b>20 years</b> |
| <b>Once the residential property has been sold: the transaction details such as the sales price and the transaction date.</b> | <b>a</b> | <b>20 years</b> |
| <b>The postcode (1234AB) and house number of the buyer's previous home address, purchase or rental property.</b>              | <b>a</b> | <b>3 years</b>  |
| <b>Your age and income bracket and family composition, type of buyer and reason for moving.</b>                               | <b>a</b> | <b>3 years</b>  |
| <b>Other information that you provide to the NVM estate agent.</b>  | <b>b</b> | <b>3 years</b>  |

|          | <b>Data recipients</b>  |
|----------|---|
| <b>a</b> | <b>NVM/brainbay (data is stored for an indefinite period)</b> |
| <b>b</b> | <b>Seller</b>   |
| <b>c</b> | <b>Notary, buyer's estate agent</b>                           |
| <b>d</b> | <b>FIU (Financial Intelligence Unit - the Netherlands)</b>    |

### 7. You want to rent a residential property listed via the NVM estate agent

The purpose of this contact is to determine whether you meet the requirements set by the landlord and to draw up the tenancy agreement on behalf of the landlord. The following data may be processed:

| <b>Data</b>   | <b>Data-sharing possible with</b> | <b>Retention period of the NVM estate agent</b> |
|---|-----------------------------------|---|
| <b>Your name, address and contact details such as your telephone number and email address.</b>  | <b>a</b>                          | <b>20 years</b>                                 |
| <b>Your age and income categories and family composition.</b>   | <b>a</b>                          | <b>3 years</b>                                  |
| <b>Data to establish whether you meet the landlord's requirements. This is in the legitimate interests of the landlord. This can be checked, for example, by using the NVM Woontoets.</b> | <b>a</b>                          | <b>5 years</b>                                  |
| <b>Data necessary to draw up the tenancy agreement, including verification of your identity.</b>  | <b>a</b>                          | <b>20 years</b>                                 |
| <b>Other information that you provide to your NVM estate agent.</b>   | <b>a</b>                          | <b>3 years</b>                                  |

|          | <b>Data recipients</b> |
|----------|------------------------|
| <b>a</b> | <b>Landlord</b>        |



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#### 8. You want to be kept informed by the NVM estate agent of the properties that are listed

The purpose of this contact is for the NVM estate agent to inform you of potentially interesting residential properties, commercial properties or agricultural holdings. This contact takes place until you state that you no longer need this service. The following data may be processed:

| Data   | Data-sharing possible with | Retention period of the NVM estate agent |
|--|----------------------------|--|
| Your name, address and contact details such as your telephone number and email address.  | none                       | Until consent is withdrawn               |
| The search profile showing what you are looking for in a property. It is possible to tailor an offering based on the search profile. | none                       | Until consent is withdrawn               |
| Other information that you provide to the NVM estate agent.  | none                       | Until consent is withdrawn               |

#### 9. You want to get a valuation for a residential property, commercial premises or agricultural holdings carried out and you have given instructions to the NVM estate agent/valuer for this

The purpose of this contact is for the NVM estate agent/valuer to carry out a valuation of your residential property, commercial premises or agricultural holdings. The following data may be processed:

| Data   | Data-sharing possible with | Retention period of the NVM estate agent |
|--|----------------------------|--|
| Your name, address and contact details such as your telephone number and email address.  | a                          | 20 years                                 |
| Data on your residential property, commercial premises or agricultural holdings in order to determine the value.   | a                          | 20 years                                 |
| Data required if the valuer needs to report an unusual transaction in the context of the Money Laundering and Terrorist Financing (Prevention) Act (Wwft). | b                          | 5 years                                  |
| Other information that you provide to your NVM estate agent/valuer.  | none                       | 20 years                                 |

|   | Data recipients                                     |
|---|---|
| a | Validation institute for property valuations.       |
| b | FIU (Financial Intelligence Unit - the Netherlands) |



**10. You are selling your commercial premises or agricultural holdings and you have given instructions to the NVM estate agent for this**

The purpose of this contact is to promote on your behalf your commercial premises or agricultural holdings, to gain an understanding of the value of and interest in your commercial property, to arrange viewings with interested parties, to negotiate on your behalf and to support the transaction. The NVM estate agent also verifies your identity. You may also be approached for an estate agent evaluation and you will receive sales statistics from funda. The following data may be processed:

| Data  | Data-sharing possible with | Retention period of the NVM estate agent |
|---|----------------------------|--|
| Your name, company name, address and other contact details such as your telephone number and email address.   | b                          | 20 years                                 |
| The reason for selling.   | a                          | 3 years                                  |
| The date when the commercial property came onto the market and how long the commercial property has been or was for sale.   | a                          | 20 years                                 |
| The description and characteristics of the commercial property such as the asking price, the year of construction, the surface areas and layout, data held with the Land Registry, photographs and videos of the building.<br><br>If agreement has been reached with the NVM estate agent, the above details will be published on Funda, other property websites and on the website of the NVM estate agent. The reason for doing this is to promote your commercial premises; this listing is shown here for up to 1 year after the transaction. | a, d                       | 20 years                                 |
| If the estate agency agreement is cancelled, the reason for cancellation.   | a                          | 3 years                                  |
| Data required if a statutory check is necessary within the legislative framework of the Money Laundering and Financing of Terrorism (Prevention) Act (Wwft). The identities of the ultimate beneficial owners are also verified and documented.   | c                          | 5 years                                  |
| Data necessary to draw up the purchase and sale agreement.  | b                          | 20 years                                 |
| Once the property has been sold: the transaction details such as the sales price and the transaction date.  | a                          | 20 years                                 |



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|   |             |                |
|---|-------------|----------------|
| <b>Your name and email address will be passed on to funda to facilitate an estate agent evaluation for customer satisfaction and marketing purposes. You will also receive sales statistics for your premises from funda.</b> | <b>e</b>    | <b>2 years</b> |
| <b>Other information that you provide to your NVM estate agent.</b>   | <b>none</b> | <b>3 years</b> |

|          | <b>Data recipients</b>  |
|----------|---|
| <b>a</b> | <b>NVM/brainbay (the data is stored for an indefinite period)</b>   |
| <b>b</b> | <b>Notary, valuer, analytics department, photographer, sales stylist, buyer, the buyer's estate agent</b> |
| <b>c</b> | <b>FIU (Financial Intelligence Unit - the Netherlands), buyer's estate agent</b>                          |
| <b>d</b> | <b>Party viewing the property, seller, buyer, buyer's estate agent</b>                                    |
| <b>e</b> | <b>funda</b>  |

#### **11. You are renting out your commercial premises or agricultural holdings and you have given instructions to the NVM estate agent for this**

The purpose of this contact is to promote on your behalf your commercial premises or agricultural holdings, to arrange viewings for interested parties, to gain an understanding of the reliability of the potential tenant and to draw up a tenancy agreement that is favourable for you. The NVM estate agent also verifies your identity. You may also be approached for an estate agent evaluation and will receive letting statistics from funda. The following data may be processed:

| <b>Data</b>  | <b>Data-sharing possible with</b> | <b>Retention period of the NVM estate agent</b> |
|--|-----------------------------------|---|
| <b>Your name, organisation name, address and contact details such as your telephone number and email address.</b>  | <b>b</b>                          | <b>20 years</b>                                 |
| <b>The reason for renting.</b>   | <b>a</b>                          | <b>3 years</b>                                  |
| <b>The date when the property came onto the market and how long the property has been or was available to rent.</b>  | <b>a</b>                          | <b>3 years</b>                                  |
| <b>The description and characteristics of the property such as the rent, the year of construction, the surface areas and layout, data held with the Land Registry, photographs and videos of the property. In consultation with you, this data will also be published on selected websites in order to promote the property.</b> | <b>a, c</b>                       | <b>20 years</b>                                 |
| <b>If the estate agency agreement is cancelled, the reason for cancellation.</b>   | <b>a</b>                          | <b>3 years</b>                                  |



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|   |             |                 |
|---|-------------|-----------------|
| <b>The requirements you need the tenant to meet.</b>  | <b>c</b>    | <b>20 years</b> |
| <b>Data necessary to draw up the tenancy agreement, including verifying the identity of the person with authority to sign.</b>  | <b>c</b>    | <b>20 years</b> |
| <b>Once the property has been let: the rent and rental conditions.</b>  | <b>a</b>    | <b>3 years</b>  |
| <b>Your name and email address will be passed on to funda to facilitate an estate agent evaluation for customer satisfaction and marketing purposes. You will also receive letting statistics for your premises from funda.</b> | <b>d</b>    | <b>2 years</b>  |
| <b>Other information that you provide to your NVM estate agent.</b>   | <b>none</b> | <b>3 years</b>  |

|          | <b>Data recipients</b>  |
|----------|---|
| <b>a</b> | <b>NVM/brainbay (the data is stored for an indefinite period)</b> |
| <b>b</b> | <b>Tenant, analytics department, photographer</b>                 |
| <b>c</b> | <b>Party viewing the property, tenant, letting agent</b>          |
| <b>d</b> | <b>funda</b>  |

**12. You are looking for commercial premises or agricultural holdings to purchase and you have given instructions to the NVM estate agent for this**

**The purpose of this contact is to find on your behalf commercial premises or agricultural holdings suitable for you, to carry out the negotiations and to support the transaction. The NVM estate agent also verifies your identity. You may also be approached by funda for an estate agent evaluation. The following data may be processed:**

| <b>Data</b>   | <b>Data-sharing possible with</b> | <b>Retention period of the NVM estate agent</b> |
|---|-----------------------------------|---|
| <b>Your name, organisation name, address and contact details such as your telephone number and email address.</b> | <b>c</b>                          | <b>20 years</b>                                 |
| <b>The search profile showing what you are looking for in a property.</b>   | <b>none</b>                       | <b>3 years</b>                                  |
| <b>Data about your current accommodation such as purchase price and amount of rent. The reason for buying.</b>    | <b>none</b>                       | <b>3 years</b>                                  |
| <b>What you are looking for in the property where you live.</b>   | <b>c</b>                          | <b>3 years</b>                                  |
| <b>If agreed with you, data to determine your financing options.</b>  | <b>none</b>                       | <b>3 years</b>                                  |



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|   |             |                 |
|---|-------------|-----------------|
| <b>Data required if a statutory check is necessary within the legislative framework of the Money Laundering and Financing of Terrorism (Prevention) Act (Wwft). The identities of the ultimate beneficial owners are verified and documented.</b> | <b>b</b>    | <b>5 years</b>  |
| <b>Data necessary to draw up the purchase and sale agreement, including verifying the identity of the person with authority to sign. This information is also shared with the seller's estate agent and the notary.</b>                           | <b>d</b>    | <b>20 years</b> |
| <b>Once the commercial premises or agricultural holdings have been sold: the transaction details such as the sales price and the transaction date.</b>  | <b>none</b> | <b>20 years</b> |
| <b>Your name and email address will be passed on to funda to facilitate an estate agent evaluation for customer satisfaction and marketing purposes.</b>  | <b>e</b>    | <b>2 years</b>  |
| <b>Other information that you provide to your NVM estate agent.</b>   | <b>none</b> | <b>3 years</b>  |

|          | <b>Data recipients</b>  |
|----------|---|
| <b>a</b> | <b>NVM/brainbay (the data is stored for an indefinite period)</b>                 |
| <b>b</b> | <b>FIU (Financial Intelligence Unit - the Netherlands), seller's estate agent</b> |
| <b>c</b> | <b>Seller, seller's estate agent</b>  |
| <b>d</b> | <b>Notary, seller, the seller's estate agent</b>                                  |
| <b>e</b> | <b>funda</b>  |

### 13. You are looking to rent a commercial property (commercial premises or agricultural holdings) and you have given instructions to the NVM estate agent for this.

The purpose of this contact is to find suitable commercial premises or agricultural holdings for you to rent, to carry out negotiations on your behalf and to provide assistance with the conclusion of the tenancy agreement and make the final arrangements. The NVM estate agent also verifies your identity. You may also be approached by funda for an estate agent evaluation. The following data may be processed:

| <b>Data</b>   | <b>Data-sharing possible with</b> | <b>Retention period of the NVM estate agent</b> |
|---|-----------------------------------|---|
| <b>Your name, organisation name, address and contact details such as your telephone number and email address.</b> | <b>a</b>                          | <b>20 years</b>                                 |
| <b>The search profile showing what you are looking for in a property.</b>   | <b>none</b>                       | <b>3 years</b>                                  |
| <b>Data about your current accommodation such as purchase price and amount of rent.</b>                           | <b>none</b>                       | <b>3 years</b>                                  |





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|  |             |                 |
|--|-------------|-----------------|
| <b>What you are looking for in the property where you live.</b>  | <b>a</b>    | <b>3 years</b>  |
| <b>If this has been agreed with you, data to determine your ability to pay your rent.</b>  | <b>none</b> | <b>3 years</b>  |
| <b>Data that is required if the landlord requires a tenant check (NVM Businessstoets). This check is in the legitimate interests of the landlord.</b>    | <b>a</b>    | <b>3 years</b>  |
| <b>Data necessary to draw up the tenancy agreement, including verifying the identity of the person with authority to sign.</b>                           | <b>a</b>    | <b>20 years</b> |
| <b>Your name and email address will be passed on to funda to facilitate an estate agent evaluation for customer satisfaction and marketing purposes.</b> | <b>b</b>    | <b>2 years</b>  |
| <b>Other information that you provide to the NVM estate agent.</b>   | <b>none</b> | <b>3 years</b>  |

|          | <b>Data recipients</b>         |
|----------|--------------------------------|
| <b>a</b> | <b>Landlord, letting agent</b> |
| <b>b</b> | <b>funda</b>                   |

**14. You want to buy commercial premises or agricultural holdings that are listed via the NVM estate agent**

**You want to buy commercial premises or agricultural holdings that are listed via the NVM estate agent. For this contact, the NVM estate agent is in contact with you and possibly your own estate agent in connection with the bidding process. The NVM estate agent then carries out the preparatory activities for the purchase and sale agreement and transfer of ownership. In this contact, the NVM estate agent also verifies your identity. The following data may be processed:**

| <b>Data</b>   | <b>Data-sharing possible with</b> | <b>Retention period used by the NVM estate agent</b> |
|---|-----------------------------------|--|
| <b>Your name, organisation name, address and contact details such as your telephone number and email address.</b>   | <b>b</b>                          | <b>20 years</b>                                      |
| <b>Your opinion about the commercial property that is listed.</b>   | <b>b</b>                          | <b>3 years</b>                                       |
| <b>Data about the offers made.</b>  | <b>b</b>                          | <b>3 years</b>                                       |
| <b>Data required if a statutory check is necessary within the legislative framework of the Money Laundering and Financing of Terrorism (Prevention) Act (Wwft). The identities of the ultimate beneficial owners are verified and documented.</b> | <b>d</b>                          | <b>5 years</b>                                       |



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|  |          |                 |
|--|----------|-----------------|
| <b>If this has been agreed with the seller, data to determine your ability to pay the purchase price or to meet other requirements set by the seller. This is in the legitimate interests of the seller.</b> | <b>b</b> | <b>3 years</b>  |
| <b>Data necessary to draw up the purchase and sale agreement.</b>  | <b>c</b> | <b>20 years</b> |
| <b>Once the residential property is sold: the transaction details such as the sales price and the transaction date and also the postcode (1234AB) of the buyer's previous address.</b>                       | <b>a</b> | <b>3 years</b>  |
| <b>Other information that you provide to the NVM estate agent.</b>   | <b>b</b> | <b>3 years</b>  |

|          | <b>Data recipients</b>  |
|----------|---|
| <b>a</b> | <b>NVM/brainbay (data is stored for an indefinite period)</b> |
| <b>b</b> | <b>Seller</b>   |
| <b>c</b> | <b>Notary, buyer, the seller's estate agent</b>               |
| <b>d</b> | <b>FIU (Financial Intelligence Unit - the Netherlands)</b>    |

#### 15. You want to rent commercial premises or agricultural holdings that are listed via the NVM estate agent

You want to rent commercial premises or agricultural holdings that are listed via the NVM estate agent. The purpose of this contact is to determine whether you meet the requirements set by the landlord and to draw up the tenancy agreement on behalf of the landlord. The following data may be processed:

| <b>Data</b>  | <b>Data-sharing possible with</b> | <b>Retention period of the NVM estate agent</b> |
|--|-----------------------------------|---|
| <b>Your name, address and contact details such as your telephone number and email address.</b>   | <b>a</b>                          | <b>20 years</b>                                 |
| <b>What you are looking for in the property where you live.</b>  | <b>a</b>                          | <b>3 years</b>                                  |
| <b>Data to establish whether you meet the landlord's requirements. This is in the legitimate interests of the landlord. This can be checked, for example, by using the NVM Businessstoets.</b> | <b>a</b>                          | <b>5 years</b>                                  |
| <b>Data necessary to draw up the tenancy agreement, including verifying the identity of the person with authority to sign.</b>   | <b>a</b>                          | <b>20 years</b>                                 |
| <b>Other information that you provide to the NVM estate agent.</b>   | <b>a</b>                          | <b>3 years</b>                                  |



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|   | Data recipients         |
|---|-------------------------|
| a | Landlord, letting agent |

16. You can engage an NVM estate agent to assist you with property management, urban planning such as integrated environmental permits, zoning plan changes, designing and/or outsourcing new-build and renovation plans, lease matters, compulsory purchase matters and suchlike.

NVM estate agents aim to give you advice in the above areas. Personal data about you will be used to contact you and to provide you with professional advice (in writing or by telephone) based on the scope of the assignment. The main data about you that may be processed is shown below:

| Data  | Data-sharing possible with | Retention period of the NVM estate agent |
|---|----------------------------|--|
| Your name, address and contact details such as your telephone number and email address.   | a                          | 20 years                                 |
| recommendations, agreements, income data, annual financial statements, lease agreements, permits such as integrated environmental permits, compulsory purchase contracts, construction plans and all other data required for providing the service. | a                          | 20 years                                 |

|   | Data recipients   |
|---|---|
| a | owners' association, site management organisations such as private landowners, <i>Staatsbosbeheer</i> (National Forest Service in the Netherlands), <i>Natuurmonumenten</i> (Society for the Preservation of Nature in the Netherlands), municipal authorities, provinces, regional water authorities and <i>Rijkswaterstaat</i> (Directorate-General for Public Works and Water Management), Pro-rail and similar companies. |

#### Use of data by the NVM/brainbay

The NVM estate agent shares certain data with NVM/brainbay via a link.

NVM/brainbay is the controller for the data received. The NVM/brainbay uses your data for the following purposes:

- A. To ensure that all NVM estate agents have up-to-date listings of residential properties, commercial premises and agricultural holdings that are listed via NVM estate agents.
- B. To ensure that current listings are published on Funda and other (property) websites.



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**C. To create a database that can be used to create valuation reports and other estimates, and to spot trends in the residential housing market, commercial real estate market and agricultural holdings market.**

#### **A Current listings of residential properties, commercial premises and agricultural holdings with NVM estate agents**

If you wish to sell/let a residential property, commercial premises or agricultural holdings via an NVM estate agent, the following data will be shared with other NVM estate agents:

- The address of the residential property, the commercial premises or the agricultural holdings, the description and characteristics of the property such as the asking price, the year of construction, the surface areas and layout, data held with the Land Registry, municipality-assessed value of the property for the purpose of calculating local property tax and photographs of the property.
- Date when the property came onto the market, date when the property was taken off the market. Sale subject to contract, sale date and transaction price.

This data is used by NVM estate agents for the services they provide to their customers (people who are searching for a residential property, commercial premises or agricultural holdings).

This data is stored indefinitely in connection with the database on which historical listings are saved; see under C.

#### **B Current listings of residential properties, commercial properties and agricultural holdings on (property) websites, including Funda**

If you wish to sell/let a residential property, commercial premises or agricultural holdings via an NVM estate agent, after consultation with you, data will also be published on Funda and other (property) websites. This concerns the following data:

- The address of the residential property, the commercial premises or the agricultural holdings, the description and characteristics of the property such as the asking price, the year of construction, the surface areas and layout, data held with the Land Registry, municipality-assessed value of the property for the purpose of calculating local property tax and photographs of the property.
- Date when the property came onto the market, date of sale.

With this data your property is brought to the attention of consumers, professional parties and/or third parties who are carrying out their own searches via (property) websites.

This data can be visible on these websites for a maximum of one year after the date of sale or the date from a residential property, commercial premises or agricultural holdings being taken off the market.

#### **C Database with historical listings**

The following data is stored in the NVM database for all residential properties, commercial premises and agricultural holdings that are sold/let via an NVM estate agent:



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- **The address of the residential property, the commercial premises or the agricultural holdings, the description and characteristics of the property such as the asking price, the year of construction, the surface areas and layout, data held with the Land Registry, municipality-assessed value of the property for the purpose of calculating local property tax and photographs of the property.**
  - **Date when the property came onto the market, date when the property was taken off the market. Sale subject to acceptance, transaction date and transaction price.**
  - **The postcode (1234AB) and house number of the buyer's previous (home) address.**
- The aforementioned data is stored for an indefinite period.**

**Brainbay uses the aforementioned data to carry out analyses of the real estate market on behalf of the NVM.**

**NVM/brainbay also shares this data with selected third parties, namely:**

- **NVM valuers, for the purpose of carrying out property valuations and other estimates.**
- **Validation institutes, following a specific request from an NVM valuer, in order to check valuation reports.**
- **Municipalities, for determining the municipality-assessed value of a property for the purpose of calculating local property tax**
- **The Ministry of Infrastructure and Public Works, for the purpose of research into the housing market.**
- **Universities, for research purposes.**
- **NVM estate agents in the context of the service they provide to their customers.**
- **Non-NVM estate agents, banks, project developers and housing corporations, for research purposes (e.g. housing requirements in a certain region).**

**These parties only have access to data for the stated purposes and where possible, data is only provided at an aggregated level.**

#### Internal audits and investigations

**The NVM may access your data when it carries out an investigation among its members to check whether the rules are being complied with and when the NVM is auditing a member. After the investigation, these data will no longer be processed by the NVM.**

#### View, change or delete data

**If you wish to view, change or delete the data processed by NVM/brainbay, please contact the NVM via [privacyhelpdesk@nvm.nl](mailto:privacyhelpdesk@nvm.nl). The NVM will assess the validity of your request and whether your request can be met.**