



## NN Group Data Protection Declaration

### **Introduction**

NN Group is an international financial services company active in 20 countries, with a strong presence in a number of European countries and Japan. As an internationally operating financial services provider we receive and process personal data of customers, employees and other data subjects such as agents and business partners.

NN Group has an extensive data protection framework in order to process and protect personal data in compliance with applicable data protection laws. This declaration provides a brief explanation with regard to some key elements of NN's data protection framework.

### **Compliance with data protection legislation**

NN Group has a Data Protection Policy in place. This policy aims to provide a clear statement on groupwide compliance with the General Data Protection Regulation ("GDPR") and other relevant data protection laws and regulation in relation to its entire range of activities and applies to all NN entities established in the EU which process personal data in the context of their business activities or NN entities that process personal data of data subjects within the EU. The GDPR effectively prescribes that all data processing entities within NN Group must be able to demonstrate compliance with GDPR obligations and principles. Privacy compliance is monitored closely and documented systematically.

All business units and legal entities within NN Group obtain and process personal data in a fair and transparent manner. Personal data is solely processed for specified legitimate business purposes and on the basis of appropriate legal grounds. NN does not further process personal data in a way incompatible with these purposes. We only share personal data with third parties (such as intermediaries and service providers) if this is needed for a legitimate business purpose and we have a solid legal ground for doing so. Where needed we conclude adequate agreements with such parties to safeguard the protection of personal data and require such third parties to maintain similar standards to ours for the protection of personal data, which is verified during our due diligence and assurance processes. At any rate NN does not sell personal data to third parties.

On the basis of the NN Group Record Retention Policy all business units and legal entities must have retention schedules in place. We retain personal data for as long as required by law and as long as necessary for the purpose for which we use the data. Data subjects can request for information on the applicable retention periods. Such information is provided in a timely manner.

On the NN Group website there is a link to the extensive joint privacy statement of the Dutch entities trading under the Nationale-Nederlanden brand, see [NN Group - Privacy and Cookie statement \(nn-group.com\)](https://www.nn-group.com/privacy-and-cookie-statement). For more information on the processing of personal data by the various non-Dutch NN business units reference is made to the privacy statements on their websites. NN also makes use of an adequate cookie statement in which it transparently describes what (types of) cookies are used by NN and for which purposes as well as what the lifespan of the various cookies is.

## **Data Protection Officers**

The NN Group DPO Charter provides a mandatory framework pursuant to which the function of Data Protection Officer (“DPO”) is established. NN Group and all European NN business units have appointed a DPO and formally established the position, role and responsibilities of the DPO according to the aforementioned DPO Charter. The DPOs continuously monitor compliance with the GDPR and act as a point of contact for supervisory authorities and data subjects.

## **Our employees**

In light of the NN Values (Care, Clear, Commit) and in accordance with the NN Code of Conduct all employees are expected to handle information (which includes the Personal Data of our customers, employees and business partners) responsibly, keep confidential what is entrusted to them and communicate proactively, honestly, with care and diligence. The NN Code of Conduct reminds employees for example of the ‘need-to-know principle’ in requesting or providing confidential information and personal data. This principle entails that information is only exchanged if it is required for the performance of their duties. Information barriers separate areas that have access to confidential information from areas that do not. We regularly verify who has access to our systems and personal data. In case of evident breaches disciplinary measures are imposed on employees. All permanent and temporary employees are required to complete a GDPR e-learning.

## **Security and data breach handling**

We protect personal data by implementing appropriate technical and organisational measures in our data processing operations. NN spends a lot of time and effort on the security of our systems and the personal data stored within them. NN has an Information Security Standard in place which regulates all relevant aspects of group wide information security aspects. Each business unit has a special team that monitors security and the use of personal data. We keep a constant watch over the security of our data processing/traffic.

The NN Group Incident Management Standard provides guidelines on how data breaches should be reported and analyzed. Every business unit within NN Group has an adequate process in place to detect, analyze, register and act upon data breaches with risk mitigating measures and if necessary report to the local Data Protection Authority and/or to NN Group head office. Where needed data subjects are also informed adequately.

## **Rights and consent**

NN has an adequate procedure in place to handle requests of customers with regard to effectuation of their rights under the GDPR in a proper and timely manner. Customers can easily effectuate their rights (such as the right to access, correction and deletion) simply by contacting NN customer service where properly trained employees can assist or by logging in to their own NN customer account. Certain (marketing) activities require consent. We always seek this consent from customers beforehand in a transparent way. If customers have given consent, it is very easy to withdraw it at any given time, for example by clicking the link at the bottom of commercial e-mails received. Where required, NN also asks in a transparent manner for consent in relation to the use of cookies.