



## **Privacy Statement of Yieldfund**

Version: October 2024

Yieldfund is a trade name. The parent company of Yieldfund is Frontpay Capital B.V. For clarity, this privacy statement uses the name 'Yieldfund,' which also refers to Frontpay Capital B.V.

This statement was originally drafted in Dutch, but versions in other languages may be available. In case of discrepancies, the Dutch version prevails.

### **1. Introduction**

Yieldfund operates an online platform for financial services. This platform is accessible via our website: [yieldfund.com](https://yieldfund.com) and will be referred to as our "services."

This is our Privacy Statement, explaining the types of personal data we collect and process through our services. Personal data includes all information that can directly or indirectly identify a person, as defined under the General Data Protection Regulation (GDPR). This statement also outlines our role in processing personal data, how long we retain such data, and your rights as a data subject.

We kindly ask you to read this Privacy Statement carefully. For further questions about the processing of your personal data, please contact us using the details at the end of this statement.



## **2. Who is responsible for processing your personal data?**

Yieldfund is responsible for processing your personal data, as described in this Privacy Statement, and acts as the 'data controller' within the meaning of the GDPR.

For questions about processing your personal data, please contact us using the details provided at the end of this statement.

## **3. What personal data is processed, and where does it come from?**

Yieldfund may process your personal data if you:

- Visit or use our website or services;
- Are a (authorized representative) client of ours;
- Have a business relationship with Yieldfund;
- Work at one of our service providers or other parties we collaborate with.

Special and/or sensitive personal data we process:

Our website and/or services do not intend to collect data about visitors younger than 16 years of age, unless they have parental or guardian consent. However, we cannot verify a visitor's age. We recommend parents monitor their children's online activities to prevent the collection of data without parental consent. If you believe we have collected personal data of a minor without consent, please contact us at [info@yieldfund.com](mailto:info@yieldfund.com), and we will delete the information.



### **3.1 Information we collect automatically**

When you visit our website or use our services, we automatically collect certain information, such as:

- Usage data: including your IP address, the pages you visit, links clicked, and technical information (e.g., browser and system details). See our Cookie Statement for more details.
- Data about your activities on our website.

### **3.2 Automated decision-making**

Yieldfund makes decisions based on automated processes that may have significant effects on individuals.

These decisions are made by computer programs or systems without human involvement (e.g., a Yieldfund employee). Yieldfund uses the following programs or systems:

- Sumsub: A compliance technology platform specializing in automating identity verification (IDV) and Know Your Customer (KYC) processes.

### **3.3 Information you provide to us**

To use our services, we may request certain information, such as:

- Registration details: Full name, address, date and place of birth, gender, phone number, country, and email address.
- Identification details: A copy of your passport, driver's license, or ID card, including a selfie for verification purposes.
- Financial information: Your bank account number (if applicable), transaction details, and wallet address.
- Other information: Source of income.



### **3.4 Information generated by us or received from third parties**

We may also generate information based on your use of our services, such as:

- Risk and fraud reports: Based on your transactions and behavior on our platform.
- Third-party data: We may receive information from external sources such as public databases or blockchain analysis providers.

### **3.5 Use by third parties**

Third parties include:

- Marketing partner: HubSpot;
- Cloud service provider: Rootnet;
- Identity verification platform: Sumsb;
- Communication provider: Bird.com.

Yieldfund may share data with suppliers, audit bodies, government authorities, and companies or individuals hired by Yieldfund to perform specific tasks (including processors).

Data may also be shared with third parties to support the provision of our services.

Yieldfund may provide data to third parties if required by applicable laws, court orders, or other legal obligations or with the data subject's explicit consent.

#### **4. For what purposes do we process your personal data?**

We process your personal data for the following purposes:

- To comply with legal obligations, such as anti-money laundering laws.
- To deliver and improve our services.
- To prevent fraud and abuse.
- To communicate with you about your account and our services.
- For marketing purposes, depending on your preferences.
- To provide customer service.
- For research and development to optimize our services.

#### **5. Data retention periods**

We do not retain your personal data longer than necessary for the purposes for which it was collected unless we are legally obligated to retain it longer.

Retention criteria:

- Agreements: Data is retained for the duration of the agreement.
- Legal obligations: Data is retained as long as legally required.
- Legitimate interests: Data is retained as long as necessary to protect such interests.

If Yieldfund has asked for and received your (explicit) consent to process your personal data, Yieldfund will retain it until you withdraw that (explicit) consent or it is deemed to have expired without your renewed (explicit) consent.

Legal retention periods:

1. Tax purposes: 7 years after the relevant calendar year (Art. 52, Dutch General Tax Act).
2. Anti-Money Laundering and Terrorist Financing Act (Wwft): 5 years after the business relationship ends (Art. 33).
3. Wwft reporting requirements: 5 years after notification to the FIU (Art. 34).

## **6. Your rights**

Under the GDPR, you have certain rights regarding your personal data, including the right to access, correct, delete, and restrict processing. You can exercise these rights at any time by contacting us.

## **7. Changes**

Yieldfund reserves the right to amend this privacy statement. We recommend reviewing this statement regularly for updates.

## **8. Right to lodge a complaint**

Yieldfund handles personal data with care and aims for continuous improvement. If you have tips or complaints about our handling of personal data, please contact Yieldfund's Data Protection Officer. You may also file a complaint with the Dutch Data Protection Authority.



## **9. Security**

Yieldfund has implemented appropriate technical and organizational measures to protect personal data against loss or unlawful use. If data is processed by third parties on behalf of Yieldfund, a data processing agreement ensures that data is handled securely and adequately.

International data transfer:

Personal data may be transferred outside the European Economic Area (EEA) to countries deemed to provide an adequate level of data protection under GDPR. This includes Canada (commercial organizations), Japan, Switzerland, and New Zealand. For transfers outside these countries, standard contractual clauses will apply.

## **10. Contact information**

For questions, comments, or complaints about this Privacy Statement or the processing of your personal data, please contact us at:

Email: [info@yieldfund.com](mailto:info@yieldfund.com)

Post: Hanzeweg 5, 7418 AW, Deventer, Attn: Yieldfund Data Protection Officer.