# KeesdeBoekhouder Privacy Statement

This privacy statement applies to the processing of personal data of website visitors, customers, suppliers and job applicants by KeesdeBoekhouder B.V. and/or its subsidiaries, including Founders Finance B.V., Backseat Surfer B.V. and KeesdeBoekhouder Office B.V. (hereinafter collectively referred to as: KeesdeBoekhouder).

KeesdeBoekhouder considers the protection of your privacy to be important. We therefore take our responsibility for protecting your personal data seriously. KeesdeBoekhouder has therefore drawn up this privacy statement, amongst other measures.

The purpose of this privacy statement is to be transparent about how KeesdeBoekhouder collects, uses and protects your personal data. We also explain how we comply with privacy legislation, such as the GDPR. Please read this statement carefully to understand how we handle your personal data.

We use personal data solely for the purpose for which we obtained it. We inform you about this privacy statement by publishing it on our website and referring to it in our agreements and terms and conditions.

**What is personal data?**

The General Data Protection Regulation (GDPR) states that personal data is any information relating to an identified or identifiable natural person. This means that information either relates directly to someone or can be traced back to that person.

**About us**

KeesdeBoekhouder is a joint controller within the meaning of the GDPR for the personal data we process about you. This means that KeesdeBoekhouder B.V., KeesdeBoekhouder Office B.V. and Founders Finance B.V. are jointly responsible. KeesdeBoekhouder Office B.V., located at Nieuwe Teertuinen 25a (1013 LV) in Amsterdam, is your point of contact. You may exercise your rights with any of these companies.

Backseat Surfer B.V., also part of our group, develops and manages our accounting platform. In doing so, it processes personal data solely on our behalf, as a data processor. However, Backseat Surfer B.V. is jointly responsible with us for the processing of personal data relating to job applicants.

If you only use our accounting software, or if we only carry out your payroll calculations using the data you provide yourself (without verification or advice), we process the data in your accounts or payroll records on your behalf, as a data processor. The terms of our data processing agreement apply in this regard, including the provisions on retention periods and sub-processors. This privacy statement relates to the processing operations for which we ourselves are responsible.

**For what purposes do we process personal data?**

We process your personal data only for carefully defined purposes. Below you will find more information about the various purposes. We process personal data from:

- Visitors to our website and social media channels;
- Customers (and third parties engaged by customers);
- Suppliers and partners; and
- Job applicants.

# VISITORS TO OUR WEBSITE AND SOCIAL MEDIA CHANNELS

## For customer service: handling enquiries / comments / complaints

You can contact us via the contact form on our website. In order to deal with your enquiry, complaint or comment and to be able to contact you again at a later date if necessary, we process personal data. For this purpose, we process your name, contact details and any information you provide to us during our communication.

The legal basis for this processing is our legitimate interest in maintaining effective contact with data subjects who have enquiries, comments or complaints (Article 6(1)(f) of the GDPR).

We retain this data for up to 12 months after we have dealt with your enquiry or comment. If your enquiry relates to a discussion or an agreement with us, the retention period specified for that purpose applies. We retain complaints and the corresponding correspondence for up to 5 years after the end of the calendar year in which the complaint was resolved, so that we can deal with any potential claims.

## For scheduling and following up on a meeting

If you book a meeting via our website or complete a form, we use your data to schedule and follow up on an introductory, advisory or sales meeting with you. To this end, we use tools for customer management, appointment scheduling and the automation of these steps. For this purpose, we process your name, contact details and the information you provide in the form.

The legal basis is taking steps at your request prior to entering into a contract (Article 6(1)(b) of the GDPR) and our legitimate interest in properly following up on your enquiry (Article 6(1)(f) of the GDPR).

If no contract is concluded, we will retain this data for up to 12 months after our last contact. If you object, we will only retain what is necessary to ensure we do not contact you again. If you become a customer, the retention periods set out below under Customers will apply.

## For analysis and to develop our website, products and services

We also process data about you that you provide to us indirectly. This is because our website uses cookies for functional, analytical and marketing purposes. The functional cookies are necessary for the use of the website.

This concerns the following data:

- Location data
- IP address or app IDs
- Internet browser and device type
- Website language

Data from analytical and marketing cookies is not linked to any other data. You can see which cookies we use and how long they and the data collected through them are stored in the cookie settings on our website. The legal basis is consent, which you provide by agreeing to our cookie policy in the cookie banner on the website (Article 6(1)(a) of the GDPR) or, in the case of functional cookies, our legitimate interest in ensuring the website functions properly (Article 6(1)(f) of the GDPR).

# CUSTOMERS

We process personal data relating to customers, their employees, contact persons and third parties engaged by them. The customer is responsible for informing the third parties engaged by them of the contents of this privacy statement. A copy of this privacy statement can be found on our website.

## For the performance of our contract

*What does this purpose entail?*

We process personal data in order to provide our services. For example, to handle your accounts or tax returns and to send invoices for our services. We can only provide our services if we process personal data in doing so. These services include: (day-to-day) communication, processing business accounts, and preparing annual accounts, income tax returns, VAT returns, intra-Community supply returns and

payroll tax returns. The legal basis for this is the performance of the contract we have with you (Article 6(1)(b) of the GDPR).

*What personal data do we process for this purpose?*

This varies depending on the service provided by KeesdeBoekhouder, but in order to provide our services, we process, amongst other things:

- Name and address details
- Gender / title
- Email address
- Citizens Service Number (BSN)
- VAT identification number
- VAT number
- Date of birth
- Company start date
- Company IBAN
- LH number
- RSIN
- Chamber of Commerce
- Business activity
- Language
- Tax partner (Date of birth, BSN)
- Children
- Former annual accounts (JR)
- Past VAT returns
- Annual bank statements
- Details of other companies you own but which are not customers
- Annual statements
- Loan statements and related documents
- Asset documents
- Bonus
- Alimony
- Annuity
- Occupational disability insurance
- Medical expenses
- Donations
- Education costs
- Dividends
- Other income
- Bank transactions

*How long do we keep this data?*

We retain the data we need for this purpose for as long as our agreement remains in force. We then retain the tax returns, annual accounts and (payroll) records that we prepare for you, as well as the supporting documents on which they are based, for up to 7 years after the end of the year to which they relate. This ensures they remain available for the duration of the 7-year tax retention period, enables us to respond to enquiries from the tax authorities regarding tax returns we have filed on your behalf, and allows us to defend ourselves should we be held liable. We carry out a data purge on our systems once a year; therefore, we delete this data no later than 8 years after the end of the year to which it relates. The legal basis for retaining data after the end of the agreement is our legitimate interest (Article 6(1)(f) of the GDPR).

Some of the data we require for your tax return may reveal information about your health (such as medical expenses or a disability benefit) or about your religion, beliefs or political preferences (such as a donation to a church or political party). This constitutes special categories of personal data. We will only process such data with your explicit consent, which we will request before you provide it (Article 9(2)(a) of the GDPR). If you do not give your consent, we cannot include this data in your tax return. You may withdraw your consent at any time; this does not affect anything we have already done. After withdrawal, we will only retain information already contained in a submitted tax return for the retention period set out below, so that we can defend ourselves should we be held liable (Article 9(2)(f) of the GDPR).

## Maintaining customer relations

*What does this purpose entail?*

To maintain our relationship with you as effectively as possible, we also store personal data in the form of notes. This ensures that, when preparing your tax returns or when you call, we are aware of the current situation and any relevant details. We also occasionally ask you about your satisfaction with our services. The

legal basis is our legitimate interest in maintaining a good customer relationship (Article 6(1)(f) of the GDPR).

*What personal data do we process for this purpose?*

- Personal circumstances that you share with us
- Personal characteristics and preferences that you share with us

*How long do we retain this data?*

We retain these notes for as long as you are a customer and for up to 2 years after the end of the calendar year in which our agreement ended. We retain notes that form part of a tax return or administrative file for as long as that file is retained.

## For customer service: handling enquiries/comments/complaints

*What does this purpose entail?*

You can contact our customer service team with any questions, comments or complaints you may have. In order to answer all your questions, we need certain data. The data we require varies depending on the nature of the enquiry. The legal basis for this is our legitimate interest in the efficient handling of enquiries, comments and complaints (Article 6(1)(f) of the GDPR).

*What personal data do we process for this purpose?*

Name, email address, telephone number and any other information you share with us when contacting our customer service team.

*How long do we retain this data?*

We retain this data for up to 12 months after we have dealt with your enquiry or comment. If your enquiry relates to a tax return or your records, we retain the correspondence for as long as the relevant file is kept. We retain complaints and the related correspondence for up to 5 years after the end of the calendar year in which the complaint was resolved, so that we can deal with any potential claims.

## Legal obligations

*What does this purpose entail?*

As an accountancy firm, we are obliged to comply with the Money Laundering and Terrorist Financing (Prevention) Act (Wwft) and, from 10 July 2027, with the European Anti-Money Laundering Regulation (Regulation (EU) 2024/1624). To this end, it is necessary for us to be able to identify our clients and fulfil the other obligations arising from these regulations. To this end, we may also verify your details against public sources and registers. Where required by law, we will report unusual transactions to FIU-Netherlands. The legal basis for this is compliance with a legal obligation (Article 6(1)(c) of the GDPR).

*What personal data do we process for this purpose?*

- Proof of identity (passport, ID card, Dutch driving licence)
- Name
- Date of birth

*How long do we retain this data?*

We retain this data for 5 years after the end of our relationship with you, or 5 years after a one-off transaction, and destroy it immediately afterwards. We retain data relating to a report to FIU-Netherlands for 5 years after the report was made. These are statutory retention periods; we therefore do not wait for our annual data purge before disposing of this data.

## For analysis and to develop our website, products and services

When you visit our website, we use cookies. You can read about how we do this above under Visitors to our website and social media channels.

## For the (automatic) transcription of a (sales) conversation using AI

When you have a (sales) conversation with us, we may record the conversation and use an AI tool to transcribe it automatically. We do this so that we can efficiently

produce an accurate internal record of the conversation and ensure that any follow-up (such as answering questions or preparing for a follow-up conversation) is carried out properly.

Before the conversation begins, we always ask whether you have any objections to the conversation being recorded and to the use of an AI tool for automatic transcription. If you object, we will not record the conversation and will not use the tool. This will not affect the conversation in any way.

For this purpose, we process (i) the recording of the conversation, (ii) the content of the conversation (everything shared with us during the conversation) and (iii) the transcription derived from the conversation (the text transcript). An automatically generated transcript is always checked manually and corrected where necessary, so that any errors in the automatic transcript are rectified. We retain the recording of the conversation for a maximum of 30 days. We retain the checked transcript as part of your client file if you become a client. If no agreement is reached, we retain the transcript for up to 12 months after the conversation.

The legal basis for this processing is our legitimate interest in efficient and accurate internal record-keeping and the proper follow-up of (sales) conversations (Article 6(1)(f) of the GDPR). You have the right to object to this processing. If you object (prior to the meeting), we will not record the meeting and will not use an AI tool for transcription.

We have entered into a data processing agreement with the AI supplier. The supplier processes the data exclusively on our behalf and for the benefit of KeesdeBoekhouder. The supplier is not permitted to use the data for its own purposes, such as improving or training the algorithm.

## For marketing purposes

*What does this purpose entail?*

For our marketing, it is important to identify and target our audience. That is why we use your email address, for example, to target so-called lookalikes of our customers on Facebook and LinkedIn. By uploading the hashed email addresses of our customers, we can target an audience on Facebook and LinkedIn with an advert that resembles our customer base. In addition, we may use your email address to send you our newsletter.

We share responsibility with Meta (Facebook) and LinkedIn for uploading the hashed email addresses and displaying adverts to the target audience. What Meta and LinkedIn subsequently do with the data is their own responsibility and is governed by their own privacy policies.

If you do not wish us to use your email address for this purpose, you can send an email to support@keesdeboekhouder.nl or unsubscribe from the newsletter by using the unsubscribe button at the bottom of the newsletter.

*What personal data do we process for this purpose?*

- Email address

The legal basis is our legitimate interest in conducting an effective marketing campaign (Article 6(1)(f) of the GDPR).

*How long do we retain this data?*

We use your email address for targeted advertising on Facebook and LinkedIn for as long as you remain a customer and have not objected. For the newsletter, we use your email address until you unsubscribe. We will then add your email address to an unsubscribe list, so that you no longer receive newsletters from us. We retain data relating to your subscription and unsubscription for up to 5 years after you unsubscribe, so that we can demonstrate that we have respected your choice.

# SUPPLIERS AND PARTNERS

## For processing orders and requests (day-to-day business operations)

*What does this purpose entail?*

To carry out and process our orders and assignments with you as a supplier (carrying out our day-to-day business operations), we process personal data relating to, for example, your contact persons. This data helps us to provide you with the correct information for placing an order or issuing an assignment. We may also process personal data for financial settlement purposes. For example, if you are acting on behalf of a partnership. The legal basis for processing personal data for this purpose is the conclusion or performance of a contract (Article 6(1)(b) of the GDPR).

*What personal data do we process for this purpose?*

Name, title, job title, telephone number, Chamber of Commerce number, employer, email address, address details, bank account and VAT numbers, and other relevant information provided during the performance of the contract.

*How long do we retain this data?*

We retain this data for the duration of the contract. We retain data that forms part of our financial records, such as invoices, for a further 7 years, as required by tax legislation. We carry out a data purge once a year; therefore, we delete this data no later than 8 years after the end of the financial year to which it relates. We retain other contact details for up to 2 years after the end of the calendar year in which our collaboration ended.

## To maintain a good relationship

*What does this purpose entail?*

We appreciate you supplying us with products or services. To show our appreciation, we process certain data about you, for example to send you a small gift at important

times, such as at Christmas or at the end of the year. If you do not wish to receive this, you can always let us know via support@keesdeboekhouder.nl. The legal basis is our legitimate interest in maintaining a good supplier relationship (Article 6(1)(f) of the GDPR).

*What personal data do we process for this purpose?*

Name, title, address details and information about personal circumstances and preferences that you or your contact person provide to us during our supplier relationship and which are relevant for this purpose.

*How long do we retain this data?*

We retain this data for as long as we work together and for up to 12 months thereafter, unless you inform us earlier that you do not wish us to do so.

## Communication purposes

*What does this purpose entail?*

You are a supplier with whom we are pleased to work and/or who supplies certain goods or services. To ensure that we can provide you with relevant information, we process your data so that we can contact you.

*What personal data do we process for this purpose?*

Name, address details, telephone number, email address and, where applicable, job title.

*How long do we retain this data?*

We retain this data for as long as we work together and for up to 12 months thereafter.

# JOB APPLICANTS

## To ensure a responsible, effective and efficient recruitment and selection process.

For this purpose, we process your contact details (such as name, address and telephone number), the personal data from your CV and your cover letter.

We forward your CV and cover letter to the hiring manager and our HR staff. They retain access to these until the application process ends for you. The application process may end either with a rejection based on your cover letter or an interview, or with an offer of an employment contract. In the latter case, your employment begins.

This personal data is retained, as standard, for up to 4 weeks after the end of the recruitment process. This enables us to provide you with a substantive response should you have any questions regarding the outcome of your application during this period. If the application leads to an appointment, the personal data will form part of your personnel file; in this case, the retention periods set out in our privacy statement for employees apply. The legal basis is KeesdeBoekhouder's legitimate interest in the efficient conduct of the recruitment and selection process (Article 6(1)(f) of the GDPR).

## Retaining your CV for suitable vacancies in the future.

It may be that we do not currently have a suitable vacancy for you and you have sent an unsolicited application, or that we have unfortunately chosen someone else for a vacancy. If you give your written consent for us to retain your data for a longer period, we will keep your data (including your CV, cover letter and contact details) in our system so that we can contact you in the future if we believe we have a vacancy that may be of interest to you, or if we organise (external) recruitment events.

In this case, a member of staff from the HR department will ask you to give your consent by email to the extended retention of your data. From that point onwards, your written consent will form part of your application file. Once you have given your consent, we will retain your data for a maximum of 12 months.

The legal basis for this is your consent (Article 6(1)(a) of the GDPR). You always have the right to withdraw your consent. You can do this easily by sending an email to hr@keesdeboekhouder.nl. In that case, we will delete your data from our systems as soon as possible and will no longer use it for this purpose.

**Your rights**

You have the right to be properly informed about what we do with your data and why we need it. We do this through this privacy notice. In addition to the right to be informed transparently, you have the following rights:

- Right of access (if you wish to know what data we collect about you);
- Right to rectification (we are happy to correct any data that is no longer accurate);
- Right to be forgotten (in some cases, you may ask us to delete your data);
- Right to restriction of processing (in some cases, you may ask us to restrict the processing of your data);
- Right to data portability (if you wish, we can transfer your data to another party or provide you with a copy of your data);
- Right to object (in some cases, you may object to the use of your data).

If you wish to exercise any of your rights, please contact us by emailing support@keesdeboekhouder.nl. We will always respond to your request within one month.

**Who do we share data with and where do we store it?**

We only share your data where necessary for the purposes set out in this privacy statement, and only with the following (categories of) recipients:

- The other KeesdeBoekhouder companies that are jointly responsible with us (see About us) for our services, customer service and internal operations;
- Other suppliers who process data on our behalf (data processors), for hosting our platform and the receipts and photos you upload, hosting our websites, automatically recognising receipts and invoices, and reading bank transactions; accounting, tax return and payroll software; our customer management and marketing system; sending emails from our platform; office and communications software and telephony; scheduling appointments; automating work processes; digital signing; accounts receivable management; AI transcription, website statistics and optimisation, recording cookie consent,

the management, logging and security of our systems, recruitment and selection, identity verification and checks against sanctions and PEP lists, and support from digital marketing agencies;
- The Tax and Customs Administration (Belastingdienst), when we file tax returns on your behalf and where we are required by law to provide data; we submit tax returns via Digipoort, the secure link managed by Logius on behalf of the government;
- The Chamber of Commerce, when we file your company's annual accounts;
- FIU-Netherlands, where anti-money laundering regulations require us to report an unusual transaction, and the Financial Supervision Office, which monitors our compliance with those regulations;
- Your company's accountant, when we prepare your accounts for their compilation, review or audit work;
- Meta (Facebook) and LinkedIn, for compiling target groups using hashed email addresses (see For marketing purposes), and advertising and social media platforms if you give your consent to marketing cookies via the cookie banner;
- Banks and payment service providers for the payment of our invoices, and debt collection agencies and bailiffs if an invoice remains unpaid;
- Parties to whom you ask us or authorise us to disclose data, such as your mortgage adviser, your bank or your new accountant;
- Our own advisers, such as solicitors and accountants, and our insurer, where necessary for the purposes of advice, a dispute or a liability claim;
- Parties involved in a potential takeover, merger or investment, and their advisers, to the extent necessary, subject to confidentiality and, where possible, using only anonymised or pseudonymised data; and
- The police, the judiciary, the Dutch Data Protection Authority, other government bodies and courts, where we are required to do so by law.

We will never sell your data to other parties.

Processors who assist us in processing your personal data may only use your data on our instructions and for the purpose of performing the relevant services they provide to us. They may not use or disclose your data independently. We have entered into a data processing agreement with them. The other recipients are themselves responsible for what they do with your data; you can read about how this applies to Meta and LinkedIn under For marketing purposes. If you would like to know exactly which recipients we have disclosed your data to, you can request this information from us.

We use various applications to process certain data. To safeguard your privacy, we select our suppliers carefully and these applications are subject to strict rules. Most data is stored within the European Economic Area (EEA). A number of suppliers, including those responsible for sending emails from our platform, the automatic recognition of receipts and invoices, appointment scheduling, recruitment and selection, website statistics, marketing, AI transcription, and the management and security of our systems, also process data in the United States, or form part of a group based there.

For data processed outside the EEA, we rely on the European Commission's adequacy decision for the EU-US Data Privacy Framework (Implementing Decision (EU) 2023/1795), provided that the recipient is certified under it. If this is not the case, we enter into the standard contractual clauses adopted by the European Commission (Implementing Decision (EU) 2021/914). You can request a copy of these safeguards from us via support@keesdeboekhouder.nl.

**How long do we retain your data?**

The retention period for your data is specified for each purpose listed above. Once that period has expired, we will delete or anonymise your data. We carry out a data purge once a year; where this affects the retention period, the expiry date is stated alongside the relevant purpose. If we require data for a longer period due to an ongoing dispute or investigation, we will retain only that data, and only for as long as necessary. For data that we process on your behalf as a data processor (see About us), the provisions regarding retention and deletion set out in our data processing agreement apply.

If you ask us via support@keesdeboekhouder.nl to delete data or your account, we will do so, except for data that we are required to retain by law or for one of the purposes mentioned above. You can always view and/or amend some of your personal data in your own account.

**How do we protect your data?**

Under Article 32 of the GDPR, we are obliged to take appropriate technical and organisational measures to prevent the loss of personal data or its unlawful processing. The security of your personal data is well managed by us through physical, administrative, organisational and technical measures.

Only employees who have been authorised by us to do so have access to the data. They have also signed a confidentiality agreement. We therefore maintain an appropriate level of protection. We also update this level of protection periodically where necessary.

Our organisation is structured in such a way that we do everything in our power to prevent security breaches, known as data breaches. In the event of a data breach, we will act in accordance with the Data Breach Protocol.

**Contact and complaints**

If you have any questions about this privacy statement or wish to exercise your rights as a data subject, please contact us at support@keesdeboekhouder.nl. If you are a Founders customer, you can also email us at support@founders.nl.

If you have any complaints, for example regarding the way in which we use your data or how we respond to privacy-related enquiries, you may lodge a complaint with the Dutch Data Protection Authority.

This privacy statement can be downloaded from https://www.keesdeboekhouder.nl/en/privacy-statement/

**Amsterdam, January 2027**