PRIVACY STATEMENT DMPM

WHO ARE WE?

Dutch Mortgage Portfolio Management or “DMPM” builds, manages and services mortgage portfolios for its clients and provides services related to all aspects and complexities of the Dutch residential mortgage market among which price setting, product development and advisory services.

DMPM subsidiaries such as Robuust Hypotheken BV, HollandWoont BV, IQWOON Hypotheken 1 BV and Clarian Wonen B.V. originate mortgages and offer mortgages to consumers.

DMPM is part of Blauwtrust Groep. We are registered with the Dutch Chamber of Commerce under number 65442253 and located at:

Fascinatio Boulevard 1302
2909 VA Capelle a/d IJssel
The Netherlands

Within the context of the GDPR, DMPM is a controller in respect of the personal data it processes for which it is authorized to determine the purpose and means of processing, sometimes together with others, such as her subsidiaries.

There are also activities which include the processing of personal data that DMPM carries out, for which DMPM acts as a ‘processor’, in these cases, DMPM will only process personal data upon the explicit instruction of the controller. This is for example the case when DMPM is hired as a portfolio manager, for example for ELAN Woninghypotheken BV. For these processes you will need to check the privacy statement of the controller for more details on the processing of your personal data.

DMPM values the protection of your privacy and will handle your personal data with due care. With this Privacy Statement DMPM aims to clarify how it handles your personal data.

WHO’S PERSONAL DATA DO WE PROCESS?

DMPM processes personal data from:

- a) persons visiting this website and those providing information via the contact form;
- b) contact persons of suppliers, parties involved in establishing and/or processing of mortgage loans and clients;
- c) persons who have applied for (whether or not granted) a mortgage of one of DMPM’s subsidiaries;
- d) applicants & employees;
- e) persons who have applied for (whether or not granted) a mortgage of one DMPM’s clients for which DMPM performs Portfolio Management services.

We do so in accordance with the General Data Protection Regulation (GDPR) and the Dutch GDPR Implementation Act (UAVG).
FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA?

DMPM will use the personal data of website visitors for the following purposes:
- For the development, security and improvement of our website;
- To provide you with information about, and the development and improvement of our products and services;
- To answer any questions asked via the contact form on our website.

DMPM will use the personal data of contact persons for suppliers and clients for the following purposes:
- Normal business-related communication with regards to our services and products;
- To comply with legal obligations related to Dutch, European and International Law.

DMPM will use the personal data of persons who have applied for (whether or not granted) a mortgage of one of DMPM’s brands for the following purposes:
- To establish whether an individual meets the mortgage requirements;
- To carry out any (pre)contractual obligations;
- To comply with legal obligations of DMPM or its clients related to Dutch, European and International Law;
- To improve products and services by performing credit risk and behavior analysis;
- To send personalized offers;
- Customer satisfaction surveys.

DMPM will use the personal data of applicants and employees for the following purposes:
- To contact applicants and evaluate their applications;
- To carry out obligations stemming from the employee contract;
- To comply with legal obligations related to Dutch, European and International Law.

Your personal data may also be processed for the aforementioned purposes by selected third parties, for example for screening purposes or complying with legal obligations.

WHAT PERSONAL DATA DO WE PROCESS?

DMPM processes different kinds of personal data, depending on the purpose of the processing.

Website visitors
- General browsing information such as surfing behavior, visiting time and frequency;
- If the contact form is used: name, email and (if provided) telephone number.

Contact persons for suppliers and clients
- General contact information, such as name, address, email and telephone number;
- Occasionally more extensive information is necessary to meet legal requirements, including date and place of birth, identification documents, financial information and national identification number (BSN).

Individuals applying for a mortgage with a DMPM brand
- All personal information as provided (or collected by us) to assess the application for and the processing of the mortgage loan, including for example contact information, birth date, nationality, national identification number (BSN), bank account details and copies of identification documents;
- More extensive information can be found on the respective websites of the DMPM labels.
Applicants & employees

- Name, address, email and telephone number;
- Date and place of birth;
- Curriculum Vitae, including information about prior positions and education history;
- (Financial) information needed for the execution of the employment contract such as bank account numbers;
- A more extensive notice for applicants and employees is available upon request.

ON WHAT LEGAL GROUND DO WE PROCESS YOUR PERSONAL DATA?

DMPM uses several different legal grounds as included in article 6 of the GDPR to process personal data.

Execution of a Contract

- This includes obligations arising from employee contracts as well as contracts with suppliers and clients;
- This includes processing of personal data required in the pre-contractual phase.

Meeting legal obligations

- DMPM is obligated to comply with several different laws and regulations, such as the Dutch Financial Supervision Act and the Anti-Money Laundering and Anti-Terrorist Financing Act;
- In order to meet these obligations DMPM may collect, use and store information, as well as share it with different supervisory bodies;
- It may also be necessary to share personal information with suppliers or clients in order for them to meet their legal obligations.

Legitimate interest of DMPM or a third party

- DMPM will process personal data in order to pursue its legitimate business interests;
- DMPM will only use legitimate interest as a legal basis for processing your personal data after ensuring that our legitimate interest is not overridden by your fundamental rights and freedoms.

Consent

- This ground is used only for those processing activities for which we have no other legal basis;
- We will rarely process your personal data based on your (explicit) consent, but in those cases where we do, you can withdraw this consent at any time.

On an incidental basis, DMPM might also need to use ‘vital interest of the data subject or others’ as grounds for the processing of personal data (E.g. If an employee suffers a medical emergency and immediate processing of personal data is necessary to save their life).

DMPM does not process personal data for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Additionally, DMPM will only process special categories of data if it meets an exception included in article 9 of the GDPR. (E.g. Medical data of a person who needs immediate medical attention.)
WHAT RIGHTS DO YOU HAVE?

1 Access: You have the right of access to your personal data and to obtain a copy of your personal data which we process.

2 Rectification: You may request us to correct any inaccuracies in your personal data.

3 Erasure: You may ask us to erase personal data. If your erasure request is granted, we will take all reasonable steps to inform processors who process the personal data on our behalf, that you have requested the removal of links to, and copies of, your personal data.

4 Restriction of processing: You may request us to restrict the processing of personal data, for example if you dispute the accuracy of your personal data.

5 Data portability: You have the right to obtain the personal data you have provided to us for processing based on your consent or a contractual relationship and which we store in an automated manner. You will receive this data in a structured, commonly used and machine-readable form, for example to send it to a third party.

6 Withdrawal of consent: For processing of personal data that occurs based on your consent, you have the right to withdraw this consent, as a result of which we will no longer process the personal data in question.

7 Submitting a complaint: You may submit a complaint about the processing of your personal data to the Dutch Data Protection Authority, if you are unhappy with the handling of your request by DMPM.

When exercising these rights, exceptions may apply, meaning that not all requests can be met with a positive response, for example when we are required by law to keep your personal data on file.

Do you wish to exercise your rights, make a complaint or ask a question?

To exercise your rights, please send us a letter or an e-mail specifying your request. Depending on the request submitted we may need to verify your identity through a request for additional information, in some cases this might include asking for a copy of your ID or passport. In case we require a copy of your identification, please make sure you cover your national identification number (BSN) and passport photo to avoid fraud.

DMPM will respond to your request without delay, and always within one month following the receipt of your request.

If you have any further questions, want to exercise any of your rights, or if you want to complain about the way we handle your personal data, please contact us via post or e-mail:

DMPM
To the attention of the Privacy Office
P.O. Box 306
3000 AH Rotterdam
The Netherlands

e-mail: privacyofficer@dmpm.nl

COOKIE STATEMENT

DMPM uses various cookies on this website. Our Cookie Statement explains what cookies are, what they do and what cookies we use for our website.