



Privacy Policy

1. WHO ARE YOU?

We are **Lemonero B.V.**, registered address: Westplein 12, 3016BM Rotterdam, registration number: RSIN 864285218, establishment number 000053320557.

We provide services assessing performance of your business and business loans. In that connection we may get in touch with your personal data, without which we could not provide our service to you and communicate with you either.

Due to this fact we are in the position of your personal data controller and are liable to comply with the applicable data protection legislation when processing your personal data, including but not limited to the Regulation of the European Parliament and of the Council (EU) no. 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter just “**GDPR**”).

2. WHAT IS IN THIS DOCUMENT?

As we are your personal data controller, we are obliged to inform you about detailed terms and conditions of such personal data processing. Therefore, this document includes information about how we process your personal data if you install our add-on, request a loan or otherwise communicate with us.

This document is to fulfill our liability pursuant to Art. 13 of GDPR, requiring from us to provide you all information you may find useful before we start processing your personal data.

3. DO YOU USE COOKIES ON YOUR WEB SITE?

Yes, our web site on www.lemonero.nl does use cookies and similar technologies – but never without your consent. For detailed information about the cookies, please see directly the cookies bar which can be found minimized in the bottom left corner of your screen even after you click for your consent with our cookies use.

In addition, you can find further information on <https://www.lemonero.nl/cookies>

4. WHERE CAN I CONTACT YOU?

All contact information can be found on our web site on www.lemonero.nl In the case of any question or comment or the need to contact us with anything else we will be glad to receive your email on info@lemonero.nl.

5. WHAT IS PERSONAL DATA?

The personal data definition provided by GDPR, however complex it may sound, is in fact very simple – personal data is all information we process about you. So if you tell us any information we will consider it your personal data and handle it accordingly.

Personal data break down to several categories, and we usually process the following of them:

Categories of Personal Data	Example
Identification data	Degree, first name, surname, position at work etc.
Contact data	E-mail, phone number or social media alias etc.
Payment data	Bank name, account number and payment instructions.
Address data	Address of your registered offices or any other address you tell us, including postal code etc.
Content of your communication with us	We consider all you tell us your personal data.
Service use information	Statistical data about what services you use and how.
Photocopies of personal documents	A photocopy of your identity card or another identity document, if necessary
Your appearance	A photo of you.

Below you will find how we process your personal data and what categories of personal data we use for that purpose.

6. ON THE BASIS OF WHAT DO YOU PROCESS MY PERSONAL DATA?

To be able to process your personal data we must meet one of the basic conditions of data processing, and that is a valid legal title. If we want to process personal data in compliance with GDPR, we can only do that if:

- Such processing is necessary to execute a contract with you, to fulfill it, or if we need such personal data for processing related to the contract execution;
- Such processing is directly required by law and is needed to meet a particular legal obligation by us;
- Such processing is necessary to protect our legitimate interests which, in the particular case, override your rights to privacy;
- Such processing is with your explicit consent granted by you willingly, that you can revoke any time.

7. HOW AND FOR HOW LONG DO YOU PROCESS MY PERSONAL DATA?

The way we process your personal data depends on the particular purpose for which you provide it. As part of the processing of personal data, we have specific titles which we will inform you about together with other information before collecting your data, to the maximum possible extent. The following section provides a detailed survey of situations in which we process your personal data and what data is concerned.

Lemonero add-on download or Lemonero service activation

If you activate any of our services on a third-party platform you express your agreement with our business terms and conditions by that. To be able to provide the service to you we need your personal data. Without the below personal data we would not know to whom we provide our service (or with whom we execute the contract) and would not be able to provide the service either.

In such case we can process your personal data in the following manner:

Purpose of processing	Categories of Personal Data	Legal title	Processing period
Execution and fulfillment of service provision contract, including related communication	Identification data; Contact data; Service use information	Necessary for contract fulfillment (or legitimate interest of controller in the case of cooperation with a legal entity)	For the period of cooperation (contractual relationship) and another 3 years after cooperation termination (basic data about the relationship for 10 more years)
Addressing by e-mail or SMS with our product and service offers related to the service subscribed	Identification data; Contact data; Service use information	So called customer exception (see below)	For the period of the service use (contractual relationship duration) and another 3 years after use termination
Addressing by phone with service and product offers, including discounts or promo communications of third parties - all tailored on the basis of performed analysis of what might be interesting for you	Identification data; Contact data; Service use information	Legitimate interest for the purpose of direct marketing	For the period of the service use (contractual relationship duration) and another 3 years after use termination

In the event that you activate our service or add-on, we are entitled to use your email to contact you with an offer of a similar product or service that we provide to you based on the so-called customer exception. If you do not wish to receive these messages, you can certainly exclude this when negotiating the contract, or you can find a link at the end of each commercial communication, after clicking on which we will stop sending you such communications until you give us your consent to do so again. You may also exclude delivery of these messages to you in advance by the consent withdrawal procedure described below.

It is also in our legitimate interest to call you from time to time to ask how you like our service, or to offer you improvements or provide any other offers. Our legitimate interest is that, based on your use of our service, we assume that you enjoy using it and might be interested in other news from us. In any case, you have the possibility to simply exclude this processing by using the procedure for filing an objection against data processing on the basis of legitimate interest.

Loan provision

If we want to grant a loan to you we will need certain personal data. Without this personal data we would not be able to execute the contract with you and to fulfill it either. In such case we can process your personal data in the following manner:

Purpose of processing	Categories of personal data	Legal title	Processing period
Provision of financing to your business by means of a loan through our Lemonero system	Identification data; Contact data; Service use information; Payment data	Necessary for contract fulfillment (or legitimate interest of controller in the case of cooperation with a legal entity)	For the period of the contract (contractual relationship) duration and another 3 years after use termination (basic data about the relationship for 10 years)
Personal identity verification including fraud prevention	Identification data; Photocopies of personal documents, your appearance	Legitimate interest	For the period of the contract (contractual relationship) duration for the duration of the forfeiture periods (3 years unless otherwise agreed in the contract)
Addressing by e-mail or SMS with our product and service offers related to the service subscribed	Identification data; Contact data; Service use information	So called customer exception (see below)	For the period of the service use (contractual relationship duration) and for 3 subsequent years after the use termination
Addressing by phone with service and product offers, including discounts or promo communications of third parties - all tailored on the basis of performed analysis of what might be interesting for you	Identification data; Contact data; Service use information	Legitimate interest for the purpose of direct marketing	For the period of the service use (contractual relationship duration) and for 3 subsequent years after the use termination

Because we are entering into a contract remotely, we need to check that we are really dealing with the right person. Failure to do so could result in damage to both us and our customers. Therefore, for fraud prevention and identity verification purposes, we need to see a copy of personal documents as well as the person claiming them. Our legitimate interest then lies in the fact that this processing prevents situations where a loan is granted to a wrong person.

In the event that you execute a contract with us, we are entitled to use your email to contact you with an offer of a similar product or service that we provide to you based on the so-called customer exception. If you do not wish to receive these messages, you can certainly exclude this when negotiating the contract, or you can find a link at the end of each commercial communication, after clicking on which we will stop sending you such communications until you give us your consent to do so again. You may also exclude delivery of these messages to you in advance by the consent revoking procedure described below.

It is also in our legitimate interest to call you from time to time to ask how you like our service, or to offer you improvements or provide any other offers. Our legitimate interest is that, based on your use of our service, we assume that you enjoy using it and might be interested in other news from us. In any case, you have the possibility to simply exclude this processing by using the procedure for filing an objection against data processing on the basis of legitimate interest.

Newsletter

If you grant your consent to us, we will be happy to send you news about our services and products, including related third-party offers. Provision of your personal data for this purpose is voluntary and the procedure is as follows:

Purpose of processing	Categories of Personal Data	Legal title	Processing period
Addressing you with our product and service offers tailored on the basis of your use of our services, including offers by our partners	Identification data; Contact data; Service use information	Consent with commercial communication	For the duration of the consent validity until recall of the consent

You can withdraw your consent at any time, either by following the procedure below or by clicking on the link in the newsletter.

Communication

If you communicate with us by means of various channels, especially by asking a question via our web site, email, chat instruments or social media. Then we process your personal data within the scope, for the purpose and for the legal reason (title) specified below:

Purpose of processing	Categories of Personal Data	Legal title	Processing period
Settlement of and record keeping about your requirements, proof of receipt and settlement of your requirement, for example when you order or file a	Identification data; Contact data; Service use information; Communication content	Legitimate interest	For the forfeiture period since the last communication, which is 3 years

complaint with us in this way			
Call recording for the purpose of service quality improvement and fraud prevention	Identification data; Contact data; Communication content	Legitimate interest	For 7 days from the phone call, or 3 years in the case of contract execution on the phone or in the case of a problem detection

If you call us, or we call you in accordance with this policy, we would like to keep a record of the call for a limited period of time so that we can prevent potential fraud or to provide an even better service based on your feedback. And this is where our legitimate interest lies, which we try to balance as much as possible so that the data in question is kept only for the necessary period of time, its necessity is regularly reviewed and regular deletion takes place.

8. WHOM DO YOU PROVIDE ACCESS TO MY PERSONAL DATA?

We do not know to whom we may provide your personal data in future. That is why we list here categories of potential recipients with justification why they may be provided with your personal data processed by us:

Recipient	Reason for provision
Persons providing necessary services to our company in relation to your financing by our loan	We may need administrative support in contract preparation to be able to provide you the loan for your business, or to be able to assess the risks and your creditworthiness before we provide the loan to you
The person serving our accounting and tax-related duties	We need our accounting and tax service provider, who is in the position of data processor, to keep our accounts and fulfill our tax liabilities
The person assuring operation of our web, applications and software (computer systems) including cloud service providers	We need our software provider, who is in the position of data processor, to service our web site and assure operation of our information systems
The person responsible for e-mail distribution	We may commission a third party to distribute our e-mails with product and service offers, and we may provide this person with your e-mail address for that purpose

We would like to inform you that we will always provide you information about to whom and for what purpose we provide your personal data in this context on your request.

Economic Data Resources B.V. (EDR): If and when you wish to become a customer, we will supply your data to Economic Data Resources B.V. (EDR). EDR shall use this data for giving advice on the creditworthiness of the company and for any negative comments on the company's board/management. EDR uses this data for investigating the creditworthiness and contact details of you and your company. If you wish to object or would like to obtain information about the use of your personal data by EDR go to: <https://www.edrcreditservices.nl/privacy-statement/>.

Stichting BKR (Bureau Krediet Registratie): BKR processes personal data in its credit information system for the purpose of preventing and limiting credit and payment risks for the affiliated institutions and preventing and limiting overindebtedness of borrowers, as well as for the purpose of contributing to the prevention of problematic debt situations. When assessing your loan application,

we obtain information about creditworthiness of you and your managing directors from BKR. We also report to BKR your defaults (for natural person) and defaults of your company (for managing directors) in payment obligations. If the financing is provided to a natural person, we also register the concluded contract with BKR. If you wish to object or would like to obtain information about the use of your personal data by BKR go to: <https://www.bkr.nl/privacy-statement-van-bkr>.

9. WHAT ARE MY RIGHTS IN RELATION TO THE PROCESSING OF MY PERSONAL DATA?

Because our company processes your personal data, you are endowed with certain rights which this section wants to inform you about. You can apply your rights with us in any manner convenient for you and allowing us to check whether it is you who applies (to check your identity). Then we will try our best to satisfy you. In order to be able to meet your requests as completely as we can, we would like to ask you to apply your rights in writing on e-mail address info@lemonero.nl.

Right for consent withdrawal - we process some of your personal data on the basis of your consent. You are entitled to withdraw your consent with your personal data processing, including your consent with commercial information receipt. You can withdraw your consent on info@lemonero.nl.

As for processing of your personal data for the purpose of commercial information distribution you can withdraw your consent with your data processing for that purpose simply by clicking on the relevant link at the end of every commercial information e-mail sent to you or change your user profile setting.

Right of access - you are entitled to access to your personal data processed about you by us and for information about what personal data we process about you, for how long, for what purpose, for what recipients, and whether we use them for automated decision-making (including how this automated decision-making works).

We will provide a copy of your processed personal data free of charge to you. In the case of a request for more copies we will ask for their payment.

Right for correction - if you find out that your personal data processed by us are incorrect or incomplete, you are entitled to ask for their correction or completion if required by the purpose of their processing.

Right for deletion - You are also entitled to ask for deletion of your personal data we process and save about you. The request for deletion must be justified by one of the following reasons:

- i. Your personal data are no longer needed for the purpose for which they were obtained and processed;
- ii. We process your personal data illegally;
- iii. You have withdrawn your consent with your personal data processing and we have no other authorization (legal title) to continue to do so;
- iv. You file an objection against your personal data processing for the purpose of direct marketing (direct mail);
- v. You file an objection against your personal data processing on the basis of our legitimate interest which we are unable to prove to govern over your right for data deletion;
- vi. There is a legal reason for your personal data deletion;
- vii. We process personal data of a child without its parents' consent.

We would like to note that there are situations when your personal data cannot be deleted on your request or after withdrawal of your consent with their processing. This is mainly when continued processing of your personal data is required by law. When this happens we will inform you about the reason why your personal data cannot be deleted despite your explicit request for the deletion.

Right for portability - another right vested onto you is the right for the data portability. On the basis of this right you can ask for provision of your personal data provided to us on the basis of your consent and processed by automated procedures by us. Your personal data meeting these conditions will be provided to you on request in the standard structured and machine-readable format, or forwarded to another controller of your choice on your request if technically feasible.

Right to limited processing - if you believe that your personal data processed by our company are incorrect, you can request limitation of our processing of your data for the minimum period necessary for review of accuracy of your personal data and their potential correction.

You are endowed with this right also in the following cases:

- i. Processing of your personal data by our company is illegal but you do not wish your personal data to be deleted;
- ii. We no longer need your personal data for the purpose for which they were provided but you insist on their processing (archiving) by our company for the purpose of specification, execution or defense of your claims;
- iii. You have raised an objection against your personal data processing on the basis of legitimate interest of our company. In this case the right to limited processing will apply for the period necessary for specification whether our legitimate interest overrides your right for withdrawing your data from further processing.

Right for complaint about processing of your personal data on the basis of a legitimate interest - as some of your personal data are processed on the basis of our legitimate interest, you are entitled to file an objection on the basis of which we will assess whether it is really our legitimate interest that prevails over your wish to have your personal data deleted or whether your right for immediate stop of your personal data processing prevails.

Right for objection against your personal data processing for the purpose of direct marketing - you are entitled to protest against processing of your personal data by our company for the purpose of direct marketing (for example for the purpose of commercial information sending). In such case our company will stop processing your personal data for that purpose.

Right for complaint - if all of the above rights are insufficient from your point of view, or if you believe that we violate your rights you can file a complaint with the supervisory board. The complaint may be raised via the contact to the Autoriteit Persoonsgegevens, (The Dutch Data Protection Authority), by contacting them (<https://autoriteitpersoonsgegevens.nl/>) or file a complaint directly via: <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/gebruik-uw-privacyrechten/klacht-melden-bij-de-ap>.

10. **DO YOU USE AUTOMATED INDIVIDUAL DECISION-MAKING IN THE CONTEXT OF DATA PROCESSING?**

No

11. **WILL YOU AMEND THIS POLICY?**

We may need to amend or precise this policy in future. Should this happen and should it have a significant impact on your rights, we will always let you know about this amendment in advance.