

## **Privacy policy for visitors to the funda platform**

### **Who we are**

Funda is officially registered with the Chamber of Commerce as Funda Real Estate B.V., under number 34242436. Our office is located at 167 Piet Heinkade in Amsterdam. Throughout this document we use our shortened and better-known name: funda.

Funda is there to help you, our visitor, to get closer to your dream home or to support you, as a real estate professional, in your work. Your privacy is of the utmost importance to us. Of course, we process your personal data, that is simply part of our work. For example, you expect us, very practically, to pass your request on to a real estate agent or to email you about new offers. We handle your details very carefully throughout our entire work process. In this privacy policy we would like to explain - in the clearest language possible - what we do, why and what that means for you.

First of all, we promise you that:

- we are transparent about the way in which and the purposes for which we process your personal data
- we use appropriate techniques to protect your personal data
- you have a high degree of control over your personal data
- we are accessible and available if you want to communicate with us about your privacy with funda

In this document we use a number of terms that we would like to clarify in advance:

- Funda platform: the whole of funda.nl, the apps, and fundainbusiness.nl
- Object: a house or business property that is or has been for sale or for rent on the funda platform

If you feel there is anything missing from this privacy policy, please let us know by sending an email to [privacy@funda.nl](mailto:privacy@funda.nl)!

### **Who is this privacy policy for?**

At funda we treat our visitors and their personal data with care. We want to enable you as a visitor to find, modify and use your personal data in the way that suits you best, always keeping our privacy promise. Would you like to know more about privacy at funda? Below we have listed everything for you. This policy applies to all personal data we obtain about you as a visitor through your use of our services on the funda platform, regardless of whether you are a potential buyer, tenant, seller, landlord or otherwise visiting funda. If, as a broker you provide information to funda, the [privacy policy for brokers](#) also applies in addition to this privacy policy.

### **What personal data does funda process?**

Funda processes the following data from you, that may be personal data insofar they can be traced back to you as an individual:

A.) **Account information**, information with which you create and use an account, such as e-mail address and password, account information with which you optionally enrich your account, such as name and gender, household information and

information you use to make your search easier, such as the Objects you save and the comments you save with an Object. With this single account you are able to log in to both funda and funda in business and manage your data.

**B.) Information you supply us with so we can provide you with a service,** such as the content of contact requests and other service requests that we forward to the broker at your request, a review of your broker that you leave behind on the funda platform or the financial information you use for paid services such as when requesting a housing report. When using the app, we also collect your GPS data to enable 'map search' and to enable you to set a current location in a search.

**C.) Automatically generated data,** such as IP addresses, device ID and browser data that we collect through cookies, among other things

**D.) Information about the way you use the funda platform** such as which services you use and which Objects you find interesting. This information is used to build a profile on the basis of which we can personalise the funda platform and our services (for more information see below 'What about profiling?')

**E.) Feedback data** that we use to improve our services, such as data that you fill in on feedback forms or surveys relating to our platform and our services or data that you provide via the 'report an error' option.

**F.) Correspondence data,** such as data in e-mails you send to funda or messages you send to us via social media

**G.) Object data,** such as photos, address data, maps, m2, year of construction and other characteristics of an Object

**H.) Identification details,** such as a copy of your proof of identity (without BSN and passport photo) in the event of exercising your rights as a data subject

### **Why does funda process personal data?**

In short, it is necessary to process personal data in order to provide and improve our services, and to ensure our platform remains secure, fast and always available. It is also necessary to process personal data in order for our customer contact to run smoothly. We also use your personal data for marketing purposes.

By marketing purposes, we mean (market) analyses, statistical research, sending newsletters, targeted advertisements and other content and profiling (see below 'What about profiling?'). When we process personal data based on an agreement with you or because of a legal obligation, the provision of that personal data is a necessary condition to be able to use our services and products. Optional fields will be indicated as such.

Below is a detailed description of which personal data we process for which purpose and the legal grounds for doing so.

<b>Purpose</b>	<b>Personal data</b>	<b>Principles</b>
Provision of services	A. Account details B. Data for the provision of services D. Information about the way you use the funda platform	1. Agreement; 2. Legal basis: insofar as it concerns financial information (invoices);

	G. Object data	3. Consent: as far as it concerns GPS data that we process in the funda app or data processed via cookies.
Improving services	A. Account details B. Data for the provision of a service C. Automatically generated data D. Information about the way you use the funda platform E. Feedback data F. Correspondence data G. Object data	Justifiable interest: <i>we use the data to tailor our services as closely as possible to the needs of our users. To limit the impact on privacy, we use data on an aggregated level wherever possible. If we engage third parties for this, we make good agreements with them to safeguard privacy.</i>
Security and reliability of funda platform	C. Automatically generated data D. Information about the way you use the funda platform E. Feedback data F. Correspondence data	Justifiable interest: <i>we use the data to ensure the quality of our service and to guarantee the availability, integrity and confidentiality of the (personal) data we process.</i>
Customer contact	F. Correspondence details	1. Agreement 2. Justifiable interest: <i>We process your data to provide you with the best possible service. You are in control of what information you provide us with.</i>
Market analyses and statistical research	A. Account details B. Data for the provision of a service C. Automatically generated data D. Information about the way you use the funda platform E. Feedback data F. Correspondence data G. Object data	Justifiable interest: <i>We use the data to make analyses and business reports to keep a good overview of the functioning of our platform and to optimise our business operations. In some cases, we share the resulting insights with third parties, but only at an aggregated level.</i>
Sending relevant newsletters	A. Account details D. Information about the way you use the funda platform	Consent
Targeted ads and showing personalized content	A. Account details B. Data for the provision of a service C. Automatically generated data D. Information about the way you use the funda platform G. Object data	1. Consent 2. Justifiable interest: <i>we may process your pseudonymized data to show you relevant advertisements. We use security measures such as hashing to limit the privacy impact. If we engage third parties, we will enter into legally required arrangements with them to secure privacy. We also ensure that we show relevant advertisements on a low frequency.</i>

Identification in order to implement requests from data subjects	H. Identification data	Legal obligation
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### **How does funda obtain personal data?**

Most of the personal data we have at our disposal is provided by you as a visitor to funda. This happens for example when you create an account, make an inquiry with or for a broker, use another service such as the value check or when you contact funda.

With regard to data that we obtain through funda's social media channels that you use yourself, we refer to the information under 'What about social media?'

In addition, funda processes automatically generated data, such as the page you visited, your IP address and browser data. This is done using cookies or similar techniques (see our [cookie policy](#) for more information).

Funda also considers Object data to be personal data, insofar as these can be traced back to an individual. Funda obtains this information through the broker who works on behalf of the seller/buyer or landlord/tenant. The broker uses the distribution system of the Nederlandse Vereniging van Makelaars en Taxateurs NVM. Funda also obtains Object data from the Kadaster, such as living area and an Object's year of construction.

When you pass on your e-mail address to a real estate agent, the real estate agent can pass on your e-mail address to funda, so that the Object you offer can be linked to your account. After such a link you will get extra information about your property and after selling or renting the property you can leave a review about your real estate agent. You can also leave a review about your real estate agent if you are a buyer or tenant: at your request, the agent will pass on your e-mail address to funda so that you can use this service. If you already have an account with funda you can also ask funda to link your account to your property or to an Object that you have purchased or rented. Funda only does this after verifying your identity with your broker.

It is also possible that a friend, family member or other acquaintance gives your e-mail address to funda, so that we can draw your attention to an Object.

### **How long are personal data stored?**

We only keep your personal data for as long as we need it for the purpose for which we process it or to comply with our legal obligations. We use the following criteria to determine how long we keep data:

- If you use our services, such as creating an account or using Makelaarsmatch, we will retain your personal information for as long as we need it to provide and improve that service. Or until the moment you want to delete them.
- If you have given your consent to receive e-mails, we will retain your personal data until you withdraw your consent. Once you do so, funda will retain personal data necessary to demonstrate when you gave your consent and when you withdrew it.

- If you decide to leave a broker review, funda will show this review for a maximum of 2 years on the funda platform, until you delete it yourself, you instruct funda to do so or until the broker completely disables the ability to leave reviews.
- Personal profiles that funda has based on profiling (see below under 'What about profiling?') are stored for a maximum of 13 months.
- We store financial information such as invoices for as long as we are legally obliged to do so. For most financial information this is 7 years.
- In principle, we publish Object data for 1 year after the date on which the Object was deregistered as sold. The broker concerned can also indicate earlier that an Object may no longer be published on the funda platform. We retain Object data for as long as we need it for the provision and improvement of our services.
- Object data we obtain from the Land Registry are refreshed monthly.
- If cookies or similar techniques are placed on your computer, we indicate their retention period in our [cookie policy](#).

### **Who does funda share personal information with?**

For the purposes described above (see 'Why does funda process data?') we work with third parties. We often share (part of) your personal data with them. If you leave your details on our platform to purchase a certain service, we will (if necessary) share your personal details with the party providing the service, such as a broker or financial services provider. Think of contact requests for a broker or if you request a mortgage offer from a financial service provider via our platform.

We also work, for example, with parties who take care of communication for funda and monitor the platform. In addition, we share data with our hosting parties, research and analysis agencies, advertising platforms, the supplier of our data management platform, and (other) data processors acting on our behalf.

When third party advertisements are placed on our platform, it is possible that third parties collect personal data, such as your click behaviour on the funda platform. For more information about this, see our [cookie policy](#).

Funda of course, publishes Object data on the funda platform, making it visible to anyone visiting the funda platform. In addition, funda sends Object data via e-mail or push-notification to a visitor if they fit within his search criteria. We share Object data via our social media channels. A visitor also has the possibility to share Objects on social media or via e-mail with others using the funda platform. Furthermore, funda offers brokers and selected parties (such as municipalities) the possibility to display Objects on their website (using an IFrame).

Brokers can choose to show the broker reviews you place on the funda platform on their website using an IFrame.

Should it happen that (one or more parts of) the company funda is transferred to a third party, then as part of this takeover the personal data that funda processes can also be transferred to this third party. If this situation occurs, funda will inform you promptly via the funda platform.

### **International transfer of personal data**

Funda is a Dutch party, just like many of the parties we work with. To the extent that the third parties with whom we cooperate process the personal data at a location outside the EEA, they do so subject to appropriate safeguards, such as model contractual clauses drawn up by the European Commission and additional safeguards.

### **How does funda protect personal data?**

To prevent someone else from unlawfully using or processing your personal data, we have taken appropriate technical and organisational measures. We use physical (access) security, passwords, password encryption, bot detection, encryption (of storage and communication channels) and pseudonymisation of data. We take these measures partly on the basis of our security policy, which we regularly evaluate and amend where necessary.

As part of the organisational measures taken, we have made agreements with these third parties to protect your personal data, including agreements on the technical and organisational measures they need to take and demonstrate to us, partly on the basis of annual reports.

### **What about social media?**

Funda does not include any functionalities of social media, such as like buttons or pixels, on the funda platform. We do have profiles on social media channels such as Twitter and Facebook and link to them on the funda platform. This privacy statement of funda applies to the processing of personal data obtained by funda via a social media channel. All of the information that the social media channel obtains from you, falls under the social media channel's own privacy statement. You can find this here:

Facebook: <https://www.facebook.com/privacy/explanation/>

Twitter: <https://twitter.com/en/privacy>

LinkedIn: [https://www.linkedin.com/legal/privacy-policy?l=en\\_NL](https://www.linkedin.com/legal/privacy-policy?l=en_NL)

YouTube: <https://policies.google.com/privacy?hl=en>

Instagram: <https://help.instagram.com/155833707900388>

You can also login to funda with a social media profile, for example via Facebook. Facebook will then provide funda with your public profile and e-mail address. Funda only stores your e-mail address.

If you share an Object from the funda platform via a social media channel, funda only sends the information of the Object to the relevant social media channel. Funda can also place Object data on funda's social media channels.

### **What about iFrames and other third-party websites?**

On the funda platform, services and information are also offered by third parties in a so-called iFrame. These pages seem to run within the funda platform, however the content of an iFrame is not managed by funda, but by the third party that offers you services or information in the iFrame. An example is the monthly cost indicator, which allows you to calculate what your estimated mortgage charge would be if you bought a particular property. The personal data you enter in the iFrame will go directly to the third party and will therefore be subject to the privacy and cookie policy of that third party. Funda does not process these personal data itself. If an iFrame is being used, we clearly indicate this on our platform.

In addition, if a link to another person's website is shown on the funda platform (such as a broker), or if we link to someone else's website (such as Matterport Inc. for 3D tours), the privacy and cookie policy of that other party applies to your visit to that website. The funda's privacy policy does not apply to the data you leave on that site and/or the data processed on that site.

### **What about profiling?**

In short, profiling is the collection of characteristics, interests and data about you as a visitor. Based on this, a profile is created, so that you can receive targeted and relevant information. Funda does this on the basis of data that we generate using cookies and similar techniques (see our [cookie policy](#)), combined with other personal data, such as your surf and click behaviour, what you enter in your account, what you enter when using our products and services (such as the Waardecheck, and the results thereof), which Objects you view and what you are looking for.

Funda only uses profiling to personalize information and to display mailings and advertisements relevant to you. You will not be withheld Objects or other content based on these activities.

### **What are your rights?**

You have control over your personal data. You are entitled to clear, transparent and understandable information. You can always view, modify or delete the personal data you have entered through your account. In addition, you can contact us to view the personal data from you that funda processes, free of charge. You can also request that funda changes or deletes your personal data. We may also transfer personal data under certain circumstances. Moreover, you can request that we limit the processing of your personal data.

You may always object to the processing of your personal data where we do this on the basis of our justifiable interests.

Where we use your personal data on the basis of your consent, you can withdraw that consent at any time. For example, if you have subscribed to a funda newsletter and no longer wish to receive it, you can always unsubscribe (thus withdrawing your consent) by clicking unsubscribe in a newsletter. You can also unsubscribe via your account.

You can easily remove or block cookies and similar techniques yourself. See our [cookie policy](#).

If you make a request regarding how we handle your personal data, we may ask you to identify yourself if necessary. If you send us a copy of your passport or other proof of identification for that purpose, we will ask you to make your passport photo and BSN number illegible in the manner indicated here:

<https://www.rijksoverheid.nl/onderwerpen/identiteitsfraude/vraag-en-antwoord/fraude-voorkomen-met-kopie-id-bewijs>

### **Questions or comments?**

Do you have any questions or comments about privacy at funda? Do you disagree with the fact that or the way in which funda processes personal data about you? Or would you like to get in touch with the Data Protection Officer at funda?

Please send an e-mail to [privacy@funda.nl](mailto:privacy@funda.nl).

We take all questions, comments and requests seriously and would like to stay in touch with you about your privacy at funda, even if there is something you are not satisfied with. Of course, we prefer to resolve complaints with you directly, but you also have the opportunity to submit a complaint to the Personal Data Authority.

*This privacy policy was amended on 14 September 2021, and therefore the 11th version. [Click here](#) to save this version of the Privacy policy. Funda reserves the right to change this privacy policy and advises you to check this page regularly. Changes in our privacy policy will be announced by e-mail or on our platform.*