

PRIVACY- EN COOKIE POLICY NOVERA

1. Introduction

This Privacy & Cookie Policy explains how **Novera Tax & Finance B.V.** processes personal data of clients, suppliers, applicants and website visitors in accordance with the GDPR and Dutch AML legislation (WWFT).

By using our services or visiting our website, you agree to this policy.

2. Controller

Novera Tax & Finance B.V.
Keizersgracht 477E, 1017 DL
Amsterdam, The Netherlands
KvK51355477
E-mail: info@novera.nl

3. Personal data we process

3.1 Clients

- Identification details and ID documents
- Contact information
- Financial data such as income, assets, payroll and accounting documents
- Tax positions, mobility data and sport- or executive-related contract information
- Correspondence and documents provided
- AML data such as UBO information, risk assessments and source-of-funds information

3.2 Suppliers and business partners

- Contact details, roles, contract and invoicing data

3.3 Applicants

- CV, education, references
- Other information shared during recruitment

3.4 Website visitors

- IP address, browser data, device information
- Cookies (see chapter 10)

4. Purposes of processing

- Execution of tax, finance and mobility services
- Compliance with legal obligations, including tax law and **WWFT obligations**
- Client due diligence and risk monitoring
- Administration and invoicing
- Recruitment
- Website performance analysis
- Marketing (only with consent)

5. Legal bases

- Performance of a contract
- Legal obligation (tax law and WWFT)
- Legitimate interest (quality and security)
- Consent (cookies, newsletters)

6. Sharing data

We only share data when necessary:

- With internal and external tax, finance and mobility specialists
- With IT, cloud and compliance service providers
- With notaries, lawyers, accountants and advisors
- With public authorities including the Tax Administration and FIU-Netherlands
- With international partners where needed for cross-border matters

7. WWFT (WWFT-P)

Under Dutch Anti-Money Laundering and Counter-Terrorist Financing legislation (WWFT), Novera must:

7.1 Conduct client due diligence

- Verify identity and address
- Identify UBOs
- Assess source of funds and economic background
- Evaluate risks of money laundering or terrorist financing
- Monitor the client relationship continuously

Clients are legally required to provide all requested information.

If insufficient information is provided, Novera may **refuse or terminate** the engagement.

7.2 Report unusual transactions

Novera is legally required to report unusual transactions to **FIU-Netherlands**, and may **not** inform the client about such reports.

7.3 Retention period

WWFT data is stored for a minimum of **five years** after the end of the business relationship.

8. International transfers

Data may be transferred outside the EEA where required for cross-border work.

Novera only transfers data when adequate safeguards exist (SCCs or adequacy decisions).

9. Retention periods

- Tax files: minimum 7 years
- AML files (WWFT): 5 years
- Applicant data: 4 weeks or 1 year with consent
- Cookies: see chapter 10

10. Cookies

10.1 Functional cookies

Necessary for website operation.

10.2 Analytical cookies

Used to analyse website usage.

Privacy-friendly settings are applied where possible.

10.3 Marketing cookies

Placed only after consent and used for LinkedIn campaigns, remarketing and ABM activities.

Cookies can be deleted or disabled through browser settings.

11. Security measures

- Encryption
- Limited access to client files
- Secure portals
- Logging and monitoring
- Regular audits

12. Rights of data subjects

You may request access, correction, deletion, restriction, portability or object to processing. You may withdraw consent at any time.

Contact: info@novera.nl

13. Minors

Novera does not target minors.

Personal data of minors is only processed when necessary for tax matters and with appropriate consent.

14. Changes

Novera may update this policy in response to legal or operational changes.

15. Contact

For questions or complaints: info@novera.nl

You may also contact the Dutch Data Protection Authority.