

AMSTERA PROPERTIES B.V.

Last updated: 30 October 2025

1. Who We Are (Data Controller)

AMSTERA PROPERTIES B.V.

Dieselweg 34, 3752 LB Bunschoten-Spakenburg, The Netherlands

Chamber of Commerce (KvK): 95753400

RSIN / VAT No.: NL867278079B01

Corporate seat: Amersfoort

Email: privacy@amsteraproperties.com

Tel: +31 683 175 478

If you are located within the EU/EEA, AMSTERA PROPERTIES B.V. acts as the **data controller** of your personal data collected via our websites, inquiry forms, events, and communications.

Where we collaborate with international developers in United Arab Emirates, European Union Countries and those entities act as **independent controllers** of any data shared with your consent.

2. Personal Data We Collect

We may collect and process the following categories:

- **Identification and contact details** – name, email, phone, full address, country, nationality;
- **Investment and property interest information** – budgets, preferences, selected developments, meeting availability;
- **Financial and compliance information** – identification documents, proof of address, residency or visa status, source-of-funds declaration (when required by relevant legislation);
- **Transactional and communication records** – inquiries, offers, contracts, agreements, invoices, correspondence, proof of payments, SWIFT documents and bank details;
- **Website and marketing data** – cookies, IP addresses, browsing behavior, newsletter engagement metrics;
- **Travel and event information** – for Fly-In or Roadshow programs (only when provided according to AMSTERA PROPERTIES B.V. policy papers, contracts, agreements, official offers, official documents of developers).

We do not intentionally collect data from individuals under 16 years of age.

3. Why We Process Your Data (Purposes & Legal Bases)

| Purpose | Legal Basis (General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, Art. 6) |
|--|---|
| Responding to inquiries, scheduling viewings, and sending offers | Contract – Art. 6(1)(b) |
| Organizing Fly-In programs and investment trips | Contract / Consent / policy paper/ offer |
| Marketing communications (emails, newsletters) | Consent – Art. 6(1)(a) |
| AML/KYC verification | Legal Obligation – Art. 6(1)(c) |
| Business analytics and service improvement | Legitimate Interest – Art. 6(1)(f) |
| Cooperation with developers | Agreement / Contract |
| Legal, tax, and record-keeping requirements | Legal Obligation |
| Website operation and cookie analytics | Consent / Legitimate Interest |

4. Cookies and Similar Technologies

Our website uses:

- **Functional cookies** (necessary for core functionality).
- **Analytical cookies** (to measure performance).
- **Marketing cookies** (only with prior consent).

In compliance with the **Dutch Telecommunicatiewet** and **EU ePrivacy Directive**, non-essential cookies are set only after you have provided explicit consent via the cookie banner.

5. Sharing and Disclosure

We may share your data only with:

- **Developers and real-estate partners;**
- **Professional advisers and financial institutions;**
- **Service providers (processors)** – CRM, hosting, email, analytics, IT support;
- **Public authorities** – where required by legislation or court order.

Each processor operates under a **Data Processing Agreement** and must ensure adequate technical and organizational safeguards.

6. International Transfers

Where we transfer personal data to recipients **outside the EEA**, we rely on:

- **Standard Contractual Clauses (SCCs)** approved by the European Commission, or;
- **Your explicit consent** for specific, one-off disclosures related to property purchase or event participation.

7. Data Retention

- Inquiries and correspondence – up to 24 months after last contact;
- Contracts, agreements, financial, and compliance records – 7 to 10 years;
- Marketing data – until consent is withdrawn;
- Cookie data – per consent lifetime, typically 6–12 months.

We delete or anonymize your data once it is no longer necessary.

8. Security

We apply **industry-standard technical and organizational safeguards**, including encryption in transit, strict access controls, regular data backups, secure server environments, and staff confidentiality undertakings.

All sensitive payment information is processed **exclusively by licensed financial institutions**, such as **Revolut Bank UAB** (Barbara Strozziilaan 201, 1083 HN Amsterdam, the Netherlands).

9. Your Rights

Under the **General Data Protection Regulation (GDPR)** you have the right to:

- Access and obtain a copy of your data;
- Request correction or deletion;
- Restrict or object to processing;
- Withdraw consent at any time;
- Data portability (where applicable).

You may exercise your rights by contacting privacy@amsteraproperties.com.

If you believe your rights have been violated, you may lodge a complaint with the **Autoriteit Persoonsgegevens** (Dutch Data Protection Authority).

10. Compliance references:

- EU General Data Protection Regulation (2016/679);
- Dutch Implementation Act of the GDPR (UAVG);
- Dutch Telecommunicatiewet (Cookie rules);
- Principles adapted from development companies' privacy frameworks.

11. Marketing and Profiling

We may tailor communications based on your preferences or investment history.

This profiling is limited and does not produce legal or significant effects.

You can unsubscribe or object to profiling at any time.

12. Third-Party Links

Our website may contain links to external developer or partner websites.

We are not responsible for their content or privacy practices. Please review their respective privacy statements.

13. Changes to this Policy

We may update this Privacy Policy periodically. The latest version will always be posted on our website with a revised "Last updated" date.

If significant changes are made, we will notify you by email or website notice.

14. Contact

For any questions, requests, or complaints related to this policy:

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