PRIVACY POLICY

LUMER Finance
KVK number: 71060057
Version 2026
Effective from 1 September 2026

1. Introduction

LUMER Finance respects your privacy and is committed to protecting your personal data.

This Privacy Policy explains how LUMER Finance collects, uses, stores, shares and otherwise processes personal data in connection with its accounting, tax compliance, financial, administrative and advisory services, as well as through the website **www.lumerfinance.nl**.

This Privacy Policy has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR", or "AVG" in Dutch) and other applicable Dutch privacy legislation.

Depending on the circumstances and the services provided, LUMER Finance may act as a data controller or may process personal data on behalf of a client. Where LUMER Finance determines the purposes and means of processing personal data, LUMER Finance acts as the data controller.

2. Data Controller

Where LUMER Finance acts as the data controller, the contact details are:

LUMER Finance
Werkzijde 16
2543 CA Den Haag
The Netherlands
KVK number: 71060057
Email: **info@lumerfinance.nl**
Website: **www.lumerfinance.nl**

Questions concerning this Privacy Policy or the processing of personal data may be sent to **info@lumerfinance.nl**.

3. Personal Data We Process

Depending on the services provided and the circumstances of the client, LUMER Finance may process the following categories of personal data:

- name, address and other contact details;
- telephone number and email address;
- date of birth;

- Dutch citizen service number (BSN), where processing is permitted or required by law;
- identification and passport information where necessary and legally permitted;
- bank and payment information;
- income, salary and employment information;
- employment agreements and payroll-related information;
- tax information and tax returns;
- VAT and other tax-related information;
- accounting records, invoices and financial documents;
- information relating to businesses, sole proprietorships, partnerships and companies;
- information concerning partners, spouses, children or other family members where relevant to a tax return or another requested service;
- information and documents required in connection with IND-related services;
- information required for client identification, verification and other applicable statutory compliance requirements;
- correspondence and communications with LUMER Finance;
- information submitted through the contact form on our website;
- technical website information, such as IP address, browser/device information and website usage data, where collected through Wix and related technologies.

LUMER Finance seeks to process only personal data that is relevant and reasonably necessary for the applicable purpose.

4. How We Obtain Personal Data

LUMER Finance may obtain personal data:

- directly from clients and prospective clients;
- through email, telephone and WhatsApp communications;
- through the contact form on our website;
- through accounting, payroll and tax software;
- through e-Boekhouden and other digital systems used for the provision of services;
- through cloud storage or document-sharing services;
- from the Dutch Tax Administration (Belastingdienst) and other competent authorities where applicable;
- from employers, employees, business partners or other persons involved in a client's administration;
- from a previous accountant, bookkeeper or adviser when an administration is transferred to LUMER Finance;
- from public registers or other legally accessible sources where necessary for the relevant service;
- from other third parties where this is necessary for the requested service and legally permitted.

Where personal data is not obtained directly from the person concerned, LUMER Finance processes such information only where there is an appropriate legal basis for doing so.

5. Purposes and Legal Bases for Processing

LUMER Finance processes personal data only where there is an appropriate legal basis under applicable data protection law.

5.1 Performance of a contract or steps prior to entering into a contract

Personal data may be processed in order to:

- respond to enquiries and requests for services;
- prepare proposals and establish client relationships;
- maintain accounting and financial administrations;
- prepare financial reports and annual accounts;
- prepare and submit tax returns;
- provide tax, accounting, financial and administrative services;
- provide agreed advisory and support services;
- provide agreed IND-related administrative services;
- communicate with clients concerning the services;
- manage and conclude client engagements;
- transfer relevant client files to the client or a new service provider following termination of an engagement.

5.2 Compliance with legal obligations

Personal data may be processed where necessary to:

- comply with Dutch tax and administrative legislation;
- comply with applicable statutory record-keeping obligations;
- comply with applicable client identification, verification and other regulatory requirements;
- respond to lawful requests from the Belastingdienst or other competent authorities;
- fulfil other legal obligations applicable to LUMER Finance.

5.3 Legitimate interests

Where appropriate, LUMER Finance may process personal data on the basis of legitimate interests, including:

- operating and managing its business;
- maintaining appropriate client and business records;
- protecting its systems, communications and information;
- preventing fraud, misuse and security incidents;
- handling complaints and disputes;
- establishing, exercising or defending legal claims;
- improving the operation, security and effectiveness of its website and services.

Where LUMER Finance relies on legitimate interests, those interests are balanced against the interests, fundamental rights and freedoms of the person concerned.

5.4 Consent

Where consent is required by law, personal data will be processed on the basis of consent.

Consent may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

These categories reflect the GDPR requirement to identify both the purposes and legal bases of processing. EUR-Lex

6. BSN and Identification Data

Because of the nature of accounting, tax and certain administrative services, LUMER Finance may need to process BSN and identification information.

Such information is processed only where necessary and legally permitted, including in connection with:

- preparation and submission of tax returns;
- payroll-related services;
- applicable client identification or verification requirements;
- IND-related services where identification information is necessary for the requested service;
- other statutory or regulatory requirements applicable to the relevant engagement.

LUMER Finance does not use BSN or identification information for unrelated purposes.

7. Client Identification and Legal Compliance

Where LUMER Finance is required by applicable legislation or regulation to identify or verify a client, representative or other relevant person, LUMER Finance may request and process the information and documents necessary for that purpose.

This may include information relating to:

- the identity of the client;
- representatives of the client;
- ultimate beneficial owners (UBOs);
- ownership and control structures;
- the purpose and intended nature of the business relationship;
- the source of funds or assets where such information is legally required.

Where LUMER Finance is legally required to provide information to a competent authority or make a statutory report, it may process and disclose the necessary personal data without obtaining separate consent where permitted or required by law.

This is consistent with the client due-diligence provisions already included in the General Terms and Conditions.

8. Payroll-Related Services

Where a client requests payroll-related services, LUMER Finance may provide information necessary for payroll processing to an external payroll service provider.

This may include:

- employee identification and contact information;
- employment information;
- employment agreements;
- salary and payroll information;
- other information necessary for payroll administration.

Only information reasonably necessary for the relevant payroll service will be shared.

9. Sharing Personal Data

LUMER Finance does **not sell personal data**.

Where necessary and legally permitted, personal data may be shared with categories of recipients such as:

- the Belastingdienst;
- other government authorities and public bodies;
- accounting, tax and payroll software providers;
- payroll service providers;
- IT, hosting, cloud storage and email service providers;
- Wix in connection with the operation of the LUMER Finance website;
- banks, notaries, lawyers and other professional advisers where necessary for a specific service;
- a new accountant, bookkeeper or adviser where the client requests the transfer of an administration;
- other service providers or professional parties where their involvement is necessary for the requested service;
- other recipients where disclosure is required or permitted by law.

Where an external service provider processes personal data on behalf of LUMER Finance, appropriate data-protection arrangements are used where required by applicable law.

The General Terms and Conditions likewise provide that LUMER Finance may use software providers, payroll administrators and other external service providers in performing an engagement.

10. Personal Data Processed on Behalf of Clients

In providing accounting, payroll, administrative or related services, LUMER Finance may receive personal data relating to persons other than the client, such as:

- employees;
- customers;
- suppliers;

- business partners;
- family members;
- other persons whose information forms part of the client's administration.

Depending on the circumstances, the client may determine the purposes for which such personal data is processed and LUMER Finance may process that data on the client's behalf.

Where LUMER Finance acts as a processor, the processing is governed by the applicable contractual arrangements and data-protection requirements between LUMER Finance and the client.

11. Client File Transfers

Following termination of an engagement, relevant client information and available administrative records may, at the client's request and where legally permitted, be:

- transferred directly to the client; or
- transferred to a new accountant, bookkeeper or other service provider designated by the client.

LUMER Finance may take reasonable steps to verify transfer instructions and the identity or authority of the recipient before transferring personal data.

This corresponds with the transfer arrangements in the General Terms and Conditions.

12. Data Retention

LUMER Finance does not retain personal data longer than necessary for the purposes for which it is processed, unless longer retention is required or permitted by applicable law.

Retention periods are determined taking into account:

- the nature and purpose of the processing;
- the duration of the client relationship;
- applicable statutory tax, accounting and administrative retention obligations;
- applicable regulatory requirements;
- the need to handle outstanding matters;
- the establishment, exercise or defence of legal claims;
- other legitimate reasons for continued retention where permitted by law.

Client files, data and documents that are subject to statutory retention requirements are retained for the applicable statutory period.

Where no specific statutory retention period applies, personal data is retained only for as long as reasonably necessary for the purpose for which it was collected or processed.

Following expiry of the applicable retention period, personal data will be deleted, destroyed or anonymised where appropriate, unless continued retention is legally required or otherwise permitted.

Clients remain independently responsible for complying with their own statutory administration and record-keeping obligations.

This wording follows the same principle as Article 13 of the General Terms and Conditions, which uses the applicable statutory retention periods rather than one universal period. The AP likewise states that personal data should not be retained longer than necessary, while specific statutory periods may apply under other legislation. Autoriteit Persoonsgegevens

13. Website and Contact Form

The LUMER Finance website is operated using Wix.

Visitors may contact LUMER Finance through the website contact form.

Depending on the information provided, LUMER Finance may receive:

- name;
- email address;
- telephone number;
- information contained in the enquiry;
- technical information associated with the website visit or submission.

Information submitted through the contact form is used to respond to the enquiry and, where applicable, to take steps towards establishing a client relationship.

Visitors are requested not to submit unnecessary sensitive personal information through the general website contact form.

14. Cookies and Website Analytics

The LUMER Finance website uses cookies and similar technologies necessary for the operation, security and functionality of the website.

The website uses Wix and Wix's integrated website functionality and analytics. This may involve the processing of technical information relating to website visits and interactions.

At the effective date of this Privacy Policy, LUMER Finance does **not separately use Google Analytics, Meta Pixel or Google Ads tracking on the website**.

Where consent is legally required for non-essential cookies or similar technologies, such technologies are used subject to the visitor's consent.

The website provides a cookie consent mechanism through which visitors can accept cookies, decline non-essential cookies and review or change their cookie preferences.

Cookies that are strictly necessary for the technical operation, security or essential functionality of the website may be used without consent where permitted by applicable law.

Visitors can change their preferences through the cookie settings function available on the website.

15. Electronic Communications

LUMER Finance may communicate with clients and prospective clients through email, telephone, WhatsApp, client portals, accounting software and other agreed electronic communication methods.

Electronic communications and third-party digital systems may involve inherent security and privacy risks. LUMER Finance takes reasonable measures to protect personal data but cannot guarantee that external communication networks or third-party systems will be completely free from security incidents, technical failures or unauthorised interception.

Where appropriate, LUMER Finance may request that particularly sensitive information or documents be provided through another suitable channel.

LUMER Finance does not currently use client contact details for general email newsletters or WhatsApp marketing broadcasts.

The use of electronic communications and external digital systems is also addressed in Article 15 of the General Terms and Conditions.

16. International Data Transfers

Some technology, hosting, communication, software or cloud service providers used in connection with LUMER Finance's activities may process personal data outside the European Economic Area ("EEA").

Where personal data is transferred outside the EEA, LUMER Finance seeks to ensure that the transfer takes place in accordance with applicable GDPR requirements.

Where required, this may include reliance on:

- an adequacy decision of the European Commission;
- Standard Contractual Clauses;
- another transfer mechanism or safeguard recognised under applicable data protection law.

Where applicable, further information about relevant safeguards may be requested by contacting **info@lumerfinance.nl**.

The GDPR specifically requires transparency concerning intended third-country transfers and applicable safeguards. EUR-Lex

17. Security and Confidentiality

LUMER Finance takes appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

Access to client information within LUMER Finance is restricted to persons who require such access for the performance of their duties.

LUMER Finance treats confidential client information as confidential unless disclosure is required or permitted by law.

Where external digital systems and service providers are used, appropriate measures are taken where required by applicable data protection law.

No method of electronic transmission or storage can provide absolute security.

The confidentiality obligation continues after termination of the client engagement, consistent with Article 14 of the General Terms and Conditions.

18. Your Rights Under the GDPR

Subject to the conditions and limitations provided by applicable law, individuals whose personal data is processed by LUMER Finance may have the right to:

- request **access** to their personal data;
- request **rectification** of inaccurate or incomplete personal data;
- request **erasure** of personal data where the applicable legal conditions are met;
- request **restriction of processing**;
- **object** to processing in circumstances provided by the GDPR;
- receive certain personal data in a structured, commonly used and machine-readable format and exercise the right to **data portability**, where applicable;
- **withdraw consent** at any time where processing is based on consent;
- lodge a **complaint with a supervisory authority**.

These rights are subject to applicable statutory conditions and exceptions. For example, LUMER Finance may be unable to erase information where continued retention is required by law.

Requests concerning personal data may be submitted to:

info@lumerfinance.nl

LUMER Finance may request information reasonably necessary to verify the identity of the person making the request.

The GDPR expressly provides for access, rectification, erasure, restriction, objection, portability, withdrawal of consent where applicable, and the right to complain to a supervisory authority. EUR-Lex The AP also states that organisations should clearly explain how individuals can exercise these rights. Autoriteit Persoonsgegevens

19. Complaints

If you have concerns about how LUMER Finance processes your personal data, you may first contact:

info@lumerfinance.nl

You also have the right to lodge a complaint with the Dutch supervisory authority:

Autoriteit Persoonsgegevens (AP)
The Dutch Data Protection Authority

Information about submitting a privacy complaint is available on the official website of the Autoriteit Persoonsgegevens. Autoriteit Persoonsgegevens

20. Third-Party Websites and Services

The LUMER Finance website may contain links to websites, social media platforms or services operated by independent third parties.

LUMER Finance is not responsible for the privacy practices of independent third parties. Personal data processed directly by such third parties is subject to their own privacy policies and terms.

21. Changes to this Privacy Policy

LUMER Finance may amend this Privacy Policy where reasonably necessary, including as a result of changes in:

- applicable legislation or regulatory requirements;
- the services provided by LUMER Finance;
- business processes;
- technology, software or external service providers;
- website functionality.

The current version will be made available through the LUMER Finance website.

The effective date stated at the beginning of this Privacy Policy indicates when the current version took effect.

22. Contact

For questions concerning this Privacy Policy, the processing of personal data or the exercise of GDPR rights, please contact:

LUMER Finance
Werkzijde 16
2543 CA Den Haag
The Netherlands
KVK number: 71060057
Email: **info@lumerfinance.nl**
Website: **www.lumerfinance.nl**

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