

# Privacy Statement of DiviDragon B.V.

*January 1<sup>st</sup> 2021*

During the processing of personal data DiviDragon B.V. conforms to the requirements of the applicable data protection legislation, like the General Data Protection Regulation. This means we:

- **clearly specify our purposes** before we process personal data, by using this privacy statement;
- **limit our collection of personal data** to only the personal data needed for legitimate purposes;
- first **ask for explicit permission** to process your personal data in cases where your permission is required;
- take **appropriate security measures** to protect your personal data and we demand the same from parties who process personal data on our behalf;
- **respect** your right to access, correct or delete your personal data held by us.

DiviDragon B.V. is the party responsible for all data processing. In this privacy statement, we will explain what kind of personal data we collect and for which purposes within our online services and website. We recommend that you read it carefully.

If you have any questions regarding the processing of personal data, you can find the contact details of DiviDragon B.V. at the end of this privacy statement.

## **Registration**

Certain features of our service require you to register beforehand. You will have to provide your email address and choose a password for the account that we will set up for you.

To be able to give you access to our service and to provide you with detailed and personalized information about your passive income from dividends we use your email address, nickname, country where you pay taxes, stock brokers you use, the account numbers and the stock orders placed. This data is part of our agreement with you. We store this information for up to three months after you closed your account. We will retain this data so that you do not have to re-enter it every time you visit our website, and in order to contact you in connection with the execution of the agreement, invoicing and payment, and to provide an overview of the products and services you have purchased from us.

## **Sending mail**

DiviDragon occasionally sends out emails. To verify your email address, for example, when you sign up or to help reset your password if you forgot it. We also have a personalized newsletter to inform you of development of your passive income as well as news, tips and information about our products and services. Your email address is added to the list of newsletter subscribers, only with your permission and you can cancel the newsletter at any time.

We work together with [Twilio SendGrid](#) to send out all of our emails. Even though we do not directly share your names and email address with them, all outgoing emails from DiviDragon pass through their services and can therefore be intercepted and analyzed by SendGrid.

### **Access to portal**

Within our portal, you can access a management environment where you can set, specify and change settings. For this purpose, we use your email address and nickname. We need this data because of our agreement with you. We store this information for up to three months after our services to you have ended.

### **Subscription**

Via DiviDragon you can take out a paid subscription. We work together with payment provider [Stripe](#). For the purpose of billing, they use your invoice address, email address and payment details. You can manage your subscriptions and details on the Stripe Customer Portal. We do not store any of these payment details in DiviDragon.

### **Contact form**

You can use our contact form to ask questions or make any request.

For this purpose, we use your name and email address. We need this data because of our agreement with you. We store this information until we are sure that you are satisfied with our response and three months thereafter. This way we can easily access the information in case you have any following questions and train our customer service to improve even more.

### **Promotion**

Other than the advertisements on the website, we can inform you about new products or services:

- by e-mail
- via social media

You can object at all times against this promotional communication. Every e-mail contains a cancellation link. On social media, you can block us or use the cancellation option. You can also inform us through your account.

### **Providing data to third parties**

Except for the parties necessary to deliver the above mentioned services, we do not under any circumstance provide your personal data to other companies or organisations, unless we are required to do so by law (for example, when the police demands access to personal data in case of a suspected crime).

### **Statistics**

We keep statistics on the use of our online service, giving us access to individual data.

However, we only access individual data insofar as necessary for the purposes set out in this statement.

### **Cookies**

Our online service only uses cookies that are required for our service to work properly. We do not use cookies for tracking or statistics and we do not allow third party cookies on our service.

You can disable the use of cookies through your browser setting, but some parts of our service may not work properly as a result of that.

### **Security**

We take security measures to reduce misuse of and unauthorized access to personal data. We take responsibility in the security of your personal data. We renew our security measures to ensure safe storage of personal data and keep track what might go wrong.

### **Changes to this privacy statement**

We reserve the right to modify this statement. We recommend that you consult this statement on a regular basis, so that you remain informed of any changes.

### **Inspection and modification of your data**

You can always contact us if you have any questions regarding our privacy policy or wish to review, modify or delete your personal data.

You have the following rights:

- Right of access: you have the right to see what kind of personal data we processed about you;
- Right of rectification: you have the right to rectify any personal data we have processed about you, if this information is (partially) wrong;
- Right to complain: you have the right to file a complaint against the processing of your personal data by us, or against direct marketing;
- Right to be forgotten: you can file a request with us to remove any personal data we have processed of you;
- Right to data portability: if technically possible, you have the right to ask us to transfer your processed personal data to a third party;
- Right to restriction of processing: you can file a request with us to (temporarily) restrict the processing of your personal data.

If you exercise any of the rights mentioned above, we might ask to identify yourself with a valid ID, to confirm it is your personal data. If so, it is important that you hide your social security number and photo.

We will usually respond to your request within one month. This term can be extended if the request is proven to be complex or tied to a specific right. You will be notified about a possible extension of this term.

### **Complaints**

If you want to file a complaint about our use of personal data, please send an e-mail with

the details of your complaint to [info@DiviDragon.com](mailto:info@DiviDragon.com). We will look into and respond to any complaint we receive.

If you think that we are not helping you in the right way, you have the right to file a complaint at the authority. For The Netherlands, this is the Autoriteit Persoonsgegevens.

**Contact details**

DiviDragon B.V.  
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[info@DiviDragon.com](mailto:info@DiviDragon.com)