

Privacy Statement

1. Introduction

At UpToMore, we care about the protection of your data and privacy and how it applies to you, as a user of our website and mobile application, as an applicant and providing us services. In this privacy statement we explain why we collect, record, and process certain personal data. The processing of your personal data complies with the General Data Protection Regulation (GDPR), the Dutch GDPR Execution Act and the Dutch Telecommunications Act.

2. About Us

The data controller for the processing of your personal data is UpToMore bv, registered at the Dutch Chamber of Commerce with registration number 76966526 (**UpToMore**). Our address is Waldorpstraat 5, 2521CA 's Gravenhage, the Netherlands.

If you have any questions about the processing of personal data after reading our Privacy Statement, you can contact us at info@uptomore.com

3. Types of Personal Data we collect

We collect and process the following personal data you provide to us when you use our online services (e.g. your online onboarding to participate in our fund). We may also obtain personal data from third parties when we perform a customer due diligence check. However, the categories of personal data we collect depend on the purpose for which we process it.

Personal data category	
Name, address and contact information	Name, address, postal code, country of residence, email address, phone number
Identification information	Social security number and/or tax identification number, information stored on your identity card or passport
Personal attributes	Gender, date of birth
Electronic identification	Username, password and IP address
Customer- and product related information	Client ID, IBAN (bank account number), balance and transaction data, information on source of funds, qualification as a politically exposed person, annual income statements, salary, US taxpayer status
Communication information	Correspondence with UpToMore: emails, phone conversations, app or chat messages, complaints, requests or inquiries, uploaded documentation and interactions with UpToMore social media accounts
Information received from third parties	For identification purposes: data from iDIN; For client due diligence purposes: PEP status, connection to financial fraud and sanction list status
Information that we share with third parties	Financial data to the tax authorities and unusual transactions to the regulator. Commercial third parties process personal data if UpToMore engages these parties for marketing services.

4. Legal basis of processing your data

Processing shall be lawful only if and to the extent that at least one of the following applies:

- a. processing of your personal data is necessary to enter into, administrate, and implement an agreement with you;
- b. comply with legal obligations;
- c. protect our legitimate interests as a fund manager.

We are legally allowed to process and use your personal data without being required to ask for your consent in case of 4a, 4b or 4c. In any other case, we require your consent for the processing of your personal data.

5. Purpose of processing your personal data

UpToMore processes your personal data in accordance with laws and regulations. Therefore, personal data is processed to:

- a. enter into, administrate, and implement an agreement with you.
- b. provide our services in a secure, legal and transparent manner.
- c. comply with legal obligations.
- d. respond or react to customer questions, inquiries or complaints.

We process personal information after you may have contacted us by email, chat or phone. We store this information to improve our customer service, to verify and investigate customer assignments, to comply with legal obligations and/or for fraud prevention purposes.

- e. carry out promotional or (direct) marketing activities.

You shall have the right to revoke or object at any time to the processing of personal data for (direct) marketing purposes.

- f. improve and develop our products and online service to optimise your user experience.

6. Automated decision-making and profiling

We may use automated decision-making based on your personal information to enter into an agreement with you.

You have the right to object to an automated decision. We will then process your application manually.

7. Sharing data with third parties

UpToMore will share personal data if necessary to comply with our legal obligations, to protect your and our security, to prevent fraud, to combat money laundering and terrorist financing, and to perform essential work. We could thus share your data with:

- a. Other financial institutions, for example, when we carry out payment transactions.
- b. Authorised (public) authorities: De Nederlandsche Bank, the Netherlands Authority for the Financial Markets (AFM), the Dutch Data Protection Authority, the Dutch Tax and Customs Administration, or other bodies or persons that have legal authority to data (like bailiffs etc).

To be able to provide our services, we share certain personal data with third parties that provide services to us such as (cloud) hosting, payment services or performing customer due diligence checks. We only share personal data if it complies with our privacy statement and/or if it is necessary to carry out work. Data processing agreements are signed and in place with third party service providers that process personal data on behalf of UpToMore.

We will take additional measures to protect your data if we share these with third parties outside the European Union. These measures include contractual safeguards based on an EU approved template. An overview of third parties that may receive your data is attached to this Privacy Statement.

8. Security

UpToMore has appropriate technical and organisational measures in place to protect your personal data and privacy. Our employees are under a confidentiality obligation that applies to your data, and employees only have access to data to the extent necessary to carry out their work.

Other measures include but are not limited to encryption of personal data and other sensitive information, encryption of devices, (IT) facilities protected by appropriate security measures, training and awareness programmes, enablement of intrusion detection, logging of access.

In order to help maintain the security of your information, you should protect the confidentiality of your username and password.

9. How long do we keep your personal data?

We do not keep your personal data longer than is necessary to achieve the purposes mentioned in this Privacy Statement. This will be dependent on the specific data and purpose(s) for which we process your data. In most cases, this will be seven years after the termination of your relationship with UpToMore. This retention period may however vary for specific cases, for example, the retention period for complaint data is five years.

We are legally obliged to retain a sizable amount of data after ending the client relationship. For these personal data, the retainment period is usually five or seven years.

10. Your Rights

You have the following rights regarding your personal data:

- a. right to access your personal data
- b. right of rectification
- c. right to be forgotten / erasure

You can ask us to erase any personal data we may hold about you where such data is unnecessary, where the processing is unlawful or where you have withdrawn your consent to the processing.

- d. Right to restriction

You can ask us to restrict the processing of any of your personal data if you think the data is inaccurate, the processing is unlawful or you think we no longer need the data

- e. Right to object to a processing on the basis of our legitimate interests

You can object to the processing of your personal data on grounds relating to your particular situation.

You have the right to object to the processing of your personal data for direct marketing purposes.

- f. Right not to be submitted to automated decision

If a decision is made through an automated process, and that decision affects you significantly, you have the right to object to this decision

- g. Right to lodge a complaint with the Dutch Data Protection Authority.

To exercise your right(s), please send us an email at info@uptomore.com.

11. Changes to this Privacy Statement

We may change this privacy statement, for instance if laws and regulations change. This Privacy Statement is effective as of July 9, 2025. When changes are made to this Privacy Statement, we will notify you by email or by posting notice of such change on our website.

12. Questions and Complaints

If you have any questions or complaints regarding this Privacy Statement, please send an email to info@uptomore.com. You may also make a complaint with Autoriteit Persoonsgegevens, the Dutch Data Protection Authority (www.autoriteitpersoonsgegevens.nl), if you think your rights have been violated.

13. Cookies

We use cookies on our website. A cookie is a small text file that is stored on your device when you visit our website. By using cookies, we can save information about you as our website visitor. This information may include your IP address and the device you use. We use session cookies, which are erased when you close your browser, and persistent cookies which remain on your device for a predefined period. These allow us to remember your preferences and provide personalized features.

We use the following type of cookies:

Functional cookies

These cookies are essential for the proper functioning of the website and application. Without them, certain features may not perform optimally.

Analytical cookies

Analytical cookies track visitor statistics on the website. This provides UpToMore with better insight into the website's performance.

Marketing cookies

These cookies track individual browsing behaviour and create a profile of you. This is collected by your device's browsing behaviour and are used to make advertisements more relevant to you and your interests. They are also used by third-party services offered on this website, in addition to providing the requested functionality.

Third parties provide these services in exchange for recognizing that you (or more precisely, you on your device) have visited a certain website. These third parties place advertising cookies both when you visit our website and when you use services elsewhere after leaving our website.

You can block cookies. In that case our website may not perform properly, and you may not be able to use all features.

Attachment 1: List of Third Parties

- AFM
- BNP Paribas S.A.
- Bluem bv
- Chamber of Commerce (KVK)
- Connected Information Systems bv
- Google Cloud EMEA Limited
- Intercom, Inc
- Refinitiv Limited
- Meta Platforms, Inc.
- Microsoft Corporation
- Mixpanel, Inc
- Notion Labs, Inc.
- MailerLite Limited
- Belastingdienst
- Tiktok, Inc
- Trustpilot A/C
- Zapier, Inc