



Netherlands Advisory Board on Impact Investing

PRIVACY POLICY

Version	Date	Reviewed by	Main changes
v1	2021	MD	Original version
v2	28/07/2025	MD	GDPR-specific update elements added

Effective Date: 28 July 2025

Last Updated: 28 July 2025

The Netherlands Advisory Board on Impact Investing (“NAB”, “we”, “us”, or “our”) respects your privacy and is committed to protecting your personal data. This privacy policy explains how NAB collects, uses, discloses, and safeguards your information in compliance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”), the Dutch GDPR Implementation Act (UAVG – *Uitvoeringswet Algemene Verordening Gegevensbescherming*), and other relevant Dutch and EU data protection laws.

Who We Are

NAB is a foundation (*stichting*) established under Dutch law, located at:

- Saturnusstraat 95, 2516 AG, Den Haag, The Netherlands
- Email: contact@nabimpactinvesting.nl
- KvK (Chamber of Commerce) Registration Number: 81042582

We act as a Data Controller for the personal data you provide to us.

Scope of this Privacy Policy

This policy applies to personal data we collect via:

- Our website: www.nabimpactinvesting.nl, including contact and signup forms
- Events, newsletters, and stakeholder outreach
- Any other interaction you may have with us (e.g. via email or in person)

It does not apply to third-party websites or services that may be linked on our website. We advise reviewing those third parties’ privacy statements.

What Personal Data We Collect

Pursuant to Articles 4 and 6 of the GDPR, we may collect the following types of information:

- 1) Non-Sensitive Personal Data
 - First name, last name
 - Email address
 - Organisation name and role/title
 - IP address and session activity
 - Communication content (e.g. enquiries or comments submitted via website)
 - Newsletter/event registration data

- 2) Technical Data

Through cookies or similar technologies (see [Cookie Policy](#)), we may collect:

- IP address
- Browser type and version
- Device type and operating system
- Session time stamps and user journey data

We do not collect or process special categories of personal data (sensitive data) unless required by applicable law or with explicit consent under Article 9(2) GDPR.

Why we Collect your Information

We collect such Non-personal and Personal Information for the following purposes:

- to be able to contact our Visitors with general or personalised updates and informational messages of our activities;
- to create aggregated statistical data and other aggregated and/or inferred Non-personal Information, which we may use to improve our performance and reach;
- to comply with any applicable laws and regulations

Legal Bases for Processing

Under Article 6 GDPR, we rely on the following lawful bases to process your personal data:

Purpose	Legal Basis under GDPR
Legal Basis under GDPR	Consent (Art. 6(1)(a)) / Legitimate interests (Art. 6(1)(f))
Sending newsletters or marketing	Consent (Art. 6(1)(a))
Ensuring website functionality	Legitimate interests (Art. 6(1)(f))
Legal and statutory compliance	Legal obligation (Art. 6(1)(c))
Event registrations and participation	Performance of a contract (Art. 6(1)(b))

Individuals always have the right to withdraw consent at any time (see section 9).

How We Collect Personal Data

We may collect personal data through:

- Website forms (e.g. newsletter sign-up, contact forms, registration forms)
- Email correspondence
- In-person interaction at events or meetings
- Cookies (as mentioned in our [Cookie Policy](#))

We will only collect information that is minimally necessary and proportionate to the purpose for which it is collected, consistent with the principle of data minimization (Article 5(1)(c) GDPR).

Storage and Retention of Personal Data

Your personal data, including information collected through cookies and other tracking technologies, is hosted and processed on platforms that are fully compliant with the General Data Protection Regulation (GDPR) and applicable international data protection standards.

Our website infrastructure is provided by Wix.com Ltd, which stores data in secure facilities within the European Economic Area (EEA) or, where necessary, transfers data under lawful mechanisms such as the EU–U.S. Data Privacy Framework and Standard Contractual Clauses (SCCs) pursuant to Article 46 GDPR.

In addition, we use third-party service providers such as Microsoft (including SharePoint Online) and HubSpot for content management, communications, marketing automation, and secure document sharing. These providers also maintain GDPR compliance and store personal data within the EEA or in jurisdictions that offer adequate levels of protection.

Where data is processed or transferred outside the EEA, such transfers are based on recognised legal safeguards, including SCCs. Data collected via cookies is retained only for as long as necessary to fulfil the purposes stated in our [\[Cookie Policy\]](#), which may include functionality, performance analytics, or marketing. The specific retention period depends on the type of cookie and service used but does not exceed the duration necessary for legitimate processing under applicable data protection laws.

You may manage your cookie preferences at any time through your browser settings or our cookie consent banner. We regularly review our data processing and retention practices to ensure ongoing compliance with privacy legislation and to uphold the principles of transparency, data minimisation, and purpose limitation.

Retention Period

We retain your personal data only for as long as necessary to fulfil the purpose for which it was collected, or as required by law. Specifically:

- Newsletter data: retained until you unsubscribe
- Website form submissions: max 12 months after final correspondence
- Event data: up to 24 months unless consent renewed

Disclosures to Third Parties

We do not sell, rent, or commercially exploit your personal data.

However, we may share your data with carefully selected third parties where necessary for the operation of our services, compliance with legal obligations, or in furtherance of our legitimate interests.

These third parties include:

IT and cloud service providers, including website hosting and development platforms (e.g., Wix.com Ltd, Microsoft, SharePoint, HubSpot) that support our digital infrastructure and communications;

Professional advisers, such as accountants, auditors, and legal counsel, for purposes of legal compliance, risk management, and business administration; Analytics and marketing technology providers (e.g., HubSpot) to support lawful marketing and performance optimisation efforts, subject to your consent where required;

Public authorities, regulatory agencies, or law enforcement bodies, where disclosure is required by law or necessary to protect our legal rights.

Where any such third party processes your personal data on our behalf as a Data Processor, we ensure compliance with Article 28 GDPR by entering into legally binding Data Processing Agreements (DPAs), which impose strict confidentiality, security, and data protection obligations on these processors.

International Data Transfers

We do not routinely transfer personal data outside the EU. Where such transfers are necessary (e.g. if third-party providers are outside the EU), appropriate safeguards are applied, including:

- Adequacy Decisions by the European Commission
- Standard Contractual Clauses (SCCs)

You can request more information by contacting us.

Your Rights under GDPR and Dutch Law

Under the GDPR and Dutch AVG, you have the following rights:

- Right of access (Art. 15): to request a copy of your personal data
- Right to rectification (Art. 16): to correct inaccurate or incomplete data
- Right to erasure ('Right to be forgotten') (Art. 17)
- Right to restriction of processing (Art. 18)
- Right to data portability (Art. 20)
- Right to object to processing (Art. 21)
- Right to withdraw consent at any time (Art. 7(3))

- Right to lodge a complaint with the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*) via www.autoriteitpersoonsgegevens.nl

To exercise any of these rights, please contact:

 contact@nabimpactinvesting.nl

 Saturnusstraat 95, 2516 AG Den Haag, The Netherlands

We reserve the right to request identity verification before acting upon such requests.

Data Security

We implement appropriate technical and organisational measures to protect personal data, in accordance with Articles 25 and 32 GDPR. Measures include:

- SSL encryption
- Firewalls and access controls
- Regular security updates
- Data minimisation and anonymisation where appropriate

Despite these measures, we cannot guarantee absolute security of data transmitted over the internet. Any transmission is at your own risk.

Changes to this Privacy Policy

We may update this privacy policy to reflect regulatory changes, organisational changes, or legal developments. The latest version will always be available on our website, and material changes will be communicated.

Last updated on: 28 July 2025

Contact Information

If you have any questions or concerns regarding this privacy policy, or if you wish to exercise your data protection rights, please contact:

Stichting Netherlands Advisory Board on impact investing
Saturnusstraat 95, 2516 AG Den Haag, The Netherlands

 contact@nabimpactinvesting.nl

 www.nabimpactinvesting.nl

This privacy policy is governed by Dutch law and subject to the oversight of the Dutch Data Protection Authority.