



ANNUAL REPORT 2021

**Privacy First Foundation
Amsterdam**

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1. Vision and policy

Privacy First was founded in 2008 as an independent foundation with the aim to preserve and promote everyone's right to privacy. Privacy is a human right which encompasses the protection of personal data, confidential communication, home inviolability and physical integrity. Of all human rights, the right to privacy is under the most pressure in this day and age. Privacy First is therefore strongly committed to protecting and promoting this right as much as possible. As an Institution for General Benefit (ANBI), Privacy First does this in the general interest, either for the entire population or for vulnerable groups. Privacy First applies a broad, principled orientation to privacy, both in relation to our free, open society and in relation to other relevant human rights. Our field of vision and activities extends to both the digital and analogue domains. However, these worlds are becoming increasingly integrated and are making the classic 'analogue space' ever smaller. Developments in the digital domain are happening at a rapid pace. In order to steer things in the right direction, Privacy First has for years been advocating good legislation with solid privacy safeguards in addition to privacy-by-design, i.e. including privacy into technology right from the start. In this respect, the introduction of the new European General Data Protection Regulation has given us a tailwind. At the same time, Privacy First always operates in an arena where privacy is constantly under threat.

Privacy First's established policy is to focus its attention primarily on (impending) privacy breaches that may affect large groups of people simultaneously. In our selection of topics, we are guided by 1) the scale, 2) the severity and 3) the impact and consequences of a particular breach. Massive and serious privacy violations are first investigated and brought to public attention. Next, Privacy First seeks to put an end to the violation in question through quiet diplomacy and political lobbying, followed, if necessary, by a public campaign, legal action or – as a last resort – litigation.

In line with these criteria, in recent years the attention of Privacy First has focused mainly on biometrics, camera surveillance, medical confidentiality as well as mobility and anonymity in public space. In addition, the topics of financial privacy, children and privacy, the Internet of Things as well as artificial intelligence are increasingly on our radar.

We will elucidate our main activities from 2021 in the following chapters. To find out more about Privacy First's most recent activities, please visit our website.

2. Projects and events

2.1 Dutch Privacy Awards & National Privacy Conference

Despite the ongoing limitations related to the Covid-19 pandemic, ECP|Platform for the Information Society and Privacy First again jointly organized their annual National Privacy Conference on 28 January 2022. This has become the primary privacy event in the Netherlands in the context of European Data Protection Day. The aim of this event is to contribute to building a privacy-friendly information society together with government, the business community and the scientific community. Due to pandemic restrictions, the conference was once more mostly an online event which was streamed from the television studio of our regular conference location: Nieuwspoor in The Hague. Once again, the interest proved enormous: hundreds of professionals had registered for the livestream. In chronological order, the conference speakers were Marjolijn Bonthuis (ECP deputy director), Monique Verdier (Dutch Data Protection Authority vice chairwoman), Martin Vliem (National Security Officer, Microsoft), Max Schrems (founder of None of Your Business, NOYB), Haroon Sheikh (senior scientist at the Scientific Council for Dutch Government Policy, WRR), Gry Hasselbalch (cofounder of the European ThinkDoTank DataEthics), Paul Korremans (Privacy First chairman) and Wilmar Hendriks (chairman of the Dutch Privacy Awards jury). The moderator for the day was television presenter Tom Jessen (RTL, BNR).



Tom Jessen interviewing Monique Verdier (vice chairwoman of the Dutch Data Protection Authority) during the Dutch Privacy Conference, Nieuwspoor, 28 January 2022. © Nieuwspoor

As a concluding part of the conference, Privacy First presented the annual Dutch Privacy Awards. During the summer of 2021, we received several high quality entries for these Awards. Our independent Awards jury then conducted reviews and interviews with all entrants in the fall and winter of 2021. Nominated in the Consumer Solutions category were Street Art Museum Amsterdam (SAMA, raising awareness around privacy through art in public space), PiM (privacy-friendly ID app

of KPN) and Privacy Rating (visualization of website visitors and webshops: Twente University). The nominations in the Enterprise Solutions were Scoor voor je Club



Nederlandse PRIVACY AWARDS

(‘Scoring for your Club’, GDPR proof communication and financing of social organizations) and the privacy-friendly social media platform Quodari. In the Government Services category, Summitto

(combating VAT fraud without data storage) and Shuttercam (data minimization through the shielding of cameras; AMS Institute and the municipality of Amsterdam) were the nominees.

During the online conference, all nominees presented their projects to the audience through Award video pitches. Street Art Museum Amsterdam, Quodari and Summitto were then declared winners by the jury. The Dutch Center for Information Security and Privacy Protection (CIP) was awarded the Incentive Award.



Privacy First chairman Paul Korremans handing a Dutch Privacy Award to CIP community manager Walter van Wijk and director Ad Reuijl, 25 February 2022.

The jury of the 2021 Dutch Privacy Awards consisted of the following persons:

- Wilmar Hendriks, founder of Control Privacy, Privacy First board member and chairman of CUIC (jury chairman);
- Paul Korremans, Privacy First chairman;
- Melanie Rieback, CEO and cofounder of Radically Open Security;
- Nico Mookhoek, privacy legal expert and founder of DePrivacyGuru;

- Rion Rijker, privacy and information security expert and IT lawyer, partner at Fresa Consulting;
- Magdalena Magala, Data protection officer at the municipality of Zaanstad;
- Mathieu Paapst, lecturer in IT law at Groningen University and project lead at [cookiedatabase.org](https://www.cookie-database.org);
- Jaap van der Wel, IT and privacy expert and managing partner at Comfort Information Architects;
- Erik Bruinsma, legal expert and director Strategy and Administrative Consulting at Statistics Netherlands (CBS).



The 2021 National Privacy Conference and the Dutch Privacy Awards were made possible by the Democracy & Media Foundation and The Privacy Factory. The entire conference was streamed live from Nieuwspoort and can be viewed at <https://www.youtube.com/watch?v=roBpRWW1-MI>.

In early 2023, Privacy First and ECP will be organizing this inspiring event again. Would your organization like to become a (media) partner or sponsor? Then please get in touch with Privacy First!

2.2 External projects

In recent years, companies and public authorities have regularly sought advice from Privacy First. When the intentions of the organizations that come to us are in line with our own mission, we are keen to help out. Through our critical involvement in such projects, Privacy First seeks – in the public interest – to positively influence certain social developments and to have privacy safeguarded not only ‘from the outside’ but also ‘from the inside’. However, due to the coronavirus pandemic, there were fewer new projects in 2021 than previously expected. Nevertheless, Privacy

First was actively involved in several large-scale external projects in 2021, most notably:

- 1) **Coalition-based project with TU Delft:** ELSA Lab research proposal to the Dutch Research Council (NWO) on artificial intelligence and democracy: 'Making AI Public: Governance, Justice and Security in the Digital Era'. Partners include several universities, ministries, municipalities, NGOs and companies. The envisaged contribution by Privacy First is to give advice and opinions on privacy issues.
- 2) **Coalition-based project with Tilburg University:** multi-year project (2020-2024) for privacy-friendly Blockchain applications for the Dutch national government. Partners include the Dutch Research Council (NWO), various ministries, the Association of Dutch Municipalities (VNG), the Central Fine Collection Agency (CJIB), ECP, companies and other organizations. Privacy First will provide critical input throughout the project and will organize several public events in its context.
- 3) **Ethics advisory group of the Dutch National Police:** since the end of 2021, the director of Privacy First has been appointed by the Chief of Police as a member of this new advisory group. Other external members of this group include people from universities and NGOs.

2.3 Other activities

Since 2019, Privacy First has been involved on a structural basis in the UvA Academy Masterclass: Privacy in Perspective (University of Amsterdam), both as a speaker and as a recruiter of participants. This collaboration was continued in March-April 2021.

In 2021, Privacy First has had meetings with a whole range of different parties, including the Dutch Platform for the Protection of Civil Rights (*Platform Burgerrechten*), Antwerp University, ECP, the Netherlands Organization for Applied Scientific Research (TNO), Accidental Americans, Voys Telecom, Nieuwe Gevers, Amsterdam University, the Netherlands Committee of Jurists for Human Rights (NJCM) and its Public Interest Litigation Project (PILP), Goedzo Data Ethiek, Omni Bridgeway, Datavakbond, Open State Foundation, the National Human Rights Institute, FBNet, Amber Alert, Amnesty International, The Privacy Collective, Tilburg University, None of Your Business (NOYB), the Dutch Ministry of Justice & Security and its Scientific Research and Documentation Centre (WODC), the Dutch Data Protection Authority, AFMP, RTL Nieuws, Auto & Fiscus, Argumentenfabriek (session about police policy regarding Dutch protests against Covid-19 measures), NOS, SEO Economic Research, Controle Alt Delete, Dutch Scientific Council for Government Policy (WRR) and the National Police.

Our board members and people involved with Privacy First are regularly asked to be speakers at public events of public authorities, the business community and the

scientific community. In addition, Privacy First continuously conducts quiet diplomacy in our broad field of activity.

3. Political lobbying

3.1 Covid-19 measures

The coronavirus-induced crisis turned out to be not only a global health crisis, but also a crisis for countless other human rights, including the right to privacy. From the very beginning (March 2020), Privacy First has therefore adjusted its priorities and has critically monitored virtually all privacy-relevant Covid legislation and policies. In doing so, we sought to stop or positively influence overreaching measures as much as possible. As an extension of our political lobbying efforts in 2020, Privacy First devoted critical attention in 2021 to issues such as:

- **the Dutch government imposing a curfew (*avondklok*)**
- **possible introduction of so-called 2G policy**
- **legislative proposal concerning proofs of Covid-19 test results (coronavirus entry pass / Digital Covid Certificate).**

Partly as a result of our critical input, privacy-by-design became an important precondition for the introduction of the Dutch (Digital) Covid Certificate, especially in comparison to such certificates in other European countries.

3.2 Data Processing Collaborations Bill ('Super SyRI')

In cooperation with the coalition that won the groundbreaking court case against the System Risk Indication (SyRI) in 2020, Privacy First and the Dutch Platform for the Protection of Civil Rights are closely following the similar Data Processing by Partnerships Act (WGS). SyRI was a system that scrutinized entire neighborhoods on the basis of secret algorithms in order to profile citizens in relation to the risk they commit fraud with social security benefits. Partly in light of the Dutch scandal revolving around childcare benefits, the SyRI coalition emphatically warned the Dutch Senate in early 2021 about the possible consequences of WGS. Should our joint political lobbying against it prove fruitless, the SyRI coalition will in all likelihood initiate legal action.

3.3 Other topics

As part of the Dutch cabinet formation process, Privacy First sent a critical yet extensive and constructive **letter to the *informateur*** in April 2021.

In May 2021, Privacy First (in collaboration with Amber Alert) drew critical attention to the privacy risks of **Burgernet** ('civil network', a joint collective of citizens, local government and police aiming to improve local security). This led to questions in Parliament and to investigation by the Dutch Data Protection Authority.

In July 2021, Privacy First warned the Dutch Senate about the objections and risks of the EU-wide reintroduction of **biometric fingerprints in ID cards**.

In August 2021, Privacy First and the Platform for the Protection of Civil Rights sent a critical letter to the Dutch House of Representatives regarding the impending legitimization of **unlawful surveillance by the Dutch National Coordinator for Counterterrorism and Security (NCTV)**.

Following joint lobbying efforts by Privacy First and Publicroam (winner of a 2020 Dutch Privacy Award), the Netherlands Standardisation Forum issued an advisory in September 2021 to ensure that **public Wi-Fi networks for guest use are always offered securely from now on**. The independent advisory body recommends improving Wi-Fi security by using the WPA2-Enterprise standard. This authoritative advice applies to all public and semi-public institutions in the Netherlands and thus relates to thousands of Wi-Fi networks.

In 2021, Privacy First also provided critical input to the Internet consultations concerning the draft legislative proposal for the amending Act on the Reference Portal for Bank Information and the draft legislative proposal that grants access to a greater number of third parties to the Dutch Personal Records Database (BRP). In addition, Privacy First provided critical input to the Netherlands Committee of Jurists for Human Rights (NJCM) for the preparation of our joint periodic shadow report intended for the UN Committee against Torture in Geneva, particularly regarding **Dutch police violence at demonstrations** and arming the police force with **taser weapons**.

4. Campaign: Don't-PSD2-Me

In the context of multiple projects, Privacy First has been working to mitigate the risks created by the EU Payment Services Directive 2 (PSD2) since late 2017. This European banking law allows consumers to share their banking data with other parties for 'account information services'. For this, consumers must first give their consent. Following consent, banks must share all the consumer's transaction data with external parties (financial service providers). With support from the SIDN Fund, Privacy First launched a campaign in the summer of 2019 around the privacy risks of PSD2: psd2meniet.nl/en/ (Don't-PSD2-Me). The main goal of our PSD2 campaign was



to develop a Don't-PSD2-Me filter, similar to already existing do-not-call-me registers and do-not-track (Wi-Fi) registers. In the context of the European Commission's upcoming review of PSD2, Privacy First wrote a comprehensive

whitepaper in 2021, laying out the insights gained from our PSD2 project. In this whitepaper, we elaborated on a number of privacy solutions, namely:

- providing better information to consumers;
- detecting special personal data in financial transactions;

- filtering these data.

The most important privacy-by-design solution coming out of our Do-Not-PSD2-Me project is the Don't-PSD2-Me filter. In our whitepaper we explain how special personal data may be detected. This can be done using a list of bank account numbers from which special personal data can be derived. On the basis of such a list we have built an Application Programming Interface (API) that makes filtering possible. We have sent our whitepaper to all relevant regulators, privacy NGOs and all account information service providers (AISPs) that are listed in the European Banking Authority (EBA) register. Our API has now been adopted by a service provider: FwdPay, Gatekeeper for Open Banking. In late 2021, our PSD2 project also served as Privacy First's input to the Dutch Ministry of Finance's evaluation of PSD2.

Although this project has now been completed, Privacy First will continue to monitor developments related to this issue and will continue to report on these developments at [PSD2meniet.nl/en](https://psd2meniet.nl/en) since this website will remain up and running.

5. Lawsuits

As a civil society organization, Privacy First is concerned with operating as effectively as possible with the limited resources it has. If quiet diplomacy, political lobbying and campaigns prove insufficiently effective, Privacy First initiates fundamental lawsuits aimed at banning legislation and policies that lead to large-scale privacy violations. **In recent years, Privacy First has successfully opposed the central storage of**



everyone's fingerprints under the Dutch Passport Act, the storage of everyone's telecommunications data under the Telecommunications Data Retention Act, and the large-scale risk profiling of citizens under a program called System Risk Indication (SyRI).

Privacy First prefers to conduct such cases in coalition with other parties and through the pro bono support (or

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external sponsorship) of appropriate law firms.

5.1 Ultimate Beneficial Owner (UBO) register

Lawsuit targeting large-scale disclosure of sensitive personal data

Since late 2020, Privacy First has been conducting a large-scale lawsuit targeting the new UBO register. This public register at the Dutch Chamber of Commerce contains information about all ultimate beneficial owners (UBOs) of all companies and other legal entities established in the Netherlands (including all foundations and associations), with all the privacy and security risks this entails. Making the personal data of all UBOs accessible to everyone is a massive invasion of privacy that, in the

view of Privacy First (and also that of the European Data Protection Supervisor), is completely disproportionate. With this lawsuit Privacy First therefore aimed to render the UBO register inoperative and to have preliminary questions on the register asked to the EU Court in Luxembourg. To this end, we initiated summary proceedings against the Dutch government before the District Court of The Hague on 25 February 2021. Despite doubts on the part of the court about the legality of the UBO register, the claims of Privacy First were unfortunately rejected, partly because, in the meantime, a similar lawsuit concerning the UBO register had already been filed with the EU Court in Luxembourg. In our subsequent urgent appeal, the case was also dismissed by the Court of Appeal of The Hague, although the judges did explicitly point out there is a legal possibility for UBOs to have their data shielded. Further legal action by Privacy First concerning the UBO Register may follow midway through 2022, depending on the outcome of similar cases before the EU Court. Our UBO case is handled by Boekx Attorneys.



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5.2 ANPR: Automatic Number Plate Recognition

Lawsuit targeting mass camera surveillance

After years of delay (due to various circumstances, including lack of funding), the long-awaited summary proceedings of Privacy First against the Dutch government concerning the controversial Act on Automatic Number Plate Recognition finally took place in November 2021. Under this law introduced on 1 January 2019, the number plate codes of virtually every motorist in the Netherlands end up in a central police database for four weeks. The Dutch General Intelligence and Security Service (AIVD), the Military Intelligence and Security Service (MIVD), and in time possibly more parties have direct access to this database. At the beginning of December 2021, the District Court of The Hague declared our summary proceedings admissible, yet dismissed the case for 'lack of urgency'. Privacy First will now continue this case as proceedings on the merits and has recently submitted a detailed draft writ of

summons with a request for consultation to the Dutch State attorney (required under Article 3:305a of the Dutch Civil Code). This case is being handled on a pro bono basis by CMS Attorneys through Pro Bono Connect. To enhance the case as far as the facts are concerned, CMS has filed several Freedom of Information requests to ministries in recent years. This case is now also supported by the Digital Freedom Fund.



Summary proceedings targeting Automatic Number Plate Recognition, the Hague District Court, 10 November 2021. From left to right: Paul Korremans (Privacy First chairman), Leonard Böhmer (CMS attorney) and Vincent Böhre (Privacy First director).

5.3 Citizens v Plasterk

Lawsuit concerning cross-border data exchange by secret services

Together with citizens and other organizations, Privacy First has been challenging the Dutch government since 2013 in the case ‘Citizens against Plasterk’ (Ronald Plasterk was the Dutch minister of the Interior between 2012-2017). The revelations by whistle blower Edward Snowden about the practices of (foreign) intelligence services, including the American NSA and British GCHQ, were the reason this civil lawsuit was brought. Our coalition of parties demands that the Dutch government stops using foreign intelligence obtained not in accordance with Dutch law. Our lawyers at Bureau Brandeis are taking care of this case on the basis of their own pro bono fund for social litigation. The coalition is formed by Privacy First, the Dutch Association of Criminal Lawyers (NVSA), the Dutch Association of Journalists (NVJ) and Internet Society Netherlands. Following disappointing verdicts from both the District Court and the Court of Appeal of The Hague, the Dutch Supreme Court unfortunately also dismissed this case in 2018. With that, the Supreme Court has since provided a ‘free pass’ for Dutch secret services to continue to collect large amounts of data from Dutch citizens through foreign intelligence services. In the face of this, citizens are left without legal protection. Our lawyers have therefore

continued this case at the European Court of Human Rights (ECHR) in Strasbourg in early 2019, in parallel with similar British and Swedish lawsuits. However, the disappointing rulings of the ECHR in these latter cases have in part complicated the outcome of our own case, the admissibility of which should still be reviewed by the Court several years on (probably as a result of Covid-related delays). Nevertheless, the coalition remains hopeful of a positive outcome.

5.4 New case against the Digital Covid Certificate?

Since the legal introduction in the Netherlands of the Digital Covid Certificate in May 2021, Privacy First has been looking at the possibility of bringing a lawsuit to critically review the certificate's privacy aspects. However, a request for financial support for the necessary pre-litigation research was denied by the Digital Freedom Fund in the summer of 2021. Our request for independent and objective litigation advice with a view to such a lawsuit was subsequently also rejected by the law firms affiliated with Pro Bono Connect and Pro Bono Club. The reasons given for this were conflicts of interest and 'lack of capacity'. Subsequently, the law firm Van Benthem & Keulen turned out to be willing to facilitate a pro bono brainstorming session about the matter with relevant legal experts and lawyers from Privacy First's network. As a result of this brainstorming session, Privacy First intends either to initiate its own lawsuit targeting the Dutch and/or EU Digital Covid Certificate, or to join someone else's relevant lawsuit, provided that such a lawsuit is brought by a professional party and has sufficient chances of success.



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5.5 Lawsuits of private citizens

Privacy First occasionally supports lawsuits by private citizens, provided that such cases are of such nature that our support is indispensable. Moreover, these cases should be in the interest of positive precedent-setting and should have a social

impact, raise awareness and likely influence legislation and policy. The Arnhem-based privacy activist Michiel Jonker has brought several such cases in which privacy-by-design plays a central role. These cases relate to the introduction of an anonymous chip-card to place domestic waste in municipal containers, to traveling anonymously in public transport and to the right to cash (anonymous) payment.

Other court cases brought by private citizens in which Privacy First is now involved concern child benefits (against the *Sociale Verzekeringsbank*, SVB) and the virtually unregulated way in which Dutch municipalities (such as Amsterdam) try to stop alleged criminal or radical behavior of individuals ('Person-directed Approach', *Persoonsgerichte Aanpak*). In cases such as these, Privacy First gives advice and may submit so-called *amicus curiae* letters to the courts. These lawsuits often lead to media reporting and critical questions in municipal councils and Parliament.

6. New foundation for collective redress: Consumers United in Court (CUIC)

Since early 2020, Privacy First has actively explored the new possibility of initiating privacy-related collective claims under the General Data Protection Regulation (GDPR). Due to the lack of effective enforcement by national privacy regulators (including the Dutch Data Protection Authority), such class actions seem to be the only possibility to enforce structural compliance with the GDPR. In this regard, Privacy First has in recent years already provided moral support to several collective claims, including to a case by The Privacy Collective against Oracle & Salesforce. By now, the time seems ripe for Privacy First to take legal matters into its own hands. To this end, Privacy First established in late 2021 a new foundation for collective claims together with Max Schrems' Austrian-based digital rights NGO 'None of Your Business' (NOYB). Our new foundation, which shares its office with that of Privacy First's office, is called CUIC: Consumers United in Court – Privacy Foundation for Collective Redress. The preparatory development of CUIC is now at an advanced stage and a first court case in the Netherlands is already in the offing. One of CUIC's goals is to become active on a pan-European level in the future. For Privacy First this is also likely to generate positive interactions with other European organizations.

In August 2021 the Dutch Data Protection Authority was informed and consulted by Privacy First about its intention to establish CUIC. Considering the fact that all data and privacy regulators in Europe have a lack of capacity in enforcing the GDPR, NGOs play an important role in exposing and eventually bringing an end to large-scale privacy violations.



Max Schrems (NOYB founder) and Wilmar Hendriks (Privacy First board member and CUIC chairman), 17 June 2022.

7. Media and online presence

7.1 Mass media presence

In 2021, Privacy First was cited in the media several times a week most of the time. In addition to requests for interviews, Privacy First is regularly approached by journalists – sometimes from foreign media – for background information and research tips.



Interview with Privacy First director Vincent Böhre about the use of drones, EditieNL 26 October 2021. © RTL 4



Interview with Privacy First board member Haykush Hakobyan about dubious call centers, Undercover in Nederland, 1 August 2021. © SBS6

7.2 Online presence

The Privacy First websites are our primary way to share news and voice opinions. There is both a Dutch website www.privacyfirst.nl and an English one: www.privacyfirst.eu. Both websites are sponsored by the privacy-friendly Dutch internet services provider Greenhost and will be completely renewed midway through 2022. In addition, Privacy First manages its campaign websites: <https://specifieketoestemming.nl> (medical confidentiality), <https://psd2meniet.nl/en> (PSD2) and <https://privacyawards.nl> (Dutch Privacy Awards). The total number of visitors to our websites has grown to approximately 93,000 per month in 2021. We also have a presence on [Twitter](https://twitter.com/privacyfirst) and have our own LinkedIn group for privacy professionals; our following on both platforms has been growing steadily for years. Would you like to stay up to date on the latest developments around Privacy First? Then sign up to our digital newsletter by sending an email to info@privacyfirst.nl!

8. Organization

Privacy First is an independent Dutch ANBI (Institution for General Benefit) certified foundation that largely consists of professional volunteers. In 2021, Vincent Böhre was the only employee (director and legal expert, one FTE), alongside freelance PSD2 project leader Martijn van der Veen. In addition, Privacy First operates mainly with volunteers and external experts from various fields. Privacy First's goal in 2022 is to develop a compact, flexible organization with three to four permanent employees.

Since March 2021, the board of Privacy First consists of the following persons:

- Paul Korremans (chairman and treasurer)
- Nelleke Groen (vice chairwoman)
- Haykush Hakobyan (secretary)
- Marc Smits (board member)
- Wilmar Hendriks (board member and chairman of the board of CUIC).

In 2021, our board meetings were held monthly most of the time.



The Privacy First board. From left to right: Paul, Haykush, Nelleke, Wilmar and Marc.

In 2021 our Advisory Board consisted of the following individuals, in their personal capacity:

- Hans Franken (Emeritus Professor of Information Law, Leiden University)
- Quirine Eijkman (vice-chairwoman of the Netherlands Institute for Human Rights & Lecturer in Access to Law, HU University of Applied Sciences Utrecht)
- Joris Sprakel (socioeconomic human rights lawyer at Fischer Group and Lecturer in Human Rights Law, The Hague University of Applied Sciences)
- Eva de Leede (senior public official at the Ministry of Economic Affairs and Climate Policy).

Wilmar Hendriks moved from our advisory board to the managerial board at the beginning of 2021. Eva de Leede unfortunately had to leave the advisory board due to her busy working schedule. Meanwhile, three new members have joined the advisory board, which convenes at least twice a year with the managerial board to share its vision whilst also giving unsolicited advice at other moments.

Privacy First's group of volunteers is mostly made up of professionals who structurally support the foundation, not only as far as the actual work at hand is concerned (various privacy issues) but also in terms of organization (IT, PR, translations, etc.) and legal matters (research and advice). Apart from that, Privacy First can rely on a large network of experts from all corners of society, varying from academics, legal experts and people working in IT to journalists, politicians and public officials.

9. Finances

To carry out its activities, the Privacy First Foundation largely depends on individual donations and sponsoring by funds and law firms. Since 2015, Privacy First has been supported by the Democracy and Media Foundation; in 2017, this has become multi-year institutional support. Our Do-Not-PSD2-Me campaign has been supported by the SIDN Fund since May 2019. Meanwhile, we have been able to team up with several other funds to develop new projects and to strengthen and make more sustainable our organization and activities. These funds include Stichting Goeie Grutten for the benefit of our upcoming PrivacyWijzer project (concerning the Internet of Things) and the Digital Freedom Fund to support our lawsuit aimed at getting the Automatic Number Plate Recognition Act off the table.

In addition to financial support from individual donors and funds, we are also open to corporate sponsorship, provided that we can continue to operate completely freely and independently. Since 2016, IT company Detron has supported us by supplying hardware and infrastructure to our office. Both our payroll and our financial administration are carried out by an external administration office which offers its services partly as corporate sponsorship. Privacy First's websites are sponsored in part by provider Greenhost, while TechSoup Netherlands enables Privacy First to purchase software at a reduced price. Since the end of 2017, Privacy First is also supported by Voys Telecom. Our annual National Privacy Conference is sponsored by ECP|Platform for the Information Society and our Dutch Privacy Awards are partly sponsored by The Privacy Factory. Would your organization also like to sponsor Privacy First or the Dutch Privacy Awards? Then get in touch with us!

Privacy First's policy is to spend as much of its income as possible on relevant matters and to keep its operational costs as low as possible. To this end, our communications (including by telephone) are effected largely over the Internet. Support activities are partly carried out by professional volunteers. In March 2022, Privacy First moved from the Keizersgracht in Amsterdam to a new office situated at the Nieuwe Herengracht: we share this office with our new claim foundation CUIC. Privacy First events are preferably organized at external and sponsored locations. The procedural documents in our lawsuits are partly the result of our own factual and legal research. Moreover, it is Privacy First's policy to conduct large-scale litigation in principle only as part of a coalition through the Public Interest Litigation Project (PILP), through Pro Bono Connect of the Netherlands Committee of Jurists for Human Rights (NJCM) or by means of external sponsorship. We do so to spread the costs and financial risks and to increase the chances of legal success. In this way, every euro donated to us will benefit the privacy of everyone in the Netherlands as effectively as possible.

Below is our 2021 financial overview. The sponsorship of lawsuits by law firms or external partners is not included.

Financial overview	2021	2020
Revenues:		
Donations and funds	€ 107,286	€ 113,514
Expenditures:		
Personnel costs	€ 68,061	€ 70,588
Legal costs	-	-
Campaign costs	€ 17,310	€ 10,702
Events	€ 3,267	€ 3,482
Housing	€ 8,444	€ 8,352
Banking and insurance	€ 2,171	€ 2,106
Travel expenses	€ 279	€ 677
Websites	€ 1,966	€ 729
Communications	€ 698	€ 354
PO box and postage	€ 408	€ 353
Office costs	€ 130	€ 184
Representation expenses	€ 68	-
Expense allowance scheme	€ 567	€ 519
Training costs	-	85
Subscriptions	€ 340	€ 110
Miscellaneous	€ 1,049	€ 677

Would you like to support Privacy First? Then please transfer a donation to account number (IBAN) NL95ABNA0495527521 (BIC: ABNANL2A) in the name of *Stichting Privacy First* in Amsterdam, the Netherlands, or support us anonymously through [the donation page on our website](#). The Privacy First Foundation is recognized by the Dutch Tax and Customs Administration as an Institution for General Benefit (ANBI). Your donations are therefore tax-deductible.





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