

ANNUAL REPORT

STICHTING ONDERZOEK MARKTINFORMATIE

2025

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MANAGEMENT REPORT

STICHTING ONDERZOEK MARKTINFORMATIE

2025

Management report ex art. 305a BW paragraph 2 sub d under 44

Introduction

1. The Stichting Onderzoek Marktinformatie ('SOMI' or the 'Foundation') was established on May 31st, 2016. Since its inception, the Foundation has always included the report of its activities in its newsletters, which have been posted on its website. Initially, the Foundation's website was www.kenniscentrumvastgoedfinanciering.nl, but it has since been succeeded by www.somi.nl, which is hereinafter referred to as the "Site" of the Foundation.
2. SOMI endorses the best practice provisions of claim codes for organizations that are committed to collective advocacy. At the time the Foundation was founded, this was the Claim Code 2011 and now this is the Claim Code 2019. These claim codes are related - in whole or in part - to the activities of the Foundation from time to time and as they have applied from time to time, it has been changed as referred to as the 'Claimcode'.
3. SOMI is a non-profit foundation under the Dutch law, established to identify and influence issues of social importance. We focus on the functioning of markets in the areas of privacy, elderly, housing and healthcare. SOMI is open to initiatives from third parties, but is currently particularly committed to protecting the fundamental rights of consumers and minors who use online services.
4. The Foundation acts in the collective interest of the (legal) persons for whom it acts in accordance with its statutory objectives. The statutory objective, the actual activities and the governance of the Foundation show that the Foundation and the directors affiliated with the Foundation do not have a profit motive in the performance of the Foundation activities.
5. The governance of the Foundation is laid down in the articles of association. In fulfilling its duties, the board and its individual members focus on the interests of the Foundation and the persons it represents.
6. On the date of adoption of this annual report of the board, the directors of the Foundation were: Jan van den Broek, Hans Franke and Noora Mäki (hereinafter each individually and all jointly; the 'Directors'). The composition of the Foundation's board was last changed on July 8th, 2024.
7. Through this report of the board, the Directors provide an annual accountability, insofar as this is not already included in the Foundation's newsletters with regard to

the year 2025 (the '**Newsletters**') with all documents or information to which they are referred refer to as links or attachments, which form an integral part thereof and which are subsequently placed on the Site within eight days after adoption by the Directors. This report of the Board, together with the Newsletters, is hereinafter referred to, together with each part and as a whole, as the '**Board Report**'.

Events in 2025

With regard to the board

8. The current articles of association of the Foundation (the '**Articles of Association**') were most recently amended on May 31st, 2021. According to registration in the register of the Chamber of Commerce, the Foundation, in accordance with its statutory purpose description - in abbreviated form – aims to '*Promoting the interests of natural persons, in particular consumers and minors, who use online services, including with regard to privacy rights and consumer rights, and of home owners and home seekers and with regard to (information about) real estate (financing) and related developments.*'. SOMI has its registered office in the municipality of Haarlemmermeer and is registered there in the Chamber of Commerce under number 66169208. See the Site for all current contact information and registration details.
9. In 2021, Jan Huijnk and Philip Vromen were active for SOMI as members of the Boards of Directors and Supervisory Boards. They left the Foundation in 2022 for personal reasons. SOMI is extremely grateful to both of them for their expertise and sharpness, sense of diplomacy and for their selfless commitment to achieving SOMI's social objectives.
10. On November 14th, 2022, Cor Wijtvliet joined as a Director (he was previously a member of the Supervisory Board). Mr. Wijtvliet is an analytical expert in the financial field. Over the past 36 years, he has mainly been involved in consultancy and research in the financial sector, since 2000 he has been focusing on themes in the social and economic domain. He carried out such research for Van Lanschot Bankiers for 11 years. He currently has his own research agency that provides services to small and medium-sized companies in the financial sector, such as ER Capital Rotterdam and IEX Amsterdam. Mr. Wijtvliet has been involved with SOMI since its inception. He regularly publishes about SOMI's affairs in blogs and newsletters.
11. On July 8, 2024, Cor Wijtvliet and Menno Weij stepped down from the Foundation as members of the board and supervisory board. They were succeeded by board member Noora Mäki and supervisory board member Najat Idrissi. However, Menno Weij did not bid a complete farewell to the Foundation, as he has been a member of the Board of Recommendations since then.
12. Noora Mäki is a legal professional with broad experience in both private and public law. Noora holds two master's degrees in law, one from Finland and one from the Netherlands. During her career, she has gained extensive work experience in both the private and public sectors, including work as a court clerk and judge in Finland before

moving to the Netherlands. Most recently, she has been working as a legal consultant with a focus on advising international companies and their legal teams.

13. Najat is one of the few lawyers who specializes in indirect taxes and economic crimes. Her expertise includes economic investigations, VAT, customs duties and excise duties. In addition to her legal work, she lectures and received her PhD from Erasmus University in Rotterdam. She is a frequent author on VAT and a speaker at meetings or conferences. Finally, she is a member of the Dutch Association of Tax Advisers.
14. The Board of Recommendations of SOMI was established in July 2024 and plays an important advisory role within the organization. This council consists of experienced professionals and experts from various sectors who support the foundation with strategic advice and substantive expertise. Their insights help the foundation strengthen its research activities and increase its social impact. The Board of Recommendations consists of: Menno Weij and Steve Berman.
15. Steve Berman represents consumers, investors and employees in large, complex lawsuits filed in state and federal courts. Steve's litigation experience has earned him considerable recognition and The National Law Journal has named him one of the 100 most powerful lawyers in the country, and has repeatedly named Hagens Berman as one of the top 10 plaintiff law firms in the country. Steve was named MVP of the Year by Law360 from 2016 to 2019 for his class-action lawsuits and received the 2017 Plaintiffs' Trailblazer award. He was recognized for the third year in a row as an Elite Trial Lawyer by The National Law Journal.
16. In 2024, Prof. Liesbeth Zegveld contributed to SOMI as a member of the Board of Recommendations. Mrs. Zegveld stepped down from the Foundation in February 2025. SOMI is profoundly grateful to Mrs. Zegveld for her sharp legal insights, her unwavering dedication to human rights and principled authority. Her commitment to justice has been an inspiration to SOMI's social objectives.
17. In March of 2025, Gretchen Peters joined the Board of Recommendations. Ms. Peters is Executive Director of the Alliance to Counter Crime Online, a Washington DC based nonprofit that researches and advocates about organized crime activity and illegal exploitation in cyberspace. She is also President of Marven & Shaw LLC, an investigative company that works with law firms to develop complex litigation. Ms. Peters is considered a leading authority on the intersection of crime and terrorism, trade-based money laundering, the illegal wildlife trade, online crime and transnational organized crime. In 2022, Fast Company named her one of the most creative people in business for her work to reform the laws governing cyberspace and to bring forward whistleblowers in the tech industry.
18. In 2025, Gretchen Peters served as a member of the Board of Recommendations. Mrs. Peters stepped down from the Foundation in September 2025. SOMI is deeply grateful for the global perspective and investigative rigor she brought to the Board. Her profound expertise in the tech industry provided invaluable support to SOMI's efforts to hold digital platforms accountable.

Per month

January 2025

- a. No updates

February 2025

- a. February 4th, 2025 SOMI filed collective damage claims against X (Twitter) and TikTok with the Higher Regional Court of Berlin (Kammergericht) in Germany.
- b. February 25th, 2025 SOMI sent a complaint letters regarding Meta to Laboratorio Privacy Sviluppo, Macroregione Mediterranea, Sportello Unico Internazionale Per La Difesa Civica in Italy.

March 2025

- a. March 6th, 2025 SOMI filed injunctions against X (Twitter) and TikTok before the Higher Regional Court of Berlin (Kammergericht) in Germany.

April 2025

- a. SOMI launched Litigation Certificates and Capital Certificates Serie 2025.
- b. April 2nd and 3rd, 2025 oral hearing with regard to SOMI v TikTok with the Netherlands Commercial Court of Appeal (NCCA) in Amsterdam, the Netherlands.
- c. April 24th, 2025 SOMI sent a complaint to TikTok in France regarding violations of EU-data protection regulation.

May 2025

- a. No updates.

June 2025

- a. June 11th, 2025 SOMI's app version 3.0.1 is launched and available on Google Play Store and App Store
- b. June 11th, 2025 oral hearing with regard to SOMI v Meta with the District Court of Amsterdam, The Netherlands.
- c. June 13th, 2025 SOMI sent a cease and desist letter to Meta in Germany regarding violations of EU-data protection regulations.
- d. June 24th, 2025 SOMI filed a petition against Meta with the Corporate Court in Brussels, Belgium.
- e. June 27th, 2025 SOMI files an injunction against Meta in summary proceedings with the Schleswig-Holstein Higher Regional Court

July 2025

- a. SOMI app version 3.0.4 is launched, resolving minor reported issues.

August 2025

- a. SOMI app version 3.1.2 is launched with improved registration forms.
- b. August 1st, 2025 SOMI filed an injunction against X (Twitter) in France with the Tribunal Court in Paris, France.
- c. August 12th, 2025 oral hearing at the Schleswig-Holstein Higher Regional Court regarding SOMI v Meta in summary proceedings. The court has determined that SOMI's admissibility as a claimant was broadly accepted in terms of its status as a qualified entity, however the Court dismissed SOMI's application, citing a lack of procedural urgency following Meta's public announcements in April 2025.

September 2025

- a. September 10th, 2025 SOMI filed a collective damage claim against Meta with the Higher Regional Court of Berlin (Kammergericht) in Germany.
- b. September 29th, 2025 Mr. Franke Spoke on behalf of SOMI at the National Hearing on Social Media and Search Engines in Copenhagen, Denmark.
- c. September 29th, 2025 SOMI sent a warning letter to Meta in Denmark regarding violations of EU-data protection regulation.

October 2025

- a. SOMI app version 3.1.11 is launched with the addition of Dutch language option, the introduction of an online chat and option to download documents feature, improved UI-design and bugfixes.
- b. October 7th, 2025; court ruling from the Netherlands Commercial Court of Appeal (NCCA) in Amsterdam, the Netherlands regarding the admissibility of SOMI and non-collective damages.
- c. October 15th, 2025; interim judgement from the District Court in Amsterdam with regard to SOMI v Meta whereby the main case has been scheduled for Wednesday April 1st, 2026 and the proceedings were put on hold, pending the answers of the CJEU tot the preliminary questions referred by the District Court of Rotterdam in the Amazon case.

November 2025

- a. November 5th, 2025 SOMI filed a petition against X (Twitter) with the Corporate Court in Brussels, Belgium.
- b. SOMI app version 3.1.18 is launched with bugfixes. ‘
- c. November 25th, SOMI filed a petition against TikTok with the Tribunal Court in Milan, Italy.

December 2025

- a. No updates.

The above overview is a summary of some details, some of which have already been included in our Newsletters. Throughout 2025, SOMI kept the public, media and opinion leaders informed about its activities, especially in the GDPR area, by newsletters, email, website chat and telephone.

Fees

17. The members of the Board of Directors receive a management fee for their services to the Foundation.
18. For meetings of the Board of Directors or joint meetings with the Supervisory Board and for additional services related to the activities of the Foundation, the members of the Board of Directors are entitled to a compensation of EUR 75 per hour.
19. The members of the Board of Directors are also entitled to reimbursement of costs reasonably incurred (for example travel expenses) in the performance of their services, provided that these costs are properly substantiated.

Closing

20. In 2025, the Directors maintained regular contact in varying compositions, both in person and through digital communication. Where appropriate, meetings were held in Arnhem and Amstelveen/Badhoevedorp, partly in person and partly via video connections, sometimes in the presence of the Supervisory board members and with the support of campaign leaders, lawyers and advisors of the Foundation. Where there was a (potential) conflict of interest due to the financing of SOMI by (companies of) Mr. Franke, deliberations and decision-making on these matters took place without Mr. Franke's presence.

Board of Directors

Hans Franke
Jan van den Broek
Noora Mäki

**ANNUAL ACCOUNTABILITY IN MAIN LINE ON THE SUPERVISION EXERCISED
STICHTING ONDERZOEK MARKTINFORMATIE
2025**

Supervisory report ex art. 305a BW paragraph 2 sub d under 3

Introduction

1. Stichting Onderzoek Marktinformatie ('SOMI' or the 'Foundation') was established on May 31, 2016. Since its inception, the Foundation has always included the report of its activities in its newsletters, which have been posted on its site. Initially, the Foundation's website was www.kenniscentrumvastgoedfinanciering.nl, but it has since been succeeded by www.somi.nl, which is hereinafter referred to as the "Site" of the Foundation.
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3. SOMI is a non-profit foundation under Dutch law, established to identify and influence issues of social importance. The Foundation focuses on the functioning of markets in the areas of privacy, the elderly, housing and healthcare. SOMI is open to initiatives from third parties but is currently particularly committed to protecting the fundamental rights of consumers and minors who use online services.
4. The Foundation acts in the collective interest of the (legal) persons for whom it acts in accordance with its statutory objectives. The statutory objective, the actual activities and the governance of the Foundation show that the Foundation and the directors affiliated with the Foundation do not have a profit motive in the performance of the Foundation activities.
5. The governance of the Foundation is laid down in the articles of association. The Supervisory Board has the task of supervising the policy of the board and the general affairs of the Foundation and provides the board with advice. In fulfilling its duties, the Supervisory Board and its individual members focus on the interests of the Foundation and the persons it represents.
6. On the date of adoption of this annual general accountability for the supervision exercised, the members of the Supervisory Board of the Foundation were: Wijnand Prins, Sergei Purewal and Najat Idrissi (hereinafter each individually and jointly; the '**Supervisors**'). The composition of the Foundation's Supervisory Board was last changed on July 8th, 2024.
7. On November 14th 2022, Menno Weij resigned as a member of the Supervisory Board and was succeeded by Najat Idrissi as of July 8th, 2024. However, Menno Weij did not fully resign from the Foundation, as he has since been a member of the Board of Recommendations.

8. Najat is one of the few lawyers who specializes in indirect taxes. This includes VAT, customs duties and excise duties. In addition to her legal work, she lectures and received her PhD from Erasmus University in Rotterdam. She is a frequent author on VAT and a speaker at meetings or conferences. Finally, she is a member of the Dutch Association of Tax Advisers.
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14. Through this Supervision Report, the Supervisors provide an annual account, to the extent not already included in the Foundation's newsletters relating to the year 2025 (the "**Newsletters**") with any documents or information to which they refer by way of links or attachments, which are an inseparable part thereof and which are then posted on the Site within eight days of their adoption by the Directors. This Supervisory Report, together with

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- f. The members of the Supervisory Board are also entitled to reimbursement of costs reasonably incurred (for example travel costs) in the performance of their services, provided that these costs are properly substantiated.

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15. In 2025, the Supervisors maintained regular contact in varying compositions, both in person and through digital communication. Where appropriate, meetings were held in Arnhem and/or Amstelveen/Badhoevedorp, partly in person and partly via video connections, sometimes in the presence of the Directors and with the support of campaign leaders, lawyers and advisors of the Foundation. Where there was a (potential) conflict of interest due to the financing of SOMI by (companies of) Mr. Franke, deliberations and decision-making on these matters took place without Mr. Franke's presence.
16. Overall, the Supervisory Board has a good picture of the policies pursued by the Board in 2025 and has always been well informed by the Board in this regard.
17. The Supervisory Board notes that the Foundation has further intensified its litigation and advocacy efforts in 2025 and that the existing proceedings have been pursued with great diligence and care. At the same time, the Board has conducted extensive research and has continued to strengthen the Foundation's governance structure, while actively exploring opportunities for both external and internal financing. The Supervisory Board considers this level of commitment to be commendable.
18. In addition, the Supervisory Board notes that the Board has actively sought cooperation with various expert partners in order to pursue the Foundation's statutory objectives and to promote the interests of its supporters in the most effective manner.
19. The Supervisory Board further observes that, in 2025, the Foundation initiated a series of new legal actions against X (Twitter), TikTok, and Meta in several EU jurisdictions, including Germany, France, Belgium, Denmark, and Italy. In parallel, the Foundation has launched and further developed the SOMI app to support these activities.
20. The Foundation currently has sufficient financial resources to continue and conclude the various proceedings, as well as to initiate new proceedings where appropriate. This has been made possible in part by the financial and personal contributions of Mr. Franke, the issuance of profit rights, and growing external support.

21. Finally, the Supervisory Board looks forward to the continued development of these proceedings and to what 2026 will bring for the Foundation and its supporters.

22. The Supervisory Board therefore expresses its full confidence in the Board of the Foundation.

The Supervisory Board

Wijnand Prins
Sergei Purewal
Najat Idrissi