

Dutch Advocaten Privacy Statement

This is the privacy statement of Dutch Advocaten LLP, having its registered office at Sarphatistraat 370 in (1018 GW) Amsterdam, the Netherlands. This privacy statement applies to the processing of personal data belonging to our clients, potential clients, and other persons who visit our website or have contact with us.

This privacy statement contains information about how we handle personal data. If, after reading this privacy statement, you still have questions about how we handle personal data, or if you wish to avail yourself of your rights under the General Data Protection Regulation ("GDPR") or other laws or regulations relating to personal data, or if you wish to submit a complaint about the use of your personal data, you can contact us by telephone on +31 (0)20-2261200 or send us an e-mail at info@dutchadvocaten.nl. If you are dissatisfied about how your complaint is handled or if you would rather not submit your complaint to us, you are also free to submit it to the Dutch Data Protection Authority via autoriteitpersoonsgegevens.nl/en.

Dutch Advocaten is responsible for processing your personal data and will exercise the utmost care in this respect.

Which personal data do we process?

Files

If you engage our services, we process the personal data you provide us, as well as the personal data provided to us by other parties involved in your case. These in any event include:

- your contact details, such as your name, address, e-mail address and telephone number;
- a copy of your passport or identity document, with your citizen service number (BSN) rendered illegible;
- personal data that are relevant to the file. Which personal data are included differs from file to file.

In some instances, we also collect personal data ourselves regarding other parties involved in the case, for example, so that we can contact a person, business or institution.

Contact

If you contact us by e-mail, social media, or telephone, we process the personal data that you provide to us. That data includes the contact details you provide to us (name, e-mail address, telephone number) and the reason why you are contacting us (for example, because you have a question).

Analysis of website visitors

Finally, we process analytical data regarding visitors to our website (and their computers) via cookies that are saved if you visit the website. Via these cookies, all or part of a visitor's IP address is saved, with the last eight numbers of that IP address being masked.

For what purposes and on what basis do we process personal data?

File

We use the personal data that you provide in the context of your instruction for us to handle your file. The basis for this is the performance of the contract you conclude with us.

We use your data to invoice for our work and to refund any fee advances you may have overpaid. This processing is also essential to performing any contracts you conclude with us.

We keep a copy of new clients' passport or identity document because the code of conduct that applies to lawyers requires us to identify our clients and record proof of that identification. We might also be required to request this information based on the Dutch Money Laundering and Terrorist Financing Prevention Act (*Wet ter voorkoming van witwassen en financieren van terrorisme*). We render BSNs illegible because there is no statutory ground for processing those numbers.

We also use clients' names and information about their files in order to assess whether any conflicts of interest may arise.

We process personal data belonging to parties other than our clients if that is necessary to advancing our clients' legitimate interests.

Contact

We use the contact details you provide us by e-mail or telephone to contact you if necessary, for example, to answer a question. We process these personal data because this is necessary to advance our legitimate interest in performing our work and acquiring new engagements.

Invitations, Christmas mailing

We may also use your e-mail address to invite you to certain events we organise, such as seminars, and to send you holiday greetings. If you have engaged our services, we have an 'existing client relationship' with you and we send you these mailings based on our legitimate interest. If you have never used our services but have come into contact with us in some other way (such as by sending an e-mail with a question), we will only send you these mailings if you have consented to this.

Analysis of website visitors

The data we collect about the visitors to our website are only used to track statistics about the visit to the website (for example, so that we can see which pages are visited most often). The data is retained in anonymised form. The data sharing option is disabled. We do not use any other Google services in combination with Google Analytics.

How long do we retain your personal data?

File

In principle, we retain our files and the personal data they contain for a period of twenty years after the file is closed, in connection with the maximum prescription period/statute of limitations. In exceptional cases, we retain files longer than twenty years, such as when the prescription period is tolled or if the lawyer handling the case believes that another legitimate interest justifies retaining the file longer.

Accounting records

In order to meet our tax-related retention obligations, we retain our accounting records, including the invoices and other documents containing parties' personal data, for a period of seven years after the close of the relevant financial year.

Other contact details

We retain other contact details for a period of one year from our most recent contact, unless you submit a request to us to erase these details sooner.

Analysis of website visitors

The data relating to website visitors is retained for a period of two years after the visit to the website; this has to do with standard settings in Google Analytics.

With whom do we share your data?

Your data are stored in a digital filing and invoicing system and may be included in e-mails that we send or receive. Our ICT providers (including Legalsense) use this system to store (and thus process) the data. We have concluded processing agreements with these providers that ensure at least the same level of security and confidentiality which you are entitled to expect from us.

We may also provide your data to third parties if such is necessary to perform the services for which you have engaged us. For example, we might provide your file to a court, expert, or mediator.

If you submit, or someone else submits, a complaint against our lawyers in relation to our handling of a file which includes your personal data, your personal data might be provided to the Dean of the Amsterdam Bar Association. If the complaint is not resolved, your data might subsequently be provided to the Board of Discipline or – in the case of an appeal – to the Disciplinary Appeals Tribunal of the Dutch Bar Association.

The data that are collected via Google Analytics are processed by Google. We have concluded a processing agreement with Google.

We do not provide your data to any other third party unless an applicable law or regulation requires us to provide certain data, for example, to the police in connection with a criminal investigation.

How are your data secured?

We have taken suitable technical and organisational security measures to protect your personal data against loss, abuse, and unauthorised access by third parties. For example, we use strict access authorisation both offline and online, our servers are backed up regularly, and we work with secure connections. Our servers are in the Netherlands.

What are your rights?

You have the following rights:

- a. The right to examine your personal data and to receive a copy of those data.
- b. The right to rectify your personal data if these are incorrect or incomplete.
- c. The right to object to the processing and/or – in certain cases – to restrict the processing of your personal data.
- d. In certain cases: the right to have your personal data erased ('right to be forgotten').
- e. The right to receive your personal data in a structured, common and machine-readable format and to transfer those data to another party.

For more information about these rights and when you can exercise the: see Articles 15-20 of the General Data Protection Regulation.

You can exercise your rights by contacting us via the e-mail address or telephone number stated at the beginning of this privacy statement.

Changes

The personal data that we process or the applicable regulations may change from time to time. In that case, we will be entitled to amend this privacy statement. In the event of comprehensive changes, we will publish an announcement on our website or notify you of the change by e-mail.