

## PRIVACY STATEMENT WIJN & STAEL ADVOCATEN N.V.

Effective 25 May 2018

### Our vision on privacy

Wijn & Stael Advocaten N.V. ('Wijn & Stael') is a law firm in Utrecht. High quality, broad expertise, social commitment and decisiveness are important pillars for us. Protecting the personal data we process is also of great importance to us. We process the personal data of our clients and potential clients with whom we have had contact or wish to contact, recipients of our newsletters and all other persons who contact us.

When processing personal data in the Netherlands, Wijn & Stael is bound by the General Data Protection Regulation which took effect on 25 May 2018. In this privacy statement we explain how we protect your privacy and how we handle your personal data. If you have any questions about this privacy statement, please contact us as set out at the bottom of this statement. This privacy statement does not apply to persons working for Wijn & Stael, job applicants, temporary employees, staff brought in on loan and student trainees.

### Who processes your personal data

This privacy statement relates to the processing of personal data by Wijn & Stael as the data controller. Wijn & Stael is situated in Utrecht at the (3581 BE) Maliesingel 20. You can reach us by telephone during office hours on +31(0)30 - 23 20 800 and by e-mail via [privacy@wijnstael.nl](mailto:privacy@wijnstael.nl).

### What personal data do we process

Personal data are data that say something about you or data that can be linked to you. Everything that can be done with your personal data, for example the collection, storage, use, transmission or deletion of your data, is called the 'processing' of personal data.

We process personal data that you yourself have provided to us. These are contact details and other personal details required for the handling of your case by our lawyers, for example your name, address, postal code, place of residence, telephone number, e-mail address, company name, job title, bank account number, date of birth and other information that is necessary in order to be able to serve you. This may also include personal data that we obtain from other sources, such as personal data from the

Commercial Register of the Chamber of Commerce or the Land Register, and personal data available on public business and other websites.

We can also obtain your personal data from other parties.

### **Why and on what grounds do we process your personal data**

In order to be able to carry out our work properly, we need to collect and process your personal data. We will process your personal data if this is necessary for executing the letter of engagement you entered into with us for the provision of legal services by our lawyers. Your personal data is used to keep in contact with you about your case. Your contact details are also entered into our client database and can—if you have given us your permission—be used to send you newsletters and invitations to a seminar or event, for example. Depending on the nature of your case, personal data other than your contact details may also be required. Your personal data is also used to send you our invoices.

We are also legally obliged to record certain personal data in some instances. For example, under the Dutch Money Laundering and Terrorist Financing (Prevention) Act (*WWFT*), we are obliged to store a copy of your identity document or passport.

We can also process your personal data if we have a legitimate interest and do not disproportionately invade your privacy.

### **How we process your personal data**

We have taken technical and organisational measures to protect your personal data and to prevent abuse. For example, we ensure that the systems in which we store your personal data are as secure as possible. Your personal data will only be used within Wijn & Stael by those employees who, given their position, need to have access to it.

In addition, all the information we receive from our clients is protected by the professional privilege to which our lawyers are bound.

We can also engage service providers (processors) to process your personal data.

For example, we work with processors who provide us with hosting services or ICT support. We also use processors to send out our newsletters. For that purpose, we conclude processing agreements with these processors in which they guarantee that they will comply with the requirements of the General Data Protection Regulation.

### **Who we share your personal data with outside the EEA**

To send our newsletter and mailings, we use a processor situated in the United States, i.e. outside the European Economic Area (EEA). This processor participates in the EU-US Privacy Shield. Because this processor meets the strict requirements of this EU-US Privacy Shield, we are allowed to exchange data with this processor. For more information about the EU-US Privacy Shield, please consult: <https://www.privacyshield.gov/welcome>.

### **How long we store your personal data**

We take great care to ensure that all your data is carefully stored and protected. We have a retention policy which stipulates how long we store personal data and we do not store your data for any longer than is necessary for the purpose for which it was processed. We comply with the statutory retention periods. We keep client files containing personal data for a period of 10 years after the letter of engagement has been terminated, unless there are reasons to retain this file for a longer period.

### **Who we share your personal data with**

In principle, we do not share your personal data with third parties. However, it may sometimes be necessary to share your personal data with third parties. For example, it may be necessary to share your personal data with judicial authorities or other parties. It may also be necessary to share your personal data for the conclusion of a contract or the execution of a notarial deed. In some cases, transactions must be recorded, for example, in the Commercial Register of the Chamber of Commerce or in the Land Register. Data may also be shared with contractors engaged by us, such as bailiffs. Furthermore, we may be legally obliged to share your personal data with third parties. If a court decision orders us to share your personal data with third parties, we are obliged to comply with this.

Your personal data will not be shared with third parties for commercial purposes.

### **Your rights: view or modify your personal data**

Would you like to know what personal data we have recorded about you? At Wijn & Stael you can request an overview of the personal data that has been or will be processed about you. If you find that your personal data have been processed incorrectly or incompletely, or if you feel that certain personal data need not have been processed, you can submit a

request to Wijn & Stael and ask us to amend, supplement or delete your data. You also have the right to object to the processing of your personal data and you have the right to data portability (i.e. you can ask us to send data either to yourself or another organisation). In addition, you have the right to withdraw any consent granted for the processing of your personal data, This is the case, for example, if you no longer wish to receive our newsletter.

If you send us a request regarding the processing of your personal data, we will let you know what action we have taken as soon as possible, but in any event within four weeks of receiving your request. Because the lawyers working for Wijn & Stael are bound by a duty of confidentiality, we cannot grant access to data processed in the context of our services.

If you have any questions or complaints about Wijn & Stael's processing of personal data, please send an e-mail to [privacy@wijnstael.nl](mailto:privacy@wijnstael.nl) or submit written requests to:

Wijn & Stael Advocaten N.V.  
Attn.: Mrs R.P. O'Connor  
Access request personal data  
Maliesingel 20  
3581 BE Utrecht

### **Lodging a complaint with the national regulatory authority**

The Dutch Data Protection Authority checks whether undertakings comply with the General Data Protection Regulation. If you believe that we do not comply with applicable privacy laws, please contact us. We will gladly help you resolve any issues. If the issue cannot be resolved, you are entitled to lodge a complaint with the Dutch Data Protection Authority.

### **About this privacy statement**

The rules in the field of privacy law change regularly, and consequently our privacy policy is never definitive. We keep our privacy policy updated and may therefore amend this privacy statement from time to time. If you wished to be kept informed of any changes, we will ensure that you are notified accordingly. The most current version of our privacy

statement can always be found on our website. This privacy statement was last amended on 25 May 2018.