

LOYR privacy statement

LOYR is a young and modern law firm in Amsterdam. We give advice to our clients and represent their interests, particularly in the following areas of law: corporate law, real estate law, employment law, privacy law and sports law. For us to provide our services, we ask all our clients and prospective clients to provide us with data that we collect or otherwise use for the purpose of advising our clients, providing legal assistance and/or improving the services we already provide and aligning our services with our clients' needs. LOYR is therefore considered to be the data controller, as referred to in the GDPR.

This privacy statement explains how we handle your personal data. We respect the privacy of our (potential) clients, business relations, job applicants and the users of our website. We make sure that we process the confidential personal data that you have provided to us in accordance with the applicable privacy laws and regulations and that we respect their confidentiality.

1. Whose personal data do we process?

We process personal data of the following categories of natural persons:

- clients and potential clients;
- job applicants;
- visitors to our website: www.LOYR.nl;
- subscribers to our newsletters;
- participants in our events;
- any other person who contacts us to build a business relationship.

2. Purpose of processing personal data

We process your data for the following purposes:

- performing agreements entered into to provide legal services;
- invoicing the work we have carried out;
- complying with the statutory obligations, such as the Netherlands Money Laundering and Financing of Terrorism (Prevention) Act (*Wwft*), the Netherlands Sanctions Act (*Sanctiewet*) and the laws and regulations that apply to the legal profession;
- managing our client database;
- carrying out (targeted) marketing and promotional activities and/or events to establish, maintain or expand a relationship with (potential) clients, including sending out newsletters or specific information;
- personalising the website and recommending services you might find of interest.
- evaluating our services and/or an event (such as a workshop or seminar), based on evaluation forms completed by participants;
- sending out newsletters. If you are interested, you can register via our website, where you can also unsubscribe. You can also unsubscribe by sending an email to: info@loyr.nl.
- further development and improvement of the website. The user statistics of our website provide us with information about the number of visitors, the duration of their visit, which parts of the website were viewed and the browsing behaviour of visitors. Based on user

statistics, we can check whether the current website is functioning properly. If we find that certain parts require improvement, we will change our website accordingly. These are generic reports that cannot be traced back to individual visitors.

3. How do we collect your personal data?

We collect data:

- provided to us personally (during a meeting or event), by telephone or digitally (via email or forms on the office website), these may include contact details and - depending on the nature of the event or business - other personal data;
- provided by a professional liability or legal assistance insurer, professional or trade association for the purpose of handling a case;
- generated during visits to our website or when our digital newsletter has been read, such as the IP address, browsing activities on the website (such as data about the initial, previous and current visit, the pages that have been viewed and the way in which the website is navigated) and click behaviour on the website;
- obtained from other sources, such as public business websites, the Trade Register of the Chamber of Commerce, business social media platforms such as LinkedIn and the Land Registry.

4. What personal data do we process?

We process the following personal data that are necessary for us to perform our services:

- Contact details, such as your name and address, telephone number and email address;
- Data relating to your identity document, such as passport or driving licence number;
- Data about your age, gender, nationality, marital status or family structure;
- Data about your employment, such as income, position, employer, employment history;
- Data about your company;
- Information about your financial situation, assets and any debts;
- Data about your current financial products, such as bank accounts or insurances;
- Special personal data, such as your medical data and Citizen Service Number (BSN number) (if necessary for our services or if you have given your explicit consent).

If you have applied to us for a job, we will process the following data:

- Contact details, such as name and address, telephone number and email address;
- Your date and place of birth;
- Data about your education, previous jobs and employment-related data, such as income, position, employers, employment history;
- any other data you have provided to us, such as your professional abilities (and the languages you speak) and whether or not you hold a driving licence. Sometimes job candidates also provide their photo and/or a vlog and/or include information about their marital status, their family structure, their leisure activities and interests, a link to their LinkedIn profile and possibly their own personal website.

For any other purposes, we process the following data:

- IP addresses, location data and cookies;
- email address and telephone number.

5. Legal basis for processing

We process personal data pursuant to the following legal bases:

- an agreed contract entered into for providing legal services;
- a legal obligation, such as under the Dutch Money Laundering and Financing of Terrorism (Prevention) Act (Wwft) and the laws and regulations for the legal profession;
- a legitimate interest, such as using contact details to invite you to an event (such as a workshop or a seminar) or to send our office newsletter;
- a specific purpose for which you have given us your explicit consent*.

* Any consent you have given us can be revoked at any time. This means that the previous processing of your data remains lawful, but we will no longer use your data in the future.

6. Storing data

We do not store your personal data for longer than necessary and, in principle, we apply the following retention periods:

Case files: up to seven years after the case is closed;

Job application letters and CVs: up to one month after the vacancy has been filled, unless you have given us explicit consent to store these documents. In that case, we store them for one year;

For data that you have provided to us via the website or an email without this leading to an agreement with us: no more than thirty days after the initial contact.

Recipients of our newsletters or guests at our events: up to five years after unsubscribing from the newsletter and/or after being invited to one of the events, unless you object to this, in which case we will delete the data immediately.

7. Security

We have taken appropriate technical and organisational measures to protect your personal data. We guarantee that - in accordance with current technological developments - the protection of personal data is sufficient to prevent any unlawful processing, unauthorised access, modifications, disclosure or loss of data as much as possible. If possible, we will ensure the data is encrypted.

Only employees who are authorised to do so on account of their functions have access to the personal data. They are contractually bound by a confidentiality clause. Lastly, we only use your personal data for the purposes for which we have received the data.

Reporting Data Breaches

Access to personal data by unauthorised persons constitutes a data breach.

We keep an internal register of all data incidents, whether large or small. In the event of a data breach leading to the considerable risk of serious adverse consequences for the protection of personal data, or if these consequences have already happened, we will report the data breach to the Dutch Data Protection Authority. We will also report the data breach to the person whose data has been breached, if the breach is likely to have or will have an adverse impact on their privacy and we have no compelling reason not to make this report.

8. Confidentiality and disclosure to third parties

We handle your data with the utmost care. We do not sell your data to third parties and only disclose data to third parties if this is necessary for the performance of an agreement or if we have to comply with a legal obligation. When handling a case, it may be necessary for us to share personal data in the course of legal proceedings, for example with a judicial authority, the bailiff, (the lawyer of) the other party or for invoicing the services (for example, the Legal Aid Council or an insurance company).

We enter into processing agreements with companies that process your data on our behalf; in these agreements, we stipulate the same level of security and confidentiality for your data. This means that any third parties engaged by us are also obliged to respect the confidentiality of your data and to make sure your data is properly secured.

9. Transfers to outside the EEA

In principle, we do not transfer personal data to countries outside the European Economic Area (EEA). Should this nevertheless be necessary, we will ensure that the transfer only takes place if the European Commission has ruled that the relevant country offers an adequate level of protection or if there are sufficient appropriate safeguards as referred to in the General Data Protection Regulation (GDPR).

10. Rights

As a data subject, you have the right to access your personal data and to request that we correct, supplement, delete or restrict your data. In order to prevent third parties from getting access to your data, you can only access your data if you ask us to do so in person, so that we can establish your identity with certainty.

You can then ask us to rectify or delete the data we have about you. We will delete your data if they are factually inaccurate, incomplete or irrelevant to the purpose for which we have collected them or if we have used them in any other way that is contrary to the law.

You also have the right to ask for a restriction of data processing. This means that you can ask us to stop one part of the data processing and continue another part. You also have the right to data portability, which means that we provide you with your data in compressed format, to ensure easy transferability to a third party or third parties. We can also send this compressed data directly to the relevant third party, but of course only with your permission and specific instructions.

You can also object to the data processing if you believe that your specific interests outweigh our legitimate interest in processing the data. If you object to the data processing, we will carefully consider your objections and then make a considered decision regarding the data processing to which your objection relates. If you do not agree with that decision, or if you have other objections against the way in which we handle your data, you can submit a complaint to the Dutch Data Protection Authority.

You also have the right not to be subjected to automated decisions, the right to an effective judicial remedy and the right to compensation in the event of a breach of privacy. Lastly, data subjects now also have a right to bring collective actions.

If you wish to exercise any of your rights, you can contact us by telephone on 020 - 8204467 or by email to: info@loyr.nl.

11. Changes to the privacy statement

We may make changes to this privacy statement. We will only inform you by email if we make any substantive changes to the content of this privacy statement. We therefore recommend that you regularly check the privacy statement on our website. That way you will be kept informed of all changes. The privacy statement can be found at the bottom of our website.

12. Questions and contact

The purpose of this privacy statement is to give you clarity about the way in which we handle your data. We regularly check whether we still comply with the provisions of this privacy statement. If, despite these efforts, you feel that we are not acting in accordance with privacy laws or if you have any other questions, please feel free to contact us.

We trust that in such a case we will be able to find a satisfactory solution together. If, however, we cannot agree on a solution, you can submit a complaint to the Dutch Data Protection Authority via: <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/gebruik-uw-privacyrechten/klacht-melden-bij-de-ap>.

If you have any queries about this privacy statement or any other questions, you can contact us via:

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