

PRIVACY STATEMENT

LOYR (KvK 65667220), located in (1103 AD) Amsterdam at the address Daalwijkdreef 47, is responsible for the processing of personal data. This privacy statement explains how LOYR handles data of identified or identifiable natural persons.

LOYR respects the privacy of our (potential) clients, our relations, our applicants and of visitors to our website. LOYR processes the personal information you provide to LOYR in accordance with applicable laws and regulations for the protection of personal data and treats it as confidential. This privacy statement informs you as a data subject about the use of your personal data, the purpose of the processing within LOYR, the security of the data, your rights as a data subject, such as the right of inspection and of deletion of your data and about the possible recipients of the data.

1. Definition of terms

- general terms and conditions: the general terms and conditions of LOYR;
- data subject(s): the person(s) whose personal data are processed;
- personal data: any (particular) personal data directly or indirectly traceable to a natural person as referred to in Article 4 of the General Data Protection Regulation (GDPR);
- processor agreement: an agreement to be concluded between a controller and a processor under the AVG in which the processor provides a number of minimum guarantees with respect to the processing of personal data;
- handling/processing: the processing of personal data;
- Website: the LOYR website: www.loyr.nl;

2. From whom does LOYR process personal data?

LOYR processes personal data of the following categories of natural persons:

- (potential) clients;
- applicants;
- visitors to our website, www.loyr.nl;
- recipients of newsletters from LOYR;
- participants in LOYR meetings;
- all other persons who contact LOYR to establish a business relationship with.

3. Purpose of processing personal data

LOYR processes the data you provide for the following purposes:

- Performing a contract of assignment to provide legal services;
- Declaring the work done;
- Complying with legal obligations, such as the Prevention of Money Laundering and Financing of Terrorism Act (Wwft and the Sanctions Act, which includes the obligation to complete/check the UBO register) and the laws and regulations governing the legal profession;
- Managing LOYR's relationship file;
- Carrying out (targeted) marketing and promotional activities and/or events to establish, maintain or expand relationships with (potential) clients, including by sending newsletters or information of a specific nature.
- To personalise the website and recommend our services that may be of interest. You can easily refuse cookies on our website by selecting the 'refuse' button.
- Evaluating our services and/or a meeting (such as a workshop or seminar), based on evaluation forms completed by participants;
- To send newsletters. In the newsletter you will find the option to unsubscribe easily. If it is missing by mistake, you can send an e-mail message to hello@loyr.nl.
- To further develop and improve the website. User statistics of the office website provide information on the number of visitors, the duration of the visit, which parts of the website are viewed and the click behaviour. Based on user statistics, LOYR can see whether the current website is functioning properly. If LOYR sees that parts of the website need to be improved, LOYR adapts the website. These are generic reports, not traceable to individual visitors.

4. How and/or from whom does LOYR obtain personal data?

LOYR obtains personal data that:

- you have provided to us in person (during a meeting or meeting), by telephone, or digitally (via e-mail or by filling in web form from the website), such as contact details and -depending on the nature of the occasion or matter- other personal data;
- provided to us by a professional liability or legal expenses insurer, a professional or trade association or any other referring party for the handling of a case;
- generated during a visit to our LOYR website or while reading digital newsletters, such as the IP address, browsing behaviour on the website (such as data on the first visit, previous visit and current visit, the pages viewed and the way of navigating through the website and the extent to which and by which addresses the newsletter was read) and which parts of it were clicked on;
- LOYR also derives personal data from other sources, including business social media platforms such as LinkedIn, public business websites, the trade register of the Chamber of Commerce, the Ubo register, the Land Registry, such as completed and required contact details and other personal data.

5. What personal data does LOYR process?

LOYR processes the following personal data necessary for the performance of its services:

- Contact details, such as name, address, phone number, e-mail address;
- Details of an identity document, such as passport or driving licence number;
- Age, gender, nationality, marital status, family composition;
- Employment data, such as income, position, employer, employment history, level of pay, etc., (correspondence on) performance;
- Details of your business;
- Details of your financial situation, assets and any debts or those of your company;
- Data on current financial products, such as bank accounts or insurance;
- Special personal data, such as your medical data and BSN (to the extent necessary for our services and only on the basis of your explicit consent).

LOYR processes the following data for an application process:

- The data provided to us by the candidate.

In general, applicants provide us with at least their name and address details, telephone number, e-mail address, date and place of birth, nationality, level of education, work experience, skills (and languages mastered) and whether or not they hold a driving licence. Sometimes they also provide their photo and/or a vlog and/or include details of their marital status, family composition, leisure activities and interests, a link to their LinkedIn profile and possibly their personal website.

LOYR processes the following personal data for other purposes:

- IP addresses, location data and cookies;
- e-mail address and phone number.

6. Legal basis of the processing operations

LOYR processes personal data on the following legal grounds:

- Performing the contract of assignment to provide legal services;
- Your express consent for specific purposes, which consent you can withdraw at any time. If you withdraw your consent, this does not affect the lawfulness of the processing based on the consent before the withdrawal;
- a legal obligation, such as under the Wwft (part of which is the Ubo registration obligation and check) and the laws and regulations governing the legal profession;
- a legitimate interest, such as the use of contact details to invite you to a meeting (such as a workshop or seminar) or to send the office newsletter.

7. Profiling

LOYR does not use profiling. Nor do we subject our clients to automated decisions.

8. Data security

LOYR has taken appropriate technical and organisational measures to secure the personal data provided to us. We ensure that, given the state of the art, the security of the personal data is sufficient to prevent unlawful processing, unauthorised access, modification, disclosure or loss of the data as much as possible. To the extent possible, we ensure data encryption.

Only employees authorised to do so by virtue of their job have access to personal data. In doing so, they are contractually bound by a confidentiality clause. Moreover, we use the personal data only for the purposes for which we received them.

Mandatory data breach notification

When personal data ends up in the hands of an unauthorised person, we speak of a data breach. In practice, a data leak often occurs when an employee accidentally leaves his laptop, phone and/or a USB stick in public transport or another public place or when these are stolen, when a company's data are hacked, when an employee accidentally sends a file containing personal data by e-mail to an unauthorised person, or when computer files are leaked in some other way. LOYR records all data breaches (minor and major) internally.

If there is a data breach with a significant probability of serious adverse consequences for the protection of personal data or if such consequences have already materialised, LOYR will report the data breach to the Personal Data Authority (AP). LOYR shall also report the data breach to the person whose data is affected if it has or will in all likelihood have adverse effects on his or her privacy and LOYR has no compelling reasons for withholding the report.

9. Retention of data

LOYR does not retain personal data longer than necessary. In principle, LOYR uses the following retention periods:

Your file: seven years after the last substantive communication.

Letters of application and CVs: one month after the vacancy has been filled, unless the candidate has expressly consented to their retention for one year;

Data provided via the website or e-mail without leading to an agreement with LOYR; thirty days after initial contact.

Recipients of LOYR newsletters and invitees to meetings: five years after unsubscribing to the newsletter and/or inviting you to one of the meetings, unless you have previously objected to this in which case LOR will immediately proceed to destruction.

10. How do we handle confidentiality and disclosure of data to third parties?

LOYR is careful with the data LOYR receives from you. LOYR does not sell data to third parties and only provides it to third parties if:

- .) this is necessary for the execution of the agreement; or
- b .) to comply with a legal obligation.

The handling of a case may require the sharing of personal data as part of legal proceedings, such as with a judicial authority, the bailiff or (the lawyer of) the opposing party or the declaration of services (such as to the Legal Aid Board or an insurer).

With companies processing your data on behalf of LOYR, LOYR enters into a processor agreement, in which the same level of security and confidentiality of your data is agreed.

The third parties engaged by LOYR are obliged to respect the confidentiality of your data and secure it properly.

11. Transfer outside the EEA

In principle, LOYR does not transfer personal data to countries outside the European Economic Area (EEA). If this should nevertheless be necessary at any time, LOYR will ensure that the transfer only takes place if the European Commission has ruled that the country in question offers an adequate level of protection or if there are adequate safeguards within the meaning of the General Data Protection Regulation (AVG).

12. Provision of personal data is not mandatory

LOYR would like to emphasise that it is not mandatory for you, as a visitor to our website or as a client of LOYR, to provide us with your personal data. If you want to use our services, we do need at least your name and address details and contact information for contacting you and sending your invoice. In addition, it is generally not possible to provide our services without receiving more data. This is because we will have to carry out an analysis of the problem and will need a number of documents for this purpose, depending on the problem.

It is always a voluntary choice whether to engage with us and send us documents. You can revoke the assignment given to us in the way we have agreed in the concluded agreement and/or in our general terms and conditions. You can then request us to destroy your data. If permitted by law, we will do so as soon as possible.

13. Changes

LOYR reserves the right to change its privacy statement. If there are substantial changes, we will notify you by e-mail. Therefore, please check this privacy statement regularly, which can be found at the bottom of our website.

Rights, feedback, questions and complaints

As a data subject, you have the right to access your personal data and request that we correct, supplement, delete or block it. You can also request us to rectify or delete the data known about you. We will delete your data if it is factually incorrect, incomplete, irrelevant for the purpose for which we collected it or if we have otherwise used it in violation of any law.

You further have the right to restrict data processing. This means that you can ask us to stop processing part of the data and continue processing another part. You also have the right to data portability, which means that we will provide you with your data in a compressed form so that you can easily provide it to a third party or third parties. We may also send this compressed data directly to your desired third party, but obviously only with your consent and specific instruction to do so.

You also have the right not to be subjected to automated decisions, the right to an effective remedy in court and the right to damages if there is a breach of privacy. Finally, data subjects now also have a collective right of action.

In addition, you can object to data processing if you consider that your specific interests outweigh our legitimate interest in processing it. If you object to data processing, we will weigh your objections and then make an informed decision regarding the data processing to which your objection relates.

If you do not agree with that decision, or otherwise feel that LOYR is not acting in accordance with privacy legislation, or otherwise object to the way we handle your data, we would of course like to hear from you. LOYR trusts that we will be able to find a solution together. Naturally, you can also choose to submit a complaint to the Dutch Data Protection Authority (AP). You can easily submit your complaint via the AP's [website](#). The AP does set the condition that you have first submitted your complaint to the person concerned before submitting it to them. We would like to emphasise that LOYR is open to your feedback and you should not hesitate to inform us of your complaint.

You can send a request to exercise your rights by email to dubois@loyr.nl. You can also contact LOYR by telephone on 020 - 8204467.

Version July 2022