

PRIVACY POLICY HJ ADVOCATEN CLIENTS

General

is an Amsterdam-based law firm trading under the name HJ Advocaten & Mediators (registered with the Chamber of Commerce under number 50860755). Our firm is located at Weesperzijde 99-A in Amsterdam (hereinafter: 'HJ Advocaten & Mediators' or 'we' or 'our').

In representing our clients' interests, we process personal data. These are data of identified or identifiable natural persons that can be traced back directly and/or indirectly to a person (hereinafter: 'data subjects').

HJ Advocaten treats such information with due care and respects the privacy of our clients by handling these data confidentially. In processing personal data HJ Advocaten & Mediators is the controller as defined in the General Data Protection Regulation (hereinafter: 'GDPR').

This privacy policy implements the duty of information imposed by the GDPR on controllers. This policy relates to (potential) clients (hereinafter: 'clients').

Processing Purposes

The lawful processing of personal data requires a legitimate purpose. We process the personal data of our clients for the reasons listed below:

- I. To maintain contact with clients and business relations where applicable;
- II. To execute instructions to provide legal services, including advice, mediation and conducting (legal) proceedings;
- III. To refer clients (in consultation with the client);
- IV. To charge clients for services provided and to collect invoices;
- V. To comply with legal and statutory obligations (including the Money Laundering and Terrorist Financing (Prevention) Act ('Wwft'), the Act on Advocates and the guidelines of the Dutch Bar Association ('NOvA') and the State Taxes Act ('Awr').

Personal Data to be Processed

The personal data we process:

- I. Have been provided by our clients at their initiative;
- II. Have been obtained from parties with whom clients have been in contact about possible referrals; and/or
- III. Have come to our notice via public sources (like the trade register of the Chamber of Commerce, the Land Registry Office and/or company websites) (insofar as relevant to the services).

Depending on the instructions, the services to be provided and/or the type of client (natural person or legal entity), HJ Advocaten & Mediators processes the following (categories of) personal data of its clients:

- I. Contact details (first and last names, telephone number, e-mail and physical addresses);
- II. Identity details, whether or not in the form of an ID if provided (date and place of birth, nationality, BSN number, gender);
- III. Financial details (bank account number).

In line with the GDPR we process as few personal data as possible. We need the personal data that we request and process to provide our services.

Principles of Data Processing

The lawful processing of personal data requires a legitimate basis. HJ Advocaten & Mediators processes the personal data of its clients on the legal bases mentioned in the GDPR:

- I. Consent has been granted for processing (by the client getting in touch with us, whether or not via a referring party);
- II. Processing is necessary for the execution of the brief given to us by clients;
- III. Processing is necessary to meet legal obligations (for instance those arising from the Money Laundering and Terrorist Financing (Prevention) Act, the rules of the Dutch Bar Association and the State Taxes Act).

Sharing of Personal Data with Third Parties

If necessary for the provision of services and/or organisation, we will share the personal data we process with third parties. We do so with due observance of the purposes referred to above. Third parties with whom we could share personal data include:

- I. ITC suppliers;
- II. accountant;
- III. Judicial agencies (in consultation with clients in case of legal proceedings);
- IV. Experts, including accountants, civil law notaries and/or lawyers (in consultation with the client);
- V. Opposing parties (if applicable, and then in consultation with the client); and/or
- VI. Supervisory authorities and/or public authorities if required by law.

We carefully select the third parties with whom we share personal data at our initiative. They are parties with whom we have good experience.

We enter into data processing agreements and/or additional (security) arrangements with the third parties who process personal data on our instructions.

The third parties engaged by us that provide services as controllers will be responsible for compliance with the GDPR in the (further) processing of data.

Transfer of Personal Data

In principle, HJ Advocaten & Mediators processes personal data only within the Economic European Area ('EEA'). If personal data must be transferred to countries outside the EEA that offer a lower level of protection, we will take appropriate measures.

Protection of Personal Data

Not just the GDPR (among other things) requires us to protect and secure your personal data. Law firms are subject to a statutory duty of professional confidentiality, as are our lawyers. Confidentiality is one of the five core values of the legal profession and we take it very seriously.

Taking account of the state of the art, we will take technical – and organisational – measures that offer protection against the destruction, loss, alteration and/or unauthorised access to your (personal) data.

Retention Periods of Personal Data

In line with the GDPR a limited retention period applies to personal data. We retain personal data of job applicants with due observance of the above purposes and to enable compliance with the applicable laws and regulations.

Under the State Taxes Act administrative and accounting data must be retained for seven years.

In compliance with the rules of the Dutch Bar Association we retain our files for a period of five years.

Rights of Data Subjects

Under the GDPR data subjects have the rights listed below:

- I. Right to information about the processing of personal data;
- VII. Right of access to the personal data we process;
- VIII. Right to rectification, erasure (oblivion) and right to restriction of processing;
- IX. Right to object to data processing;
- X. Right to the transferability of personal data (data portability);
- XI. Right to withdraw consent previously given; and
- XII. Right to lodge complaints with the competent supervisory authority (www.autoriteitpersoonsgegevens.nl).



Data subjects can address requests to exercise the above rights to info@hjlaw.nl and/or the lawyer handling the file.

Only requests relating to the data subject's own data will be considered. HJ Advocaten & Mediators reserves the right to ask the data subject concerned for identification to ascertain that the information requested will be provided to the right person.

Under circumstances HJ Advocaten & Mediators can and may not or not fully honour requests, for instance because of applicable legal retention periods. In that case, we will explain why the request has been refused.

Changes in Privacy Policy

HJ Advocaten & Mediators reserves the right to change this privacy policy at any time, without prior notice. The most recent version of this policy will always be posted on our website (www.hjlaw.nl). Although in some cases we will inform clients directly about changes, we recommend clients to check our website regularly.

Questions, Requests, Contact

Clients can direct any questions about our privacy policy and/or the processing of personal data info@hjlaw.nl and/or the lawyer handling their file.

Of course, the same goes if clients wish to exercise any of the above rights and/or have a complaint about the processing of their personal data. In the latter case HJ Advocaten & Mediators kindly requests them to first contact the firm at the above e-mail address.

This privacy policy is dated November 2019.



PRIVACY POLICY HJ ADVOCATEN JOB APPLICANTS

General

HJ Advocaten B.V. is an Amsterdam-based law firm trading under the name HJ Advocaten & Mediators (registered with the Chamber of Commerce under number 50860755). Our firm is located at Weesperzijde 99-A in Amsterdam (hereinafter: 'HJ Advocaten & Mediators' or 'we' or 'our').

During job application procedures we process personal data. These are data of identified or identifiable natural persons that can be traced back directly and/or indirectly to a person (hereinafter: 'data subjects').

HJ Advocaten treats such information with due care and respects the privacy of job applicants by handling these data confidentially. In processing personal data HJ Advocaten & Mediators is the controller as defined in the General Data Protection Regulation (hereinafter: 'GDPR').

This privacy policy implements the duty of information imposed by the GDPR on controllers. This policy relates to persons who come to apply for a job with our firm.

Processing Purposes

The lawful processing of personal data requires a legitimate purpose. We process the personal data of job applicants to keep in touch with them and to schedule appointments where necessary.

Personal Data to be Processed

The personal data we process have been provided by job applicants at their initiative in their application letters and/or CV's.

Which personal data we process depends on the content of said letters and/or CV's. Usually they are contact details (first and last names, telephone numbers, e-mail and physical addresses). In addition, we may take notes during job interviews of answers to questions and/or our impressions of job applicants).

Principles of Data Processing

The lawful processing of personal data requires a legitimate basis. HJ Advocaten & Mediators processes the personal data of job applicants on the basis of consent as referred to in the GDPR. Job applicants contact us at their initiative and in doing so provide their personal data.

Sharing of Personal Data with Third Parties

If necessary for (the continuation and/or completion of) job application procedures we will share the personal data we process with third parties. We do so with due observance of the purposes referred to above. Examples of third parties with whom we could share personal data are:

- I. ITC suppliers;
- II. HRM experts/advisors;
- III. Regulatory authorities and/or public authorities, if required by law.

We carefully select the third parties with whom we share personal data at our initiative. They are parties with whom we have good experience. We share the personal data and documents submitted by job applicants with experts/advisors of our choosing only after consultation with and with the consent of the job applicant in question.

We enter into data processing agreements and/or additional (security) arrangements with the third parties who process personal data on our instructions.

The third parties engaged by us that provide services as controllers will be responsible for compliance with the GDPR in the (further) processing of data.

Transfer of Personal Data

In principle, HJ Advocaten & Mediators processes personal data only within the Economic European Area ('EEA'). If personal data must be transferred to countries outside the EEA that offer a lower level of protection, we will take appropriate measures.

Protection of Personal Data

The GDPR (among other things) requires us to protect and secure your personal data. Taking account of the state of the art, we will take technical – and organisational – measures that offer protection against the destruction, loss, alteration and/or unauthorised access to your (personal) data.

Retention Periods of Personal Data

In line with the GDPR a limited retention period applies to personal data. We retain personal data of job applicants with due observance of the above purposes and to enable compliance with the applicable laws and regulations. We will keep the data up to four weeks maximum from the time that it has become clear that a job applicant did not get the job. We may ask job applicants if we can keep their data and documents longer. If we obtain their consent, we will apply a term of 1 year maximum after the consent was granted.

Rights of Data Subjects

Under the GDPR data subjects have the rights listed below:

- I. Right to information about the processing of personal data;
- IV. Right of access to the personal data we process;
- V. Right to rectification, erasure (oblivion) and right to restriction of processing;
- VI. Right to object to data processing;
- VII. Right to the transferability of personal data (data portability);
- VIII. Right to withdraw consent previously given; and
- IX. Right to lodge complaints with the competent supervisory authority (www.autoriteitpersoonsgegevens.nl).

Data subjects can address requests to exercise the above rights to info@hjlaw.nl and/or the member of staff with whom they have been in touch.

Only requests relating to the data subject's own data will be considered. HJ Advocaten & Mediators reserves the right to ask the data subject concerned for identification to ascertain that the information requested will be provided to the right person.

Under circumstances HJ Advocaten & Mediators can and may not or not fully honour requests, for instance because of the applicable legal retention periods. In that case, we will explain why the request has been refused.

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Questions, Requests, Contact

Job applicants can direct any questions about our privacy policy and/or the processing of personal data info@hjlaw.nl and/or the members of staff with whom they have been in contact.

Of course, the same goes if job applicants wish to exercise any of the above rights and/or have a complaint about the processing of their personal data. In the latter case HJ Advocaten & Mediators kindly requests them to first contact the firm at the above e-mail address.

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