



PRIVACY STATEMENT

Loyal is a cost partnership consisting of partners. The partners can be natural persons or legal entities. In this Privacy Statement we inform you about how Loyal handles your personal data. This Privacy Statement applies to the processing of the personal data of the contact people at our clients, business relations and referrers, as well as to the visitors to our [website](#).

Loyal is the controller for the processing of your personal data. We may amend this Privacy Statement from time to time, if there are changes to how we process your personal data, for instance, or if this is necessary on the basis of regulations.

CONTENT OF THE PRIVACY STATEMENT :

1. To whom does this Privacy Statement apply;
2. What personal data does Loyal process in relation to you;
3. For which purposes do we process your personal data;
4. What is the legal basis for the processing of your personal data;
5. How did we obtain your personal data;
6. How long do we keep your personal data;
7. Who has access to your personal data;
8. Transfer of personal data to countries outside the EEA;
9. How do we secure your personal data;
10. Your rights;
11. Cookies;
12. Third-party websites;
13. Our contact details.

§ 1 . TO WHOM DOES THIS PRIVACY STATEMENT APPLY ?

1.1 This Privacy Statement applies to everyone who visits our website and to people whose personal data are processed by Loyal in the context of its legal services.

1.2 People whose personal data are processed by Loyal in the context of its legal services are:

- a. Our clients, private persons;
- b. Contact persons at our clients;
- c. Contact persons at our potential clients;
- d. Contact persons at our business relations;
- e. Contact persons at our referrers;
- f. Recipients of our communications, such as our newsletters and invitations for events organised by or in cooperation with Loyal;
- g. Visitors to our [website](#);



- h. People who contact us otherwise or whose personal data we process otherwise in the context of our services.

§ 2 . WHAT PERSONAL DATA DOES LOYAL PROCESS IN RELATION TO YOU

2.1 The personal data we process in relation to you are:

- a. Personal data you have provided to us;
- b. Personal data that give insight into the use of our website or other electronic means of communication;
- c. Personal data obtained from other sources.
- d. Personal data provided by you:
 - contact details and other personal data which are needed for our services provided by a lawyer. These are details such as your name, address, telephone number and identity documents;
 - contact details and other personal data filled in on contact forms or other web forms. The precise content of the data depends on the content of the contact forms and web forms;
 - contact details provided during initial meetings, events, seminars, etc. These may include details provided on business cards;
 - Other personal data that are provided by you.
- e. Personal data that give insight into the use of our website or other electronic means of communication. These could be data such as:
 - IP address (unique number identifying your device when you connect with the internet), which we use to measure your interest in our website;
 - your browsing behaviour on the website, such as data on your first visit, previous visit and current visit, the pages visited and how you navigate through the website;
 - the opening and reading of a newsletter or commercial email. This also includes clicking behaviour in the email or newsletter.In this context, we also refer to our Cookie Statement.
- f. Personal data obtained from other sources:
 - personal data available on public professional social media platforms such as LinkedIn. These are names and contact details;
 - personal data obtained from the Trade Register of the Chamber of Commerce and the Land Registry Office. This could include a Chamber of Commerce number and contact details;
 - personal data available on public professional websites, such as company websites.

§ 3 . FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA

3.1 We may use your personal data for the following purposes:

- a. To perform an agreement in which you have engaged us to provide you with legal services. When a lawyer handles your case your contact details will be requested in that context. Other personal data may also be necessary for the handling of the matter, depending on the nature of the case.

Data from other parties involved may also be processed. To perform legal services in and out of court.

- b. To invoice for services rendered.
- c. To comply with our statutory obligations. The Money Laundering and Terrorist Financing (Prevention) Act (Wwft) contains provisions regarding customer screening, identification and verification of customers, and the reporting of unusual transactions. [Wwft \(Prevention\) Act](#). The State Taxes Act requires us to process and save certain personal data.
- d. To stay in contact with you. We feel it is important to contact you with information that is relevant for you. We combine and analyse the personal data available to us in order to be able to do so. Based on this, we determine what information and channels are relevant and which moments are most suitable for providing information or making contact. In conducting marketing campaigns, we do not process any special personal data or any confidential data.
- e. To prepare analyses. To this end we use:
 - Interaction data: personal data obtained from contact between Loyal and you. For example, on your use of our website or supporting applications. This also applies to offline interactions, including how often there is contact between Loyal and you
 - Behaviour data: personal data that Loyal processes on your behaviour, such as your preferences, opinion, wishes and needs. We can derive these data from your browsing behaviour on our website, for instance, the reading of our newsletters or because you requested information. But also from inbound telephone conversations and email contact with our employees. We collect and use information obtained via tracking cookies only with your consent, which you can withdraw at any time. See also our Cookie Statement.
- f. To conduct client satisfaction surveys.

We sometimes ask clients to participate in a client satisfaction survey, by means of an online questionnaire. Participation is voluntary. Before each client satisfaction survey, you will receive further information on the procedure and the way in which we handle the information obtained.
- g. To improve and secure our website.
- h. To prepare user statistics.

The user statistics from the website enable us to get a picture of, among other things, the number of visitors, the duration of the visit, what parts of the website are viewed and the clicking behaviour of visitors. These are generic reports without any information on individual persons. We use the information obtained to improve the website.
- i. To perform audits.

4.1 We process your personal data only when this is permitted on grounds of one of the legal bases cited in the General Data Protection Regulation (GDPR). We are guided by the following legal bases:

a. Consent

- We ask your consent for participation in a client satisfaction survey.
- We ask your consent for the use of cookies on our website. See our Cookie Statement for more information on this.
- If we have requested and obtained your consent to process your personal data, you have the right to withdraw such consent at any time. You can do this here by contacting us: lawyers@loyal.nl

b. Necessity

- The processing is necessary in order to establish a contract or in the run-up to the establishment of a contract
- If you give us an assignment to provide legal services, we process personal data if and to the extent this is necessary.

c. Statutory requirement

- The Money Laundering and Terrorist Financing (Prevention) Act (Wwft) obligates Loyal to obtain and record certain personal data. This includes, among other things, a copy of identification (passport).

d. Legitimate interest

- We may also process personal data if we have a legitimate interest and this does not breach your privacy disproportionately. We may use your contact details to invite you to seminars and events, for instance.
- We also have a legitimate interest if we use your personal data to contact you after you have approached us yourself.
- We do not always need permission to contact you. If we obtain your email address as a result of providing services, we can offer you similar services via direct marketing. In that case, we have a legitimate interest in offering you these services.

§ 5 . HOW DID WE OBTAIN YOUR PERSONAL DATA

5.1 We obtain some information automatically when you visit our website. We collect this information via cookies, for instance. In this context, we also refer to our Cookie Statement.

5.2 We obtain other information if you actively provide it to us. For example, if you are or become a client of ours or if you sign up for newsletters or events.



5.3 We also obtain information from third parties, such as personal data from the Trade Register of the Chamber of Commerce and the Land Registry Office, or personal data available on public professional websites. We also obtain information from professional social media sources like LinkedIn.

§ 6 . HOW LONG DO WE KEEP YOUR PERSONAL DATA

6.1 We will not keep your personal data longer than strictly necessary for the purposes for which they are processed.

6.2 Unless statutory requirements obligate us to keep your personal data longer:

- a. We will delete your personal data if you have withdrawn your consent or have decided to opt out.
- b. In general we will retain your file during a period of 5 years after the case is closed. This may be extended to a period of 20 years when a limitation period is applicable under the Dutch civil code.
- c. We will delete visitor registration details within seven weeks from the date the right to access the information expires or from the date of the visit.

§ 7 . WHO HAS ACCESS TO YOUR PERSONAL DATA

7.1 Your personal data are only accessible to people at Loyal authorised to access them on a 'need-to-know' basis. Outside of the situations mentioned in this Privacy Statement, we will not disclose your personal data unless we deem this disclosure necessary in order to satisfy our statutory obligations, to protect our rights or someone else's rights, or to enforce compliance with this Privacy Statement.

7.2 Sometimes it is necessary to share your personal data with third parties. Depending on the circumstances of the case, this may be necessary in order to handle your contract. There are also statutory obligations which mean that personal data must be passed on to third parties.

7.3 Personal data are provided to third parties in the following cases, among other things:

- a. While handling your case it might be necessary to share your Personal Data with third parties such as other parties in legal proceedings and or other parties in negotiations.
- b. Loyal is obliged to report unusual transactions on the basis of The Money Laundering and Terrorist Financing (Prevention) Act (Wwft). Loyal may not inform clients about a (intention) to report an unusual transaction.
- c. Furthermore, Loyal may be obliged to provide information to fiscal authorities on the basis of the European directive (EU) 2018/822 van 25 May 2018 regarding cross border constructions.
- d. If a court order requires us to provide personal data to third parties, we must comply with that.

7.4 Your personal data are not shared with third parties for commercial purposes. There is one exception to this. We sometimes work with other organisations to organise a joint activity, such as an event or seminar. In that case, only the necessary contact details will be exchanged.

7.5 Personal data may also be provided to third parties in the event of a reorganisation or merger of our business or sale of (part of) our business.



- 7.6 We may engage service providers (processors) for the processing of your personal data, who process personal data exclusively on our instructions. We conclude processing agreements with these processors which fulfil the requirements of the General Data Protection Regulation (GDPR).
- 7.7 We work with service providers who provide SaaS (software as a service) solutions or hosting services. There are also ICT service providers who help us keep our systems secure and stable. We also use third-party services to send newsletters and commercial emails.

§ 8 . TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EEA

- 8.1 When your personal data are processed, your personal data may be shared with third parties. These parties may be located outside the EEA. When applicable, we have taken appropriate security measures for sharing the personal data.
- 8.2 We can transfer these data if this is necessary to perform the contract for services for the provision of legal services or if this is necessary in the context of a legal claim for which we are providing you with legal support.

§ 9 . HOW DO WE SECURE YOUR PERSONAL DATA

- 9.1 We do our utmost to take appropriate technical and organisational security measures to protect against the loss, abuse and alteration of your personal data for which we are responsible.
- 9.2 To ensure the security of your personal data, we have taken the following technical and organisational measures, among other things:
- a. Physical security: Our building is secured by physical access control. Only people authorised to access our building may enter.
 - b. Authorisations: The access to our systems is protected via role-based security.
 - c. Data Leaks: We have established a Data Leak Team to detect and report data leaks.

§ 10 . YOUR RIGHTS

- 10.1 You have various privacy rights pursuant to the privacy regulations.
- 10.2 You can request:
- a. to inspect the personal data we process in relation to you.
 - b. to amend your personal data or supplement these if you believe that the personal data we process in relation to you are incomplete or inaccurate.
 - c. to have certain personal data relating to you erased.
 - d. to have your data transferred to another party.
- 10.3 You can also object to the processing of your personal data.



10.4 For more information on the rights you can exercise on the basis of the privacy regulations, please see the website of the Dutch DPA. See this [webpage](#) for an overview of your rights under the privacy regulations. In cases that arise, you also have the right to submit a complaint to the Dutch DPA.

§ 11 . C O O K I E S

11.1 Loyal uses cookies on its website. A cookie is a small text file that a web browser saves to your computer. You can block the use of cookies generally by changing your browser settings accordingly. This could affect the functioning of the website, however. For more information, please see our Cookie Statement.

§ 12 . T H I R D - P A R T Y W E B S I T E S

12.1 Our website contains hyperlinks to websites of other parties and social media buttons. We are not responsible for the content of these websites or the services of the particular social media platforms. Nor is Loyal responsible for the privacy policy and use of cookies on those websites and social media platforms.

§ 13 . O U R C O N T A C T D E T A I L S

13.1 Please contact us, if you have any questions or comments with regard to how we handle your personal data:

Loyal

Contact:

Pedro de Medinalaan 71
1086 XP Amsterdam

Jeroen Oskam 020-2617638, jeroen.oskam@loyal.nl

lawyers@loyal.nl

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