

PRIVACY STATEMENT OF KÖSTER ADVOCATEN N.V.

Köster Advocaten N.V. (“**Köster Advocaten**”) is a public limited liability company organised under Dutch law, having its registered office in Haarlem, the Netherlands, and registered at the Chamber of Commerce for Amsterdam under number 34321036.

Köster Advocaten is the controller for the processing of your personal data. In this Privacy Statement we wish to inform you about the manner in which we handle your personal data at Köster Advocaten. This Privacy Statement applies to, among other things, the processing of the personal data of the contacts at our clients, accounts and referrers, and to the visitors of our website www.kadv.nl. We may amend this Privacy Statement from time to time, for instance if the manner in which we process your personal data changes or if the regulations so require.

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1. To whom does this Privacy Statement apply?

This Privacy Statement applies to all persons who visit our website, persons who contact us and persons whose personal data Köster Advocaten processes when providing legal services. They are:

- contacts of clients and prospective clients;
- contacts of accounts, prospective accounts and referrers;
- contacts of opposing parties and prospective opposing parties, not being clients;
- persons who attend meetings organised by Köster Advocaten;
- persons who visit the www.kadv.nl website;
- persons who contact Köster Advocaten; and
- job applicants and employees.

2. Which of your personal data do we process?

Köster Advocaten processes your following personal data:

- contact details, such as first name, surname, business and private address, business and private telephone number, and business and private email address;
- identity data, such as date of birth, place of birth, nationality, sex and other data from ID documents;

- financial and administrative data, such as bank account number, VAT number and Chamber of Commerce numbers;
- data that provide information on the use of our website, such as IP address and the surfing behaviour on our website;
- personal data available on public business social media platforms, such as LinkedIn. These data include names and contact details;
- personal data obtained from the Trade Register of the Chamber of Commerce and from the Land Registry. These data may include Chamber of Commerce numbers and contact details;
- personal data available on public business websites, such as company websites; and
- personal data to control access to our offices and for safety purposes.

3. How did we obtain your personal data?

We process your following personal data:

- personal data with which you have provided us;
These are personal data with which you have provided us with a view to the provision of services, as part of an introduction meeting or marketing or other activity, or when you were in contact with us.
- personal data from other public sources;
These are personal data obtained from public websites (including business websites), social media platforms and public registers such as those of the Chamber of Commerce, the Land Registry and the Insolvency Register; and
- personal data that provide information on the use of our website.

4. For what purposes do we process your personal data?

Köster Advocaten processes your personal data for the following purposes:

- to provide legal services and to conduct legal proceedings;
- to invoice services provided and to collect invoices;
- to comply with statutory obligations;
The *Wet ter voorkoming van witwassen en financieren van terrorisme* (Money Laundering and Terrorist Financing (Prevention) Act) obligates lawyers to record certain information of yours. The *Algemene wet Inzake Rijksbelastingen* (State Taxes Act) requires that we process certain personal data. The Dutch Bar Association obligates lawyers to record certain information on you;
- to maintain contact with you;
- to perform marketing activities;
We never process special personal data or legally privileged personal data in marketing activities.
- to improve our services;
- to improve and optimise our website;
The anonymous user statistics give us an impression of the number of visitors and the duration of the visit.
- to recruit and select new employees;
- to carry out client satisfaction surveys; and
- to draw up user statistics.

5. On what grounds do we process your personal data?

We process your personal data only if that is permitted on the following grounds set out in the GDPR:

- consent;

When necessary, we request your consent to process your personal data. If we have requested your consent and you have granted it, you may withdraw that consent at any time. You may do so by contacting us.

- agreement;
if you engage us to provide legal services, we process your personal data if and insofar as that is necessary to perform the agreement entered into with you.
- statutory obligation;
The Money Laundering and Terrorist Financing (Prevention) Act obligates lawyers to record certain information about you. The State Taxes Act requires that we process certain personal data. The Dutch Bar Association obligates lawyers to record certain information on you.
- legitimate interest of Köster Advocaten ;
We are allowed to process your personal data if we have a legitimate interest in doing so and do not disproportionately infringe on your privacy.

6. With whom do we share your personal data and why?

We share your personal data with third parties only if we are required to do so by law or if that is necessary to perform the agreement entered into with you or to protect our interests or the interests of third parties.

7. How long do we retain your personal data?

We retain your personal data as long as necessary for the purpose for which they were originally collected and for as long as necessary to comply with our statutory obligations. We destroy your personal data after that period. Specific retention periods apply to the following personal data:

- files handled at Köster Advocaten are retained for a maximum period of 20 years after termination and in accordance with the recommendations of the Dutch Bar Association; and
- in principle, financial and administrative data are retained no longer than seven years after the file is closed.

8. How do we protect your personal data?

Köster Advocaten takes all appropriate technical and organisational measures that are necessary to protect personal data for which we are responsible against unintentional destruction, alteration or disclosure of personal data.

We apply internal policy frameworks (IT security, data breaches and policy) to protect your personal data. Your personal data can be accessed by employees only when necessary. All our employees are furthermore bound by a duty of confidentiality on the basis of professional or other rules.

The technical and organisational measures taken to protect your personal data include the following:

- Availability and continuity:
We make every effort to safeguard optimal availability and continuity of our website and systems.
- Device management and security:
Only devices managed by Köster Advocaten have direct access to our systems. Devices not managed by Köster Advocaten have access to our systems only via a connection that is secured using passwords and two-factor authentication.
- Physical security:
Our building is secured by physical access control. Only duly authorised persons have access to our building.

- Authorisations:
The access to our systems is secured.
- Encryption:
On request, the data exchange with you may take place using encryption.
- Monitoring of our systems:
Our internal computer systems on the computers with which Köster Advocaten provides its employees are continuously checked for suspect behaviour by means of monitoring by a certified third party.
- Thread protection:
Several systems have been set up to avoid unauthorised access and exchange of personal data.
- GDPR design:
Every new system that we intend to use must be tested beforehand to check whether it meets the privacy-by-design and privacy-by-default principles.
- Data protection impact assessments:
Before putting a new system to use, we also subject that system to a data protection impact assessment, if so required by law.

9. Transmission of personal data to countries outside the EEA

In principle, Köster Advocaten processes your personal data only within the European Economic Area (EEA). If personal data are transmitted to a country outside the EEA, Köster Advocaten arranges for appropriate safeguards to guarantee insofar as possible that the transmission takes place in accordance with the regulations that apply within the EEA.

10. Your rights

You have the following rights when we process your personal data:

- the right of access to your personal data that we process;
- the right to have your personal data changed or rectified;
- the right to object to the processing of your personal data;
- the right to restrict the processing of your personal data;
- the right to request transmission of your personal data (right to data portability);
- the right to erasure of personal data and the right to be forgotten;
In some cases you may have your personal data erased, for instance if the personal data are no longer needed for the original purpose for which they were collected or if you withdraw your permission;
- the right to file a complaint.
If you are dissatisfied with the manner in which we process your personal data, you may file a complaint with us. You may also contact the Dutch Data Protection Authority.

If you wish to exercise one of these rights, please file a request to that effect via our contact details provided in this Privacy Statement. You will receive a reply to your request within six weeks. We will handle only requests related to your own personal data. A copy of your ID must therefore be enclosed with your request. Please render the passport photograph and your citizen service number illegible.

We cannot honour (or fully honour) your request in all cases, for instance because your request conflicts with a statutory obligation. If we do not honour your request, we will inform you of the reason.

11. Third-party websites

Our website contains hyperlinks and social media buttons to third-party websites. We are not responsible for the content of third-party websites or for the manner in which third parties handle your privacy.

12. Cookies

Köster Advocaten uses cookies on its website. A cookie is a small text file that is stored on your device by a browser and ensures that the website functions properly. On your first visit to the website you will be informed about the cookies and, if necessary, we will request your permission to install them. You may block the use of cookies via the settings of your browser. That may affect the functioning of the website. A list of the cookies that we use is provided below:

Provider	Name	Retaining period	Cookie domain
Google Analytics	<ul style="list-style-type: none">_ga_gat_UA-36429859-1_gat_gid	<ul style="list-style-type: none">2 years30 seconds30 minutes1 day	Kadv.nl

13. Amendments to this Privacy Statement

This Privacy Statement may be amended. The most recent version of this Privacy Statement can be found on our website www.kadv.nl.

14. Our contact details

If you have any questions or comments regarding the manner in which we handle your personal data, please contact us at:

Köster Advocaten N.V.
Dreef 22
2012 HS HAARLEM
the Netherlands
info@kadv.nl

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