

WRE ADVOCATUUR privacyverklaring (version d.d. January 2021)

This privacy statement indicates how WRE Advocatuur and the service providers associated with its office (hereinafter “WRE”) deal with personal data and privacy.

The main thing is that personal data and personal information are always treated strictly confidential. This stems from the duty of confidentiality that the Netherlands’ Lawyers Act (“*Advocatenwet*”) imposes on lawyers.

Under the General Data Protection Regulation (GDPR), WRE is responsible for personal data that it holds or processes in connection with its services, such as data from clients and relations, visitors to the website and persons who otherwise have contact with WRE.

Use.

Personal data held by WRE will only be used for and in connection with:

- carrying out assignments regarding legal advice, legal assistance in proceedings and transactions and related activities;
- complying with legal duties and obligations;
- conducting financial administration, including invoicing and debt collection;
- conducting personnel administration;
- handling complaints;
- improving and securing the website and digital communication.

WRE also uses personal data to selectively inform its relations about legal developments without disproportionately infringing on their privacy and to invite them to events. WRE does not use personal data for third-party marketing purposes. Personal data will not be processed for purposes other than those for which the data subject has given permission.

Retention periods.

Data relating to legal files are in principle stored for 10 years, unless WRE or an involved service provider considers a longer period to be necessary, for example in connection with liability periods in relation to the services provided by WRE.

Shorter retention periods apply with regard to:

- personnel administration: 5 years during the employment and 5 years after the end thereof, unless there is still a dispute or procedure, in which case a term of 5 years applies after the end of the dispute or the procedure.
- financial administration and salary administration: 7 years.
- application data: in the event of non-employment 4 weeks after the position is no longer open, unless data may be kept longer with the applicant's permission, for example with a view to a possible future suitable position.

How is data obtained?

Data are actively provided by the client, relations, counterparties or third parties, or requested by WRE from third parties, such as the Chamber of Commerce, the Land Registry or derived from websites and social media, such as LinkedIn or Facebook.

To whom does WRE provide personal data?

WRE does not provide personal data to third parties, unless this is legally required or necessary, or related to the execution of assignments by WRE and its affiliated service providers.

In connection with the execution of assignments, it may be necessary for WRE to provide personal data to, for example, the following recipients:

- lawyers and service providers associated with WRE and their supporters;

- external lawyers, civil-law notaries, bailiffs and other professional service providers, such as tax specialists, accountants, pension advisers and other advisers;
- IT service providers and software suppliers for the benefit of WRE's office organization, provided that they have committed themselves to secrecy;
- Dutch Bar Association and associated institutions, such as the Dean;
- judicial authorities;
- Tax authorities;
- registrars, such as the Land Registry, the Chamber of Commerce, the FIU;
- WRE insurers and their intermediaries;
- banks;
- couriers;
- counterparties or other contracting parties of WRE.

WRE does not provide personal data to third parties outside the EU, unless with the consent of the person concerned or if this is necessary or ensues from the handling of an assignment.

Security of personal data.

WRE provides appropriate technical and organizational security measures to prevent loss, misuse and/or mutilation of personal data, but a violation of data integrity by targeted or professional cybercrime cannot be ruled out.

Legal protection.

If WRE processes personal data, a data subject has the right to:

- information and notification;
- insight;
- rectification of inaccuracies;
- restriction of processing;
- opposition to processing;
- withdrawal of permission granted;
- delete (right to be forgotten);
- transferability;
- absence of automated individual decision-making, including profiling.

A request with regard to these rights is made in writing via the contact mentioned below. Before a request can be processed, the requester will always be identified on the basis of his/her valid proof of identity.

It is possible that a right under the GDPR conflicts with other laws, such as provisions from the Advocates Act. If WRE does not honor a request, you will be informed in writing.

Contact, complaints and suggestions.

For information about privacy aspects, please contact WRE Advocaatuur B.V., Antonio Vivaldistraat 66, 1083 HP Amsterdam. (edo.smid@wre-advocaatuur.nl)

Any complaints about privacy aspects regarding WRE can be submitted in writing to edo.smid@wre-advocaatuur.nl.

You can also contact the Dutch Data Protection Authority. (see www.autoriteitpersoonsgegevens.nl)

Suggestions for improving privacy applications by WRE are always welcome.

Amendments.

WRE may change a current privacy statement at any time without further notice. The current privacy statement has a 'version date' and is published on the WRE website.
