

## **PRIVACY AND COOKIE STATEMENT VEEM.LEGAL**

### **1. Introduction**

In this Privacy and Cookie Statement, you can find information about whether, how, and why VEEM.Legal collects and uses your personal data. This Privacy and Cookie Statement applies to all personal data that are processed by or on behalf of VEEM.Legal when you make use of VEEM.Legal's services, visit the our website [www.veemlegal.nl](http://www.veemlegal.nl) or otherwise communicate or are in contact with VEEM.Legal.

VEEM.Legal uses cookies and similar technologies when offering website. In this Privacy and Cookie Statement, VEEM.Legal also informs you about what cookies are, how VEEM.Legal uses cookies on its website and how you can manage these cookies.

### **2. The role of VEEM.Legal**

Generally speaking, with regard to your personal data VEEM.Legal is or can be seen as the controller within the meaning of the General Data Protection Regulation ("GDPR"). This means VEEM.Legal has certain statutory duties and responsibilities regarding its processing activities. This Privacy and Cookie Statement serves to inform you on how VEEM.Legal meets her duties and responsibilities. For the sake of clarity, VEEM.Legal has divided this Privacy and Cookie Statement into different sections, each headed by a question. Please go to the relevant question below to find further information.

### **3. How does VEEM.Legal receives or collects your personal data?**

- ✓ VEEM.Legal collects personal data in a number of ways. VEEM.Legal will receive personal data from you in the course of offering and providing its legal services, when you engage VEEM.Legal as a client or otherwise contact VEEM.Legal.
- ✓ Furthermore, your personal data may be collected when you visit the website.

**4. Which personal data does VEEM.Legal process, for what purposes and on what legal grounds?**

Below, it is indicated per category which personal data it concerns, for what purpose and what the legal grounds are.

✓ **Category: Clients**

*VEEM.Legal may process the following personal data of clients:*

- contact information: name, address, job title, title, telephone and fax number, Chamber of Commerce registration number, VAT number, bank account number, website, e-mail address and other company and contact information;
- communication: letters and e-mail messages with contact persons;
- assignment information: information on the legal services provided to our clients and information regarding the substance of the matter;
- billing information: information regarding the calculation and recording of fees and expenses, making payments and collecting debts;
- other information: any other information, including date of birth, nationality, place of birth and sex.

*VEEM.Legal processes these personal data for the following purposes:*

- to provide legal services;
- to calculate or record fees or payments;
- to make payments or collect debts, including assigning debts to third parties;
- to conduct (legal) proceedings;
- to perform audits or other checks; and/or
- to implement or apply any law or regulation.

*The legal ground for the processing of these personal data is:*

- the necessity to perform the agreement with clients;
- the necessity to comply with a legal obligation to which VEEM.Legal is subject;
- the necessity to pursue VEEM.Legal's legitimate interests or those of a third party, where these interests override the interests or the fundamental rights of the data subject.

✓ **Category: Applicants** (if applicable)

*If VEEM.Legal applies a job application procedure, VEEM.Legal may process the following personal data of applicants:*

- contact information: name, address, job title, title, telephone and fax number, Chamber of Commerce registration number, VAT number, bank account number, website, e-mail address and other company and contact information;
- data that have been provided by the data subject, including date of birth, nationality, place of birth and sex, as well as data concerning education, past employers, or other data that are relevant to the fulfilment of the position;
- any other data of which processing is required or necessary for the application of laws or regulations.

*VEEM.Legal processes these personal data for the following purposes:*

- to assess the suitability of the applicant;
- for internal security purposes; and/or
- to implement or apply any law or regulation.

*The legal ground for the processing of these personal data is:*

- the necessity to perform the agreement (or pre-contractual arrangements) with the applicant;
- the necessity to comply with a legal obligation to which VEEM.Legal is subject;
- the necessity to pursue VEEM.Legal's legitimate interests or those of a third party, where these interests override the interests or the fundamental rights of the data subject.

✓ **Category: Suppliers**

*VEEM.Legal may process the following personal data of suppliers:*

- contact information: name, address, job title, title, telephone and fax number, Chamber of Commerce registration number, VAT number, bank account number, website, e-mail address and other company and contact information;
- communication: letters and e-mail messages with contact persons;
- assignment information: information on the services provided by VEEM.Legal's suppliers;

- other information: (in some cases) certificate of conduct and information of the identity document, or any other data of which processing is required or necessary for the application of laws or regulations.

*VEEM.Legal processes these personal data for the following purposes:*

- to purchase goods and/or services;
- to keep accounts (of payments) and to make payments;
- to conduct (legal) proceedings;
- to perform audits or other checks; and/or
- to implement or apply any law or regulation.

*The legal ground for the processing of these personal data is:*

- the necessity to perform the agreement with VEEM.Legal's suppliers;
- the necessity to comply with a legal obligation to which we are subject;
- the necessity to pursue VEEM.Legal's legitimate interests or those of a third party, where these interests override the interests or the fundamental rights of the data subject.

✓ **Category: Third parties**

*VEEM.Legal may process the following personal data of third parties:*

- contact information: name, address, job title, title, telephone and fax number, Chamber of Commerce registration number, VAT number, bank account number, website, e-mail address and other company and contact information;
- communication: letters and e-mail messages from or addressed to third parties;
- other information: data VEEM.Legal receives from clients or third parties or from a public source for the purpose of dealing with a case.

*VEEM.Legal processes these personal data for the following purposes:*

- communication purposes, such as keeping in contact and informing about VEEM.Legal's services;
- internal management activities, such as keeping accounts (of payments) and making payments;
- offering and providing legal services to clients, such as conducting (legal) proceedings;

- access control and security of our office buildings and websites; and/or
- to implement or apply any law or regulation.

*The legal ground for the processing of these personal data is:*

- the necessity to perform the agreement with VEEM.Legal's suppliers;
- the necessity to comply with a legal obligation to which VEEM.Legal is subject;
- the necessity to pursue VEEM.Legal's legitimate interests or those of a third party, where these interests override the interests or the fundamental rights of the data subject.

✓ **Category: Website users / visitors**

*VEEM.Legal may process the following personal data of website users / visitors:*

- if applicable: contact information such as name, website e.d.;
- if applicable: communication data such as technical data of the equipment that is used to visit the website;
- technical information (depending on the settings for cookie preferences): surfing behaviour on VEEM.Legal's website, including mouse and clicking behaviour, duration and times of visits to the website;

*VEEM.Legal processes these personal data for the following purposes:*

- to provide relevant information, such as newsletters, legal updates and invitations to events;
- to make VEEM.Legal's website operate properly; and/or
- to optimize VEEM.Legal's marketing activities and to adjust its offer and its information on the website accordingly.

*The legal ground for the processing of these personal data is:*

- the consent of the data subject;
- the necessity to pursue VEEM.Legal's legitimate interests or those of a third party, where these interests override the interests or the fundamental rights of the data subject.

## 5. Cookies

A cookie is a small text file that is stored on your device when you visit websites. Cookies can be consulted via your web server or your device.

If applicable, VEEM.Legal can place cookies on your device as the operator of the website. These cookies are called 'first party' cookies. Some cookies may also be placed on your device by other parties, such as advertisers or parties that place cookies to display certain content on the website (for example videos). These cookies are called 'third party' cookies.

This Privacy and Cookie Statement does not apply to the use of cookies by third parties. VEEM.Legal cannot guarantee that these third parties will handle your (personal) data in a reliable or secure manner and for that reason VEEM.Legal is not responsible for this.

Below is listed which cookies are used by the VEEM.Legal website.

### ✓ The VEEM.Legal website uses Google Analytics

- This is a web analysis service provided by Google.
- Google Analytics then uses analytical cookies. These are cookies (small text files) that are placed on your computer, in which certain data is stored, such as a web page you visit, in order to determine usage statistics.
- When you visit the VEEM.Legal website, you will see a bar at the top of the website that informs you of the use of cookies.

### ✓ Cookies are set in a privacy-friendly way

- Any data that is processed is only the data that Google Analytics processes.
- As a result of Google Analytics, certain non-traceable data are provided such as: IP address (which has been made anonymous), technical characteristics (for example, which browser you use, the resolution of your computer screen, etc.), which pages you visit on the website of VEEM.Legal and from which page you came to the VEEM.Legal website. VEEM.Legal has entered into a processor agreement with Google. This stipulates that Google only acts as a processor in the processing of the data.
- The maximum retention period of the cookies used through this service has been set by VEEM.Legal at 24 months. This means that after this period the data can no longer be read. The processing of your personal data via Google Analytics is based on VEEM.Legal's legitimate interest in obtaining general statistics of the website visitors. If you have given permission for this on the website, a tracking cookie with the name "NID" will also be placed.

This NID cookie contains a unique ID that Google used to remember your preferences and other information, such as your preferred language (eg Dutch), how many search results you want to show per page (eg 10 or 20) and whether or not you want Google's SafeSearch filter enabled.

- The cookies are set in such a way that Google does not process the full IP address, the so-called 'Anonymise IP'. This means that the last octet of the IP address is anonymised.
- In addition, no data is shared with Google. The option to share the data with Google has therefore been disabled.
- VEEM.Legal does not use other Google services in combination with the Google Analytics cookies.
- You can find information about Google's privacy policy at <https://www.google.com/intl/nl/policies/privacy/>
- You can find information about Google's specific privacy policy with regard to Google Analytics at <http://support.google.com/analytics/answer/>

✓ **Option for enabling and disabling cookies**

- If you do not want cookies, you can refuse the use of the cookies by changing your browser settings. In that case, it is possible that some functions (and services) on this website and possibly other websites will not function properly.
- Necessary cookies help make a website more usable, by enabling basic functions such as page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- You can also choose to manually delete the cookies. For more information about this, please consult the manual of your web browser.

**6. When does VEEM.Legal share your personal data with third parties?**

When you use VEEM.Legal's services or website, VEEM.Legal may share some of your personal data with third parties. This may be necessary, for example, to allow VEEM.Legal to properly perform the agreement to which you are a party, or because VEEM.Legal is subject to a statutory obligation to share your personal data.

When VEEM.Legal shares your personal data with third parties who process personal data on VEEM.Legal's behalf (data processors), VEEM.Legal will ensure that your personal data are protected in accordance with the GDPR and the terms of this Privacy and Cookie Statement through the data processing agreements VEEM.Legal has concluded with these third parties.

Below, VEEM.Legal will explain, for each category of data subjects, with which third parties the personal data may be shared:

✓ **Category: Clients**

- suppliers (such as external translation agencies, bailiffs, or other experts engaged in the course of our services);
- parties involved in VEEM.Legal's services, such as legal professionals, judges, opposing parties, and/or
- other third parties, if the data subject has given consent or if this sharing arises from a statutory provision.

✓ **Category: Applicants**

- suppliers (such as the assessment agency that offers VEEM.Legal's assessments);
- references that are mentioned in the application letter or resume to verify the competences of an applicant; and/or
- other third parties, if the data subject has given consent or if this sharing arises from a statutory provision.

✓ **Category: Suppliers**

- parties with whom VEEM.Legal cooperates, such as debt collection agencies or – in the case of a dispute – legal professionals, judges, opposing parties; and/or
- other third parties, if the data subject has given consent or if this sharing arises from a statutory provision.

✓ **Category: Third parties**

- suppliers (such as external translation agencies, bailiffs, or other experts engaged in the course of VEEM.Legal's services);
- parties involved in VEEM.Legal's services, such as clients, legal professionals, judges, opposing parties; and/or
- other third parties, if the data subject has given consent or if this sharing arises from a statutory provision.



✓ **Category: Website users / visitors**

- suppliers (such as the party that keeps the user statistics of our websites);
- other third parties, if the data subject has given consent or if this sharing arises from a statutory provision.

VEEM.Legal's website also contain links to third-party websites. If you click on these links, you will exit VEEM.Legal's website. VEEM.Legal's Privacy and Cookie Statement does not apply to third-party websites, since VEEM.Legal does not control the ways in which these third parties treat your personal data. Therefore VEEM.Legal cannot accept liability for the ways in which these third party websites use your personal data. You use these websites at your own risk. For more information on how these third parties treat your personal data, please check their respective privacy policies.

**7. Where is your personal data processed?**

When processing your personal data for the purposes specified above, in some cases we may disclose your personal data to organizations located outside the European Economic Area ("EEA"). For example, some cooperation partners (sub processors) of our ICT supplier are domiciled in the United States (such as Google), which leads to the disclosing of your personal data outside the EEA.

In such situations VEEM.Legal will ensure that appropriate safeguards are in place that offer an adequate level of protection of your rights and freedoms as a data subject in accordance with the GDPR. VEEM.Legal does this, for example, by concluding standard contractual clauses approved by the European Commission for the transfer of personal data, or by transferring your personal data only to third parties that are considered to guarantee an adequate level of protection by the European Commission, such as third parties that are members of the EU-US Privacy Shield Framework. If you wish, you may request a copy of the existing model contractual clauses by using the contact information below.

**8. What security measures does VEEM.Legal take to protect your personal data?**

VEEM.Legal has taken appropriate technical and organisational measures to protect your personal data, in accordance with the GDPR, against destruction, loss, alteration, unauthorised disclosure or unauthorized access, including by ensuring that:

- ✓ the confidentiality of your personal data is guaranteed and the integrity and availability of your personal data will be maintained;
- ✓ VEEM.Legal's personnel is trained in information security requirements; and
- ✓ your personal data is protected against unauthorized access.

**9. How long does VEEM.Legal retain your personal data?**

In principle, VEEM.Legal will not retain your personal data for any longer period than necessary to fulfil the purposes described in this Privacy and Cookie Statement.

However, a longer retention period of your personal data may occur if this is necessary in order to comply with a legal obligation. For example, in VEEM.Legal's accounting system certain personal data are required to be retained for a minimum of 7 years after the end of a tax year. Furthermore, as advised by the Dutch Bar Association, VEEM.Legal has to retain some of your personal data in our files for archiving purposes for a maximum of 20 years. If a dispute or (legal) proceedings are expected, VEEM.Legal may also retain your personal data for a longer period of time.

**10. What are your rights with regard to the personal data that VEEM.Legal processes?**

As a data subject, you have a number of rights that you may exercise in the context of VEEM.Legal's processing of your personal data:

- ✓ the right of information about the personal data VEEM.Legal processes about you;
- ✓ the right to access your processed personal data;
- ✓ the right to rectify your personal data;
- ✓ the right to erase your personal data;
- ✓ the right to restrict the processing of your personal data;
- ✓ the right to transmit your personal data to another organisation in a structured, commonly used and machine-readable format;
- ✓ the right to object to the processing of your personal data; and
- ✓ the right to withdraw your consent to the processing of your personal data.

If you wish to exercise any of your rights, you may reach VEEM.Legal by using the contact information specified in Article 11. In order to properly identify you, VEEM.Legal will request you to send us a copy of your passport or other proof of your identity, in which your (passport) photo and citizen service number have been obscured. VEEM.Legal will delete this copy as soon as we have verified your identity. Please take into account that your rights are not absolute in all cases,

and that VEEM.Legal may not be required to comply with your request. If that is the case, VEEM.Legal will make sure you will be informed of this.

#### **11. Contact details in case of questions or complaints**

If you have any questions or complaints about the processing of your personal data, you can send an email to [info@veemlegal.nl](mailto:info@veemlegal.nl) VEEM.Legal will be happy to help you.

If you believe that your rights have been violated, you can also submit a complaint to the Dutch Data Protection Authority ([www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)).

For more information about the protection of personal data, you can consult the website of the Dutch Data Protection Authority.

The contact details of VEEM.Legal are:

Sophialaan 33,

1075 BL Amsterdam

Telephone number: +31 (0) 20 - 676 25 00

#### **12. Can VEEM.Legal amend this statement and, if so, what is the policy?**

Yes, VEEM.Legal can amend this Privacy and Cookie Statement in order to continue to comply with the legal obligation. If VEEM.Legal wants or has to make changes to this Privacy and Cookie Statement in the future, VEEM.Legal will post the amended Privacy and Cookie Statement on its website.

In the event of changes that may significantly affect those involved, VEEM.Legal will do its best to inform them immediately. Any changes will take effect once the Privacy and Cookie Statement is posted on the website.