

PRIVACY AND COOKIE STATEMENT

Ledeboer Strategy & Legal (“**LSL**”) mainly advises on Dutch law matters (the “**Services**”). LSL values the treatment and protection of your Personal Data (as defined below) in accordance with applicable law, including, but not limited to, the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”).

This privacy and cookie statement sets out how LSL processes information that directly or indirectly identifies a natural person (“**Personal Data**”). This document specifies what Personal Data LSL obtains, for what purpose LSL processes Personal Data, and for how long LSL stores Personal Data. If you have any questions, please contact LSL through the contact details provided at the bottom of this document.

What Personal Data do we process and for what purposes do we use them?

Depending on the relationship LSL has with a person, LSL processes certain Personal Data for different purposes. Below is a breakdown of the Personal Data that LSL processes of a (potential) client, a (potential) supplier, a job applicant or third parties (such as counterparties).

Data of (potential) clients	Purpose(s)
<i>Contact details of existing clients:</i> First name and surname, initials, gender, address, postal code, residence, email address, and telephone number of the contact.	LSL uses these data to approach clients and to maintain contact with clients.
<i>Bank details of clients:</i> Account number, IBAN and BIC code. (LSL is only able to view a client’s bank details via LSL’s bank.)	LSL uses these data to: ○ invoice for Services; ○ check and administer payments from clients for Services; ○ maintain a list of accounts receivable and outstanding invoices. In this, LSL does not process any bank details of clients, only the invoice number, invoice date, invoice amount and trade name of the client.
<i>Client data in correspondence and documentation:</i> Personal Data provided to LSL by clients in their correspondence and documentation, such as names, shareholder relationships, tax information and addresses.	LSL uses these data to render Services to clients.
<i>Data relating to previous Services to clients:</i> History of Services already rendered to clients.	LSL uses these data to identify which Services have been provided to clients in the past.
<i>Identification details of clients:</i> First and last name, address, and date of birth.	LSL uses these data to identify clients if required pursuant to the Dutch Act on the Prevention of Money Laundering and Financing of Terrorism (<i>Wet ter voorkoming van witwassen en financieren van terrorisme</i>) (“ Wwft ”).

Data of (potential) suppliers	Purpose(s)
<i>Contact details of existing supplier:</i> First name and surname, initials, gender, address, postal code, residence, email address, and telephone number of the contact.	LSL uses these data to approach suppliers and to maintain contact with suppliers.
<i>Bank details of suppliers:</i> Account number, IBAN and BIC code.	LSL uses these data to: ○ check and administer payments to suppliers; and ○ maintain a list of accounts payable and outstanding invoices. In this, LSL does not process any bank details of suppliers, only the invoice number, invoice date, invoice amount and trade name of the client.
<i>Data relating to previous purchases from suppliers:</i> History of purchases from suppliers	LSL uses these data to identify which purchases have been made from suppliers in the past.

<i>Supplier data in correspondence and documentation:</i> Personal Data provided to us by suppliers in their correspondence and documentation, such as names, shareholder relationships, tax information and addresses.	LSL uses these data to purchase services or goods from suppliers.
<i>Data relating to previous purchases from suppliers:</i> History of purchases from suppliers	LSL uses these data to identify which purchases have been made from suppliers in the past.

Data of job applicants	Purpose(s)
<i>Contact details of job applicant:</i> First name and surname, initials, gender, address, postal code, residence, email address, and telephone number.	LSL uses these data to approach job applicants and to maintain contact with job applicants.
<i>Application data of job applicant:</i> Details provided by job applicant as part of the application, including the curriculum vitae, the letter of application, salary requirements, availability, and in addition also data which emerge from any social media.	LSL uses these details to assess whether a job applicant is a suitable candidate to work at LSL.
<i>Details of job application procedure:</i> Notes during job application procedure(s).	LSL uses these details to assess whether a job applicant is a suitable candidate to work at LSL.

Data of third parties (such as counterparties)	Purpose(s)
<i>Contact details of third parties:</i> First name and surname, initials, gender, address, postal code, residence, email address, and telephone number of the contact.	LSL uses these data to approach third parties and to maintain contact with third parties.
<i>Data related to or originating from third parties</i> Personal Data related to or originating from third parties, such as names, shareholder relationships, tax information and addresses.	LSL uses these data to render Services to clients.

In the case of a legal entity, we also process business data of the relevant organisation (such as the company registration number). For this purpose we make use of the Trade Register of the Chamber of Commerce, among other things.

What is the legal basis for processing Personal Data?

LSL processes Personal Data on the basis of one or more of the following legal processing grounds:

- if this is necessary for the proper execution of our contractual engagement with you or to perform precontractual acts at your request;
- if this is necessary to comply with legal obligations we are subject to;
- if this is necessary to justify our legitimate interests or the interests of a third party; and
- your consent, it being understood that when LSL processes your Personal data on the basis of your consent, LSL will ask you for it separately.

How long is Personal Data stored?

We store Personal Data for as long as we need it for the above purposes:

- *Personal Data in LSL's records for the Tax and Customs Administration:* LSL stores these data for seven (7) years, unless LSL is statutorily required to retain the data for longer.
- *Personal Data of clients:* LSL stores these data for at least five (5) and up to twenty (20) years after the collaboration with the client has ended, unless LSL is statutorily required to retain the data for longer;
- *Personal Data of job applicants:* LSL stores these data up to four (4) weeks after the job application procedure, unless LSL has consent from the job applicant to retain the data for one (1) year;
- *Other information:* LSL stores potential other Personal Data only for as long as it is necessary for the purposes, which means that such data are deleted as soon as these are no longer necessary for the purposes for which LSL processed these data.

Do we share Personal Data with others?

LSL may use third party service providers for email management and communications, data storage, invoicing, accounting, sending newsletters and CRM. LSL will only provide Personal Data to third party service providers to the extent this is permitted by applicable law. These third party service providers are (sub) processors within the meaning of the GDPR. To the extent possible LSL has entered into data processing agreements with its (sub) processors that define - in line with this privacy and cookie statement - what these third party service providers may do with your Personal Data, how they must secure these and when these must be deleted. In addition, LSL may be obligated pursuant to the Wwft to provide (personal) data to the Netherlands Financial Intelligence Unit ("FIU") in the event of an (intended) unusual transaction, without this report being made known to the client. LSL will only report to the FIU if LSL is obligated to do so by the Wwft.

How is Personal Data protected?

LSL takes appropriate technical and organisational measures to prevent unlawful processing of Personal (e.g. unauthorised access, tampering, modification, or disclosure of Personal Data).

Websites of third parties

LSL's website may contain hyperlinks to websites of partners, suppliers, advertisers, sponsors, licensors or other third parties. LSL has no control over the contents or links that appear on these websites and we are not responsible for any practices of websites linked to or from LSL's website. These websites of third parties may change constantly and may have their own privacy policy, user terms, and client policy. Browsing and interaction on any other website, including websites linked to or from LSL's Website, are subject to the terms and policy of that website.

Cookies

LSL does not place cookies via LSL's website that require a cookie banner.

Amendments to this privacy and cookie statement

LSL constantly improves its Services, which also means that this privacy and cookie statement may be amended from time to time. LSL reserves the right to amend this privacy and cookie statement at any time. You are advised to consult LSL's website for the most up-to-date version of this privacy and cookie statement.

What are your rights if LSL processes your Personal Data?

If you have any questions, you can always contact LS using the contact details below. In addition, data subjects from whom LSL collects Personal Data have the following rights:

- *right to access*: request LSL to access your Personal Data stored by LSL (if any);
- *right to rectification*: request LSL to correct or update your Personal Data;
- *right to object*: lodge an objection to LSL processing your Personal Data;
- *right to erasure*: request your Personal Data to be deleted from LSL's database;
- *right to data portability*: request a copy of your Personal Data that LSL has processed or request the transfer of such copy to another data controller;
- *right to withdraw your consent*: withdraw consent for the processing of your Personal Data by LSL, which, for the avoidance of doubt, does not affect the validity of processing executed before the time that consent was withdrawn;
- *right to file a complaint*: submit a complaint to the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*) if you think LSL processed your Personal Data unlawfully.

LSL is committed to respond to such requests within five (5) working days after receipt. LSL may ask you for identification before fulfilling your request.

Contact details

For questions about this privacy and cookie statement or your rights, you may always contact LSL using the following information:

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