

## Privacy Statement Elfi Advocaten

Elfi Advocaten, with its registered office in Rotterdam, the Netherlands, filed at the Dutch Chamber of Commerce [Kamer van Koophandel] with number 65063813, attaches importance to the protection of personal data. In this privacy statement Elfi Advocaten explains how it handles information about identified or identifiable natural persons as referred to in the Dutch General Data Protection Regulation [Algemene Verordening Gegevensbescherming; AVG].

### 1. WHICH ARE THE PERSONAL DATA THAT WE PROCESS?

Personal data cover all information by which a natural person (the person involved) may or can be identified. Personal data that we may process in your case (ranging from receiving and filing to adapting, forwarding and deleting), are for instance:

- basic information like your first name(s) and surname, title, gender, employment or function;
- contact details like postal address, (mobile) telephone number or email address;
- additional personal details like proof of identity, date of birth, nationality and marital status;
- financial information like your bank account number;
- personal details you supply to us on applying for a function with us, like training and career particulars;
- all other personal records we receive from you or about you that we may ourselves acquire, used for the purposes set out below.

### 2. HOW DO WE ACQUIRE PERSONAL DATA?

In most cases you are the one who supplies your personal data, for instance in case of a letter of engagement you give us or a medical power of attorney, if

you visit our website, if you complete a contact form on our website, if you apply for a function with us, if you give your card or give us information during (telephone) calls or email contact between us. We may obtain personal data in other ways as well, for instance through opposing parties or third parties (like care providers) while handling your case, via (public) registers (like the Trade Register of the Chamber of Commerce) or from public sources and websites.

### 3. WHY DO WE PROCESS PERSONAL DATA?

We need personal data for all relations contracted by us, for the ultimate purpose of providing service and cooperation to the fullest extent possible. We process your personal data for the following purposes, and only data we require for preparing, executing and completing (and invoicing) your commission (on providing legal advice or conducting court proceedings).

We process personal data to comply with statutory obligations and (professional) rules of conduct that apply to lawyers, like identification, data verification and control, administrative requirements or (statutory) retention periods.

In order to maintain and expand our clientele we may contact you with information, publications or invitations relevant to you. The website of Elfi Advocaten contains hyperlinks to websites of other parties and social media buttons of Facebook, LinkedIn and Twitter. If you click these buttons your personal data are processed by the corresponding social media platform. Elfi Advocaten is not liable for the content of these websites, the service provided by these social media platforms and their privacy and cookie policies.

We consider it important to learn about your opinion regarding our services. For this reason we may invite you to complete a client satisfaction survey after completing a commission.

To be able to handle your registration or application for a function with us we ask you to provide your personal data. The data you share with us via email and

during (telephone) calls are kept by us until no more than four weeks after completion of your application procedure. If we should wish to contact you again in the case of a possible future vacancy we ask your permission for storing your personal data over a longer period. This period will not exceed one year.

#### 4. WHAT ARE THE GROUNDS FOR US TO PROCESS PERSONAL DATA?

We are allowed to process your personal data only in the case of an existing legal ground. The processing examples set out above are conducted on the basis of one on the following legal grounds referred to in the Dutch General Data Protection Regulation [AVG]:

- execution of a letter of engagement for performance of judicial services and the fee statement for the services performed;
- a legal obligation, including thereunder the Dutch Money Laundering and Terrorist Financing Prevention Act [*Wet ter voorkoming van witwassen en financieren van terrorisme; Wwft*];
- an application for government-funded legal aid;
- improvement of product and service information and performance of focused marketing actions to be able to provide relevant information to clients/target groups, without involving particular personal data or confidential information in the corresponding combination and analysis of data required for this purpose, and without creating individual client profiles;
- improvement of the [www.elfi.nu](http://www.elfi.nu) office website;
- maintaining user statistics of the office website;
- permission given by the client;
- a legitimate interest.

#### 5. WHO DO WE SHARE PERSONAL DATA WITH?

We may be obliged to share your personal data with third parties. This may for instance be necessary:

- to be able to perform our judicial services, for instance when conducting court proceedings;
- to conclude an agreement;
- to issue our fee statement for the service provided;
- to involve subcontractors for carrying out processes set out in our privacy statement, like our medical consultants, ICT-suppliers or a translation agency;

Third parties to whom we supply your personal data are themselves also responsible for the processing of these data and for complying with the Dutch General Data Protection Regulation [AVG]. If a third party processes your data on behalf of Elfi Advocaten we conclude a processing agreement that complies with the demands imposed by the AVG.

If one of our external contractors processes data outside the European Economic Space, our written agreement with them will contain appropriate measures, most of them standard contract terms and conditions.

Elfi Advocaten in principle does not transfer personal data to countries outside the European Economic Space. Nevertheless, should this be necessary, Elfi Advocaten will ensure that data are transferred only if the European Commission has indicated that the country concerned provides an appropriate level of protection, or if there are adequate guarantees within the meaning of the Dutch General Data Protection Regulation [AVG].

Elfi Advocaten does not share personal data with third parties for commercial purposes.

## 6. HOW LONG DO WE KEEP PERSONAL DATA?

We will not keep your personal data longer than necessary for the purpose for which we have collected and filed them.

If there is a statutory retention obligation or a retention period pursuant to rules of conduct or profession we observe these terms.

## 7. WHAT RIGHTS DO YOU HAVE?

You may inspect the personal data we process in your case. You have the right to instruct your personal data to be amended or even deleted if the details concerned are not (or no longer) correct, or if the processing of these data is not (or no longer) justified. In certain circumstances you may also restrict the processing, ask us to transfer your data or object to their processing. We will judge whether we can comply with your request pursuant to the law. You also have the right to lodge a complaint with the regulator (the Dutch Data Protection Authority; DPA [*Autoriteit Persoonsgegevens*]). We may not be able to meet your request. For instance because we are required to process certain personal data in order to comply with our judicial and legal obligations and/or professional requirements, or due to other exceptions, like the rights and freedoms of third parties or the interest involved in the ability to conduct court proceedings. If we should not (be able to) meet a certain request, we will of course inform you correspondingly, stating motivations.

## 8. CONTACT US

If you should wish to know more or have any questions or complaints about our processing of your personal data, please contact us (in writing) at [info@elfi.nu](mailto:info@elfi.nu) or by regular post at:

Elfi Advocaten

Attn. Mr O. Emre LL.M.

Postbus 1300

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THE NETHERLANDS