

PRIVACY POLICY & COOKIE STATEMENT

Estrafidus respects and protects your privacy. We ensure that the personal data we receive from you, is treated confidentially and carefully, and is properly secured. That is why we provide this Privacy Policy to inform you about which kind of personal data we process and why we do that.

This privacy policy applies to all persons of which Estrafidus processes personal data, like (potential) clients, visitors and job applicants.

1. What is personal data

Personal data is all information about an identified or identifiable person, which means that information is either directly or indirectly about you.

2. The personal data we process

The processing of personal data is not Estrafidus' core activity, it is however necessary for the services we provide as a law firm.

We may collect the following types of personal data *directly from you*, a *third party* and/or by using *publicly available* resources:

- Information about identity; name, surname, birth date, nationality, and such;
- Contact information; e-mail address, home address, billing address, telephone number, and such;
- Professional information; title and position, employer, work history, and such;
- Financial information; bank details/statements, salary specifics, and such;
- Usage data; information about your visits to our website, like ip-address, and such.

3. The use of personal data

The purpose of processing personal data is:

- To provide legal services to our (potential) clients and to maintain contact with our clients;
- To act in accordance with our legal obligations;
- For marketing purposes;
- For recruitment purposes.

We use personal data based on the following legal base:

- By consent: you give us (explicit) permission;



- Performance of a contract to which you are a party or to be able to take measures at your request before the acceptance of that contract;
- To comply with a legal obligation;
- Legitimate interest.

4. Exchange of personal data

In some situations we need to share your personal data with third/other parties. We will only share your personal data with third/other parties for the purpose and on the legal grounds stated in this Policy. We conclude a processor agreement with third/other parties that process your information *on our behalf*.

With regard to Estrafidus' general practice we share your personal data with the accountant and our IT provider.

With specific regard to our legal department we share your personal data with third/other parties in case it is relevant for your legal matter or because required by law, and <u>always</u> based upon your consent (for example; the court, government, translators, other lawyers upon your request, etc.).

We try to process personal data as much as possible within the EU, but sometimes we cannot avoid sharing your personal data with a party outside of the EU (for example when employers and embassies outside of the EU are relevant for your legal matter). If this exceptional situation arrises, Estrafidus will inform you about it in advance.

5. How long your personal data will be kept

Estrafidus does not store your personal data longer than strictly necessary to realize the purposes for which your data is collected.

Your personal data will be erased at the moment that the consent based on which your personal data is processed and/or stored is withdrawn by you and also when the legitimate interest based on which your personal data is processed, expires.

After finalizing a legal case, the digital file is digitally archived in the file system of Estrafidus. After five years the file will be definitively erased.

6. Security of personal data

It is a priority for Estrafidus to secure your personal data. Estrafidus takes appropriate organizational and technical steps to protect your personal data against misuse, loss or any other form of unlawful processing.



7. Your rights

You have the right to be informed about, to access, make a request for correction or erasure of your personal data processed by Estrafidus. You can send a request to info@estrafidus.com.

To the extent that the processing of personal data is based on consent, you always have the right to withdraw your consent.

Furthermore, you have the right to object in case your personal data is processed based on legitimate interest.

You also have the right to submit a complaint to the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*), if you believe that your rights have been infringed.

8. Cookies: Automatic collected information

When you visit our website, some information is collected automatically. On our website we make use of cookies. A cookie is a simple small file that is sent along with pages from this website and is stored by your browser on the hard drive of your computer/tablet/mobile device. The information stored therein will be sent back to our servers on a next visit. They also ensure that the website works properly.

We also use Google Analytics to see how our visitors make use of our website.

Our website includes buttons to promote web pages on social networks such as LinkedIn. These buttons work by means of pieces of code that come from LinkedIn itself. Cookies are placed through this code. We have no influence on this. Read the privacy statement of LinkedIn (which can change regularly) to read what they do with your (personal) data that they process via these cookies

Permission is requested on our website about the use of the above cookies. If you do not want your data to be tracked, we recommend that you do not give permission.

9. Changes

This Privacy Policy and Cookie Statement may be updated from time to time. We will notify you of any changes by posting the new Privacy Policy and Cookie Statement on the website. Your use of the website and/or any of our services following any such notice means that you assent to and accept of such changed Privacy Policy and Cookie Statement.

10. Contact

If you have any questions or comments about this Privacy Policy and Cookie Statement, please contact us at info@estrafidus.com.

The Hague, 1 July 2022