



## **PRIVACY & DISCLAIMER**

The data on this website are included exclusively by way of general information and is therefore exclusively intended as such. No rights can be derived from these data in any way. Elements Legal is not liable for any damage whatsoever that may arise as a result of the lack of clarity or the incompleteness of the data included on this website. Elements Legal does not guarantee the reliability of sending information to Elements Legal via the internet, by e-mail or via our website. Elements Legal cannot guarantee that information sent to Elements Legal in the manner set out above reaches Elements Legal confidentially and undamaged.

### **Elements Legal Privacy Policy**

Elements Legal N.V. (hereinafter referred to as "EL" or "us" or "we") processes personal data as a data controller in accordance with the European General Data Protection (hereinafter referred to "GDPR").

This Privacy Policy was last updated on 1 October, 2018. We may unilaterally change or update this Privacy Policy by amending this page.

#### **Personal data**

Personal data comprises information by which a natural person (the data subject) can be identified or is identifiable. Personal data that EL processes may include:

- Basic information such as your first and last name, prefix and title;
- Contact details such as your e-mail address, postal address and phone number;
- Financial information, such as your bank account number;
- Technical details, such as your IP address and the device you use to visit our website;
- Personal data you may provide us for the purpose of a job application, such as your full name, date of birth, address, phone number, nationality, marital status and any other personal data set out in your application;
- All other personal data that we acquire from you or about you, or that we are able to acquire ourselves and which we use for the purposes and legal grounds cited below.

In most cases, we acquire your personal data from you, for example if you ask us to carry out an assignment for legal services, you visit our website, you apply for a job with us, you give us your business card or from information we acquire during (telephone) conversations and e-mail contact with you.

In addition, we may also acquire your personal data in other ways, such as from an opposing party or third parties in connection with a case that we are handling, from (public) registers (such as the Commercial Register of the Chamber of Commerce) or from public sources and websites.

#### **Purposes and legal grounds for the processing of personal data**

EL may process your personal data for the following purposes:

- To provide our legal services;
- To comply with our legal and regulatory obligations;

- For marketing and business development activities;
- To handle your job application and the organization of events;
- To generate statistics regarding the use of the website and/or to analyse and improve the website.

We will process your personal data using one or more of the following legal grounds:

- For the implementation of an agreement;
- Due to a statutory obligation;
- With your permission;
- Due to a justifiable interest.

### **Retention period**

EL will not store your personal data any longer than is necessary to achieve the purposes stated in this Privacy Policy or to comply with the relevant laws and regulations. Retention periods from statutory provisions such as the Notaries Act ("*Wet op het notarisambt*") and the Public Records Act ("*Archiefwet*") apply. Notarial deeds are eternally preserved.

### **Sharing personal data**

In some cases we may also share your personal data with third parties. This may include, but is not limited to:

- Third parties relevant to the legal services that we provide, such as counterparties, third parties in connection with a case that we are handling, courts, regulatory authorities and governmental institutions;
- Third parties that we engage with, such as supervisory authorities and other bodies, in order to comply with legal obligations;
- Third party suppliers in connection with the processing of your personal data for the purposes described in this Privacy Policy, such as IT providers, communication service providers or other
- suppliers to whom we outsource certain support services.

We will only transfer your personal data to the above mentioned third parties for the purposes and on the legal grounds stated in this Privacy Policy.

Third parties to whom we transfer your personal data are themselves responsible for compliance with privacy legislation. EL is neither responsible nor liable for the processing of your personal data by these third parties. To the extent that a third party processes your personal data as a data processor of EL, EL will conclude a processor agreement with such party that meets the requirements set out in the GDPR.

To be able to provide our services, it may be necessary for us to transfer your personal data to a recipient in a country outside of the European Economic Area. In that case, EL will ensure that the data transfer is compliant with the applicable law.

### **Security**

We have taken suitable technical and organizational measures in order to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized amendment of your personal data.

If you have any questions concerning the security of your personal data or if you suspect any misuse, please contact us via [info@elementslegal.com](mailto:info@elementslegal.com)

### **Your rights**

The GDPR gives you the option to, among other things, inspect the personal data we store from you, to request us to change or delete them or to indicate that you wish to correct or supplement these data. You also have the right to request a limitation of the processing of the data or to object to that processing. Finally, you have the right to request the personal data stored by us and relating to you, in the context of data portability.

If you wish to use one of these options, you can let us know via [info@elementslegal.com](mailto:info@elementslegal.com). We will comply with your request where possible.

We will inform you if we cannot comply with your request because it would be in conflict with our obligations as a civil-law notary, in conflict with the law or when it is impossible for other special reasons. You have the right to submit a complaint to the Dutch Data Protection Authority at all times.

### **Cookies**

EL uses cookies on its website. A cookie is a simple text file that is stored on your computer by a web browser. You may refuse the use of cookies by selecting the appropriate settings on your browser. Please note that this may affect the functionality of the website.

The website does not use any tracking cookies or advertising cookies.