

## **Privacy Policy**

Houthoff Coöperatief U.A. (hereinafter referred to as "Houthoff" or "us" or "we") respects your privacy and processes personal data as a data controller in accordance with the European General Data Protection Regulation (hereinafter referred to as "GDPR").

This Privacy Policy was last updated on 30 April 2018. We may unilaterally change or update this Privacy Policy by amending this page, so make sure you check this page from time to time. If there are substantive adjustments made to this Privacy Policy, a clear notification will be made available on our website.

In this Privacy Policy we explain:

- what personal data we collect and how;
- for what purposes and on what grounds we process your personal data;
- how long we keep your personal data;
- who we share your personal data with;
- how your personal data is protected;
- the rights you have as data subject;
- our use of cookies;
- how you can contact us.

### **Personal Data**

Personal data is any information relating to an identified or identifiable natural person. Personal data that we process may include:

- Basic information such as your first and last name, prefix, title;
- Contact details such as your e-mail address, postal address and phone number;
- Data related to the device you use to visit our website, such as an IP address;
- Data related to your visit to our website;
- Personal data you provide us for the purpose of attending events or meetings, such as access and dietary requirements;
- 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.

- Any other personal data relating to you which you may provide us or that we may obtain in relation to the purposes and based on grounds set out below.

We collect this personal data because you provided this data to us. For example, you may provide data when entering into an agreement with us, by entering your data on our website, by giving us your business card or by applying for a job. We may also collect your personal data from other sources, such as local counsel, counterparties, the Trade Register, the Land Registry or by using publically available sources.

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

Houthoff 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, such as news updates, invitations for our events and other marketing communications that may be of interest to you;
- To handle your job application or subscription to any of our recruitment services and 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:

- Performance of a contract;
- Compliance with a legal obligation;
- Legitimate interest;
- Your consent.

### **Retention period**

Houthoff 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.

### **Sharing with others**

Houthoff may share your personal data with any company belonging to the Houthoff group, for the purposes described in this Privacy Policy.

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, local counsel, 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. Houthoff 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 Houthoff, Houthoff 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, Houthoff will ensure that the data transfer is compliant with the applicable law.

## **Security**

Houthoff has taken technical and organisational measures to ensure an appropriate level of security to protect your personal data from unauthorised or unlawful processing and from loss, destruction, damage, alteration or disclosure. If you have any questions regarding the security of your personal data, or if there are indications of misuse, please contact [compliance.officer@houthoff.com](mailto:compliance.officer@houthoff.com).

## **Your rights**

You, as a data subject, have a number of legal rights:

- Right of access. This means you can make a request to obtain access to the personal data concerning you. Please note that there may be circumstances in which we are entitled to refuse your request for access to copies of personal data, for example based on legal professional privilege;
- The right to rectification or correction of your personal data if it is inaccurate or incomplete;
- The right to erasure of the personal data that relates to you. Please note that there may be circumstances in which we are required to retain your data in order to meet our legal and regulatory obligations;

- The right to object to or to request restriction of the processing. Again, there may be circumstances in which we are legally entitled to refuse your request;
- The right to data portability. This means that you have the right to receive your personal data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- The right to object to profiling;
- The right to lodge a complaint with a supervisory authority;
- The right to withdraw your consent. Again, there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations.

## **Cookies**

Houthoff uses cookies on our 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. The following functional and analytical cookies may be placed via the website without your prior consent:

<b>Type of cookie</b>	<b>Purpose</b>
Asp.net_sessionid	functional
Sxa_site	functional
Sc_analytics_global_cookie (Sitecore)	analytics
ga (Google Analytics)	analytics
_gid (Google Analytics)	analytics
_gat (Google Analytics)	analytics

More information about cookies can be found on [www.allaboutcookies.org](http://www.allaboutcookies.org)

## **Contact**

If you need further information or have any questions or complaints regarding the processing of your personal data, please contact us in writing via:

[compliance.officer@houthoff.com](mailto:compliance.officer@houthoff.com) or

Houthoff, att. Compliance Officer, PO Box 75505, 1070 AM Amsterdam, the Netherlands.