

1. Privacy

The mindset at LegalRail is about performing at the highest level at all times and placing the interests of the client first. This also applies to the protection of your privacy. This statement is related to the processing of client data and prospects for marketing purposes as well as the processing of personal data. This policy reveals how LegalRail obtains personal data, which personal data LegalRail processes and for which purposes, and which rights you can exercise under the General Data Protection Regulation. Personal data that has been obtained is processed in accordance with the prevailing privacy legislation. Personal data is only processed in the manner described in this statement.

This privacy statement is meant for all persons whose personal data are processed by LegalRail for marketing purposes. Such persons may include:

- LegalRail's clients (and their employees);
- prospects of LegalRail
- people involved in legal proceedings or a transaction in which LegalRail acts as advocate;
- suppliers (and their employees);
- persons who have subscribed to newsletters, white papers and invitations from LegalRail;
- visitors of LegalRail's website;
- third parties that communicate with LegalRail.

2. Why and how we acquire your data

LegalRail obtains your personal data from:

- you personally.*
 - you furnished your personal data to LegalRail for the purpose of handling your case;
 - you filled in your personal data on a contact form or web form;
 - you have provided your personal data as a (representative of a) counterparty of a client whose interests are represented by LegalRail;
 - you furnished your contact details via business cards during introductory meetings, events, congresses, etc.
- your (former) employer,*
- public sources* such as LinkedIn or the website of the organisation where you are currently employed.

3. Why and how we process your personal data

LegalRail processes your personal data for several purposes:

- To provide legal services for LegalRail's clients and the representation of your interests in the legal matters for which you or your company has appointed LegalRail;
- To comply with our statutory obligations, such as retention obligations, archiving duties and obligations under the Money Laundering and Terrorist Financing (Prevention) Act (*Wet ter voorkoming van witwassen en financieren van terrorisme, WWFT*);
- To improve the quality of our services;
- To perform marketing activities, such as sending newsletters and other forms of marketing communications that may be of interest to you;
- To secure, use and improve our website and social media sharing;
- under certain circumstances: the legitimate interest of LegalRail to send you newsletters, white papers and invitations, to improve its product and service information and to conduct direct marketing campaigns.

4. What personal data does LegalRail process?

LegalRail processes personal data that you or your colleagues have provided to LegalRail (to its employees), and personal data that LegalRail has derived from other sources such as the register of the Chamber of Commerce or social media personal data. Some personal data may be generated during your visit to our website (at the moment, a visit to LegalRails website does not generate personal data; please see also LegalRails cookie-statement).

Personal data provided to LegalRail by you.

- Contact details and other personal data that are necessary for handling your case;
- Personal data you provide to LegalRail in the context of symposia, seminars or meetings;

Personal data received via our website.

- Data concerning your visit to our website;
- Data concerning the device you used to visit our website, for example your IP address;
- Your surfing behaviour and interests

Personal data received from other sources:

- Personal data received from public online sources such as company websites and social media platforms such as LinkedIn;
- Personal data obtained from the Trade Register of the Chamber of Commerce or the Land Registry.

The chart below provides an overview of the personal data that LegalRail can process plus the purpose and the purpose for which these data could be collected:

Personal Data	Purposes
Name (Including your initials)	For a correct salutation in our digital notices
Address (business and, when necessary to serve your case, private)	In order to be able to contact you
Position or profession	For a correct salutation and in order to be able to personalise our digital notices
Title(s)	For a correct salutation
Email address	In order to be able to contact you, communicate digitally with you and send you our digital notices
Telephone number, mobile number	In order to be able to contact you
Gender (m / w / n)	For a correct salutation
Company or organisation	Primary: to record the correct client data and to be able to correspond and invoice correctly if your company is a client or otherwise a relationship of LegalRail Secondary: to be able to include your company name or the name of your organization on your badge and for the link with our client relations

Personal Data	Purposes
Contact person including the above information of your company	To correctly address emails mails
Your contact person at LegalRail	In order to be able to personalise our written and digital notices
Interest areas (practice areas, themes and/or sectors) only in so far you informed us	In order to personalise our notices and to ensure that you receive relevant and appropriate notices
Contact details of your secretary	In order to be able to contact you
Digital send- and read e-mail confirmation	In order to verify the correctness of digital notices sent and to be able to analyse our digital notices
Dietary requirements*	In order to customise the menu that we provide during a lunch or dinner meeting. This information is erased immediately after the end of the event
Opt-in	In order to correctly register and observe opt-in forms so that we can customise our digital notices to your wishes
Opt-out	In order to correctly register and observe opt-in forms so that we can ensure that you do not receive any unwanted digital notices. After your opt-out has been processed, this information will immediately be deleted
Click behaviour	In order to be able to analyse whether digital notices are read and to improve future digital notices. LegalRail does not process personal data. For more information, LegalRail refers to its cookie statement.

* Only in so far you have furnished these details in the context of a lunch or dinner meeting or a specific event of LegalRail.

5. Retention period

LegalRail will not retain your personal data any longer than is necessary for achieving the purposes stated in this Privacy Statement or for complying with statutory retention periods. The retention period for legal profession cases is often twenty years.

Your personal data that are not provided or required in the context of handling the case you have submitted, will be processed until you inform LegalRail that you no longer wish to do business with LegalRail or if you no longer wish to receive messages and / or LegalRail stops sending newsletters, invitations to events or other digital mailings. Your personal data will be deleted if:

- it appears that your email address is no longer in use (for example when error messages are received);
- the consent based on which your personal data is processed and / or stored is withdrawn by you;
- the legitimate interest based on which your personal data is processed, expires because for example:
 - a. your company ceases to exist;
 - b. you have not had any contact with LegalRail for a period of five years.

6. Your rights

You have the right to ask LegalRail to correct, supplement, delete or block your personal data if it is incomplete, incorrect or is being processed in contravention of any statutory provision. You also have the right to request LegalRail to inform you of any personal data it holds relating to you.

If you no longer wish to receive emails, invitations to seminars, symposia you can unsubscribe at any time and at no cost via privacy@legalrail.nl.

In short: you can always withdraw your consent concerning the use of your personal data by LegalRail. In addition, you are entitled to request LegalRail to allow you to inspect your personal data and / or to correct it, to make additions, to erase it or to hide it, and / or to restrict it, and / or to provide your personal data in a structured, standard and machine-readable format.

You can address any request in that regard to: LegalRail, P.O. Box 82025, 2508 EA The Hague, The Netherlands, or to: privacy@legalrail.nl

In so far as your personal data are processed on the basis of legitimate interest, you are entitled to object to this processing. LegalRail will discontinue the processing if it is required by law to do so. LegalRail will continue with the processing if there are justified imperative grounds to do so that outweigh your interests, rights and freedoms or that are related to bringing, exercising or substantiating a legal action.

Finally, you are entitled to submit a complaint to the Dutch Data Protection Authority.

7. Personal data en third parties

In certain cases it may be necessary for LegalRail to give third parties access to certain personal data. For example to be able to properly serve the legal case that you have assigned to LegalRail. A non-exhaustive overview is provided below:

- Third parties that are relevant to the legal services we provide, such as counterparties, local lawyers, courts, regulatory authorities and government institutions, in order to be able to carry out the legal services properly;
- Third parties, such as regulators and other organisations, in order to comply with our statutory obligations;
- External suppliers in connection with the processing of your personal data for the purposes described in this Privacy Statement, such as ICT suppliers, suppliers of communication services or other suppliers to whom we outsource certain support services.

LegalRail does not share personal data with third parties for commercial purposes. LegalRail can organize an activity with another party. In that case, the relevant contact details are only shared to the extent that is necessary for the organization of that activity.

8. Protection of your personal data

LegalRail has taken appropriate technical and organisational measures to protect your personal data against loss or against any form of unlawful processing. People who have access to your data or files on LegalRail's behalf have a duty of confidentiality, inter alia on the basis of the rules of conduct and rules of professional practice applicable to them. LegalRail uses technological and operational security standards that are generally accepted in the sector in order to protect personal data from being lost, misused, altered or destroyed.

In the unlikely event that a data breach occurs, despite all safety measures, LegalRail will follow the legal procedure regarding data leaks.

If you have any questions about the protection of your personal data, or if there are indications of misuse, please contact us via LegalRail, P.O. Box 82025, 2508 EA The Hague, The Netherlands and / or via privacy@legalrail.nl

9. Changes to this privacy statement

LegalRail reserves the right and is entitled to change this privacy statement at any time and for any reason whatsoever. It goes without saying that LegalRail remains within the limits of the privacy regulations. The most recent version of our privacy statement is available on the website www.legalrail.nl. In the event of far-reaching changes to this privacy statement, we will notify you about these changes.

10. Data outside the European Union

In order to provide our services, it may be necessary for LegalRail to transfer your personal data to a recipient in a country outside the European Union. In that case LegalRail ensures that such data transfer is in accordance with the General Data Protection Regulation (AVG)

11. Contact

If you have any questions or comments about the processing of your personal data, you can address these to LegalRail, P.O. Box 82025, 2508 EA The Hague, The Netherlands. You can also contact us via privacy@legalrail.nl.