

Privacy statement COMP.lawyers (version August 2022)

COMP.lawyers is a costs partnership comprising the following practice companies:

- EVA Advocatuur B.V., with registered office at Francis Picabiastraat 10, 3059 RP Rotterdam (Chamber of Commerce no.: 6206319);
- C-Law B.V., with registered office at Stadionkade 38-3, 1077 VP Amsterdam (Chamber of Commerce no.: 58727299).

Where reference is made below to COMP.lawyers, this reference also includes these practice companies.

COMP.lawyers treats your personal data with respect and ensures that the personal information you supply to us or that we otherwise obtain is treated confidentially. By 'personal data' we mean all information about a private individual, including information that indirectly says something about someone. The following information is given in compliance with the duty to inform the person(s) whose personal data is processed by COMP.lawyers, as required under the General Data Protection Regulation (the 'GDPR').

To provide its service, COMP.lawyers processes personal data of clients, third parties, suppliers, and website visitors. This Privacy Statement informs you about the processing of this personal data, and your rights of access, rectification, and erasure in respect of this personal data.

If you have any questions about the processing of your personal data please contact us by e-mail (info@complawyers.nl) or by post to the above address.

1. What personal data of our clients does COMP.lawyers process?

COMP.lawyers can process the following personal data of clients (and their employees):

- Name and address data (family name, given names, initials, sex, street address, postcode, town/city);
- Other contact details (telephone number, e-mail address, and similar information necessary for communication);
- Data needed for handling a case or settling a dispute, including data of third parties such as an opponent;
- Data needed for invoicing, including bank account number;
- Other client data that is required to be processed because of, or necessary to comply with, relevant laws and regulations, the Dutch Advocacy Regulation (Verordening op de advocatuur) and the code of conduct for advocates, including, under certain circumstances, production of a proof of identity to verify identity.

2. What personal data of third parties does COMP.lawyers process?

COMP.lawyers can process the following personal data of third parties (such as persons other than clients whose personal data appears in the files, the opposing party (and its employees), and other attorneys and advisers with whom COMP.lawyers has contact):

- Name and address data (family name, given names, initials, title, sex, street address, postcode, town/city);
- Other contact details (telephone number, e-mail address, and similar information necessary for communication);
- Data related to electronic messages originating from or intended for third parties, and data necessary for keeping in contact with these third parties;
- Other third-party data obtained from public sources or supplied by clients, opposing parties, or third parties to COMP.lawyers for the purposes of handling a case or settling a dispute.

3. What personal data of suppliers does COMP.lawyers process?

COMP.lawyers can process the following personal data of persons who obtain products or services from COMP.lawyers:

- Name and address data (family name, given names, initials, title, sex, street address, postcode, town/city);
- Other contact details (telephone number, e-mail address, and similar information necessary for communication);
- Data needed to place orders, purchase services, calculate and record payments in and out, and to collect debts, including bank account number;
- Other data about suppliers that has to be processed in order to comply with relevant laws or regulations.

4. What data from job applicants does COMP.lawyers process?

COMP.lawyers may process the following personal data of persons who apply for jobs with COMP.lawyers:

- Name and address data (family name, given names, initials, title, sex, street address, postcode, town/city);
- Information contained in CV and covering letter.

5. What personal data of website users/visitors does COMP.lawyers process?

COMP.lawyers may process the following personal data of website visitors/users:

- Communication data consisting of technical data of the hardware used to visit the website, such as IP address, MAC address, and the software used;
- Technical data (dependant on the choice of cookie setting);
- The surfing behaviour on the website, including mouse and click behaviour and the duration and time of the visit to the websites.

6. Cookies

COMP.lawyers uses Google Analytics to store user data pertaining to the website(s) for statistical purposes. In principle, the data collated in this way is anonymous and is used mainly to follow user behaviour and general trends, and to obtain reports. This helps to improve the effectiveness of the website(s). Google can supply this information to third parties if it is required by law to do so or insofar as any third party processes the information on behalf of Google and can store this information on servers in the United States. COMP.lawyers has no influence over this.

7. On what basis and for what purposes does COMP.lawyers process personal data?

COMP.lawyers processes the said personal data only on the basis of one or more of the following grounds, as set out in Article 6 of the GDPR:

- legal obligation
- in performance of a contract
- with the consent of the data subject
- legitimate interest

If COMP.lawyers processes personal data on the basis of your consent, it shall separately request this consent. You may revoke your consent at any time. If you subsequently revoke your consent, this has no effect on the lawfulness of the processing of your personal data before you revoked your consent.

COMP.lawyers uses the above personal data for the following purposes. If a processing is based on 'legitimate interest' this interest is briefly explained in italics.

Purposes and their underlying bases:

- to be able to provide the requested legal services, including the identification of the client and the carrying out of a conflict check to avoid any conflict of interest;
- for the administration of COMP.lawyers, including the calculation and recording of payments in and out, the payment and collection of debts (including the engagement of debt collection agencies and bailiffs) (the interest in being able to run a correct administration);
- to be able to handle any complaint or dispute concerning the service;
- to maintain contact with you and communicate with you; (the interest in bringing the services of COMP.lawyers to the attention of existing clients);
- for placing orders or obtaining services (the interest in being able to run a correct administration);
- for conducting an accountant's audit or other internal audit (the interest in being able to run a correct administration);
- for complying with our legal obligations (statutory and otherwise) including the Dutch Advocacy Regulation and the code of conduct for advocates (the interest in being able to comply with these obligations);
- enabling the websites to be able to function properly, (the interest in having a well-functioning website);
- organising marketing activities as effectively as possible and adapting the range and information on the website to these activities (the interest in bringing the service to the attention of a wider public);
- in connection with the job application process.

8. To whom does COMP.lawyers supply the personal data?

COMP.lawyers will only share personal data with third parties insofar as necessary for providing the legal service and having regard to the reasons listed above. We might share this personal data in order, for example, to engage a third-party attorney to temporarily replace the Engaged Attorney, to request an expert investigation, or to engage another third party on behalf of and on the instructions of COMP.lawyers, such as an IT supplier, as well as to



supply your personal data in connection with judicial or other proceedings, or in correspondence with an opposing party.

In addition, COMP.lawyers may supply personal data to a third party such as a supervisory body or other body with public authority, insofar as there is a statutory obligation to do so.

Insofar as necessary COMP.lawyers will enter into a processor agreement with any third party that processes personal data on behalf of, and on the instructions of, COMP.lawyers, under which such third party is required to likewise comply with the GDPR. Third parties engaged by COMP.lawyers who offer services as a controller, are themselves responsible for compliance with the GDPR when they (further) process your personal data.

9. Forwarding of data outside the EEA

For its service, COMP.lawyers may forward personal data to a recipient in a country outside the European Economic Area. In such a case, COMP.lawyers shall ensure that such forwarding of personal data complies with the relevant statutes and regulations by, for example, entering into a model contract drawn up and approved by the European Commission for that purpose. In addition, COMP.lawyers shall also test whether additional measures are necessary to guarantee an appropriate level of protection of your personal data.

10. How long does COMP.lawyers store your personal data?

COMP.lawyers does not store your personal data longer than is necessary to achieve the purposes set out in this Privacy Statement. More specifically, COMP.lawyers complies with the following storage periods:

- The files for the cases handled by COMP.lawyers will be stored for a period of at least five years in accordance with the Manual for Archiving at Law Firms of the Netherlands Bar Association (or longer if required by statute).
- Personal data that is processed in accordance with the Company Complaints Procedure will be deleted no later than two years after the complaint and/or the court proceedings arising therefrom have been dealt with.
- Personal data that must be administered by virtue of Article 52 of the General State Taxes Act (AWR) shall be stored for 7 years (as from the end of the year in which the relevant data has lost its current importance for business (tax) administration) in compliance with the fiscal retention obligation of COMP.lawyers under Article 52 section 4 of the AWR.

The specific storage periods indicated above may be extended if longer statutory retention periods apply. COMP.lawyers may also store personal data for longer if this is necessary for the settlement of incidents and/or legal disputes.

11. Security

COMP.lawyers has adopted appropriate technical and organisational measures to protect your personal data against unjustified and unlawful processing, loss, destruction, damage, alteration, or disclosure. COMP.lawyers uses the online platform of BaseNet for attorneys. This is an online cloud solution with a coded connection and encryption.

12. Your privacy rights

You have the following rights in relation to the processing of your personal data by COMP.lawyers:

- the right to learn from COMP.lawyers whether it has processed any of your personal data and, if so, to have access to that personal data and to certain information about the processing of that personal data;
- the right to rectification of your personal data if it is incorrect or incomplete;
- the right to have your personal data erased ('right to be forgotten');
- the right to object to, or to restrict, the processing of your personal data;
- the right to withdraw your consent to the processing of your personal data where such processing is based on your consent;
- the right to receive your personal data from or disclose it to any third party stipulated by you in structured, commonly used and machine-readable format ('right to data portability').

COMP.lawyers does not make use of automated decision-making as defined by Article 22 of the GDPR.

To exercise your rights, contact COMP.lawyers by e-mail to info@complawyers.nl or by post to:

COMP.lawyers Rotterdam
Boompjes 40 (gebouw Willemswerf, Regus)
3011 XB Rotterdam, the Netherlands

COMP.lawyers Amsterdam
Zuidplein 36 H Toren (Regus)
1077 XV Amsterdam, the Netherlands



If you choose to exercise your rights, COMP.lawyers may ask you for additional information to verify your identity. In principle, COMP.lawyers will inform you no later than one month following receipt of your request whether COMP.lawyers can comply with your request. In certain cases, such as where the request is of a complex nature, this period may be extended by a period of two months. If there is to be any such extension, COMP.lawyers will notify you about this no later than one month following receipt of your request. There may be circumstances in which COMP.lawyers is unable to comply in full or at all with your request as a data subject. For example, we may be prevented from doing so by the attorneys' obligation of confidentiality, or statutory storage periods. For more information about your privacy rights, please see the website of the Dutch Data Protection Authority.

13. Complaints

COMP.lawyers has a company complaints procedure published on its website: www.complawyers.nl. This procedure applies to all Instructions it receives. If you have a complaint about the processing of your personal data by COMP.lawyers, then COMP.lawyers will try to resolve it with you. If this does not achieve the desired result, then you have the right to file a complaint with the competent supervisory authority. In the Netherlands this authority is the Dutch Data Protection Authority. If you live or work in another country within the European Union, you can file a complaint with the supervisory authority in that country.

14. Amendments

This privacy statement was adopted on 1 August 2022. COMP.lawyers is entitled to update the content of this privacy statement at any time without the need to give prior notice. Updates of this privacy statement will be published on our website. You should therefore consult our website at regular intervals.