

# Privacy Policy

## Privacy Policy

Pallas Advocaten B.V. (**Pallas**) respects your privacy and processes personal data as a data controller in accordance with the European General Data Protection Regulation (**GDPR**). In this Privacy Policy we address how we handle and protect your personal data.

More precise, this Privacy Policy addresses:

- 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;
- the rights you have as data subject; and
- how your personal data is protected.

This Privacy Policy applies to all persons of whom Pallas processes personal data, such as clients, prospects, persons who have subscribed to newsletters or events, and persons who have applied for a job at Pallas.

## What are 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;
- 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 from local counsel, counterparties, the Trade Register, the Land Registry or by using publicly available sources.



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

Pallas 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.

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.

## **Sharing of 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, local counsel, courts 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 share your personal data with these 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. Pallas 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 Pallas, Pallas 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, Pallas will ensure that the data transfer is compliant with the applicable law.

### **How long do we keep your data?**

Your personal data is kept in accordance with the GDPR.

Your personal data is processed up until the moment that you inform Pallas that you no longer wish to receive any digital notices and/or Pallas stops sending you news updates, invitations to events or other digital mailings.

Your personal data will be erased 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 if your company ceases to exist; or you have not had any contact with Pallas for a period of 5 years.

### **Your rights**

At the end of each digital mailing that you receive from Pallas, you can always change your mailing preferences via the ‘unsubscribe’ or ‘subscribe’ link. Therefore, you can always withdraw your consent.

In addition, you are entitled to request Pallas 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.

In so far as your personal data is processed on the basis of a legitimate interest, you are entitled to object to this processing. You can address any request in that regard to Pallas Advocaten B.V., Willemsparkweg 82, 1071 HL Amsterdam, or per email to [info@pallas.nl](mailto:info@pallas.nl).

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

### **Security of your data**

We want your personal data to remain as secure as possible and accordingly strive to provide secure data transmission between your computer and our servers. Pallas has taken appropriate technical and organisational measures to protect personal data against loss or any form of unlawful processing.

### **Changes**

Pallas may amend this privacy policy from time to time. On our website, you can always view the latest version of our privacy statement. We would advise you to check the policy regularly and, in any event, whenever you provide us with personal data.

### **Contact**

If you have any questions or comments about our privacy policy or the processing of your personal data, please send a request in that regard to Pallas Advocaten B.V., Willemsparkweg 82, 1071 HL Amsterdam, or per email to [info@pallas.nl](mailto:info@pallas.nl).

Amsterdam, May 2018