Personal data

- Huddle Law B.V. ("Huddle") acknowledges the importance of correct and adequate protection of personal data within its organization. Huddle treats personal data with care and confidentially.
- confidentially.

 2. The term "personal data" means any information relating to an identified or identifiable natural person. This individual is known as the "data subject". For Huddle, this primarily means a client, an employee, a job applicant or a supplier's contact.
- 3. With this privacy statement, data subjects are informed of which personal data regarding them Huddle processes and for which purposes, and what rights the data subjects have in this regard. This statement constitutes compliance with the General Data Protection Regulation (Algemene Verordening Gegevensbescherming – GDPR), which went into effect on 25 May 2018.

Personal data processed by Huddle

- 4. Huddle processes personal data of clients for the purpose of the provision of its legal services, improvement of its services and for marketing and communication purposes. A client's personal data are the name and address information, for example. Huddle processes them inter alia when performing an assignment, including the organized storage of data in the client's file and the processing of these data in agreements and procedural documents and when drawing up, saving, dispatching and collecting invoices.
- 5. Huddle processes in addition to personal data of employees, also personal data of job applicants for the purpose of pursuing its recruitment and selection policy, in particular when filling vacancies. A job applicant's personal data includes application letters, CVs, grade lists, internship assessments, references and correspondence with recruitment agencies. These data are processed by Huddle upon receipt and during its follow-up activities.
- 6. Huddle processes a supplier contact's personal data for the purpose of the goods and services that these suppliers provide to Huddle. These personal data include names, telephone numbers and email addresses of the relevant contacts. Huddle processes these data when the relationship with the supplier commences, when the contact changes and/or when the contact data are updated.

Basis for processing personal data

 The processing of a client's personal data is necessary for the performance of the agreement with the client and to satisfy Huddle's statutory obligations, for example under the Counsel Act (Advocatenwet) and the Money Laundering and Terrorism Financing Act (Wet ter voorkoming van witwassen en finacieren van terrorisme – Wwft). The processing of the personal data of job applicants is done based on permission from the data subject involved, as they provide personal data at their own initiative. The processing of a contact's personal data is necessary for proper performance of the agreement with the supplier.

Retention period

8. Huddle does not retain personal data from clients and supplier contacts for longer than necessary for the purposes of the data processing mentioned above or longer than required based on laws and regulations. If a job applicant is not hired, the relevant personal data are deleted and/or destroyed within four weeks.

Disclosure to third parties

- 9. Huddle only discloses personal data to third parties in so far as necessary for the provision of services, with due observance of the foregoing purposes and where necessary with permission from the data subject. This may for example involve correspondence with an opposing party or engaging another lawyer with a different expertise or an expert for the purpose of a report or a civil-law notary for drawing up a notarial deed. In addition, Huddle will disclose personal data to a third party such as a regulator or other public authorities in so far as it is obliged to do so by law
- 10. A processing agreement is concluded with a third party that processes personal data on the instructions of Huddle, for example external software suppliers, in order to safeguard proper handling of those personal data. Third parties engaged by Huddle that are controllers themselves bear their own responsibility for the further processing of the personal data. Examples of this include an accountant, a civil-law notary, a tax advisor and process servers.

Security

11. Huddle has taken adequate technical and organizational measures to prevent the loss and/or improper processing of personal data. These measures pertain to the organization and management of the ICT environment, for example, or preventing and mitigating the consequences of data leaks and security of the office building.

Data subjects' rights

12. A data subject has the right to apply to Huddle for the inspection, rectification, deletion, transfer or restriction of processing of their personal data, and to object to the processing. A request to that end must be submitted in writing to the contact below. Huddle will then contact the data subject within two weeks. Statutory obligations may prevent Huddle from complying with part or all of the request.

Contact

13. Questions or comments about this privacy statement may be addressed to info@huddle.nl or (+31) 20 240 22 20.

Amendment

14. This privacy statement may be changed from time to time without previous notice. The present version is the most recent version and is dated 1 January 2019.

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