

PRIVACY POLICY – LEGAL SERVICES PROVISION

TABLE OF CONTENTS

1.	INTRODUCTION.....	1
2.	WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?	1
3.	WHY DO WE PROCESS YOUR PERSONAL DATA?	2
4.	WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?	2
5.	WHAT TYPE OF PERSONAL DATA DO WE COLLECT?.....	3
6.	WHO DO WE SHARE YOUR PERSONAL DATA WITH?	3
7.	HOW DO WE TRANSFER YOUR PERSONAL DATA INTERNATIONALLY?	4
8.	HOW LONG DO WE KEEP YOUR PERSONAL DATA?.....	4
9.	WHAT ARE YOUR RIGHTS?	5
10.	QUESTIONS AND COMPLAINTS	6
11.	AMENDMENTS.....	6

1. INTRODUCTION

At Liedekerke, we take our obligations under privacy and data protection law very seriously. This privacy policy is designed to help you understand what personal data we collect, why and how we use it and who we share it with. It also explains the rights you have in connection with your personal data, including how to contact us or to make a complaint.

To the extent that you, as a client, provide us with the personal data of third parties, e.g. employees, self-employed co-workers or other contacts, please provide them with this privacy policy before sharing their personal data with us.

2. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

The entity controlling the processing of your personal data is Liedekerke Wolters Waelbroeck Kirkpatrick SCRL (“Liedekerke”, “us”, “we”). Liedekerke is a Belgian cooperative company with limited liability whose main registered office is located at 1000 Brussels, 3 boulevard de l’Empereur/Keizerslaan. Liedekerke is registered in the Business Register under number 0478.065.191.

For any questions relating to this policy or to exercise your rights regarding your personal data, you may contact us via mail on the above address or via the following email address: privacy@liedekerke.com.

3. WHY DO WE PROCESS YOUR PERSONAL DATA?

Liedekerke processes the personal data of its clients, the employees or other self-employed co-workers of its clients or contacts of its clients of which Liedekerke receives the personal data via its clients, for the following purposes:

1. to provide you with our legal services as requested by you, *i.e.* legal advice, proceedings, arbitration, transactional work, etc.; to exchange information with you and to answer your questions (via mail, e-mail, telephone, etc.) in relation to the provision of our legal services to you, *i.e.* to ask for, receive and discuss your instructions, to keep you informed about the status of your file, to take the necessary steps towards third parties, authorities and other,
2. to comply with our legal obligations, among others, our obligations under the Anti-Money Laundering legislation,
3. to keep you informed about the latest legal news and insights relevant to your business via our newsletters and invitations to our seminars, to keep our database up to date, to use the information provided by you to better understand you and to improve our mailings and service offering,
4. for invoicing, administrative and other purposes.

4. WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

If you are a client, the processing by us of your personal data is necessary for the **performance of the contract**, regarding the provision of Liedekerke's legal services to you, to which you and Liedekerke are parties.

Liedekerke also processes your personal data to comply with its **legal obligations** to which Liedekerke is subject, among others the legal obligations imposed by the Anti-Money Laundering legislation.

If you are an employee or self-employed co-worker of our client and our client has indicated you as its contact person, we process your personal data on the basis of our and our client's **legitimate interest** to interact in relation to our legal services.

If you are a contact of our client and we have received your personal data from our client, *e.g.* because you are an expert, a supplier, an accountant or you work together with our client in one way or another, we also process your personal data on the basis of our and our client's **legitimate interest** to better organize our legal services to our clients.

We believe that our or our client's legitimate interest to process the personal data concerned is not overridden by your interests or fundamental rights and freedoms. If you disagree with our point of

view and do not want your personal data to be processed for the above purposes, please contact us at privacy@liedekerke.com as you have the right to oppose to such processing (see below: What are your rights?).

As we have received your personal data to provide you with our legal services, we believe it is also in Liedekerke's **legitimate interest** to process your personal data to send you our newsletters and invitations to our seminars. As such, we keep you informed about the latest legal developments as well as all relevant information about Liedekerke itself, *e.g.* its functioning, new joiners, areas of legal services provision, etc. You can object to the processing of your personal data for this purpose at any time and free of charge by clicking on 'unsubscribe' at the bottom of each newsletter or invitation. In such a case, we will remove you from our mailing list.

5. WHAT TYPE OF PERSONAL DATA DO WE COLLECT?

We process the following personal data:

1. name, surname, job title, company name, company address, legal entity, email address, (mobile) phone and fax,
2. nationality, ID-card, national number, VAT number, bank account details, business register number,
3. preferred language, specific areas of interests, memberships, industry sectors, etc.,
4. matter or company related information: matter related information may include personal data of other natural persons. We do not process these personal data in a separate database. These personal data are part of the files processed in Liedekerke's document management system. Given our professional secrecy obligation as lawyers, Liedekerke is exempted from informing the persons concerned about this processing.

The provision of some of your personal data may be a legal requirement and/or a requirement necessary to enter into a contract with Liedekerke. Not providing them may result in not entering into the contract with Liedekerke, or not enabling Liedekerke to provide its legal services.

6. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

As a general rule, we do not share your personal data with third parties.

In certain cases, we may do so:

1. when required by law or by court order,
2. when in relation to the services we provide, we may have to share your personal data with official authorities, experts, bailiffs, notaries, etc. in Belgium or abroad, if instructed as such by the client,

3. when the legal services you ask us to provide are related to any country on the African continent or the Democratic Republic of the Congo ('DRC') in particular, to our colleagues from our Liedekerke Africa office established in the DRC, if instructed as such by the client,
4. when useful or necessary for the purpose, to processors that process on our behalf, *i.e.* to perform certain (processing) activities, *e.g.* organizing mailing campaigns or events or to IT, hosting and communications service providers,

In such a case we conclude a processing agreement with these parties that have access to your personal data for the performance of their services,

5. for the purpose of our internal organization, to be able to work with other partners, associates and Liedekerke personnel to provide you with the legal services you ask us to provide.

7. HOW DO WE TRANSFER YOUR PERSONAL DATA INTERNATIONALLY?

Your personal data may be accessible to our colleagues from Liedekerke's representation desk in the United Kingdom given the fact that our UK colleagues are part of the same IT infrastructure. They also engage in firm wide marketing initiatives. If at any moment the UK would be considered to no longer ensure an adequate level of protection of personal data, we will provide appropriate safeguards to ensure an adequate level of data protection.

In case the legal services you require from us concern any country on the African continent or the Democratic Republic of the Congo ('DRC') in particular, we share your personal data with our colleagues from our Liedekerke Africa office established in the DRC.

As the DRC is a country not recognized by the European Commission as ensuring an adequate level of protection of personal data, Liedekerke has implemented appropriate safeguards for the protection of your rights and interests in this country, by entering into the European Commission's Model Contract (decision 2004/915/EC), a copy of which can be requested by sending an e-mail to privacy@liedekerke.com.

8. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

- i) Processing of personal data for the purpose of providing you with our legal services

We process your personal data for as long as necessary for the provision by Liedekerke of the legal services requested by you.

After our contractual relationship is terminated, we will process these personal data for as long as is necessary for tax, accounting or other legal requirements.

- ii) Processing of your personal data for the purpose of direct marketing

We will process your personal data to keep you informed about any legal news or insights relevant to your business via Liedekerke newsletters or event invitations until you object to the processing of your

personal data for this purpose. In such a case, we will immediately remove your personal data from our mailing lists.

This removal will not impact Liedekerke's processing of your personal data for the purpose of providing you legal services.

9. WHAT ARE YOUR RIGHTS?

You have a number of rights in relation to the personal data we process on you, including:

- **Right of access:** you have the right to ascertain what type of personal data we hold about you, how we process your personal data, and to a copy of your personal data.
- **Right to rectification:** you have the right to have any inaccurate personal data which we hold about you updated or corrected.
- **Right to erasure:** in certain circumstances you may request that we delete the personal data that we hold on you.
- **Right to restriction:** you have the right to request that we stop using your personal data in certain circumstances including if you believe that the personal data we hold about you is inaccurate or that our use of your personal data is unlawful. If you validly exercise this right, we will store your personal data and will not carry out any other processing until the issue is resolved.
- **Right to object:** where we rely on our legitimate interests to process your personal data, you have a right to object to this use.
- **Right to portability:** you may request us to provide you with certain personal data which you have given us in a structured, commonly used and machine-readable format and you may request us to transmit your personal data directly to another data controller where this is technically feasible.

To exercise your rights regarding your personal data, you may contact us via the following email address: privacy@liedekerke.com.

We may request that you provide proof of your identity for security reasons and in order to prevent the unauthorised disclosure or misuse of personal data.

Within maximum one month after receipt of the request, Liedekerke will process the respective requests. If Liedekerke has legitimate reasons not to grant the request, it will contact the person in question and motivate its decision.

In case of direct marketing, we will remove your personal data upon your request and free of charge.

10. QUESTIONS AND COMPLAINTS

If you have any questions, remarks or complaints in relation to this policy or how Liedekerke processes your personal data, do not hesitate to send an email to privacy@liedekerke.com.

If you have any complaints about the way Liedekerke processes your personal data, you can file a complaint with the Belgian Data Protection Authority (www.dataprotectionauthority.be).

11. AMENDMENTS

Liedekerke reserves the right to amend this policy in order to comply with applicable privacy laws. We may revise this policy at any time by amending this policy. At all times you can find the current version of our privacy policy on our website.