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Privacy notice

Your privacy is important to Keenon. It handles your personal data with care and adheres to its statutory confidentiality rules and professional rules for the legal profession, as well as the privacy legislation. Confidentiality in the relationship between Keenon (attorney at law) and you as a client is legally guaranteed by the duty of confidentiality of lawyers ("professional secrecy")¹ and the right of attorneys at law to adhere to it in relation to everyone ("right to refuse to give evidence"). All information provided to us as a lawyer or that we obtain in any other way, will therefore be treated confidentially in the first place based on these legal obligations. We will be happy to explain to you what, where and for what purpose we process your data, how we protect it, how long we keep it, for which purposes we share it with third parties and what your rights are.

Which personal data does Keenon process

Keenon generally obtains your personal data because you provide us with those data (by e-mail, telephone, business card, post, etc.), you use our website, LinkedIn or Twitter account or we find those data in public (online) sources, such as websites, Trade Register with the Chamber of Commerce. Even if you are not a client of Keenon, but a third party or other party in a case of our client, it may be that we have to process your personal data for the benefit of our legal services to our clients (such as the establishment, exercise or substantiation of a legal claim; a judicial, administrative or extrajudicial procedure). Depending on the type of relationship between Keenon and you, Keenon processes some of the following personal data:

- your contact details, such as your first and last name, your gender (for the purpose of the opening words in correspondence to you), date of birth, your address, your telephone number(s), your e-mail address(es), your Skype account details, your social media account details, your dial-up details;
- your payment details;
- your (other) personal information contained in the information provided to us or in public sources (such as the Chamber of Commerce) that we need to provide our services;
- your (other) personal data, such as your IP address or visiting behaviour, which we may process as a result of your visit to our website and social media accounts.

Why does Keenon processes personal data

processing purposes

Keenon processes your personal data in particular: for the benefit of our services to its clients;

- on behalf of its services to its clients;
- to contact you regarding our services or the goods or services to be provided by you to us;
- to be able to purchase goods or services from you, whether for the benefit of our customers;
- for its invoicing and payment of invoices;
- to be able to inform you about news and events.

legal bases

The processing of your personal data must be based on one of the principles of the <u>GDPR</u>. The following principles apply depending on the specific processing purposes and personal data:

- processing is necessary for the execution of the agreed delivery of goods or services by Keenon to you
 or by you to us;
- statutory obligation, such as its tax retention obligation and its statutory identification and verification obligations;
- processing is necessary for (i) the representation of Keenon's legitimate interests, such as our (legal) services and our marketing, unless you have objected to this on good grounds or (ii) to safeguard our evidence and legal position; and/or,
- processing takes place based on your given consent, unless you have subsequently withdrawn that consent.

Cookies

Because we want to know how our visitors use the website, so that we can optimize the use of the website, we use Google Analytics. All data generated by Google Analytics cookies is anonymised. Click <u>here</u> for information about Google Analytics.

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¹ Professional secrecy is not absolute. For example, an attorney at law may be required under the Dutch Money Laundering and Terrorist Financing (Prevention) Act (Wwft) to report unusual transactions where there is a suspicion of money laundering or terrorist financing to the appropriate authorities.



Keenon wants to make it as easy as possible for you to share the content of our website via social media. This can be done by means of several social media buttons. If you want to know how these social media deal with privacy, you can click on <u>LinkedIn</u> and <u>Twitter</u> to view their privacy statements.

Where does Keenon process your personal data

Your personal data will be stored in various databases. For example, in our CRM database. If the data are contained in correspondence and documents, such as process documents, contracts, quotations and invoices, we store them in our digital files. The databases are located on various servers, some of which are owned and/or managed by other parties (processors). These processors are in the EEA and in some cases outside the EEA, but in an adequate country designated by the European Commission.

How is your personal data protected

Keenon has taken appropriate organisational and technical measures to protect your personal data and to prevent misuse. If you have the impression or indications that your data is not properly secured, please contact us by e-mail <u>admin@keenon.nl</u> or by telephone +31 20 6204 402.

How long does Keenon store your personal data

Depending on the type of personal data, the processing purpose and the legal basis, Keenon stores your personal data for certain periods of time:

- your contact details for its marketing, until you have objected to this on good grounds or have withdrawn your given consent;
- documents relating to invoicing that may contain personal data for as long as this is required by law (7year tax retention obligation);
- correspondence and documents relating to our (legal) services provided, for as long as Keenon requires proof of its correct service provision (5 to a maximum of 20 years);
- the (anonymised) personal data processed based on cookies will be stored for 50 months.

Why does Keenon share certain personal data with third parties

Keenon will only share certain personal details of you with third parties if: it is legally obliged to do so, which is necessary for the execution of the agreed services, if you have given permission for this and/or for the purpose of its marketing activities. Think of sharing data with a courier company or WeTransfer that we use to send documents to you; our bookkeeper/accountant for the processing of invoices and payments and to MailChimp for the sending of newsletters and invitations. As well as the sharing of data for the purpose of handling a case to another lawyer, notary, legal advisor, expert, translation agency, other party, judicial authorities, supervisor. We will of course only do this to the extent necessary and with due observance of the aforementioned right of professional secrecy and right to refuse to give evidence.

A processing agreement will be concluded with a third party that processes your personal data (processors) on our behalf and on our instructions, as a result of which that third party will also be obliged to comply with the GDPR, unless that third party itself can be regarded as the data controller. If the third party is established or the data processing is carried out by the third party, outside the European Economic Area (EEA), we shall ensure that an adequate level of protection is in place. We will never provide (sell) your personal information to other parties for commercial purposes. For your information the links to the privacy statements of <u>WeTransfer</u> and <u>MailChimp</u>.

What rights do you have regarding your personal data

Insofar as it is not in conflict with Keenon's duty of confidentiality and retention, you have the right to access, amend, transfer, remove your personal data and/or to object to the processing of your personal data for certain purposes. For example, every marketing e-mail from us includes the option to unsubscribe from such e-mails. You can also withdraw your consent at any time. You can do this by sending an email to <u>admin@keenon.nl</u>. If you object or withdraw your consent, thus may result in us no longer being able to provide you with the relevant services.

Finally, you can submit a complaint to a Data Protection Authority, should you disagree with the way in which Keenon handles your personal data.