

Privacy Statement Penrose

Penrose (hereinafter: “we” or “our”) processes personal data within the meaning of the General Data Protection Regulation (“GDPR”), in relation to providing its legal services. This Privacy Statement applies to the processing of such personal data. The Privacy Statement describes how we, in the role of controller, collect, share, use and/or otherwise process information by which you can be identified or are identifiable.

Identity and contact

Penrose.law B.V.
Attn. Hans Klaver
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1017 WT Amsterdam
T: +31 (0)20 2400710
E: h.klaver@penrose.law

Types of personal data

In relation to our legal services we may collect and process (amongst others) the following personal data:

- Name and address, and potentially business address,
- Gender
- Birth date
- Title / function
- Contact details such as (mobile) telephone number and email address
- Identity verification information, where legally required we may also hold a copy of a shielded identity document
- Financial (company) information, such as bank account number
- IP address of the device you use to visit our websites
- The information you provide to us with applying for a job with us, such as educational and work experience
- Any other personal data that we acquire from or about you

In most cases, we acquire your personal data from you directly, for example when you ask us to perform certain legal services, when you visit our websites, or when you apply for a job with us.

We may also obtain your personal data from third parties (e.g. opposing parties) or from public sources.

Processing purposes

We process your personal data for the preparation and execution of an assignment to provide legal services. In addition, we process the personal data required to comply with statutory obligations and/or professional rules.

When you have signed up for receiving our newsletter, or when we provide or have provided legal services to you, we may incidentally approach you with information about our services, publications or events

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and/or relevant legal developments. You are able to sign out from these newsletters at any time via an opt-out link.

If you apply for a job with us, we will process certain personal data of you. We will retain this information ultimately for 4 weeks after the end of the application procedure. With your permission we will retain your personal data for a maximum of 12 months.

Personal data we share with third parties

We do not share your personal data with third parties, unless the sharing of personal data is required in one of the following situations:

1. Third party suppliers we engage order to provide our legal services ('sub processors'), such as our IT suppliers. We have concluded data processing agreements with such third parties about the careful processing and protection of our personal data.
2. Supervisory authorities or institutions in order to comply with statutory obligations.

In order to optimise and improve the content and use of our websites, we collect data about the browsing behaviour of our website visitors. In this respect we make use of Google Analytics. This functionality is configured in a privacy-friendly manner, whereby we have entered into a processing agreement with Google. The IP address is being anonymised and data is not being shared with Google.

Your personal data will generally not be transferred to third parties or countries outside the European Economic Area (EEA). In the event the transfer of personal data to third parties or countries outside the EEA is necessary, we shall take into account the statutory requirements in relation thereto.

Protection of personal data

We have taken adequate technical and organisational measures to protect your personal data against loss, unauthorised access and misuse.

Your rights

We retain your personal data no longer than is necessary for the purpose for which we have collected the personal data, or in correspondence with an applicable statutory retention term. You may at all times request the removal of your personal data.

You also have the right to request for inspection, correction, completion or transfer of your personal data. Additionally, you may request us to limit certain processing, or to object to the processing of your personal data. Any inquiries or complaints regarding your privacy may be directed to us via the contact details as described above. After receipt, we will assess your request and respond thereto within the applicable statutory terms.

For completeness, we also note that you have the right to submit a complaint with the Dutch data protection authority (the "*Autoriteit Persoonsgegevens*").

Applicable law

This Privacy Statement, including any disputes arising therefrom or in connection therewith, shall be exclusively governed by Dutch law.

Changes

We reserve the right to unitarily amend this Privacy Statement in order to ensure compliance with applicable laws and regulations. It is recommended that you consult this Privacy Statement on a regular basis in order to be aware of potential changes or updates.

Amsterdam, March 2019