

Leeway privacy statement

Introduction

We appreciate the importance of handling your personal data with care when we, Leeway B.V. (**Leeway** or **we**) process it in the course of carrying out our legal practice. So, in this privacy statement, we will set out in general terms how we process your personal data. In this context, personal data mean any data that directly or indirectly identifies a natural person. Should it be necessary to inform you specifically of any issues, we will do so with reference to this privacy statement.

Controller

We are responsible for the processing activities described in this privacy statement. Indeed, for these activities, we determine the purposes and means of processing. We always process personal data in accordance with applicable data protection laws and regulations, including the General Data Protection Regulation (**GDPR**).

Categories of people

We process the personal data of the following categories of individuals:

1. **Clients** - persons who are (potential) clients and persons employed by (potential) clients.
2. **Suppliers** - persons from whom we purchase products or services.
3. **Website visitors** - individuals who visit the website <https://leeway.nl>.
4. **Applicants** - individuals who are looking for a job or individuals who actually apply for a job at Leeway.
5. **Third parties** - persons whose personal data appears in our files; persons other than clients such as other lawyers and other persons with whom we have contact.

Minors

In general, we do not provide our services to persons under 18 years of age and do not knowingly process personal data of these minors. If we become aware that we have (inadvertently) processed the personal data of minors, we will take appropriate measures, such as requesting permission from parents or guardians or deleting the data immediately.

Categories of personal data

Clients

From clients we process - as far as reasonably necessary - the following data:

1. **Contact details:** name, address, job title, title, telephone and fax number, Chamber of Commerce number, VAT number, bank account number, unique identification number (case number), nationality, date of birth, place of birth and gender.
2. **Engagement details:** information about the legal services and content of the case.
3. **Invoicing data:** data for the purpose of calculating and recording fees and expenses, making payments and collecting claims.
4. **Other data:** data whose processing is required by applicable laws or regulations or data that clients provide us with on their own initiative.

Suppliers

From suppliers we process - as far as reasonably necessary - the following data:

1. **Contact details:** name, address, job title, title, telephone and fax number, Chamber of Commerce number, VAT number, bank account number, unique identification number, nationality, date of birth, place of birth and gender.
2. **Order data:** data about our suppliers' services such as order data.

3. **Other data:** (in some cases) certificate of good conduct and identity card data, data whose processing is required by applicable laws or regulations or data that suppliers provide us with on their own initiative.

Website visitors

From website visitors we process - as far as reasonably necessary - the following data:

1. **Communication data:** data from the equipment used to visit the website, such as the IP address and the software used.
2. **Technical data:** data for the purpose of identifying and communicating with website visitors or data recorded to keep track of our website visitor statistics.

Applicants

From job applicants we process - as far as reasonably necessary - the following data:

1. **Contact details:** name, address, job title, title, telephone and fax number, Chamber of Commerce number, VAT number, bank account number, unique identification number, nationality, date of birth, place of birth and gender;
2. **Application data:** data concerning education, courses, internships, experience and previous employment.
3. **Other data:** data that we collect from a public source, data whose processing is required by applicable laws or regulations or data that applicants provide us with on their own initiative.

Third parties

From third parties, we process the following data if necessary:

1. **Contact details:** name, address, job title, title, telephone and fax number, Chamber of Commerce number, VAT number, bank account number, unique identification number, nationality, date of birth, place of birth and gender.
2. **Other data:** data that we receive from clients or third parties or collect from a public source, data whose processing is required by applicable laws or regulations, or data that third parties provide to us on their own initiative.

Obtaining personal data

We may obtain your personal data in three ways.

1. From you or your employer

We use data that you or your employer actively provide to us, for example, when you contact us to obtain information about our services.

2. Automatically obtained

We obtain some information about you in an automated way. For example, when you visit our website, we automatically obtain information about you via cookies.

3. Third-party sources

We also obtain information about you from third parties. For example, we may request information about you or your company from public sources, such as the Chamber of Commerce Trade Register, or through social media platforms such as LinkedIn.

Lawful basis and purposes

Of the six possible lawful bases, we generally process your personal data on one of the following four bases.

1. **Performance of a contract.** If it is necessary for the performance of a contract with you, we may process your personal data for this purpose.
2. **Legal obligation.** If it is necessary to comply with a legal obligation, we may process your personal data for this purpose.

3. **Legitimate interest.** If it is necessary to process personal data about you for our or other legitimate interests, and those interests outweigh your interests or fundamental rights, we may process your personal data.
4. **Consent.** In principle, if the aforementioned three bases do not apply, we may only process your data if you have given us your consent.

Client - If you are a client of ours, we may process your personal data for the following purposes:

Purpose	Basis
Performance of a contract to provide legal services (engagement letter).	Performance of a contract
Provision of legal services including advice, mediation and referral (not on the basis of a contract of engagement).	Legitimate interest
	Legal obligation
Collecting receivables and making payments.	Performance of a contract
	Legitimate interest
Conducting (legal) proceedings.	Performance of a contract
	Legal obligation
Complying with our legal, regulatory or risk management obligations.	Legal obligation

Supplier - If you are a supplier to us, we may process your personal data for the following purposes:

Purpose	Basis
Making orders or purchasing services.	Performance of a contract
	Legitimate interest
Calculating and recording income and expenses and making payments.	Performance of a contract
	Legitimate interest
Maintaining contacts.	Legitimate interest
Complying with our legal, regulatory or risk management obligations.	Legal obligation

Website visitor - If you are a website visitor, we may process your personal data for the following purposes:

Purpose	Basis
Keeping our website functioning.	Legitimate interest
Marketing activities such as sending newsletters and invitations to events.	Consent
Offering relevant information.	Legitimate interest
	Consent
Complying with our legal, regulatory or risk management obligations.	Legal obligation

Applicant - If you are an applicant for employment, we may process your personal data for the following purposes:

Purpose	Basis
Assessing applicant's suitability for available position or open application.	Performance of a contract
	Legal obligation
	Legitimate interest
Retaining application documentation for longer than 4 weeks and verifying references.	Consent
Complying with our legal, regulatory or risk management obligations.	Legal obligation

Third party - If you are a third party, we may process your personal data for the following purposes:

Purpose	Basis
Providing legal services to a client.	Legal obligation
	Legitimate interest
Allowing access to our office.	Legitimate interest
Offering relevant information.	Legitimate interest
	Consent
Organising events.	Consent
	Legitimate interest
Complying with our legal, regulatory or risk management obligations.	Legal obligation

Sharing of personal data

We will only share your personal data with trusted third parties if they need this personal data to provide their services. We will ensure that your data is only used in a manner similar to, or for a purpose similar to, the purpose for which it was collected, and only in accordance with this privacy statement and any legal obligations.

We may share your personal data with the following parties:

1. Persons working for us and involved in the processing.
2. Persons working for any of our suppliers (incl. subcontractors or service providers) involved in the processing, such as hosting and payment providers.
3. Persons working for the client who has engaged our services.
4. Persons working for competent authorities, if required by law, such as supervisory authorities, enforcement agencies and courts.

Security

We use various appropriate technical and organisational measures to ensure data security, including protection against a breach of security leading to the accidental or unlawful destruction, loss, alteration or unauthorised disclosure of, or access to, such data. In doing so, we take into account the state of the art, implementation costs, the nature, scope, context and purposes of the processing, as well as the risks the processing poses to you. The persons working for us are, of course, bound by confidentiality and must comply with our instructions aimed at protecting your personal data.

Cookies on our website

Cookies are small text files placed on your computer, laptop, tablet, smartphone or other internet-enabled device. These cookies can be stored and read through your web browser. After a cookie is

placed, your device can be recognised as long as you use the same web browser and as long as the cookie is not deleted. This makes it possible, for example, to click back to the previously visited web page. Cookies can also be used to analyse browsing behaviour. Besides cookies, similar techniques may also be used, such as web beacons (also called "tags"), HTML5 Local Storage and Local Shared Objects (LSOs, also called "flash cookies"), and embedded scripts (also called "Javascrpts"). Our website does not use such alternative techniques.

Functional cookies

Functional cookies are cookies that are necessary for our website to function properly. More precisely, these are cookies: (i) used for the sole purpose of facilitating communication or (ii) strictly necessary for a service requested by the website visitor.

Analytical cookies

Analytical cookies are used to obtain information about the quality or effectiveness of a website. We use these cookies to improve the quality and effectiveness of our website. Legally, these cookies are exempt from the cookie consent requirement. We therefore do not ask you for permission to use these cookies, but do inform you about them. We use the service Google Analytics for this purpose. Through our website, analytical cookies are placed by Google Inc. (Google), as provider of this service. We have made the settings of Google Analytics privacy-friendly in accordance with the User Guide privacy-friendly setting of Google Analytics of the Dutch Data Protection Authority. For example, your IP address is partially masked and the option to share data is disabled. Click [here](#) for more general information on how Google uses cookies and Google's privacy policy. We are not responsible for Google's privacy and/or cookie policy.

Transfer to countries outside the EEA

We may transfer your personal data to parties processing your personal data outside the European Economic Area (EEA). Transfer of your personal data to a country outside the EEA can be legitimised primarily on the basis of a so-called adequacy decision. This is a decision in which the European Commission declares that, for example, a certain country provides a comparable level of data protection to the GDPR.

If and to the extent we share personal data with parties in countries outside the EEA to which no adequacy decision applies, we will only transfer your personal data if the recipient provides appropriate safeguards and you have enforceable rights and effective remedies.

Storage of personal data

In principle, we do not store your personal data for longer than necessary to fulfil the purposes described in this privacy statement.

However, we may need to keep your personal data for longer because it is necessary to comply with a legal obligation. For example, we need to keep certain personal data for a period of at least 7 years after the end of a fiscal year. Also, on the advice of the Dutch Bar Association, we are required to keep some types of personal data in our files for up to 20 years for archiving purposes. If there is a (likely) dispute or (legal) proceedings, we may also keep your personal data for longer.

Privacy rights

You have several rights to maintain control over your personal data as a data subject, including:

Right to withdraw consent	If we process your personal data on the basis of your consent, you have the right to withdraw this consent at any time. We will then no longer process your personal data for the purposes in question.
Right to object	You have the right to object to the processing of your personal data when we process your personal data on the basis of legitimate interest. If you object, we will again carry out a balancing of interests and determine whether we have compelling legitimate grounds that outweigh your interests.
Right to erasure	In principle, we delete your personal data when it is no longer necessary for the purpose for which it was collected. Under certain circumstances, you have the right to request deletion of your personal data if (i) the personal data are no longer necessary, (ii) you have withdrawn your consent, (iii) you have objected to the processing activities, (iv) the personal data have been processed unlawfully, or (v) the personal data must be deleted due to a legal obligation.
Right of rectification	In the unlikely event that your personal data is incomplete or incorrect, you have the right to have your personal data corrected. However, this does not give you the right to change opinions, views or conclusions with which you may disagree. We may choose to add a transcript of your opinion to the relevant file in such cases.
Right of access	You have the right to request access to your personal data. We give you the opportunity to view your personal data, of which you may receive a copy. However this does not mean that you will receive a copy of the documents as such.
Right to restriction	Restriction of your personal data means that we only store the data and no longer process it in any other way, except: (i) with your consent, (ii) for the establishment, exercise or defence of legal claims, (iii) to protect the rights of another natural or legal person, or (iv) for reasons of substantial public interest. You have the right to restrict your personal data if we are not allowed to process the data, or may no longer process it, or during our assessment of certain other requests from you.
Right to data portability	Under certain circumstances, you may request that we provide certain personal data to you or to a third party of your choice in a structured, commonly used, machine-readable format.
Right in relation to automated decision-making	In this regard, please note that we do not use automated decision-making when processing your personal data.
Right to lodge a complaint	In addition to the aforementioned rights, you have the right to lodge a complaint with a supervisory authority at any time. We refer you to this webpage for an overview of the supervisory authorities and their contact details. In the Netherlands, this is the Personal Data Authority. We prefer to deal with your complaint ourselves first before referring you to the supervisory authority. Therefore, please contact us, in particular if you have a complaint about the way we handle your personal data, so that we can try to resolve the issue.

Exercising the above privacy rights is in principle free of charge and can be done by e-mail, post or telephone using the contact details provided below. We will provide you with information on the action taken on your request without undue delay and, in principle, within one month of receiving the request. If the exercise of a privacy right is clearly unfounded or excessive, in particular due to its repetitive nature, we will charge you a reasonable fee or refuse to comply with the request. We may also ask you for certain additional information to help us confirm your identity before complying with such a request.

Contact details

Leeway B.V.
James Wattstraat 100
1097 DM Amsterdam
The Netherlands

T +31 (0) 20 333 11 30
E contact@leeway.nl
I www.leeway.nl

Other

If we refer to websites, whether or not via hyperlinks from other parties, we are not responsible for the content of those websites or the services of those parties, or how they process your personal data.

Please note that we may make changes to this privacy notice from time to time. Where appropriate, we will notify you of such updates. The current version is always available on our website <https://leeway.nl>. This privacy notice was last amended in March 2023.