

Privacy and Cookie Policy Say legal

1. What is this?

This is the privacy and cookie policy of Say legal, Say legal studio and Say legal academy (hereinafter referred to as "Say legal"). Say legal processes personal data as data controller in accordance with the European General Data Protection Regulation 2016/679 ("GDPR"). This policy describes how Say legal handles the personal data it processes. Say legal ensures that the personal information provided to it or otherwise obtained by it is treated confidentially. This document is, for example, relevant when Say legal processes personal data about you (the person concerned).

2. What is personal data?

Personal data refers to all information about a person, such as a name, address or telephone number. Data that indirectly says something about a person is also personal data. This policy implements the information obligation laid down in the GDPR to the data subject(s) whose personal data Say legally processes.

3. What personal data does Say legal process?

Say legal processes, for example, the following categories of personal data:

- Information such as name, surname, gender, title(s), position and company name;
- Contact details such as e-mail address, postal address and telephone number;
- Digital information such as IP address or information about the device you use to visit the website (www.saylegal.nl);
- Personal data such as a (passport) photo, date of birth or bank account number, for example provided in the context of an application or mandatory client identification;
- All other personal data that Say legal receives or obtains and that relates to you and that it processes in the context of the purposes as described in this policy.

4. How did Say legal obtain these data?

This data is processed by Say legal because:

- as a data subject, you have provided Say legal with this information yourself (for example by contacting Say legal or by leaving a business card);
- Say legal obtains this within the framework of the service provision;
- you visit the website of Say legal;
- you apply for a job at Say legal;
- these have been made known to Say legal by third parties, for example counterparties or parties with whom Say legal cooperates such as other lawyers or consultants, or because they have become known through public sources.

5. For what purpose and on what grounds does Say legal process personal data?

Say legal processes the personal data mentioned solely for the purposes mentioned below:

- the provision of legal services, including the execution of the agreement (engagement) that Say legal has concluded with you and the conducting of (legal) proceedings;
- the collection of invoices;
- advice, mediation and referral;
- marketing and communication activities, such as sending a newsletter, invitations or publications;
- providing events such as lectures and courses, from the registration process to asking for feedback after the event;
- compliance with legal and statutory obligations, including the professional rules for the legal profession, for example:
 - o establishing the identity of the client, including (if applicable pursuant to the Dutch Act for the prevention of money laundering and financing of terrorism (Wwft)) a mandatory extensive client screening process with a view to preventing money laundering and financing of terrorism;
 - o under certain circumstances, report unusual transactions to the authorities if required under the Wwft;
 - o checking for a possible conflict of interest with a client of Say legal, whereby only the necessary information will be used to check this;
- recruitment and selection (application);
- improving the website by collecting statistics about the website.

6. What are the grounds for the processing of personal data?

Say legal processes the aforementioned personal data exclusively on the basis of one or more of the grounds mentioned below as referred to in article 6 of the GDPR:

- legal obligation

- performance of a contract
- consent obtained from the data subject(s)
- legitimate interest

7. With which third parties does Say legal share personal data?

Say legal only shares your personal data with third parties as far as necessary for the provision of services, with due observance of the aforementioned purposes and principles. For example: a referral or collaboration with a third party such as another lawyer or a consultant, the performance of an expert investigation or the engagement of another third party such as an IT supplier, storage or backup provider, CRM system, telephone or payment services, hosting for the website, bookkeeper, but also the provision of your personal data in connection with (legal) proceedings, contact with supervisory bodies or correspondence with the counterparty.

In addition, to the extent that there is a legal obligation to do so, Say legal may provide personal data to a third party, such as a regulator or other public authority.

If a third party processes personal data on behalf of and at the instruction of Say legal, a data processing agreement will be concluded as a result of which this third party is also required to comply with the GDPR. These parties may also be established in countries outside the EEA. Third parties engaged by Say legal, who offer services as data controllers, are themselves responsible for the (further) processing of your personal data in compliance with the GDPR.

8. How does Say legal protect data?

Say legal attaches great importance to the security and protection of your personal data and, taking into account the state of the art, will ensure that appropriate technical and organisational measures are in place to guarantee a level of security appropriate to the risk. In case Say legal uses the services of a third party, such as an IT supplier, Say legal will make arrangements regarding sufficient security measures in the context of personal data protection.

The client agrees to electronic data exchange (internet and e-mail) and realises that despite all the security measures taken by Say legal, no absolute security can be given against interception or consultation by unauthorised parties.

9. How long does Say legal retain personal data?

Say legal does not retain personal data that are processed for longer than is necessary for the aforementioned purposes of the data processing or as required by laws and regulations.

10. What are your rights as a data subject?

As a data subject, you have the following rights:

- right to information (receipt of privacy statement)
- right of access (with the exception of personal notes of the data controller)
- right of correction, addition, deletion or blocking (only of factual data)
- right of opposition
- right to data portability
- right to be forgotten
- the right to limit the processing of personal data
- right to revoke previously given consent.

A request for access, correction, restriction, objection, transferability of data, deletion of your personal data or revocation of previously given consent can be sent via the contact details below. You will receive further information as soon as possible, but at the latest within four weeks after receipt of your request.

Circumstances may arise in which Say legal can not or not fully execute your request as a party involved. These include, for example, the duty of confidentiality of lawyers, Wwft obligations and statutory retention periods.

Your requests as referred to above can be addressed to: Sarah Arayess LLM MSc via info@saylegal.nl. In order to ensure that Say legal will provide the personal data in question to the correct person on the basis of your request, Say legal may ask you to provide a copy of a valid passport, driver's licence or identity card with a redacted passport photo and BSN number as verification. Say legal will only handle requests concerning your own personal data.

11. How does Say use legal social media and cookies?

Social media: buttons and/or links may be included on the Say legal website in order to promote or share web pages on social (media) networks or websites of third parties, such as Twitter, LinkedIn or Facebook. Say legal does not supervise and is not responsible for the processing of your personal data by and through such third parties. The use of these media is

therefore at your own risk. Before you use the services of third parties, it is advisable to first read the privacy statement of those third parties.

Cookies: Say legal keeps track of usage data of the website(s) for statistical purposes. The personal data collected in this way is in principle anonymous and will not be sold by Say legal to third parties.

In order to increase the ease of use of the Say legal website, so-called 'cookies' are used. A cookie is a small text file that is placed on your computer, tablet or smartphone during your visit to the Say legal website. You can refuse the use of these cookies at any time (more information below), although this may limit the functionality and ease of use of the website.

The Say legal website uses cookies from Google Analytics to, in general, track user behaviour and general trends and to obtain reports. This helps to improve the functioning of the website. Google may also transfer this information to third parties where required to do so by law or where such third parties process the information on Google's behalf. By using the Say legal website, you consent to the processing of the data by Google in the manner and for the purposes set out above. Cookies may also be placed by using buttons and/or links, as described above under 'Social media'. Say legal has no influence on the placing and use of cookies by those third parties.

On the website of the Consumer and Market Authority (<https://www.consuwijzer.nl/telecom-post/internet/privacy/uitleg-cookies>) you can find more information about cookies and how to block or delete those.

12. Finally

The interpretation of privacy rules and the developments in the online environment are constantly changing. It is therefore possible that Say legal will change the content of this privacy statement at any time without prior notice. Consult the website www.saylegal.nl regularly for the latest version. At the bottom of this policy you can find the version date.

13. Help, I still have a question

If you have any questions or comments about the processing of your personal data and this privacy statement, please contact sarah@saylegal.nl. Say legal does not have a Data Protection Officer as described in the GDPR.

Version: 22 June 2021