

Privacy Statement

Publication date: 1 August 2026

1. Introduction

As part of the activities and services of Loyens & Loeff (hereafter: “we” or “us”), as a fully independent provider of legal, tax, and notarial services, we collect and process certain personal data about you. Under applicable data protection and privacy laws, such as the General Data Protection Regulation (the GDPR), any applicable local GDPR implementation laws*, and the Swiss Federal Act on Data Protection (the nFADP), we act as the data controller for your personal data**. This means we have specific legal duties and responsibilities regarding these processing activities.

This privacy notice explains how we fulfil these obligations. We understand that your privacy is important and that you care about how your personal data is used. Therefore, this notice provides information about the processing of your personal data. For clarity, we have structured this notice into different sections; please refer to the relevant section below.

**Such as, for our Home Markets, the Dutch GDPR Implementation Act (Uitvoeringswet Algemene Verordening Gegevensbescherming), the Belgium GDPR Implementation Act (Belgische Uitvoeringswet AVG), the Luxembourg GDPR Implementation Act (Loi du 1er août 2018).*

***Please, also refer to the guidelines 07/2020 on the concepts of controller and processor in the GDPR, Version 2.1, Adopted on 07 July 2021, paragraph 27, example “Law Firms”.*

Information	Paragraph
Our identity, our contact details and information on our privacy officer With any questions, you can reach us via: dataprotection@loyensloeff.com . We also have appointed a privacy officer. In this paragraph you will also find more information on our identity and our contact details and on the identity and contact details of our privacy officer.	2
The personal data we process, the purposes and legal basis We will mainly process your personal data in the context of providing legal, tax and notarial services. All our processing activities are based on a legal basis as stipulated in the GDPR. Where our processing is based on our legitimate interest, we will inform you about the legitimate interests pursued by us. In this paragraph you will find detailed information on the personal data that we process of you, the purposes for that processing as well as the legal basis for that processing. Also we include a schematic overview of the personal data we process, from whom we process this personal data, for what purposes we process this personal data and the legal basis for the processing. The schematic overview can be found further down this page. We seek to ensure that we keep your personal data accurate and up to date. Therefore, we kindly request that you inform us of any changes to your personal data.	3

Information	Paragraph
The recipients of personal data We may share your personal data with the relevant entity of Loyens & Loeff, third parties, such as service providers (for example IT services providers), competent authorities, external consultants, courts and counterparties. We ensure that, if applicable, appropriate measures are taken when we disclose your personal data to third parties. In this paragraph you will find detailed information about the recipients of your personal data and the measures taken by us to secure your personal data in that respect.	4
Data transfers outside the European Economic Area We may share your personal data with parties located in countries outside the European Economic Area, which may offer a lower level of data protection. In such case, we shall ensure that the international transfer of your personal data shall comply with the applicable data protection laws. In this paragraph you will find more information on the measures we have taken in that respect.	5
Retention periods We store your personal data no longer than necessary for the purposes for which we process your personal data, taking into account professional rules and any applicable statutory retention period in the jurisdictions in which we operate. In this paragraph you will find more information on the retention periods we apply in that respect. With regard to certain documents in files, such as notarial deeds and the associated preparatory acts or files in environmental matters, we retain these in accordance with the statutory retention periods.	6
Security measures We will protect your personal data and have taken measures in that respect. You will find more information about the measures we have taken in this paragraph.	7
Your rights Under certain circumstances you have the right to (i) information about and access to your personal data; (ii) rectify your personal data; (iii) erasure of your personal data ('right to be forgotten'); (iv) restriction of processing of your personal data; (v) object to the processing of your personal data; and (vi) data portability. In addition thereto, you have the right to lodge a complaint with the relevant data protection authority. In this paragraph you will find more information about your rights and how to invoke them.	8
Automated decision-making We do not undertake any automated decision making or profiling as defined under Article 22 of the GDPR.	9
We as processor In very exceptional circumstances, it may be the case that we act as a processor for certain very limited processing activities. This would only apply where, following a careful case-by-case assessment, it is determined that the conditions as laid down in the applicable data protection laws for such a role are met. In those instances, we process personal data solely on behalf of and under the instructions of another party. Even in such cases, we ensure that appropriate safeguards are in place to protect the personal data we process in the course of providing these services, for example by entering into data processing agreements.	10

Information	Paragraph
Job applicants As part of your application process for a position within our company, we will collect and process certain personal data relating to you. This paragraph explains how we collect and use your personal data as part of your application procedure and for what purposes we process your personal data. The Netherlands and Belgium apply a retention period of four weeks, which may be extended to a maximum of one year with your consent. Luxembourg applies a retention period of two years after the last contact with you. Switzerland applies a retention period of six months, which may be extended to a maximum of one year with your consent.	11
Cookies We may use cookies, for more information on the use of cookies we refer to our cookie policy available via: cookie policy .	12

We recommend that you read this privacy notice carefully. From time to time, we may update this privacy notice. If we make any material changes, we will actively inform you and provide you with the updated version. The most recent version is always available here: [privacy statement](#). You may also request a copy from us at any time.

Important: If you provide us with personal data relating to another individual (for example, the legal representative of the company you represent), please ensure that you provide that individual with a copy of this privacy notice before sharing their personal data with us.

Please be aware: By using our services and/or our website and by sharing your personal data with us, you acknowledge that your personal data will be processed as described in this privacy notice. This does not mean that you consent to such processing. We do not process your personal data on the basis of consent unless this is explicitly stated in this privacy notice or required by law.

2. Our identity, our contact details and information about our privacy officer

We provide our services across multiple jurisdictions. In accordance with applicable data protection and privacy legislation, the relevant Loyens & Loeff entity, office or affiliate you are in contact with qualifies as the controller for the specific processing activity concerned. Where multiple entities jointly determine the purposes and means of processing, they may act as joint controllers within the meaning of Article 26 GDPR. A complete overview of our legal entities and their corresponding addresses, can be found here: [contact](#).

Notwithstanding the foregoing, data subjects may, at all times, exercise their rights and address any requests or communications, and, where applicable, any enquiries or requests from competent supervisory authorities may be directed to, Loyens & Loeff N.V., which shall be responsible for coordinating and handling such matters within the Loyens & Loeff network.

We have appointed a privacy officer, therefore, to contact us about anything related to your personal data and/or data protection, including exercising your rights as discussed below in paragraph 8, please use the contact details below:

Name: Menno Borsboom

Email: dataprotection@loyensloeff.com

3. The personal data we process, the purposes and legal basis

3.1 Whose personal data we process

This privacy notice applies to any individual whose personal data we process in the context of our business activities, including but not limited to:

- Potential, current, and former clients, as well as their contact persons, employees, representatives, shareholders, or board members;
- (Pseudo-)Ultimate Beneficial Owners ((Pseudo-)UBOs) of our clients, and Politically Exposed Persons (PEPs) associated with them;
- Current and former professional advisers and (legal, notarial, tax, or financial) consultants of our clients;
- Counterparties of our clients, their advisers and consultants, and their employees, representatives, shareholders, or board members;
- Individuals involved in legal proceedings or investigations, such as defendants, complainants, witnesses, experts, or other parties whose personal data forms part of a legal, notarial, tax, or financial file or matter we handle (e.g., heirs, beneficiaries, employees, or contractual parties mentioned in documents);
- Contact persons of state authorities (e.g., tax authorities, courts, bailiffs, municipalities, or other government bodies);
- Contact persons, employees, or representatives of our business partners, partner firms, and service providers;
- Subscribers to our newsletters or other mailings;
- Visitors to our websites or social media channels, and individuals whose personal data is processed for marketing analytics or website tracking;
- Visitors to our offices;
- Job applicants, referees, and individuals we meet during recruitment or other business events (online or offline);
- Individuals whose personal data is included in public registers or databases consulted in the course of our services;
- Individuals whose personal data is included in data rooms we consult as part of transactional due diligence; and/or
- Individuals whose personal data is processed in the context of whistleblower reports or grievance procedures.

Please note: This privacy notice does not cover the processing of personal data of our (former) employees. For information on the processing of job applicants' personal data, please refer to paragraph 11.

If you provide us with personal data relating to another individual (for example, a legal representative or contact person of the company you represent), please ensure that you provide that individual with a copy of this privacy notice before sharing their personal data with us.

3.2 How we collect personal data

We may collect personal data about you in various ways, including but not limited to:

- Directly from you, for example when you engage our services, contact us, or when a contact person from your company provides your details by email, phone, messaging services (e.g., WhatsApp), on paper, or via a business card;
- When you interact with us, such as when you visit our website, social media channels, offices (e.g., via CCTV, visitor registration or parking space registration), recruitment events, or other business events (online or offline). For visitors of our Belgian office, please find more information here: [CCTV checklist](#);
- Through our clients or their advisers, for example when we receive your details in the course of providing legal, tax, or notarial services, handling litigation or investigations, managing corporate matters, or when your personal data is uploaded to an (online) data room, document portal, or collaboration platform we access;
- From legal or notarial documents, such as contracts, wills, articles of association, or other legal documents;
- From public authorities, such as tax authorities, courts, or bailiffs, for example when we obtain your details in the course of providing legal, tax, or notarial services;
- Through compliance and onboarding processes, such as conflict checks, matter acceptance, or Know Your Customer (KYC) procedures;

- Via communication and IT systems, including email logs, document management systems, telephony, video conferencing platforms, or internal portals where personal data is stored or shared;
- Through cookies and similar technologies (see our [cookie policy](#));
- From third parties, such as law firms, notaries, tax advisers, referral firms, or other business partners, for example in the context of legal analysis, due diligence, or referrals;
- Through whistleblower reports or grievance procedures; and/or
- From public sources, such as company websites, trade registers, professional directories, media, court decisions, sanction lists, or UBO registers, as well as through our own research.

3.3 Legal grounds for processing personal data

We process personal data only when there is a valid legal basis under applicable data protection laws, such as the GDPR and the Swiss Federal Act on Data Protection (nFADP). Depending on the context, this may include:

- a. Performance of a contract – where processing is necessary to perform a contract to which you are a party, or to take steps at your request before entering into a contract;
- b. Compliance with a legal obligation – where processing is necessary for us to comply with applicable legal or regulatory obligations;
- c. Legitimate interests – where processing is necessary for our legitimate interests or those of a third party, except where such interests are overridden by your interests or fundamental rights and freedoms; and/or
- d. Consent – where you have given your consent for one or more specific purposes.

If required by law (for example, under the nFADP for processing sensitive personal data or high-risk profiling), we will obtain your explicit consent. Where processing is based on consent, you have the right to withdraw your consent at any time. Withdrawal will not affect the lawfulness of processing carried out before withdrawal, and it must be as easy to withdraw consent as it was to give it. Please, refer to paragraph 8 to find more information about your rights (including your right to withdraw your given consent) and how to invoke them.

3.4 Categories of personal data we process

We may process the following categories of personal data about you, including but not limited to:

- Personal details: first and last name(s), date and place of birth, gender, nationality, marital status, signature(s), title(s), photos, videos, and details included in your passport or identity card (or any other means by which you identify yourself), as well as license plate numbers;
- Contact details: address(es), email address(es), and phone number(s);
- Business details: business or company information (including contact details of representatives), position/job title, details about your role in a legal entity, signatures, and personal data included in excerpts from public or private registers (e.g., Chamber of Commerce);
- Identification numbers and official documents: citizen service number (if permitted), passport number, driver's license number, residence permit number, notarial deed numbers, or file numbers;
- Due diligence details: data from sanctions lists, UBO registers, compliance checks, KYC documentation, and shareholder information;
- Account details: username and password;
- Financial details: payment information, bank account details, details about your wealth, source of funds, or financial/ shareholding position in a company;
- Service-related details: personal data that is necessary and proportionate for the provision of our legal, tax, and notarial services;
- Technical data: IP address, browser type and version, time zone setting and location, and other technology on the devices you use to access our website;
- Usage data: data about activity on our website or social media channels;
- Communication data: email content, meeting minutes, notes from phone calls, correspondence via messaging services (e.g., WhatsApp, Signal), or contact forms;

- Data from legal, tax, or notarial documents: details of heirs, contracting parties, partners, directors, shareholders, or authorized representatives as recorded in wills, powers of attorney, and court documents;
- Statistical data: data about reader activity on our website, newsletters, or updates; and/or
- Other: limited personal data, where required by applicable law or necessary for compliance, due diligence, or the establishment, exercise, or defence of legal claims.

In rare circumstances, we may process personal data relating to criminal convictions and offences, or special categories of personal data as defined under Article 9 GDPR and the nFADP. This includes data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for identification purposes, health data, or data concerning a person's sex life or sexual orientation. We only process such data where necessary for the establishment, exercise, or defence of legal claims, for compliance with legal obligations, or as otherwise permitted by law, including Articles 9(2)(f) and 10 GDPR and applicable national law, and we apply appropriate safeguards, such as strict access controls, professional secrecy obligations, data minimisation, and enhanced confidentiality measures.

We aim to keep your personal data accurate and up to date. Please inform us of any changes to your personal data (e.g., changes to your contact details).

4. Who we share your personal data with

In the context of the purposes described above, we may share your personal data with third parties, including but not limited to:

- The relevant Loyens & Loeff entity, office or affiliate with which you are in contact;
- Parties relevant to the provision of our services, such as clients, judicial bodies, courts and tribunals, bailiffs, clients' counterparties and their representatives or advisors, public authorities, governmental organizations, law enforcement agencies, engaged experts, specialists, translation agencies, lawyers, notaries, tax specialists, accountants, or compliance advisors involved in the same matter or transaction;
- Your employer or business contacts, where necessary in the course of providing our legal, tax, notarial, and financial services;
- Public authorities and regulators, where we are legally required to share personal data, for example in the context of legal proceedings or to comply with obligations under DAC6, reporting duties to the Financial Intelligence Unit, or Anti-Money Laundering (AML) and Know Your Customer (KYC) laws. We may also disclose data pursuant to a court order or at the instruction of insurers or supervisory authorities, such as data protection authorities or financial regulators (e.g., AFM, DNB, CSSF, FINMA, SEC), depending on the jurisdiction and the type of service provided;
- Service providers acting as processors, such as IT application providers, software developers, cloud service providers, and other vendors engaged for personal data processing on our behalf. We may also engage certification bodies and auditors, for example in the context of ISO certification, quality control, or professional accreditation;
- Other third parties for legitimate business purposes, such as collection agencies and postal companies;
- Public registers or databases, such as the trade register, land registry, UBO register, or sanctions lists; and/or
- Parties involved in corporate transactions, such as external advisors, auditors, potential buyers, and government authorities, in the event of a sale or transfer of all or part of our business.

We ensure that appropriate measures are taken when disclosing your personal data to third parties. Where third parties act as independent controllers (e.g., clients, banks, insurance companies, counterparties, accountancy firms, public authorities), they are responsible for compliance with applicable data protection laws. We are not responsible or liable for their processing of your personal data.

Where we engage third parties as processors or act as joint controllers, we will enter into a data processing agreement or joint controller agreement with those parties, which includes restrictions on the use of your personal data and obligations regarding its security.

5. International transfers of personal data

Any personal data we collect from you may be transferred to and shared with our entities, affiliates, and offices, both inside and outside the European Economic Area (EEA) and Switzerland. For intra-group transfers, we have implemented contractual safeguards to ensure compliance with applicable data protection laws. Transfers between the EEA and Switzerland are permitted on the basis of the European Commission's adequacy decision for Switzerland (confirmed 15 January 2024).

Files handled by our lawyers, tax advisers, and notaries are stored within the EEA and Switzerland. In principle, the personal data contained in these files will not be transferred outside the EEA or Switzerland, unless this is necessary for the establishment, exercise, or defence of legal claims, or required as part of a legal, notarial, tax, or financial matter we are handling.

We make every effort to keep your personal data within the EEA and Switzerland, even when sharing data with third parties. However, some third parties with whom we share personal data may be located in countries outside the EEA and Switzerland, where data protection laws may provide a lower level of protection. This may for example occur in the following situations:

- When we collaborate with our offices outside the EEA or Switzerland, or engage local counsel, notaries, tax advisers, or other professional service providers in the context of a legal, notarial, tax, or financial matter;
- When we are involved in cross-border litigation, arbitration, or regulatory investigations requiring us to share personal data with courts, tribunals, regulators, or counterparties outside the EEA or Switzerland;
- When we use cloud-based technology platforms, communication tools, or legal tech solutions (e.g., for document sharing, e-discovery, or video conferencing) whose servers or support teams are located outside the EEA or Switzerland;
- When we access personal data uploaded to an online data room or collaboration platform hosted outside the EEA or Switzerland, for example in the context of a cross-border transaction; and/or
- When we are legally required to report or disclose personal data to authorities or regulators outside the EEA or Switzerland, for example under DAC6-equivalent rules or local anti-money laundering legislation.

In such cases, we ensure that the international transfer of your personal data complies with applicable data protection laws. In principle, we only transfer personal data to receiving parties in countries that are subject to an adequacy decision by the European Commission. If no adequacy decision applies, we might use the European Commission's Standard Contractual Clauses and might conduct a transfer impact assessment or take other measures to ensure that the international transfer of your personal data complies with applicable data protection laws.

You may request meaningful information about the safeguards applied to such transfers by contacting us using the details provided below.

6. How long we keep your personal data

We do not retain your personal data longer than necessary for the purposes for which it was collected taking into account our professional rules and any applicable statutory retention period in the jurisdictions in which we operate. We may retain personal data for longer periods where required by law or where necessary to establish, exercise, or defend legal claims.

Certain documents, such as notarial deeds and related preparatory acts, or files in environmental matters, are retained in accordance with statutory retention periods, which may be 20, 30 years, or even longer (for example, in the case of the execution and registration of a deed). If personal data is included in such documents, the same retention period applies.

After the applicable retention period, we will delete or anonymize your personal data, unless we are legally required to retain it for a longer period or it is necessary for legal proceedings.

If you have any questions regarding certain applicable statutory retention periods within our office, please feel free to contact us.

7. How we protect your personal data

Our IT department is ISO 27001 certified, an internationally recognized standard for information security management. In line with this standard, we have implemented a comprehensive set of technical, physical, human, and organizational measures to safeguard the integrity, availability, and confidentiality of your personal data.

Our Corporate Information Security Officer (CISO) oversees the continuous development and implementation of our information security policy. This ensures that our practices remain robust and aligned with the latest security requirements.

We apply administrative, technical, and organizational measures to ensure a level of security appropriate to the risks identified. These measures protect your personal data against destruction, loss, alteration, or unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed. Examples of measures include, but are not limited to:

- Access control: Restricting access to legal, notarial, or tax files to authorized professionals only, using role-based access controls and secure document management systems;
- Data transmission security: Using encryption and multi-factor authentication when receiving personal data via email or secure portals (e.g., data rooms or collaboration platforms);
- Third-party security: Ensuring that third-party service providers (e.g., IT vendors, cloud platforms, translation agencies) are bound by data processing agreements and meet our security standards;
- Marketing data protection: Using secure mailing platforms and limiting access to mailing lists for newsletters or event invitations; and/or
- Physical and digital security: Applying strict access controls to CCTV footage and visitor registration data to prevent unauthorized access or misuse.

You may request more information about the safeguards and security measures that apply to your personal data by contacting us using the details provided below.

8. Your rights

Under applicable data protection laws, including the GDPR and the Swiss Federal Act on Data Protection (nFADP), you have the following rights within the limits and subject to the exceptions set out therein:

- Right of access: You may request information about our processing activities and obtain a copy of the personal data we hold about you.
- Right to rectification: You may request the correction or completion of inaccurate or incomplete personal data.
- Right to erasure ('right to be forgotten'): You may request the deletion of your personal data if:
 - the data is no longer necessary for the purposes for which it was collected;
 - the processing is based solely on your consent and you withdraw that consent;
 - you object to the processing and there are no overriding legitimate grounds;
 - the data has been unlawfully processed; or
 - deletion is required to comply with a legal obligation.
- We may refuse deletion where processing is necessary:
 - to exercise the right to freedom of expression and information;
 - to comply with a legal obligation; or
 - to establish, exercise, or defend legal claims.
- Right to restriction of processing: You may request that we limit the processing of your personal data if:
 - you contest the accuracy of the data (for a period enabling us to verify it);
 - processing is unlawful and you request restriction instead of deletion;
 - we no longer need the data, but you require it for legal claims; or
 - you have objected to processing based on legitimate interests.

- Right to object: You may object to processing based on legitimate interests. We will stop processing unless we demonstrate compelling legitimate grounds or the processing is necessary for legal claims.
- Right to data portability: You may request your personal data in a structured, commonly used, and machine-readable format and have the right to transmit that data to another controller, where:
 - processing is based on consent or contract; and
 - processing is carried out by automated means.

To exercise these rights, or if you have questions about how we process your data, please contact us using the details in paragraph 2. Requests should be made in writing. In principle, no fee applies. If a request is manifestly unfounded or excessive (e.g., repetitive), we may charge a reasonable fee to cover administrative costs.

We will respond within one month of receipt. If your request is complex, we may extend this period by up to two additional months. In such cases, we will inform you within one month of receiving your request.

If you are not satisfied with our response, you may lodge a complaint with a supervisory authority:

- **Netherlands:** Dutch Data Protection Authority (Autoriteit Persoonsgegevens)
<https://www.autoriteitpersoonsgegevens.nl/nl/zelf-doen/gebruik-uw-privacyrechten/klacht-melden-bij-de-ap>.
- **Belgium:** Data Protection Authority (Autorité de protection des données / Gegevensbeschermingsautoriteit)
<https://www.dataprotectionauthority.be/citizen/actions/lodge-a-complaint>.
- **Luxembourg:** Commission nationale pour la protection des données
<https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html>.
- **Switzerland:** Federal Data Protection and Information Commissioner (FDPIC)
<https://www.edoeb.admin.ch/en/reporting-portals>.

9. Automated decision making and profiling

We do not undertake any automated decision making or profiling as defined under Article 22 of the GDPR.

10. When we act as processor

In exceptional circumstances, we may act as a processor for certain limited processing activities. This only occurs after a case-by-case assessment confirming that the conditions set out in applicable data protection laws are met. In such cases, we process personal data solely on behalf of, and under the documented instructions of, another party.

Even then, we ensure appropriate safeguards to protect the personal data we process, such as entering into data processing agreements in accordance with applicable legal requirements.

11. Information for job applicants

As part of your application for a position with Loyens & Loeff, we collect and process certain personal data about you. This section explains how we collect and use your personal data during the application process and for what purposes. It applies only to the application process. If you are hired, you will receive our internal employee privacy notice. Personal data we may collect and process includes:

- Identification and contact details (e.g. name, date of birth, gender, place of birth, nationality, address, telephone number, and email address);
- Résumé, education, and employment history;
- Professional certificates;
- Appraisals;
- References;

- Information on your legal and disciplinary history to the extent legally permitted in the relevant jurisdiction;
- Copy of an identification document (if relevant for the position);
- Social security number (e.g. Burgerservicenummer in the Netherlands);
- Other data relating to your work experience (if relevant to the role);
- Any information you include in your cover letter or résumé;
- Government-issued documents, such as a residence or work permit (if applicable);
- Results of assessments;
- Information from your professional social media accounts;
- Your responses to interview questions; and
- If we offer you a position, and to the extent legally permitted in the relevant jurisdiction we may request a certificate of good conduct (Verklaring omtrent gedrag in the Netherlands) to ensure suitability, integrity, and reliability for the role.

Purposes of processing:

- To assess your suitability for the position and verify that you meet the requirements;
- To maintain records of the recruitment process;
- To contact and communicate with you;
- To prepare an employment contract; and
- To avoid duplicate assessments of applicants.

We process your personal data where necessary to take pre-contractual steps related to your application or to pursue our legitimate interests. In some cases, we may ask for your explicit consent for specific processing activities. If processing is based on your consent, you may withdraw it at any time by contacting us (see paragraph 2).

Sources of personal data: We obtain your personal data directly from you, from publicly available sources, or where appropriate and with your consent from third parties such as recruitment agencies, referees, former employers, educational institutions, and assessment agencies.

Sharing of personal data: We may share your personal data with third parties, such as service providers and professional advisers, but only for the purposes described above. We ensure appropriate safeguards when disclosing your personal data (see paragraph 4).

Retention periods: If you are hired, your application data will be included in your employee file and subject to our internal privacy notice. If you are not hired, we will delete your data as soon as reasonably possible after the recruitment process ends:

- Netherlands and Belgium: 4 weeks (extendable to 1 year with consent);
- Luxembourg: 2 years after last contact;
- Switzerland: 6 months (extendable to 1 year with consent).

We may retain your data longer if necessary to comply with legal obligations or to defend legal claims.

For your other rights regarding your personal data, please refer to paragraph 8.

12. Cookies and third-party websites

We may use cookies on our website, for more information on the use of cookies we refer to our cookie policy available here: [cookie policy](#).

Our website may contain hyperlinks to websites of other (third) parties and social media buttons. We are not responsible for the content of those websites, or the services of the social media platforms concerned. For the privacy policy and the use of cookies on those websites and social media platforms, we refer you to the respective website or social media of these other (third) parties.

Schematic overview

Categories of data subjects	Personal data	Purpose	Legal ground
All categories of data subjects	- Personal details - Contact details - Business details - Account details - Other (personal) information you provide if you send us an email or fill out the contact form on our website.	- To identify you; and - To contact you / to communicate with you, for example via email correspondence and/or telephone calls.	Article 6 (1)(a) and (f) GDPR Our legitimate interests are, <i>inter alia</i>, to know who you are, to communicate with you and to know with whom we do business, and to communicate with you and provide you with relevant information.
- Potential, current, and former clients, as well as their contact persons, employees, representatives, shareholders, or board members; (Pseudo-)Ultimate Beneficial Owners ((Pseudo-)UBOs) of our clients, and Politically Exposed Persons (PEPs) associated with them; - Contact persons, employees or representatives of our (potential) business partners and partner firms; - Contact persons, employees, or representatives of our business partners, partner firms, and service providers;	- Personal details - Contact details - Business details - Financial details - Service-related details - Other	- In order to enter into and execute the agreement / services and the management of relationships resulting therefrom; and - For performing conflict checks/conflict of interest analysis	Article 6 (1)(b), (c) and (f) GDPR Our legitimate interests are, <i>inter alia</i>, to know who you are, to communicate with you and to know with whom we do business. Other legitimate interests of ours include countering fraud, scams or other unlawful behavior and meeting our obligations incumbent on us as a business. The Anti-Money Laundering and Anti-Terrorist Financing Act and national legislation based thereon requires lawyers, notaries, and tax specialists to obtain and record certain information.

Categories of data subjects	Personal data	Purpose	Legal ground
• Potential, current, and former clients, as well as their contact persons, employees, representatives, shareholders, or board members; • Contact persons, employees or representatives of our (potential) business partners and partner firms; • Current and former professional (legal, notarial, tax or financial) advisers and/or consultants of our clients; • Counterparties of our clients, their advisers and consultants, and their employees, representatives, shareholders, or board members; • Individuals involved in legal proceedings or investigations, such as defendants, complainants, witnesses, experts, or other parties whose personal data forms part of a legal, notarial, tax, or financial file or matter we handle (e.g., heirs, beneficiaries, employees, or contractual parties mentioned in documents); • Contact persons of state authorities (e.g., tax authorities, courts, bailiffs, municipalities, or other government bodies);	• Personal details • Contact details • Business details • Financial details • Service-related details • Other	• Handling (legal, notarial, tax or financial) files or matters for our clients, such as advising our clients in any (legal, notarial, tax or financial) matter, drafting any (legal, notarial, tax or financial) documentation for them, handling any (legal, notarial, tax or financial) disputes for our clients, to establish, defend and exercise their (legal) position, etc.; and • For purposes of business continuity	Article 6 (1)(b), (c) and (f) GDPR Our legitimate interests are, <i>inter alia</i>, to continue our business in the most suitable way and assist our clients as fully independent provider of legal, tax and notarial services. The Anti-Money Laundering Directive and national legislation based thereon requires lawyers, notaries, and tax specialists to obtain and record certain information. Furthermore, certain national laws such as the Dutch Notaries Act, requires notaries to include certain personal details in a deed, such as the surname, first names, date and place of birth, address, place of residence, and marital status of the parties. In addition, notaries are legally required to provide certain personal details to the Dutch Chamber of Commerce and the Dutch Land Registry.

Categories of data subjects	Personal data	Purpose	Legal ground
• Potential, current, and former clients, as well as their contact persons, employees, representatives, shareholders, or board members; • Contact persons, employees or representatives of our (potential) business partners and partner firms; • Contact persons, employees, or representatives of our business partners, partner firms, and service providers;	• Personal details • Contact details • Business details • Financial details • Service-related details • Other	• Financial administration and tax administration purposes, to send you our invoices, to collect debts, to pay out the reimbursements and to pay out invoices from our suppliers.	Article 6 (1)(a), (b) and (f) GDPR Our legitimate interests are, <i>inter alia</i>, to continue our business in the most suitable way and have clients paying for our services. Furthermore, in accordance with the applicable tax laws in the jurisdictions in which we operate, we are required to process and retain certain (financial) personal data.
• All categories of data subjects	• Personal details • Contact details • Business details • Service-related details	• The execution of activities aimed at increasing/improving our client databases	Article 6 (1)(f) GDPR Our legitimate interests are, <i>inter alia</i>, to maintain and develop our professional relationship, improve our services and communications, and inform business contacts of relevant developments.
• All categories of data subjects	• Personal details • Contact details • Business details • Financial details	• To handle complaints, deal with possible disputes, to establish, defend and exercise our (legal) position, or in the case of (any claims under) our (professional) liability insurance	Article 6 (1)(f) GDPR Our legitimate interests are, <i>inter alia</i>, to handle complaints, deal with possible disputes, to establish, defend and exercise our (legal) position.

Categories of data subjects	Personal data	Purpose	Legal ground
• Subscribers to our newsletters or other mailings • Visitors to our websites or social media channels, and individuals whose personal data is processed for marketing analytics or website tracking	• Personal details • Contact details • Business details • Usage data • Technical data • Other (personal) information you provide if you send us an email or fill out the contact form on our website	• For marketing purposes, to inform you of new or similar products or services and to run and coordinate promotional events or host online or offline business events	Article 6 (1)(f) GDPR Our legitimate interests are, <i>inter alia</i>, to inform you of new or similar products or services and to run and coordinate promotional events to further expand our business. We note that it is always possible to unsubscribe from receiving these messages.
• All categories of data subjects	• Personal details • Contact details • Business details • Service related details • Usage data	• To conduct research and analysis and to improve our services, products, website and the quality thereof	Article 6 (1)(f) GDPR Our legitimate interests are, <i>inter alia</i>, to conduct research and analysis and to improve our services, products, website and the quality thereof.
• Potential, current, and former clients, as well as their contact persons, employees, representatives, shareholders, or board members	• Personal details • Contact details • Business details	• To send customer satisfaction surveys	Article 6 (1)(f) GDPR Our legitimate interests are, <i>inter alia</i>, to conduct research with regard to our customer satisfaction. We use this information anonymously for statistical purposes and only for us. Survey answers will not be shared with third parties or otherwise published.
• Visitors to our websites or social media channels, and individuals whose personal data is processed for marketing analytics or website tracking;	• Personal details • Contact details • Technical data • Usage data	• To administer our website and to prevent or detect fraud, or abuses and to protect our assets, business, and personnel.	Article 6 (1)(f) GDPR Our legitimate interests are, <i>inter alia</i>, to know who you are and to know who visits our website. Other legitimate interests of ours include countering fraud, scams or other unlawful behaviour on our IT-infrastructure, and to protect our assets, business, and personnel.

Categories of data subjects	Personal data	Purpose	Legal ground
• Visitors of our offices. • Visitors of our Belgium office.	• Personal details • Contact details	• To give access to our buildings or parking spaces	Article 6 (1)(f) GDPR Our legitimate interests are, <i>inter alia</i>, to know who you are and to know who visits our offices. Other legitimate interests of ours include to protect our assets, business, and personnel. For visitors of our Belgian office, more information can be found here CCTV checklist.
• All categories of data subjects	• Personal details • Contact details • Business details	• To comply with a(n) (binding) order or request of a competent authority or court of law	Article 6 (1)(b) GDPR
• All categories of data subjects	• Personal details • Contact details • Business details • Financial details • Service-related details • Other	• (Internal and external) compliance and quality control	Article 6 (1)(f) GDPR Our legitimate interests are, <i>inter alia</i>, to conduct research with regard to (internal and external) compliance, and quality control.
• All categories of data subjects	• Personal details • Contact details • Business details • Financial details • Service-related details • Technical data • Usage data • Other	• For the performance of any audits (e.g., by an accountant or for certifications such as ISO-certification)	Article 6 (1)(b) and (f) GDPR Our legitimate interests are, <i>inter alia</i>, to conduct research with regard to (internal and external) compliance, and quality control.

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