



Privacy Statement iManage

1. Introduction

This privacy statement (**Privacy Statement**) is intended to describe the practices HVG Law LLP (hereinafter referred to as **HVG Law** or **we**) follows in relation to the iManage tool (**Tool**) with respect to the privacy of all individuals whose personal data is processed and stored in the Tool. The Tool is used by HVG Law as an information management platform used to manage all matter related content and make it accessible from any device. Users can also share work-product securely with clients via dedicated extranets.

Your personal data processed in the Tool is used as follows: The Tool functions as a document management and repository system, in which (client) documentation and HR documentation will be stored. Such documentation can be accessed by authorized employees and clients. The documentation may contain several types of data. Data stored in the Tool can be used to create documents or to edit documents. Documents cannot be emailed from the Tool. Outlook will be needed for this.

HVG Law LLP is strongly committed towards protecting the privacy and confidentiality of your personal data. This Privacy Statement explains what personal data is collected and processed, for which purposes, how long we hold the personal data for, what your rights are in this regard and how to contact us. Please find below an overview of all sections of this Privacy Statement.

1. Categories of personal data
2. Legal grounds, purposes and retention periods
3. Transfer of personal data to third parties
4. Security
5. Your rights
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2. Categories of personal data

Personal data are data that can be used to identify an individual person. In order to provide you with the services when you make use of the Tool, HVG law collects, uses or otherwise processes different types of personal data about you, which may include your first name and last name; business (HVG Law) email address; contact details (address and telephone), gender, date of birth, salary, performance data (for example, the time spent on certain clients and the turn-over related thereto) education, copy passport or ID details (no social security number), bank account details. For HR the BSN-number of employees is required for identification purposes. For client data there is no legal ground to save BSN-numbers. HVG Law will take further measurements to make sure that we do not save BSN-numbers of clients.

Your personal data will be collected by HVG Law throughout the course of your relationship with us. The personal data is mostly sourced from you. Account-, client- and engagement data are sourced from EY's Mercury / GFIS (Global Financial Information System) databases by means of a data feed.

3. Legal grounds, purposes and retention periods

HVG Law will process your personal data on the basis of legitimate interest pursued by HVG Law for:

- business purposes, more specifically:
 - Conducting client engagements.
 - Complying with regulatory and legal obligations.
 - Quality & Risk Management, including complying with EY policies.
 - Safety and security of individuals, premises and IT networks.
 - Sanctions, conflict, independence, bribery and anti-money laundering checking.
 - Litigation and dispute management, including brand protection.
- Human Resource management, including performance reviews and recruitment.
- Internal administration, including mergers & acquisitions and finance.
- Learning and Events registration and management.

HVG Law will not retain your personal data longer than necessary for the purposes as described above. However, in some cases HVG Law is obligated to retain your personal data if this is necessary to comply with a legal obligation. For example, regarding our administration obligation: (i) certain client information must be retained for a period of 20 years after the rendering of our services, and (ii) personal data of employees must be retained for a period of 2 years after the end of the employment agreement. Furthermore, HVG Law is also obligated to retain your personal data if (legal) proceedings are expected.

4. Transfer of personal data to third parties

In relation to the Tool, we can engage third parties to which we may disclose or transfer your personal data. In case these third parties process your personal data while performing services and activities for us, we will be responsible for processing our personal data as a controller.

We will not disclose or transfer your personal data through the Tool to third parties for commercial purposes without your consent. Only if the law obliges us to do so, we may provide your personal data to regulators and/or (tax) authorities. Furthermore, we transfer or disclose the personal data we collect to third-party service providers (and their subsidiaries and affiliates) who are engaged by us to support our internal ancillary processes. For example, we engage service providers to provide, run and support our IT infrastructure (such as identity management, hosting, data analysis, back-up, security and cloud storage services) and for the storage and secure disposal of our hard copy files. In all cases we will take appropriate measures to guarantee confidentiality and security of your personal data as much as possible.

5. Security

We have put appropriate technical and organizational measures in place to protect the confidentiality and security of information with regard to your personal data. Access to such information is limited and policies and procedures are in place, designed to safeguard the information from loss, misuse and improper disclosure.

6. Your rights

You have a number of rights with regard to your personal data and the processing thereof:

- you have the right to obtain from HVG Law confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to your personal data and additional information about the processing of your personal data;
- you have the right to request rectification of your personal data, for example if your personal data is not accurate;
- in certain cases, you have the right to request HVG Law to erase your personal data;

- in certain cases, you have the right to obtain from HVG Law restriction of processing of your personal data, for example when you have contested the accuracy of your personal data;
- upon your request, you have the right to receive your personal data which you have provided to HVG Law in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, where the processing is based on your consent or on a contract;
- the right to object to processing of personal data which is based on the legitimate interests of HVG Law. HVG Law shall no longer process the personal data unless HVG Law demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims;
- you have the right to not be subject to a decision based solely on automated processing including profiling, which produces legal effects for you or similar significantly affects you.

These rights are not absolute. If you wish to exercise any of the rights set out above, please contact us via the contact details as stated below.

Information provided shall be initially free of charge. You can exercise these rights at reasonable intervals.

We will usually respond to your request within one month, unless this is not possible due to the complexity of your request or the number of requests submitted. In such an exceptional case, we will inform you within one month at the latest and extend our response period by a maximum of two months. If a request is allowed, HVG Law shall execute the decision to correct, amend, erase and/or transport the personal data as soon as possible.

With regard to a request to erase personal data, it should be taken into account that HVG Law shall not comply with such request, if it is incompatible with any legal retention obligations of HVG Law.

In addition to the above rights, if you are unsatisfied with the processing of your personal data by us, the handling of a request by us or if you have any other complaints, then you have the right to lodge a complaint to the Dutch Data Protection Authority whose address is Prins Clauslaan 60, 2995 AJ The Hague, Netherlands. Please visit <https://autoriteitpersoonsgegevens.nl/en> for more information.

7. Changes to this Privacy Statement

We may periodically update this Privacy Statement from time to time. Therefore, we recommend to consult us on a regular basis, so that you are aware of these amendments.

8. Questions and contact details

If you have any questions about this Privacy Statement, the way we process your personal data or if you wish to submit a request in order to exercise your rights as stated in section 6 of this Privacy Statement or if you have any other privacy related questions, please contact our Data Privacy Officer Mrs. S. Vermeer-de Jongh via saskia.de.jongh@hvglaw.nl or call +31 88 40 70103. You can also send a letter to HVG Law LLP, for the attention of Mrs. S. Vermeer-de Jongh P.O. Box 2295, 3000CG Rotterdam. Our Data Privacy Officer will be made available to investigate your complaint and give you information about how it will be handled.