

Privacy Statement Schuite Legal

1 Introduction

Schuite Legal processes personal data as part of its activities. Schuite Legal values your trust and does everything possible to protect your privacy. All processing is carried out in accordance with the General Data Protection Regulation (hereinafter: GDPR). If you are a client of Schuite Legal, this privacy statement applies to you. This privacy statement further applies to all processing of personal data within Schuite Legal. Schuite Legal reserves the right to change, supplement, or modify its Privacy Statement.

2 Processing of Personal Data

Personal data includes any information about an identified or identifiable natural person. This refers to information that can reasonably be traced back to an individual. A distinction is made between general and special categories of personal data. Special categories include data concerning race, religion, health, and/or criminal history. The processing of special categories of personal data is subject to stricter regulations. Schuite Legal does not process special categories of personal data. If an exception occurs, explicit consent will be requested from the individual before processing such data.

The personal data that Schuite Legal may process includes:

- a. First and last name;
- b. Gender;
- c. Contact details, including postal address, email address, and telephone number;
- d. Citizen service number (BSN);
- e. IBAN bank account number;
- f. Other personal information you have provided as a client of Schuite Legal.

Your personal data is obtained when you use Schuite Legal's services as a client or enter into another business relationship with Schuite Legal. Additionally, your personal data may have been provided to Schuite Legal by a client or third parties or may have become known through public sources.

3 Purposes

Depending on the type of personal data processed, the data will be processed for one of the following purposes:

- a. Your personal data is processed if and to the extent necessary for Schuite Legal's (legal) services;
- b. Your personal data may be processed for marketing and business development activities, such as news updates and other marketing communications that may be of interest to you. This only occurs in the context of fulfilling the assignment/agreement or if you have given your consent;
- c. If you provide services to Schuite Legal for business operations or otherwise supply services to Schuite Legal, your personal data will be processed if and to the extent necessary for maintaining the business relationship and for service execution.

4 Legal Bases for Processing

Schuite Legal processes personal data on the basis of the following legal grounds:

- a. Consent (Article 6(1)(a) GDPR);
- b. Performance of a contract (Article 6(1)(b) GDPR);
- c. Legal obligation (Article 6(1)(c) GDPR);
- d. A legitimate interest of Schuite Legal or a third party (Article 6(1)(f) GDPR).

5 Retention Period

- 5.1 Financial records are retained for seven (7) years in accordance with Article 52(4) of the Dutch General State Taxes Act (Algemene wet inzake rijksbelastingen).
- 5.2 Other personal data will not be retained longer than necessary, and in any case no longer than five (5) years, as required under Article 7:412 of the Dutch Civil Code (Burgerlijk Wetboek), unless a longer retention period is prescribed by law or Schuite Legal has a legitimate interest in doing so. After this period, the data will be deleted.
- 5.3 If you have contacted Schuite Legal without entering into an engagement, your personal data will be deleted once it is clear that no client relationship will be established.

6 Disclosure to Third Parties and Use of Service Providers

6.1 Use of Processors

Schuite Legal engages external service providers in the performance of its activities, such as IT providers (e.g. Microsoft Outlook and OneDrive), accounting and banking connectors (e.g. Knab/DigiBoox), and hosting providers (such as Mijndomein). These parties process personal data solely on behalf of Schuite Legal and are considered processors within the meaning of Article 4(8) of the GDPR. Written data processing agreements have been concluded with all such processors in accordance with Article 28 of the GDPR. These agreements stipulate that the processors shall implement appropriate technical and organisational measures to process your personal data securely and carefully.

6.2 Disclosure to Other Third Parties

Your personal data will only be shared with third parties who act as independent data controllers – such as the Dutch Tax and Customs Administration, regulatory authorities, or other legal service providers – if this is necessary for the performance of a contract, compliance with a legal obligation, or based on a legitimate interest (Article 6(1) GDPR). Such disclosure only takes place if it is compatible with the purpose for which the data was originally collected.

6.3 Transfers Outside the EEA

If personal data is transferred to a party located outside the European Economic Area (EEA), Schuite Legal will ensure that such transfer only occurs if an adequate level of protection is guaranteed in accordance with Articles 44 et seq. of the GDPR. In such cases, standard contractual clauses approved by the European Commission or other appropriate safeguards will be used.

6.4 No Sale of Personal Data

Schuite Legal never sells your personal data to third parties, nor are your personal data disclosed for commercial purposes of third parties.

7 Data Security

Schuite Legal implements appropriate technical and organisational security measures to protect your personal data against loss, unauthorised access, or other forms of unlawful processing. These measures include, among others:

- Password protection and two-factor authentication on sensitive accounts;
- Regular software updates and security patches;
- Restriction of access to personal data to authorised personnel only;
- Physical security of devices used to process personal data.

These measures are periodically evaluated and, where necessary, adjusted in light of technological developments and risk assessments, in accordance with Article 32 of the GDPR.

8 Your Rights

8.1 As a data subject, you have the following rights under the General Data Protection Regulation (GDPR) in relation to your personal data:

- a. Right to withdraw consent: You may withdraw your consent to the processing of your personal data at any time. (Article 7(3) GDPR)
- b. Right of access: You have the right to obtain confirmation from Schuite Legal as to whether or not your personal data are being processed, and, if so, to access such data. (Article 15 GDPR)
- c. Right to rectification: You have the right to have inaccurate personal data corrected and to have incomplete data completed. (Article 16 GDPR)
- d. Right to erasure ('right to be forgotten'): Under certain circumstances, you have the right to have your personal data erased, for example, if they are no longer necessary for the purposes for which they were collected. (Article 17 GDPR)
- e. Right to restriction of processing: You may request that the processing of your personal data be temporarily restricted, for instance, if there is a dispute about their accuracy. (Article 18 GDPR)
- f. Right to data portability: You have the right to receive your personal data in a structured, commonly used and machine-readable format, and to transmit those data to another controller. (Article 20 GDPR)
- g. Right to object: You may object at any time to the processing of your personal data, in particular when the processing is based on a legitimate interest or is carried out for direct marketing purposes. (Article 21 GDPR)

You may exercise one or more of the above rights by submitting a request to Schuite Legal, via email at info@schuitelegal.com. Schuite Legal will respond to your request within one month of receipt, in accordance with the statutory period. In the case of complex or multiple requests, this period may be extended by an additional two months.

9 Complaints Procedure

- 9.1 If you have any further questions regarding Schuite Legal's data protection policy or if you have complaints about this policy, please contact Schuite Legal at Burggravenlaan 156, 2313 JA Leiden, or via email at info@schuitelegal.com.
- 9.2 You also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) in the event of a violation of your rights. (Article 77 GDPR)