

Privacy and Cookie Policy

11/02/2019

Amsterdam

Brussels

Dubai

London

Luxembourg

New York

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1. Privacy

1.1 Introduction

This is the Privacy Policy of the Stibbe Network consisting of:

- (1) **Stibbe CVBA**, a company incorporated in Belgium, registered with the Crossroads Bank for Enterprises of Belgium under number RLE 0429 914 688 - VAT number BE0429914688 whose registered office is located at 1000 Brussels, Loksumstraat 25, (hereinafter “**Stibbe Brussels**”)
- (2) **Stibbe N.V.** a company established in the Netherlands registered in the trade register of the Dutch Chamber of Commerce under 34198700 whose office is located at 1077 WM Amsterdam, Beethovenstraat 10, (hereinafter “**Stibbe Amsterdam**”)
- (3) **Stibbe B.V.** a service company of Stibbe N.V., established in the Netherlands registered in the trade register of the Dutch Chamber of Commerce under 33170864 whose office is located at 1077 WM Amsterdam, Beethovenstraat 10, (hereinafter “**Stibbe B.V.**”)
- (4) **Stibbe Avocats** an unincorporated law partnership under Luxembourg law, whose offices are located at 2180 Luxembourg, 6 Rue Jean Monnet, (hereinafter “**Stibbe Luxembourg**”)
- (5) **Stibbe London B.V.** a company established in Amsterdam, registered in the Trade Register of the Dutch Chamber of Commerce under number 34206454 and with the Registrar of Companies for England and Wales at Companies House under numbers FC025331 and BR007672, whose office is located at London, EC2M 1JJ, 53 New Broad Street (hereinafter “**Stibbe London**”)
- (6) **Stibbe Dubai B.V.** a company established in Amsterdam, registered in the Trade Register of the Dutch Chamber of Commerce under number 34337884 and with the Registrar of Companies of the Dubai International Financial Centre under number CL0873, whose office is located at Dubai, P.O. Box 506912, Gate Village 10 Level 3 Unit 12, Dubai International Financial Centre, (hereinafter “**Stibbe Dubai**”)
- (7) **Stibbe New York B.V. P.C.** a company established in Amsterdam, registered in the Trade Register of the Dutch Chamber of Commerce under number 33261662, whose office is located at New York, NY 10022, 575 Lexington Avenue, Floor 23 (hereinafter “**Stibbe New York**”)
- (8) **Stibbe Luxembourg SARL PLLC**, the New York branch of Stibbe Luxembourg SARL, registered with the Luxembourg Trade Registry (RCS) under section B number

181.426., whose office is located at New York, NY 10022, 575 Lexington Avenue, Floor 23 (hereinafter “Stibbe Luxembourg New York”)

The Stibbe Network is jointly responsible for the collection and processing of your personal data in the absence of a territory preference or when you set EU as preference. It is possible to select either Belgium, the Netherlands, or Luxembourg as your preferred country, whereupon Stibbe B.V., Stibbe CVBA/SCRL, respectively Stibbe Avocats, will be the entity responsible for the collection and processing of your personal data.

This Privacy Policy is dated [*] and will be updated from time to time to reflect any changing regulatory requirements, processing practices or new functionalities that we might add and that require use of personal data. Any such changes will be posted on the website www.stibbe.com and will be effective upon posting.

Your personal data is processed in accordance with all laws and regulations in respect of data protection including the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (also known as the General Data Protection Regulations, hereinafter referred to as "GDPR") where applicable.

1.2 The personal data we collect and process

The personal data that we collect and process from you may include the following information (any such data hereinafter referred to as “personal data”):

- Contact details such as your name, surname, physical address, email address, phone number, your employer, your title or position, your preferred language, the practice areas, jurisdictions and industries you are interested in, your relationship to a person;
- Information that you provided us or that we collected in the course of providing our services to you in the context of our contractual client-attorney relationship or as part of our matter acceptance process and client identification procedures; such information may also include sensitive data;
- Financial information such as bank account details;
- Information that we derive from your visits to our website www.stibbe.com, applications, systems and online platforms (including MyStibbe, social media channels), such as your IP address, the pages you visit, the browser you are using, the website you have previously visited, demographic information, and the time and duration of your visit;
- Information that you provided to us or that we collected as part of your registration for events, marketing materials such as newsletters and alerts;
- Information that you provided to us for purposes of attending meetings and events, including access and details of visits to our offices and dietary requirements;

- Information that you provided to us when applying for a job at Stibbe in order to assess your profile and skills;
- Any other information that you provided to us or that is legally collected by us from a third party source such as government or credit reporting agencies, an information or service provider or from public records.

1.3 How we collect, process and use your personal data

Your personal data are used in order for Stibbe to be able:

- To provide legal advice or other services to our clients and to manage our business relationships with you or your organization (including for billing, accounting, auditing, collection, payments, employment, and other support services);
- To act in compliance with our legal and regulatory obligations, including with respect to know your customer, anti-money laundering and sanction checks;
- To manage and secure access to our offices, website www.stibbe.com, applications, systems and online platforms;
- To process these data for purposes of Stibbe's legitimate interest provided that such legitimate interest is not overridden by your interests or your fundamental rights and freedoms;
- To inform you about job vacancies and opportunities at Stibbe that we consider suitable for you;
- For any purpose related to the foregoing or for any purpose for which you provided your personal data to Stibbe.

Additionally, we may process your personal data for the following purposes:

- Communicating with you with respect to legal developments, events, products or services provided by Stibbe and that are relevant to you (including via newsletters, alerts, event invitations, etc.);
- Distributing surveys or marketing materials;
- Any other purpose for which you provided your explicit consent.

The legal basis for this processing is our client relationship or your consent and we will store your data no longer than necessary as defined by the purposes for which the data is stored.

You can withdraw your consent or change your preferences regarding newsletters, alerts and invites at any time by clicking the "unsubscribe" or "change profile" button at the bottom of our newsletters, invitations or through our website www.stibbe.com or our online platforms.

Personal data processed within the context of a recruitment process are kept for six years upon consent; otherwise your data will be kept for six months. Personal data processed during a recruitment event are kept for two years.

In addition, if you consent by clicking on our website's cookie notice, we automatically process personal data for technical and functional management of our website and to ensure it is easy

to use. We also use cookies for the same purpose. Cookies help us learn more about how the website is being used which helps us to improve the overall experience. Please see below for further information on cookies.

Lastly, when you contact us with questions or requests or when you engage our legal services, we will use personal data provided by you to answer your query.

1.4 Exchange of your personal data

Any personal data we collect from you, may be transferred to and exchanged with Stibbe's various entities, affiliates and offices, both inside and outside the European Union. For the processing of personal data between these entities, we have arranged for contractual safeguards.

Any personal data we collect from you, may also be transferred to third parties (including (sub)contractors, other counsel, legal directories, and third parties involved in your matter), both based inside and outside the European Union, in order to execute an processing agreement, based upon your consent or because required by applicable law and regulations.

For data processed outside the European Union or European Economic Area, Stibbe applies the standard contractual clauses defined by the European Commission.

1.5 Security

Stibbe secures your personal data through various technical and organisational measures, such as firewalls, secured servers, and data processing agreements with third parties.

1.6 Social media – other websites

If you share the content from Stibbe's website www.stibbe.com, applications, systems and online platforms (including MyStibbe, social media channels) via social media, your personal data will be visible to the visitors of your personal pages on these social media websites. We are not responsible or liable for any processing of your personal data via such media.

Stibbe's website www.stibbe.com, applications, systems and online platforms (including MyStibbe, social media channels), may provide references - including hyperlinks - to websites, channels or social media from other companies/persons. Stibbe is not responsible or liable for any processing of your personal data via these websites, channels or media. This Privacy Policy does not apply to the use of such websites, channels or media.

1.7 Your rights

We aim to keep information about you as accurate as possible. You have the right to know if your personal data is being processed and, where that is the case, access your personal data. Under certain circumstances, you will have the right to rectify, erase, or restrict the processing of your personal data, and to withdraw your consent. You have the right to have your personal data transferred to a third party of your choice. You have the right to object to the processing of your personal data for direct marketing purposes. You have the right to obtain restricted processing in accordance with art. 18 GDPR.

Should you have any questions or complaints about this Privacy Policy or if you wish to exercise any of your rights in respect of your personal data processed by Stibbe, please send your request for Stibbe B.V. to ASD.GDPR@stibbe.com or for Stibbe CVBA/SCRL and Stibbe Luxembourg to BRU.GDPR@stibbe.com or by post to the Stibbe entity responsible for the processing of your data.

If you believe that your rights as a data subject have been infringed, please be aware that you have the right to lodge a complaint with the relevant supervisory authority. Depending on the responsible entity, this will be the Autoriteit Persoonsgegevens (for the Netherlands), Gegevensbeschermingsautoriteit / l'Autorité de protection des données (for Belgium) or National Commission for Data Protection (for Luxembourg).

2. Cookie Policy

With this policy Stibbe wants to inform the www.stibbe.com visitor which cookies are being used and why. This Privacy Policy is dated [*] and will be updated from time to time to reflect any changing regulatory requirements, processing practices or new functionalities that we might add. Any such changes will be posted on the website www.stibbe.com and will be effective upon posting.

2.1 Responsibility for the cookies

Will be jointly responsible for your personal data in the absence of a territory preference or when you set EU as preference:

- Stibbe B.V., located at Beethovenplein 10, 1077 WM Amsterdam, the Netherlands,
- Stibbe CVBA/SCRL, located at Loksumstraat 25 Rue de Loxum, 1000 Brussels,
- Stibbe Avocats, located at 6 Rue Jean Monnet, 2180 Luxembourg.

It is possible to select either the Netherlands, Belgium or Luxembourg whereupon Stibbe B.V., Stibbe CVBA/SCRL or Stibbe Luxembourg, respectively, will be the entity responsible for your personal data.

2.2 What are cookies?

Cookies are small text files that are placed on your device when visiting our website. Cookies are composed of unique codes that will help to recognise you when visiting our website again.

There are different types of cookies, but the most important are:

1. Regarding their source:
 - First-party cookies: these cookies are created and managed by Stibbe. They are placed on the Stibbe website in order for the website to function properly. These cookies enable us to provide you with customised services.
 - Third-party cookies: these cookies are created by third parties and materialise when visiting the Stibbe website. The cookies will send information regarding your visit to third parties. For example, social media can place cookies on our website. Social media use such cookies to enable functionalities as well as to collect information which they can use for their own purposes.
2. Regarding their storage period
 - Temporary cookies: are only temporarily stored in your browser or application. As soon as you close and leave your browser or application, those cookies will be deleted.

- Permanent cookies: remain on your computer or mobile device, even if you close the browser or the application. Permanent cookies make it possible to recognise you during subsequent visits to our website. Permanent cookies remain on your device until their end date is reached, until a new cookie is installed, or until you delete them in your settings of your browser or application.
3. Regarding their necessity
- Necessary or essential cookies: are cookies that are necessary for the optimal operation of the website and enable you to use the features of our website. It is therefore advised not to disable these cookies.
 - Functional cookies: ensure that the website functions properly. Examples of this are cookies remembering your login details, ensuring the security of your login details, ensuring the uniformity of the layout of the website,...

2.3 Managing cookies

You can enable or disable cookies at any time by amending the cookie settings of your browser. How to do this can be found out through the help-function of your browser.

Google Chrome: browser > Chrome-menu > settings > Privacy and security > Content settings > cookies

Internet Explorer: browser > Tools > Internet options > Privacy:

- Set the protection level with the slider
- Click 'advanced' and set the protection level manually

Firefox: Menu > Options > Privacy & Security > Cookies and Site Data

Safari: Preferences > Privacy > Remove all website data or Details

2.4 Which cookies does Stibbe use?

We rely on third party analytics cookies e.g. Google Analytics of Google Inc., for analytical purposes and to enhance the functionality and user-friendliness of our website. Google Analytics of Google Inc. is able to provide Stibbe with aggregated statistical information about your use of this website. If you do not consent to the use of Google Analytics cookies, we will place a functional no-follow cookie on your device to remember your choice. This expires after 180 days.

If you consent by clicking on our website's cookie notice, we automatically process personal data for technical and functional management of our website and to ensure it is easy to use. For this purpose, we may process data such as your IP-address, the pages you visit, the browser

you are using, the website you have previously visited, demographic information, and the time and duration of your visit. We also use cookies for the same purpose.

All data collected by us via the use of cookies will be treated confidentially.

2.5 Any questions or complaints?

Should you have any questions or complaints about this Cookie Policy, please send your request for Stibbe B.V. (the Netherlands) to ASD.GDPR@stibbe.com or for Stibbe CVBA/SCRL (Belgium) to BRU.GDPR@stibbe.com or by post to the Stibbe entity responsible for the processing of your data.