

PRIVACY POLICY

Polestar Legal B.V. processes your personal data with due care and in accordance with the law. It provides the following information in this regard.

1. Controller

The Controller for the processing of personal data is Polestar Legal B.V., with its registered office at Brediusweg 14 in Bussum, registered in the trade register of the Dutch Chamber of Commerce under number 93181248 (**Polestar Legal**).

2. Purposes of and bases for the processing

2.1. Polestar Legal processes personal data primarily within the context of the legal and notarial services it provides to its clients. Additionally, it processes personal data within the context of its business activities, including the recruitment and selection of staff; administration; security; management of IT systems; compliance with legal obligations; archiving and handling requests, complaints and disputes. It also processes personal data for marketing and communication purposes, including managing this website, sending email newsletters and organising seminars.

2.2. The legal bases for processing are the conclusion and performance of agreements that Polestar Legal enters into with you; compliance with legal obligations; consent obtained from data subject(s), and defending the legitimate interests of Polestar Legal and of its clients and third parties. Polestar Legal additionally will ask your consent for sending you the email newsletter, email invitations to seminars and other events, and placing cookies and web beacons. You can withdraw your consent at any time.

3. What personal data is processed?

3.1. Among other data, Polestar Legal processes your title, name, address, postal code, place of residence, telephone, email address, company name, job title, bank account number, date of birth, copies of identity documents and Citizen Service Number (BSN) and other information, where these are necessary for the purposes of providing its services, complying with legal obligations or its legitimate interest.

3.2. Polestar Legal obtains your personal data because you provide this to it yourself, or because it obtains it within the context of its services (or of any of our other processing purposes) from third parties, for example from its clients or counter-parties, or from public sources such as the trade register or the land registry.

4. Sharing personal data with third parties

4.1. Polestar Legal does not share your personal data with third parties unless this is necessary for one of the processing purposes mentioned under 2. Data may for instance be shared with judicial authorities or counter-parties within the context of legal proceedings or, in the context of a transaction, with other parties involved in the transaction. Where required by law, transactions are also registered in, for example, the land registry or trade register. Data may also be shared with contractors engaged by Polestar Legal, such as bailiffs or IT service providers. If such contractors are processors within the meaning of Article 4(8) GDPR, Polestar Legal concludes a written data processing agreement with them.

4.2. Polestar Legal' lawyers and civil-law notaries are bound to maintain confidentiality under rules of professional practice. Data obtained in the course of handling a case is not shared with third parties unless permitted under the applicable professional rules.

5. Transfer of personal data outside the European Union

As a rule, Polestar Legal does not transfer your personal data to countries outside the European Union.

6. Security of personal data

Polestar Legal attaches great importance to the security and protection of your personal data and, with due observance of the state of the art, takes appropriate technical and organisational measures to ensure a risk-appropriate level of security. Where Polestar Legal uses the services of third parties, such as an IT provider, Polestar Legal will, in the context of protecting personal data, agree adequate security measures with those parties in a data processing agreement.

7. Retention period

Polestar Legal will not retain your data any longer than is necessary for the processing purposes mentioned under 2.

8. Cookies and web beacons

8.1. A cookie is a text file stored by your browser on your computer's hard drive. Most web browsers automatically accept cookies, but you can usually alter your browser's settings to prevent this. If you do not want to receive cookies, check the Help function of your Internet browser to find out how to block all cookies. A web beacon, also known as an internet tag, pixel tag or clear GIF, is used to collect information about the use of emails.

8.2. When you visit our website, the following cookies may be placed:

Google Analytics

In addition, this website uses cookies from Google Analytics. These cookies (“_ga”, “_gat_ua” and “_gid”) track general visit data, such as the most visited pages. The purpose of this is to optimise the design of the website and the information presented on it. To ensure that information from cookies is not traceable to an individual and cannot be viewed or used by Google, Polestar Legal has taken measures in line with the Dutch Data Protection Authority's guidelines on setting Google Analytics in a privacy-friendly manner. A data processing agreement has been concluded with Google. In this context, the last octet of the IP address is hidden, and 'data sharing' is deactivated. Polestar Legal does not use any other Google services in combination with the Google Analytics cookies. More information about these cookies can be found on Google's website.

Spotler

Polestar Legal uses Spotler for sending email newsletters and invitations to seminars and other events. Emails sent using Spotler contain web beacons. These enable Polestar Legal to analyse the use of the newsletter and invitations and to optimise their layout and content. A data processing agreement has been concluded with Spotler. As a rule, Spotler does not process your personal data for its own purposes but only for the purposes (and with the means) determined by Polestar Legal. This means that Spotler processes personal data in accordance with this privacy statement.

9. Your rights

- 9.1. You have the right to ask Polestar Legal to let you examine your data. If the data is incorrect, incomplete or irrelevant, you have the right to ask for this data to be amended or supplemented. You also have the right to object to the processing of this data and to ask Polestar Legal to delete or transfer the data. Because the lawyers and civil-law notaries of Polestar Legal have a duty of confidentiality, it will usually not be possible to examine data processed in the context of our services.
- 9.2. Where the processing is based on your consent, you have the right to withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing based on consent before it is withdrawn.
- 9.3. You can send a request for access, correction, restriction, opposition, data portability, or deletion of your personal data or withdraw previously given consent using the contact details below. Polestar Legal will decide on your request within four weeks.
- 9.4. In addition, you have the right to lodge a complaint with the supervisory authority. In the Netherlands the competent supervisory authority is the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*).

10. Amendments

Polestar Legal reserves the right to amend this privacy statement at any time in accordance with the applicable laws and regulations. Therefore, please check this webpage regularly to see if any changes have been made.

11. Contact

For questions or comments on the processing of your personal data, and to exercise your above-mentioned rights, you can contact Polestar Legal at:

Polestar Legal B.V.
attn. Jason van de Pol
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1401 AG Bussum
The Netherlands
jasonvandepol@polestarlegal.nl

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