tribu

PRIVACY STATEMENT

As a law firm, Tribu Legal B.V. (Tribu) processes personal data in the course of providing its services. Tribu respects your personal data (*persoonsgegevens*) and ensures that personal information provided to us or otherwise obtained is treated confidentially. The term 'personal data' means any information relating to an identified or identifiable natural person. Information that indirectly reveals something about an individual also constitutes personal data.

For the purposes of Regulation (EU) 2016/679 (General Data Protection Regulation), Tribu is the controller (*verwerkingsverantwoordelijke*) responsible for processing your personal data. Tribu manages and safeguards these personal data with the utmost care, thereby complying with the requirements of the General Data Protection Regulation (GDPR) and national legislation. This privacy statement explains how we meet these requirements.

Our contact details, including the email address at which we can be contacted with privacy-related enquiries, are set out below:

Tribu Legal B.V.
Leidseweg 90C, 3531 BG Utrecht
info@tribulegal.com

What information does Tribu process?

The personal data we process have been provided to us by you or a third party. Personal data may also be transmitted to us automatically when you visit the website. We process the following personal data relating to clients, business contacts and/or third parties:

1. surname, first names, initials, titles, gender, date of birth, address, postcode, place of residence, telephone number and similar information required for communication, such as the email address, the organisation to which the data subject belongs and the data subject's bank account number;
2. an administrative reference number containing no information other than the data referred to in item 1;
3. information relating to the data subject's citizen service number (BSN) and identity document;
4. data necessary for entering into and performing an engagement agreement (such as the contact details of third parties involved in a matter);
5. data provided by the business contact in connection with the performance of an engagement agreement;
6. data used to provide information on current affairs and developments, including legal matters, and to offer other services, including legal services;
7. data used for online and offline business development and marketing activities;
8. data used for administration, including financial administration, and the collection of receivables; and
9. data other than those referred to in items 1 to 8, the processing of which is required by, or necessary for the application of, any other law not specifically identified here.

Purposes

Tribu processes personal data only to the extent necessary for the following purposes:

1. providing our legal services;
2. communicating with the data subject and/or third parties;

3. internal management activities;
4. administration, including financial administration, and checks and audits, including those conducted by accountants;
5. securing and managing ICT systems;
6. marketing and communications, and managing the CRM system;
7. handling job applications;
8. handling requests, complaints and disputes; and
9. implementing or applying laws and regulations, including the Dutch Legal Profession Regulation (Verordening op de advocatuur) and the rules of professional conduct for lawyers.

Legal bases

Tribu processes your personal data on one or more of the following legal bases:

1. where processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract;
2. where processing is necessary to comply with a legal obligation;
3. where processing is necessary for the purposes of our legitimate interests or those of a third party; or
4. with your consent.

With whom does Tribu share your personal data?

Tribu does not disclose your personal data to third parties ('recipients' within the meaning of data protection legislation), unless this is necessary to fulfil the purposes described in this privacy statement, is required by law or you have given your consent. Examples include another lawyer covering the practice in the event of absence or illness, or engaging a third party, such as an IT provider, to act on behalf of and on the instructions of Tribu. Your personal data may also be disclosed in connection with proceedings, whether judicial or otherwise, or correspondence with the opposing party. Tribu may also be legally required to disclose personal data to a supervisory authority (*toezichthouder*) or another body vested with public authority.

Third parties to whom personal data are made available are required to treat your personal data confidentially. Where these parties qualify as 'processors' within the meaning of data protection legislation, Tribu ensures that a data processing agreement meeting the requirements of the GDPR is entered into with them. Third parties engaged by Tribu that provide services as independent controllers are themselves responsible for complying with applicable data protection legislation in relation to the processing and any further processing of your personal data.

Security of personal data

Tribu attaches great importance to the security and protection of your personal data and, taking into account the state of the art, implements appropriate technical and organisational measures to ensure a level of security appropriate to the risk. Where Tribu uses the services of third parties, such as an IT provider, Tribu will set out arrangements for adequate security measures in a data processing agreement for the protection of personal data.

Retention period

Tribu retains the personal data it processes for no longer than is necessary for the processing purposes set out above or required by applicable laws and regulations.

Your data protection rights

Subject to any restrictions under applicable laws and regulations, you have the right:

- to information about the personal data we process about you;
- to rectification of inaccurate or incomplete data;
- to erasure of your personal data;
- to restriction of the processing of your data;
- to data portability;
- to lodge a complaint with us or the supervisory authorities;
- to object to the processing of your personal data; and
- to withdraw your consent where processing is based on that consent.

Social media

This website (www.tribulegal.com) contains references to third-party websites and webpages in certain places. Although we have selected these third parties carefully, we are not responsible for their processing of your personal data, including through those webpages. This privacy statement therefore does not apply to those websites.

Statistics and cookies

This website (www.tribulegal.com) uses functional and analytical cookies. Cookies are text files placed on your device (for example, a computer, tablet or smartphone) by a website. Tribu uses cookies to remember your settings and preferences. You can disable these cookies through your browser.

Functional cookies

Functional cookies are used on the basis of Tribu's legitimate interests. These cookies record, for example, that you have registered for a seminar or mailing list. Consent is not required for the use of functional cookies.

Analytical cookies

Analytical cookies are used on the basis of Tribu's legitimate interests. The website uses Google Analytics, a web analytics service that records statistics on website visits (for example, visitor numbers, popular pages and topics). Google may disclose this information to third parties where required to do so by law or where third parties process the information on Google's behalf. Tribu has no control over this. For further information, please refer to the privacy policies of Google and Google Analytics. Consent is not required for the use of analytical cookies.

Amendments

This privacy and cookie statement was prepared on 1 September 2021. Tribu reserves the right to amend the content of this statement at any time without prior notice. Amendments to this statement will be published on Tribu's website. Where substantial amendments may significantly affect one or more data subjects, Tribu will endeavour to inform those data subjects directly.

Version: 1 September 2021