

Privacy statement Lustrous Law B.V.

This statement provides information on how our firm handles personal data processed in the context of our activities and services.

Our contact details

Our contact details are as follows:

Firm name:	Lustrous Law B.V. (" Lustrous Law ")
Address:	WTC, H-Tower, 25 th floor, Zuidplein 206
Postal code and city:	1077 XV Amsterdam
Contact person:	H. ten Voorde
E-mail address:	henk@lustrouslaw.com

Our services

Our firm requests your personal data for the following purposes only:

- a. to perform engagements to draft and execute notarial deeds, to render legal advice and/or other services;
- b. to perform statutory tasks and obligations;
- c. for the purposes for which you have specifically granted permission.

Your personal data will not be processed for any other purposes without your permission.

Rules applicable to the use of personal data in notarial deeds

If Lustrous Law draws up a notarial deed using your personal data, the civil law notary must comply with the legal regulations governing the processing of personal data:

1. The civil law notary must include certain mandatory data, personal or otherwise, in the deed. Your personal data is therefore processed on a legal basis.
2. The civil law notary must retain the signed deed containing your personal data in perpetuity.
3. As soon as the civil law notary signs the deed, it becomes an official document. This means that no further changes may be made to it, even if the personal data is incorrect. If changes need to be made, the civil law notary must draw up a new deed in which the change is incorporated.
4. The civil law notary must perform a mandatory check of certain data, personal or otherwise, in the Persons Database (*Basisregistratie Personen, BRP*), the Trade Register (*Handelsregister*) and the Dutch Land Registry (*Kadaster*).
5. The civil law notary must perform a mandatory check of your identity and will therefore request you to present a valid identity document. The civil law notary is one of the few authorized to photocopy identity documents including all the data contained therein.
6. Your personal data is subject to the civil law notary's obligation of professional confidentiality. Unauthorized parties have no access to your data.

Advisory and other services

The processing of personal data for other purposes by our firm will relate to other instructions given by you or on your behalf to draft agreements and ancillary documents and in general, to provide legal and other services and furthermore to be able (i) to remain in contact with you, including, but not limited to, the invoicing for services rendered, (ii) to invite you for events organized by us and (iii) to provide you with relevant legal information, even outside the scope of an engagement.

Job vacancies and internships

In order to ensure that we hire competent and reliable staff members and trainees, we collect personal data as part of the recruitment process. You may have provided these personal data by yourself, we may have received these personal data from third parties (such as headhunters) or we may have collected them from public sources such as social media platforms. After we have filled the vacancy for a job or internship, or after we have stopped the recruitment process for that vacancy, all personal data will be deleted or destroyed within one month, unless we have explicitly agreed with you that we will keep your personal data with a view to a new vacancy that may come up.

Our website

You may visit our website anonymously in order to inform yourself about Lustrous Law. Incidentally, we collect data about the visitors of our website, such as browser type, duration of the visit, pages visited, etc. However, these data do not enable us to identify you. We also incidentally collect IP addresses, but this information is generally not traceable to your identity. Your IP address will only be traceable to the name of your service provider or company network.

Source of processed personal data

If our firm processes your personal data which we have not received from you, this will always take place in the context of the engagement with us or with a view to potential future engagements with us. The source of such data will be one of the following:

- public registries, including the Trade Register and the Dutch Land Registry;
- a lawyer, tax advisor, financial advisor or other advisor in connection with an agreement, to which you are one of the parties or with which party you hold the office of member of the board of management, supervisory board or authorized representative;
- other sources, such as BRP and VIS;
- public sources such as social media platforms and business websites;
- business cards or other contact information received from third parties.

Forwarding your personal data

Our firm will forward your personal data to other parties (third parties) only if this is required by law or if this is actually necessary in the course of performing our services.

Our firm provides personal data to the following recipients:

- public registries, if the law so requires;
- other parties to and parties with an interest in the notarial deed and/or agreement to which you are an interested party as well as the advisors of such other parties;
- a debt collection agency or an attorney engaged by us, but only if invoices remain unpaid or if a dispute would arise about our engagement;
- banks if and to the extent fund flows and payments are handled by us in relation to legal services performed by us;
- processing parties with whom we have entered into a processing agreement;
- the Tax Authorities or the Financial Intelligence Unit, but only on a statutory basis.

Our firm does not forward personal data to non-EU countries nor to international organizations, unless there are other parties, persons with an interest or their advisors also involved in a notarial deed or agreement in which you are involved, which are located outside the EU. Countries outside the EU may possibly lower data protection standards than the Netherlands.

Retention of your personal data

Our firm will not retain your personal data any longer than necessary for the purpose for which they were collected, for the execution of statutory tasks and compliance with statutory obligations or for the fulfilment of agreements (for instance, due to time limits). The retention periods stipulated in statutory provisions apply, for instance those of the Dutch Civil Law Notaries Act (*Wet op het notarisambt*) and the Act on the prevention of money laundering and prevention of terrorism (*Wet ter voorkoming van witwassen en financieren van terrorisme*). Notarial deeds are retained in perpetuity.

Your rights relating to personal data processed by our firm

If your personal data are processed by our firm, pursuant to the General Data Protection Regulation (GDPR) (EU) 2016/679, you may exercise the rights stated below.

To that end, you must submit a request (preferably in writing) to the contact address stated in this privacy statement.

Before granting your request, we may ask you to confirm your identity on the basis of a valid identity document first.

Right of inspection by the data subject

You can always enquire which personal data our firm processes, for which purpose they are used and how long the data will be retained. In the event that there is any legal basis that precludes us from complying with your request, we will assess this and inform you accordingly.

Right to rectification

If you believe that certain data have been incorrectly processed, you have the right to request rectification of the data. This is not possible, however, if the data are used in a notarial deed, in which case a new deed must be drawn up as a rectification or correction of the incorrect deed.

Right to erasure (right to be 'forgotten')

If you wish to have your personal data erased, you may submit a request to that effect. If the data are included in a notarial deed, the civil law notary is not permitted to erase the data.

Right to restriction of processing

If you wish to restrict the processing of personal data by our firm (pending rectification of your personal data at your request, an objection lodged against processing or because you specifically do not wish to have data erased even though processing of the data is unlawful), you may submit a request to that effect.

Right to data portability

If your personal data are not processed for the purpose of a notarial deed and you wish to transfer the personal data to another service provider, you may submit a request to that effect. However, please note that such a transfer may not always be possible due to incompatibility with the statutory notarial duties.

Possible restrictions in exercising your rights under the General Data Protection Regulation (EU) 2016/679

Our firm will make every effort to fulfil your rights under the General Data Protection Regulation (EU) 2016/679. However, in some cases these rights may conflict with other statutory provisions for instance those of the Dutch Civil Law Notaries Act. Should the civil law notary for this reason be unable to fulfil a request relating to the rights described above, you will be notified accordingly in writing.

Complaints concerning the processing of your personal data by our firm

If you have any complaints concerning the processing of personal data by our firm, please let us know by contacting H. ten Voorde (for contact details, please see the top of this document).

You also have the right to submit a complaint to the supervisory authority, the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*). You can use the website www.autoriteitpersoonsgegevens.nl.