

PRIVACY STATEMENT

Version : 1.0

Last modified : April 2024

1. Deviant Legal

Deviant Legal B.V. is a Dutch private company with limited liability which provides legal services. Our firm is active in the European Economic Area (EER) and we save our data on servers in the EER.

In this privacy statement, we summarise when and how your personal data is collected, used, secured and disclosed. This is because we process your personal data when you use our legal provision of services, applications, websites, software, functionalities, or other services that are offered by us. We call these jointly "the Service(s)" in this statement.

2. Amendment of this privacy statement

Deviant Legal can change the provisions of this privacy statement. We will inform you if we do this. Nevertheless, we advise you to check on a regular basis whether the privacy statement has been changed.

3. Which personal data do we collect?

There are a number of ways in which personal data can be collected when you make use of the Service. We explain in this paragraph which of your personal data is (can be) collected by us. Each category below sets out personal data that is collected for the same objective and states for how long the personal data concerned is saved.

3.1 The processing on the basis of a legal ground if you are a client of DEVIANT LEGAL (obligation to keep records and duty to provide proof of identify), processing time 10 years

- name
- address
- VAT identification number
- date of issue of your identification document
- document number of your identification document
- as and when necessary, if required, a copy of the identification document

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You will be obliged to provide this personal data if you want to use our Service. You cannot make any objection or request that the processing is restricted. The reason for this is that we collect this data because we require this data to fulfil our statutory obligations.

3.2 The processing that is necessary for the performance of an agreement (the provision of the Service), processing time until 2 years after the end of the agreement

- name
- private and/or business email address (including for making contact regarding the Service)
- telephone number (work and private)
- all other personal data that is provided to us in the context of our provision of service (inter alia the personal data contained in the documents and information provided to us)
- other personal data provided by you when making contact with DEVIANT LEGAL

You will be obliged to provide this personal data if you want to use our Service. You cannot make any objection or request that the processing is restricted. The reason for this is that we collect this data because we require this data to be able to provide our Service. If you refuse to provide the aforesaid personal data, we can terminate the agreement with you.

3.3 The processing for taking care of the justified interests of Deviant Legal, processing time until 2 years after the end of the agreement

1. The improvement of our provision of service

- name
- (other) information filled in on the evaluation form or stated during an evaluation interview

2. Keeping the Service secure

- IP address
- device ID
- user ID
- operating system
- time, date and location of logging in

3. To inform you of other services of Deviant Legal

- email address (if you provide this when filling in the evaluation form)

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4. Marketing (if you are a client of Deviant Legal)

- Contact details

5. Job applications (if you apply to us for a job), a derogating processing time of 4 weeks after the completion of the job application, or 1 year if you have given permission for this

- Contact details
- Curriculum Vitae
- Other information voluntarily provided
- We receive the following personal data from GITP in the context of the assessment that forms part of the selection procedure:
 - Name
 - Date of birth
 - Results of various research (strong points, development points, personality characteristics)

You must provide the aforementioned personal data if you want to use our Service, or if you want to apply for a job with us (paragraph 5). You can object to the processing of the personal data that has already been executed and the processing still to be executed. We will decide on whether or not to accede to your request on the basis of balancing your interests against our interests. Please do take into consideration that we can no longer (properly) provide the Service if you restrict our possibility of processing the personal data in any manner whatsoever.

If you object to the processing as referred to in paragraph 3 (direct marketing), we will stop the processing without any balancing of interests.

3.4 Processing with your permission, processing time until 2 years after the end of the agreement

1. To inform you (upon your request) regarding the service followed by you or other services of Deviant Legal

- name
- organisation
- email address

2. To inform you upon your request and for answering your questions

- name

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- organisation
- email address
- other personal data filled in by you when making contact with DEVIANT LEGAL

4. Blogs, newsletters and marketing (if you are not yet a client of us), processing until you state to be no longer interested

- contact details

If you are not prepared to provide this personal data, or if you do not want us to process this data, this will not have negative consequences for the Service.

This personal data will be processed when you use the Service. The personal data that we only process if you have given permission for this, will indeed only be processed if you have given actual permission, or if you have personally provided the personal data.

4. Sharing personal data

We do not sell or trade any personal information regarding our visitors and users to other parties. This is only otherwise if we have stated this in this privacy statement.

4.1 Sharing with processors

Deviant Legal can ask other parties for help during the provision of the Service. It can occur in this context that these third parties will process your personal data as a result. These third parties are referred to in this privacy statement as "Processors". We conclude processing agreements with these Processors.

We make use of the following types of Processors:

- saving (personal) data and database management and maintenance;
- research agencies and analytical software for the improvement of our provision of service (including, in conformity with the advice from the Dutch Data Protection Authority, privacy-friendly Google Analytics settings, as a result of which no personal data is shared with Google)
- managers of evaluation forms;
- hosting provider(s);
- suppliers of client relationship management software, and;
- managers of videos and the storage thereof.

In some cases the Processors can collect your personal data on our behalf. We will inform the Processors that they may only use the personal data that they acquire from us to make the provision of the Service possible. If you personally provide additional information to these Processors, Deviant Legal will not be responsible for this. It is advisable to make

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thorough enquires regarding a Processor and its business, prior to providing your personal data.

4.2 Sharing with your permission

We can also share personal data with other parties if you give permission to us for this purpose. For example, we can work together with other parties to directly offer specific services to you or to make offers to you. If you register for these services of third parties or for marketing offers, we can provide your name or contact details, if these are necessary for the provision of this service or for making contact with you.

4.3 Our statutory responsibility

We are permitted to share personal data with third parties if this is:

1. reasonably necessary or suitable for the fulfilment of statutory obligations;
2. necessary to meet legal requests from authorities;
3. necessary to respond to any claims;
4. necessary for the protection of our, our users', our employees' or the public's rights, property, or security;
5. necessary to protect ourselves or our users against fraudulent, insulting, inappropriate or unlawful use of the Service.

We will immediately inform you of the requests that we receive from any government agency related to your personal data, unless we are not permitted to do this by law.

4.4 Merger or sale of the firm or part thereof

It can be the case that we disclose, share or transfer your personal data if we transfer a part of our firm. Examples of this are a merger, sale of parts of the enterprise or acquiring financing, including negotiations in this respect.

5. Personal data protection

Deviant Legal will ensure that it takes suitable technical and organisational security measures for the protection of your personal data. We follow generally accepted standards for the protection of your personal data. In any event we have taken the following measures:

We have implemented physical and electronic measures that are designed to prevent unauthorised access, loss or exploitation of personal data, inasmuch as possible.

If necessary, we use SSL (Secure Socket Layer) technology for the encryption of transmission of sensitive information or personal data, such as account passwords and other identifiable information regarding payments.

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Back-ups of personal data are made if reasonably possible.

Sensitive information is saved by means of encryptions if possible.

Vulnerabilities in the software are dealt with as quickly as is reasonably possible.

You must take into consideration that our Processors are responsible for the processing, management and saving of the personal data, or parts thereof, that we receive. The Processors are not permitted to use this data for advertising purposes. We have imposed an obligation on the Processors to secure your personal data in the processing agreement that we have concluded with these Processors.

6. Links to websites of third parties

Our Services and/or website can contain links to other websites. In addition, our Service can also contain adverts of third parties. Websites of third parties can keep information regarding you. We have no control over these websites or their activities. If you provide personal data on these pages of third parties, Deviant Legal will not be involved in this. In that case the privacy policy of this third party will apply. We are not responsible for the contents of the privacy policy of these parties and for the manner in which these parties deal with personal data. This is because the links from our website to third parties or to other websites are only made available for your benefit. We advise you to study their privacy and security practices and their policy before you provide personal data to them.

7. What choices do you have with regard to the use of personal data?

We will inform you and, if necessary, request your permission before we share your personal data with other parties in a manner that is not arranged in this privacy statement. An example of this is the sharing of personal data for (direct) marketing purposes.

We can forward marketing and promotional materials regarding our products and services to you. If you do not or no longer want your information to be used for direct marketing, you can contact us by e-mail.

You can also sign out yourself by following the sign-out instructions that are included in each promotional email. If you sign out, this will have no consequences for our possibilities of sending emails to you regarding the Service and your account. In addition, this will have no consequences for our possibility to use your personal data as we have described in this privacy statement.

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We will meet your requests as soon as possible after receipt of the request

8. Your rights

You can inspect, update, correct or remove the personal data that is collected by the website and the Service. You must make contact with us in order to make use of this possibility. You can find our contact details in article 9 of this privacy statement. If the Service itself offers a possibility to make contact with us, this is of course also possible.

Please take into consideration that the consequence of removal of personal data, restriction of the processing or withdrawal of permission may be that you can no longer use the Service.

We sometimes have the right to save your personal data. This can be the case if this is necessary or recommended to be able to provide the Service to other parties, for the resolution of disputes, for the enforcement of the applicable conditions of use, for technical and/or legal requirements and/or if the Service or the law requires this.

You must provide sufficient evidence of your identity in the manner as we request this of you, to be able to acquire access by email to your own personal data. If we do not know for sure whether you are the actual person to whom the personal data relates, we can deny you access to the personal data.

You can request us to restrict or stop the processing of your personal data in the future. We will meet your request if possible. However, please take into consideration that you can be hindered in the use of the Service, or you may not be able to use the Service anymore. We refer to article 3 of this privacy statement for further information regarding this.

You can request us to transfer the personal information that we process regarding you to another party. In that case you must specify which information you want us to transfer. We will meet such a request if this concerns information that is processed on the basis of article 3.2 or 3.4 of this privacy statement, unless this information also contains personal data regarding other (natural) persons.

We will respond within 4 weeks to all your requests as described in this privacy statement. This period can be extended by another 4 weeks in the event of

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complex requests. If we do extend this period, we will inform you of this within 4 weeks after you submitted the request.

You have the right to submit a complaint to the authorised privacy authority regarding the manner in which we deal with personal data. In the Netherlands this authority is the Dutch Data Protection Authority, which you can reach at <https://autoriteitpersoonsgegevens.nl/>.

9. Your rights

If you have any questions, problems, or comments regarding this privacy statement, please do not hesitate to contact us by email at rene.otto@deviantlegal.com.

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