

1. VAN GOMPEL ADVOCATEN BV: DATA CONTROLLER

VAN GOMPEL ADVOCATEN BV, with its registered office at 3500 Hasselt, Belgium, Herkenrodesingel 4A, company number (KBO) 0711.725.721, and RPR Hasselt ("**VGA**" of "**we**") will, in her capacity as data controller as in in article 4.7 of the General Data Protection Regulation 2016/679 of 27 April 2016 ("**GDPR**"), be responsible for the processing and protection of your personal data. VGA will process this data in accordance with the applicable laws, in particular the GDPR and subsequent privacy policy ("**Privacy Policy**").

This Privacy Policy, which should be read in conjunction with our Cookie Policy, will inform you about the processing of your personal data by VGA.

2. OVERVIEW OF PROCESSING

WHAT DATA DO WE COLLECT?	HOW DO WE OBTAIN IT?	HOW LONG DO WE KEEP IT?	ON WHAT LEGAL BASIS?
Browser and session data	Directly from the data subject, through the placement of cookies	See our Cookie Policy	Your consent or our legitimate interests
Data shared through our social media	Directly from the data subject or on his or her user profile	See the privacy policy of the concerned social media channel	Your consent or our legitimate interests
Contact and billing data / data related to legal files	Through direct contact with or by the data subject (data relating to clients or applicants) or via a third party (data relating to nonclients)	As long as required for the processing purposes	Your consent, performance of a contract or our legitimate interests
Selection and recruitment data			

Questions or complaints? CONTACT VGA OR DE DPA

For questions, complaints or requests regarding (the processing of) your personal data, this Privacy Policy and/or our Cookie Policy, please contact VGA at **(0032)11 281 280** or at

info@vangompeladvocaten.be

or

de Data Protection Authority (DPA) via

<https://www.gegevensbeschermingsautoriteit.be/burger/acties/klacht-indienen>,

contact@apd-gba.be or by mail (1000 Brussels, Drukpersstraat 35).

3. WHAT PERSONAL DATA DO WE PROCESS, FOR WHAT PURPOSE AND WHY CAN WE DO THIS?

BROWSER AND SESSION DATA OF WEBSITE USERS We collect the following browser and session data by means of cookies when you use our website: the type of internet browser, user status, language preference, date and time of your visit, domain name or website through which you reached our website, number of visits, IP address, average time spent on our website and the pages visited.

WHAT FOR (PURPOSES)?

THIS IS ALLOWED ON THE BASIS OF (LEGAL BASIS):

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| ▪ technical and functional management of our website (essential and functional cookies); | ✓ | our legitimate interests, particularly the provision of a secure and well-functioning website (essential cookies); |
| ▪ evaluating the effectiveness of our website and following the use and/or surfing behaviour of the users (analytical cookies). | ✓ | the consent given by you (functional, analytical, and marketing cookies). |

GOOGLE ADS

- VGA uses the services of Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland) for Google Ads. When you use Google Ads to access our website, after agreeing to the terms of use of Google search engine, Google activates certain marketing cookies on our website. This in order to register that you are visiting us after using Google Ads.
- In our Cookie Policy and in the policy of Google, available at this link, you may find more information: <https://business.safety.google/adscookies/>.
- VGA is joint controller of the processing of your personal data (art. 26 AVG) when these marketing cookies are activated. Google and VGA signed a joint controllership agreement, available at <https://business.safety.google/adscontrollerterms/>.
- In this agreement, it was established that every controller, that is Google and VGA, will attend the data subject requests concerning the part of the processing for which they are respectively responsible.
- Google privacy notice, with all information concerning your personal data's processing by Google, is available at: <https://policies.google.com/privacy>.

(CONTACT AND BILLING) DATA OF OUR (FUTURE) CLIENTS We collect the following contact and billing data from (prospective) clients (and/or their team) who contact us (by telephone, e-mail or via the contact form on our website) or use our services: name, address, telephone number, e-mail address, VAT and/or KBO number, invoicing data and other personal data related to the files.

WHAT FOR (PURPOSES)?

THIS IS ALLOWED ON THE BASIS OF (LEGAL BASIS):

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| ▪ answer questions or requests for information; | ✓ | our legitimate interests, in particular the ability to respond to your questions; |
| ▪ providing our legal services; | ✓ | execute an agreement made with clients. Some data we need to process in order to be able to provide our services; |
| ▪ improving our products, services, and customer service; | ✓ | our legitimate interests, i.e., the ability to improve our products, services, and customer service; |
| ▪ complying with our legal and/or tax obligations, such as creating accounting records and invoices. | ✓ | comply with a legal obligation. |

(CONTACT) DATA OF NON-CLIENTS (OPPONENTS) We process the following (contact) data of counterparty(ies) (and/or their team), which we have obtained from our clients and/or fellow lawyers: name, address, telephone number, e-mail address, VAT number and/or KBO number, other personal data related to the file.

WHAT FOR (PURPOSES)?

THIS IS ALLOWED ON THE BASIS OF (LEGAL BASIS):

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| ▪ looking after our clients' interests and defending their rights (in and out of court). | ✓ | our legitimate interests, i.e., perform our assignment and carry out our commercial activities. |
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SELECTION AND RECRUITING DATA OF APPLICANTS We collect the following selection and recruitment data when applying to VGA via our website, e-mail and/or by telephone or other channels (campusinterviews, job fairs, etc.): name, address, telephone number, e-mail address, date of birth, curriculum vitae, and other documents and/or data that candidates provide us with.

WHAT FOR (PURPOSES)?

THIS IS ALLOWED ON THE BASIS OF (LEGAL BASIS):

- processing, managing and, where appropriate, following up incoming applications. ✓ our legitimate interests, i.e. personnel management.

CONTACT AND OTHER DATA OF OUR SUPPLIERS We collect, among other things, the following contact, and other data from suppliers (and/or their team) when we negotiate and conclude commercial contracts with suppliers: (company) name, company form, address, telephone number, e-mail address, VAT number and/or KBO number.

WHAT FOR (PURPOSES)?

THIS IS ALLOWED ON THE BASIS OF (LEGAL BASIS):

- using the services of our suppliers. ✓ our legitimate interests, in particular the use of third-party services.

DATA SHARED THROUGH SOCIAL MEDIA When you post or share information on social media, the privacy policies of the social media providers will apply as for the data processing by these social media providers concerns.

VGA has an account, channel or (fan)page on LinkedIn, Instagram, Facebook y YouTube (posting of videos) and is administrator of these accounts, channels or (fan)pages. As such, VGA is joint controller of the processing of your personal data when (art. 26 AVG): (i) VGA reposts your publications or interacts with you through these social media (e.g. through comments), (ii) you post o share information on the VGA social media accounts, pages or channels and (iii) VGA consults information concerning you through your profile or on the pages of third parties-users.

So, these social media providers and VGA reached an agreement on their joint controllership rising from the abovementioned data processing flows, in order to fulfill the AVG requirements. Below, VGA provides you more information on the personal data processing and the respective roles of VGA and the social media providers.

WHY DOES VGA USE YOUR PERSONAL DATA (PURPOSES)?

- VGA uses the information provided by you on our social media accounts, pages or channels, as well as the information you made publicly available in your profile or the profile and/or page of others, exclusively for: contacting you, if you requested us to do so and/or interact with you on social media regarding posts or topics of interest to us.
- VGA will not (i) store your personal data outside the concerning social media platform nor (ii) use your personal data for any other type of marketing or publicity.
- VGA will only share your information through the social media platform itself. The only category of recipients of your information are the users of the social media platform concerned and people not-users who have access to these platforms.

WILL VGA ALSO USE STATISTICAL INFORMATION DEVELOPED BY THE SOCIAL MEDIA PLATFORMS (PURPOSES)?

- Social media providers develop statistical information on how the users use our (fan)page, account or channel. This information is presented to us in anonymized formats. It does not allow us to draw conclusions regarding a specific individual user. Examples are: the number of visits to our page, location and gender of the users-visitors, number of new followers, etc.).
- We use this anonymized information to evaluate the success rata of our page, account or channel and our posts

EXCEPT FOR THE SET FORTH IN THIS PRIVACY POLICY, WE DO NOT INFLUENCE ON NEITHER ARE WE PART OF THE DATA PROCESSING THAT OCCURS AS A RESULT OF OR RELATED TO YOUR (FAN)PAGE, ACCOUNT OR CHANNEL ON SOCIAL MEDIA.

FACEBOOK & INSTAGRAM

- The agreement on the joint controllership between VGA and Meta Platforms Ireland Limited (joint controller of VGA for Facebook and Instagram) is available at this link: https://www.facebook.com/legal/controller_addendum.
 - In this agreement it was established that Meta Platforms Ireland Limited will attend all data subject requests concerning the personal data and/or rights granted by articles 15-20 of the AVG.
 - The information that Meta Platforms Ireland Limited, as joint controller, is required to provide in accordance with articles 13(1)(a) and (b) AVG is set forth in its privacy policy, which you can consult here: <https://www.facebook.com/about/privacy>. This policy includes information on the legal basis of the processing by Meta Platforms Ireland Limited and how you can exercise your rights.
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LINKEDIN

- The agreement on the joint controllership between VGA and LinkedIn Ireland Unlimited Company (joint controller of VGA for LinkedIn) is available at this link: <https://legal.linkedin.com/pages-joint-controller-addendum>.
 - In this agreement it was established that LinkedIn Ireland Unlimited Company Will attend all data subject requests the personal data and/or rights granted by the AVG.
 - You can find the privacy policy of LinkedIn Ireland Unlimited Company, with all information concerning their processing of your personal data and how you can exercise your rights, here: <https://www.linkedin.com/legal/privacy-policy>.
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YOUTUBE

- The agreement on the joint controllership of VGA and Google Ireland Limited (joint controller of VGA for YouTube) is available at this link: <https://business.safety.google/controller/terms/>.
 - In this agreement, it was established that every controller will attend the data subject requests concerning the part of the processing for which they are respectively responsible.
 - You can find the privacy policy of Google Ireland Limited, with all information concerning their processing of your personal data and how you can exercise your rights, here: <https://policies.google.com/privacy>.
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4. PROCESSING FOR DIRECT MARKETING

You do not want to receive
receive any more direct
marketing?

You may withdraw your consent for
all purposes, including direct
marketing, at any time by informing
us at
(0032)011 281 280 or
info@vangompeladvocaten.be

We process the personal data of existing clients and business relations for direct marketing purposes of similar services and products by e-mail. Specifically through newsletter and/or mailing. This processing is done based on our legitimate interest, namely the promotion of new services, products, seminars & events.

For direct marketing to other categories of persons, consent will be required prior to the processing of the personal data, for example when subscribing to our newsletter or after explicit acceptance of this Privacy Statement (e.g., via opt-in on our website).

The absence or withdrawal of your consent for direct marketing will not have any negative consequences for our services to you or for your access to our website (tools).

5. RETENTION PERIOD

VGA will not store your personal data longer than necessary for the processing purposes (see under Section 4) or according to what is foreseen in our Cookie Policy, unless VGA is legally or judicially obliged to keep the data for a longer period.

In case of candidate-applicants (see under Section 3), we will keep the personal data in our files for a maximum of 1 year, in order to be able to inform the candidate-applicant of any future and/or more suitable vacancies.

6. ACCESS TO YOUR PERSONAL DATA

VGA will treat your personal data as confidential. Unless we are required to do so by law or a court order, we will not pass on your data to third parties.

We do sometimes use the services or products of third parties (see below), who may have access to (certain of) your personal data, in order to deliver their products or services. For example, for maintaining and hosting our website, marketing campaigns, legal software for client and case management or the transmission of legal documents & correspondence (e.g., service of a summons).

VGA will conclude a processing agreement (as pursuant to article 28 of the AVG) with these third parties. Hereby they guarantee that they will take the necessary technical and organisational measures to adequately protect your personal data and will only use your data at the light of the (realisation of the) purposes provided for in this Privacy Statement.

<u>(CATEGORIES OF) RECIPIENTS WITHIN THE EEA</u>	<u>DATA EXCHANGE WITH GOOGLE</u>
<ul style="list-style-type: none">▪ Vevida BV (hosting website)▪ BVBA Informa Europe (IT)▪ BV Legal Consulting Group (IT)▪ Notaries and bailiffs▪ Colleagues-lawyers and/or law firms▪ Accountants and fiscal advisors▪ Lawyers-associated to VGA and its personnel▪ Wolters Kluwer (legal software)	<ul style="list-style-type: none">▪ VGA uses the services of Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland), for Google Analytics. As such, Google gets access to your personal data. It is possible that Google transfers your data to third parties within or outside the EEA. Here you find our agreement with Google on (i) their role as processor and (ii) their subsequent transfer of your data:<ul style="list-style-type: none">- https://business.safety.google/adsprocessorterms/- https://business.safety.google/adsprocessorterms/sccs/eu-c2p/▪ VGA also uses the services of Google Ireland Limited for Google Ads (see above). It is possible that Google transfers your data retrieved through Google Ads to third parties within or outside the EEA. Here you find the agreement with Google in this regard:<ul style="list-style-type: none">- https://business.safety.google/adscontrollertterms/sccs/eu-c2c/

7. PROTECTIVE MEASURES

VGA takes appropriate technical and organisational measures to protect your personal data against unlawful and/or accidental destruction, damage or loss and against unauthorised processing, access or transmission.

8. YOUR RIGHTS CONCERNING YOUR PERSONAL DATA AND HOW TO EXERCISE THEM

With regard to your personal data, you have the right, at no cost, to:

- ACCESS to and INSPECTION of your personal data and all information related to its processing;
- CORRECTION of incomplete or inaccurate personal data;
- DELETION your personal data and LIMIT their processing;
- OBJECTION to (all or certain purposes), so that VGA ceases this processing;
- WITHDRAWAL of your consent;
- TRANSFER of your personal data and,
- LODGE A COMPLAINT with the DPA (see above).

If you do not wish to give us permission to process your data and/or withdraw your previous permission, it is possible that:

- you will not have access to (all) the tools of our website,
- we will not be able to offer you all of our services,
- we will no longer be able to meet our contractual obligations towards you (in full).

This will not affect the lawfulness of the processing based on your previous consent.

We will process your requests in exercise of your rights as soon as possible and at the latest within 15 working days.

VGA reserves the right to change this Privacy Policy at any time. Important changes will be announced on our website.

Please check our website regularly for any developments.

How do I exercise my rights?

By sending a copy of a valid identity document to VGA by e-mail at:

info@vangompeladvocaten.be

or via mail to:

Herkenrodesingel 4A, 3500
Hasselt, Belgium