

PRIVACY POLICY

People & Company B.V. endeavours to protect the privacy of its website users. Read this entire Privacy Policy carefully before using the services of People & Company or the website www.legalpeople.nl.

ARTICLE 1. DEFINITIONS

This Privacy Policy uses the following definitions

Legal People:	People & Company B.V. Address: Roemer Visscherstraat 44, 1054 EZ Amsterdam Chamber of Commerce number: 24187148.
Applicable Privacy Legislation:	Applicable privacy legislation, including the General Data Protection Regulation ("GDPR"), the General Data Protection Regulation Implementation Act and any other special Acts.
Candidate:	A person included in Legal People's database.
Personal Data:	Personal Data is any data concerning an identified or identifiable natural person that is Processed by Legal People, as described in article 3 of this Privacy Policy.
Privacy Policy:	This Privacy Policy.
Process/Processing:	any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Controller:	The natural or legal person or any other body including an administrative body that, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.

Met opmerkingen [AKD1]: Is dit de juiste entiteit?

Processor:	The party that Processes Personal Data on behalf of the Controller without being subject to its direct authority.
Website:	The various websites exploited by Legal People, namely: www.legalpeople.nl , compliance-people.nl , tax-people.nl and the .com versions of these websites.
Website Visitor:	A visitor to the website www.legalpeople.nl .

ARTICLE 2. APPLICABILITY OF THIS PRIVACY POLICY

- 2.1 This Privacy Policy applies to Candidates and Website Visitors whose Personal Data Legal People collects and/or Processes. This Privacy Policy regulates Legal People's collection and Processing of Personal Data.
- 2.2 Legal People's Website contains references to websites of third parties (e.g. hyperlinks, banners and buttons). Legal People is not responsible for these third parties' compliance with the Applicable Privacy Legislation.

ARTICLE 3. PROCESSING OF PERSONAL DATA

- 3.1 Legal People Processes a Candidate's Personal Data if the latter:
- has contacted Legal People on his or her own initiative;
 - has been contacted by Legal People, whether or not for a specific assignment;
 - has been spotted in an executive search carried out by Legal People. Legal People may not necessarily contact the Candidate in this case.
- 3.2 Legal People Processes the Personal Data of Website Visitors.
- 3.3 Legal People Processes the following Personal Data of the Candidates referred to at (a) and (b) above:
- name;
 - email address;
 - telephone number;
 - organisation where the Candidate works and the Candidate's position;
 - curriculum vitae;
 - reports of interviews with the Candidate;
 - data on the Candidate's availability and leave;
 - references and other data that could be relevant to assessing the Candidate's suitability;
 - data on any assessment (or its outcome) that Legal People has made of the Candidate. These data may qualify as special Personal Data;

Met opmerkingen [i2]: Is this article necessary? See article 3.5

Met opmerkingen [AKD3]: Uit het BrainCompass-rapport blijkt dat de soorten persoonsgegevens nader gespecificeerd dienen te worden. Derhalve ontvangen wij graag meer informatie over de het soort assessment, zodat dit aangevuld kan worden.

- other data disclosed by the Candidate to Legal People that is relevant to the intermediation procedure.

3.4 Legal People Processes the following Personal Data of the Candidates referred to at (c) above:

- name;
- organisation where the Candidate works;
- current position;
- substantive branches of law or areas of interest;
- work experience (if shown by the Candidate's LinkedIn profile or his or her current employer's website).

Legal People will only actively refer a Candidate in this category to this Privacy Policy if it contacts him or her for a specific position. Until then, Candidates can read this Privacy Policy on the Website.

3.5 Legal People Processes the following Personal Data of Website Visitors:

- IP address;
- Information that the visitor enters and submits through one of the forms.

ARTICLE 4. PURPOSES OF AND LEGAL GROUNDS FOR PROCESSING

4.1 Legal People collects and Processes the Personal Data of Candidates solely for the purposes specified below:

- for intermediating between the Candidate and the client. This includes Processing Personal Data for executive searches, communicating with the client and the Candidate, and recording conversations with the Candidate;
- for inclusion in Legal People's "Don't Contact Me Register". This stops Legal People from contacting Candidates who do not (or no longer) want to be contacted;
- for performing assessments. An assessment might be necessary in some cases. Legal People only Processes a Candidate's Personal Data for the purposes of assessments after the Candidate has given his or her explicit consent (Article 6(1)(a) in conjunction with Article 9(2)(a) GDPR).

4.2 A Candidate can make a request or issue an instruction and/or give his or her consent depending on the situation. Apart from such instances, Legal People Processes data for the purposes of its legitimate business interest in such Processing (Article 6(1)(f) GDPR). Partly having regard to the categories of Personal Data, Legal People's interest in carrying out its core activities with regard to executive searches and consultancy prevails over the Candidate's interests. It should also be noted here that Legal People has implemented appropriate safeguards to guarantee the Candidate's interests.

- 4.3 Legal People Processes the Personal Data of Website Visitors solely for the purposes specified below:
- a. showing the number of unique Website Visitors;
 - b. For the purpose of search and selection (see 3.5b).
- 4.4 If Legal People intends to further Process the Personal Data for a purpose other than that for which the Personal Data was collected, it will provide Candidates and Website Visitors prior to that further Processing with information on that other purpose and with any other relevant information.

ARTICLE 5. PROCESSING OF PERSONAL DATA BY THIRD PARTIES

- 5.1 Legal People discloses Personal Data to the following Processors and/or third parties:
- a. clients of Legal People: Legal People only shares the Candidate's Personal Data for purposes of intermediation, and solely after the Candidate has given his or her explicit consent;
 - b. **Het Hoofdkantoor**: Het Hoofdkantoor is the assessment agency with which Legal People cooperates. It only shares a Candidate's Personal Data with Het Hoofdkantoor after the Candidate has given his or her explicit consent. In turn, Het Hoofdkantoor only shares the Candidate's (special) Personal Data after the Candidate has given his or her explicit consent;
 - c. Yellow Yard B.V.: Legal People's software supplier;
 - d. Pro Warehouse B.V.: Legal People's IT service provider.
- 5.2 Legal People only shares Personal Data of Candidates and Website Visitors with third parties after it has made arrangements with these third parties about the Processing of Personal Data. Legal People thus ensures that the Processors take appropriate measures, treat Personal Data confidentially and safeguard the rights of Candidates and Website Visitors.

Met opmerkingen [AKD4]: Klopt deze entiteit zo?

ARTICLE 6. SECURITY

- 6.1 Legal People takes appropriate technical and organisational security measures to protect the Personal Data of Candidates and Website Visitors from being abused, lost or altered.
- 6.2 Legal People retains the Personal Data of Website Visitors and Candidates on servers in the European Union. If and to the extent that Legal People stores Personal Data at parties in countries that do not have adequate levels of protection, it will agree standard provisions on data protection determined by the European Commission with these parties.

ARTICLE 7. RETENTION PERIODS

- 7.1 Legal People does not retain Personal Data for longer than is strictly necessary for the purposes for which it collects those Personal Data.
- 7.2 Personal Data of Candidates with whom Legal People has been in contact at any point will, in principle, be retained for five years after the latest contact.
- 7.3 Personal Data of Candidates with whom Legal People has not (or not yet) been in contact will, in principle, be retained for one year unless Legal People has contact with the Candidate in the meantime. In that case, those Personal Data will, in principle, be retained for five years.
- 7.4 Personal Data of Website Visitors will be retained for six months after their last visit to the Website.
- 7.5 Candidates and Website Visitors can request Legal People to delete their Personal Data sooner. If the Personal Data is no longer needed for the purposes for which Legal People collected or otherwise Processed it, Legal People will delete it.

ARTICLE 8. COOKIES

- 8.1 Legal People uses cookies to ensure that the Website works properly.
- 8.2 Cookies are small pieces of information stored by the browser in the Website Visitor's computer. Legal People uses different types of cookies for different purposes:
 - a. functional cookies: cookies that are needed to ensure that the Website works properly, e.g. cookies needed to create an account;
 - b. analytical cookies: cookies that provide information on how Website Visitors use the Website (and parts of it) so that Legal People can improve the Website and have it correspond as closely as possible to what Website Visitors find important and interesting. Legal People only uses data obtained with these cookies to study the use of the Website as a whole and not at individual level.
- 8.3 Legal People only uses cookies belonging to third parties in order to improve the quality and effectiveness of the Website. For example, it uses Google Analytics, which is set up in a privacy-friendly way. Google Analytics Processes IP addresses for Legal People.
- 8.4 The Website Visitor unambiguously consents to the use of cookies, to the extent

obliged to do so by law.

- 8.5 Most browsers are set to accept cookies. Website Visitors can set their browsers to disable cookies or to warn when a cookie is sent. However, some functions and services provided by both Legal People and other websites may not function properly if cookies are disabled.

ARTICLE 9. RIGHTS OF CANDIDATES AND WEBSITE VISITORS

- 9.1 As a Candidate or Website Visitor, you can at any time request that Legal People allow you to access, amend, rectify, add to, delete or restrict/ring-fence your Personal Data if it is factually incorrect or incomplete, or if it is being Processed contrary to a statutory rule.
- 9.2 If a Candidate no longer wishes to be contacted, he or she will be included in Legal People's "Don't Contact Me Register". Legal People thus ensures that it does not contact Candidates against their wishes. If a Candidate wants his or her name to be removed from the "Don't Contact Me Register", Legal People will implement this request within four weeks and remove the Candidate's name.
- 9.3 You can request that Legal People provide you with the Personal Data you yourself have disclosed to it in a structured and conventional form to enable you to transfer it to another Controller. You are only entitled to do so to the extent that the Processing is based on consent within the meaning of Article 6(1)(a) GDPR or Article 9(2)(a) GDPR, or if the Processing is necessary for the performance of a contract within the meaning of Article 6(1)(b) GDPR, and if such Processing is automated.
- 9.4 You always have the right to object to the Processing of your Personal Data. Legal People will always grant your request to the extent that the Processing of your Personal Data is for direct marketing purposes. Legal People will no longer Process Personal Data for other purposes unless there are compelling legitimate grounds for the Processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
- 9.5 You always have the right to submit a complaint to the Dutch Data Protection Authority.
- 9.6 If you wish to exercise any of the rights referred to in this article, you can send your request to Legal People at:

address: Roemer Visscherstraat 44
1054 EZ AMSTERDAM

Met opmerkingen [AKD5]: Dit is noodzakelijk.

email address: info@legalpeople.nl
telephone number: +31 (0)20-612 5522

- 9.7 Legal People will inform you of its response to your request immediately, or in any case within one month after it receives it. Depending on the complexity and number of the requests, this period may be extended by two more months. Legal People will inform you of any such extension within one month after receiving your request.
- 9.8 Where your requests are manifestly unfounded or excessive, in particular because of their repetitive character, Legal People will either charge a reasonable fee or refuse to act on the request.

ARTICLE 10. MISCELLANEOUS

- 10.1 Legal People reserves the right to alter this Privacy Policy regularly. It is your responsibility to read the applicable conditions regularly. This Privacy Policy was most recently amended and revised in May 2018.
- 10.2 If any provision of this Privacy Policy is contrary to the law, it will be replaced with a similar provision reflecting the original meaning of the provision to the extent legally allowed. The other provisions will remain fully applicable in that case.
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