



Privacy Policy

We value the right to privacy and strive to protect the personal data we collect and use in accordance with applicable data protection legislation and more specifically with the General Data Protection Regulation (GDPR) and its relevant national implementing legislation.

In this Privacy Policy, we use the terms

- “we”, “us”, and “our” (and other similar terms) to refer to our law firm Advisius srl/bv;
- “Personal Information” is any information relating to an identified or identifiable natural person;
- “identifiable natural person” is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors; and
- “you” and “your” (and other similar terms) refer to our clients and individuals associated with our clients.

From time to time, we may need to change this Privacy Policy. The most recent version of this Privacy Policy is available on our website. In case of fundamental changes of our Privacy Policy, we will actively do our best efforts to inform you on these changes.

WHAT ARE YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION AND HOW TO EXERCISE THEM?

Under certain circumstances you have the following rights:

- the right to ask us to provide you, or a third party, with copies of the Personal Information we hold about you at any time and to be informed of the contents and origin, verify its accuracy, or else request that such information be supplemented, updated or rectified according to the provisions of local law;
- the right to request erasure, anonymization or blocking of your Personal Information that is processed in breach of the law;
- the right to object on legitimate grounds to the processing of your Personal Information. In certain circumstances we may not be able to stop using your Personal Information, if that is the case, we'll let you know why; and
- withdrawal of consent – when Personal Information is processed on the basis of consent an individual may withdraw consent at any time (this may apply to processing of special categories of Personal Information where you have instructed us to act on your behalf and includes the following: racial/ethnic origin, political opinions, religious or philosophical beliefs and trade union membership). In the event that you no longer

want to receive any marketing material from us, please use the unsubscribe option (which is in all of our marketing emails to you), or contact the relevant Data Controller as set out below.

To exercise such rights and if you have any questions about how we collect, store and use Personal Information, then please contact us using the details as set out in the "Data Controller contact information" section below.

WHAT BASIS DO WE HAVE FOR PROCESSING YOUR PERSONAL INFORMATION?

We will only process personal Information where we have a lawful reason for doing so. The lawful basis for processing Personal Information by us will be one of the following:

- the processing is necessary for the performance of a contract you are party to or in order to take steps at your request prior to you entering into a contract;
- the processing is necessary in order for us to comply with our legal obligations (such as compliance with anti-money laundering legislation);
- the processing is necessary for the pursuit of our legitimate business interests (including that of the delivery and the promotion of our services); and
- processing is necessary for the establishment, exercise or defence of legal claims.

WHY AND HOW DO WE PROCESS PERSONAL INFORMATION?

We aim to be transparent about why collect and how we process Personal Information.

What is relevant to you will depend on the relation you have with us. In view thereof, this Privacy Policy is structured in a layered way that enables you to read only what is relevant to you.

- If **you are a client** of Advisius, please refer to section 1 of this Privacy Policy.
- If you **provided your contact details** to Advisius, please refer to section 2 of this Privacy Policy.
- If you have subscribed to **receive certain mailings** from Advisius, please refer to section 3 of this Privacy Policy.
- If **you are a visitor** of Advisius, please refer to section 4 of this Privacy Policy.
- If **you are a visitor of the Advisius website**, please refer to section 5 of this Privacy Policy.
- If you want to apply or have **applied for a job** at Advisius, please refer to section 6 of this Privacy Policy.

1. YOU ARE A CLIENT OF ADVISIUS

1.1 Collection

Pursuant to applicable laws, all legal and financial services providers, including Advisius, are required to have at their disposal certain information and/or documents regarding the identity of their clients. We request that our clients only provide Personal Information which is necessary for us to carry out our services. If we need Personal Information in respect of individuals associated with clients in order to provide legal services, we ask our clients to provide this Policy to the data subjects.

In the majority of circumstances, we will collect Personal Information from our clients or from third parties acting on behalf of our clients.

1.2 Content

Personal Information collected by Advisius includes your name, contact details, company, position, preferred language, area of business, jurisdiction, your contact person at Advisius and other business information.

1.3 Use

- **Providing legal services:** we will use and disclose Personal Information in such a manner as we believe is reasonably necessary to provide our services, for example we may need to instruct foreign counsel on your behalf (including correspondence with you), to liaise with other professional service providers in relation to matters that we are handling, or because we need to liaise with the opposing party on a matter you have instructed us on.
- **Administration:** to collect our fees or costs in connection with other legal enforcement, we will use Personal Information to agree payment arrangements, and to collect our fees and costs owing to us in connection with legal enforcement.
- **Managing client relationships:** providing clients with information on our services and legal updates that we consider may be relevant to them; arranging and hosting events; and identifying where we may make improvements in service delivery.
- **Client engagement:** as part of our client on – boarding process we carry out certain background searches to verify whether or not there are any potential issues that may mean we cannot work with a particular person (to identify criminal convictions, politically exposed persons, sanctions or other potential reputation issues).
- **Compliance with anti-money laundering regulation:** we may use your Personal Information (e.g. evidence of your identity) in order to fulfil our obligations to check the identity of our clients in compliance with anti-money laundering law and regulations.

1.4 Retention

Our general retention period for documentation created for the purpose of providing legal services is 12 years. In some instances there are legal and regulatory exceptions which may require documentation to be held for longer or shorter periods. If you require further information please contact us using the details as set out in the "Data Controller contact information" section below.

2. YOU PROVIDED YOUR CONTACT DETAILS TO ADVISIUS

2.1 Collection

Personal Information are provided by you when you provide your business card to (an associate or partner of) Advisius or otherwise provided us with your contact details.

2.2 Content

Personal Information collected by Advisius includes your name, contact details, company, position, preferred language, and your contact person at Advisius.

2.3 Use

We will use your Personal Information in order to contact you and for example, to ask you whether you would like to subscribe to our Mailings or if you have given us your contact details for a certain purpose, such as to send you information on our firm or a specific matter, to send you this information.

2.4 Retention

We will store your Personal Information as listed above until the moment you have informed us that you no longer wish to be contacted or it appears that your e-mail address is no longer in use (for instance, when we receive a failed delivery notification).

3. YOU HAVE SUBSCRIBED TO RECEIVE CERTAIN MAILINGS FROM ADVISIUS

3.1 Collection

In order to send you tailored updates and newflashes and to invite you for events regarding matters of your particular interest, we process your Personal Information in our client relation management systems.

Personal Information are provided by you when you opt to receive our updates, newflashes and invitation to events (opt-in procedure).

3.2 Content

Personal Information collected by Advisius includes your name, contact details, company, position, preferred language, your contact person at Advisius, your areas of interest, your opt-in status and, when applicable, whether you have opened our e-mail or clicked on any links included in our e-mail.

3.3 Use

We will use your Personal Information for the sole purpose of sending you the updates, newflashes and invitations you have opted to receive.

3.4 Retention

We will store your Personal Information as listed above until the moment you have informed us that you no longer wish to receive or newflashes, updates and invites or it appears that your e-mail address is no longer in use (for instance, when we receive a failed delivery notification).

4. YOU ARE A VISITOR OF ADVISIUS

4.1 Collection

If you visit the offices of Advisius, kindly note that CCTV is installed in our building. This means that if you visit Advisius, you may appear on a private camera footage.

4.2 Use

CCTV is handled under supervision of the landlord of the building, without direct instruction or involvement of Advisius. The use of CCTV is made to ensure that only authorized persons enter our offices, to protect our business (interests), properties and employees and to be able to investigate and handle irregularities. Where relevant, the camera footage will be used to establish, exercise or defend our (legal) position in the event of (legal) proceedings.

4.3 Retention

Based on the information we received, the camera footage is in principle kept during a limited period of time in principle not exceeding 3 weeks. However, if the camera footage show some irregularities, we will keep the camera footage for a longer period to enable investigation and prompt handling of these irregularities. After these periods, the camera footage is destroyed.

5. YOU ARE A VISITOR OF THE ADVISIUS WEBSITE

Your Personal Information are currently not collected by visiting the Advisius website.

6. YOU WANT TO APPLY OR HAVE APPLIED FOR A JOB AT ADVISIUS

6.1 Collection

You will provide us most of the Personal Information through your curriculum vitae. We may also obtain Personal Information relating to you from other parties, such as employment agencies, head-hunters or selection firms. Further, we will obtain Personal Information relating to you from other sources, such as social media platforms such as LinkedIn.

6.2 Content

Personal Information collected by Advisius includes: your name, birth date, contact details, photograph, education, professional experience, current salary/fee scheme, your areas of interest and other relevant details for business purpose.

6.3 Use

We process the Personal Information in order to take steps at your request prior to entering into a contract. Further, considering the nature of our services, we have legitimate interests to process these Personal Information in order to ensure that we hire competent and honourable personnel and to deal with possible complaints or claims relating to our application and selection procedure.

6.4 Retention

Your Personal Information will be kept during our application and selection procedure and will be kept for 18 months after completion thereof (added by the duration of any contract with Advisius in case you work with us).

WHO ELSE MAY HAVE ACCESS TO YOUR PERSONAL INFORMATION?

Where you supply us with Personal Information as a client, we will assume, unless you instruct us otherwise in writing, that we can disclose your Personal Information in such manner as we believe is reasonably necessary to provide our services, or as is required under applicable law.

Where relevant, we will share your personal data with the Belgian Financial Intelligence Processing Unit (CTIF-CFI), Bar authorities, debt-collection agencies, relevant tax authorities within the EU, and third parties, where this is required for the purposes as set out above or where these third parties assist us in this respect. The recipients of your personal data may be located in countries outside the European Union (EU), which countries may offer a lower level of data protection than the country in which we are established. In such case, we will ensure that the required safeguards are taken and we will, in most cases, adopt Standard Contractual Clauses (as approved by the European Commission). You may contact our Data Protection & Privacy Lead (see below) if you wish to obtain a copy of the Standard Contractual Clauses entered into or insight in other adequate measures taken.

HOW WE LOOK AFTER YOUR PERSONAL INFORMATION

We have in place appropriate technical and organizational security measures to protect your Personal Information against unauthorized or unlawful use, and against accidental loss, damage or destruction.

We put in place strict confidentiality agreements (including data protection obligations) with our third party service providers.

DATA CONTROLLER CONTACT INFORMATION

If you have any questions, comments or complaints in relation to this Privacy Policy or the processing of your Personal Information by us, please feel free to contact your regular contact within our firm or our Data Protection & Privacy lead via office@advisius.law or +32 2 891 80 55.