

# Privacy policy

(Version May 2018)

## 1 General

Adlex Advocaten cvba, having its registered office at Grotestraat 122, 3600 Genk, Belgium, is responsible for the processing of personal data as specified in this privacy policy..

We safeguard the privacy of everyone and shall at all times treat as confidential the personal information that you provide us or that we have obtained about you indirectly.

Adlex Advocaten undertakes to keep the privacy policy up-to-date. Check the “last updated” date at the top of the privacy policy for the most recent version.

This privacy policy also applies as a supplement to any additional declarations that may be made in connection with the specific relationship between yourself and our firm.

In this privacy policy we explain to you how and for what purpose we process your personal data.

## 2 Who are We?

‘We’ means all the employees of Adlex Advocaten. As per the privacy legislation, we are the Controller in relation to your personal data. In concrete terms, this means that we determine what happens to your personal data, the manner in which it is processed, and whether or not we pass on your data to third parties.

Our contact details are as follows:

Adlex Advocaten cvba  
Grotestraat 122  
3600 Genk  
Belgium  
VAT BE 0859.633.695  
Telephone number: +32 89 46 32 23 00  
E-mail: [privacy@adlex.be](mailto:privacy@adlex.be)

## 3 Who are you?

This privacy policy is intended for all natural persons whose personal data we process. This means that this privacy policy is aimed at the following persons: clients, competitors, prospects, job applicants (recruitment), suppliers, visitors to the website or other third parties (such as consultants, experts, etc.).

## 4 What personal data do we process?

The personal data that we process concerning you depends on the relationship between yourself and our firm. We shall provide you with a category-wise list of all the personal data concerning you that we process.

<b>Clientele</b>	<ul style="list-style-type: none"><li>▪ Identification data (such as name, last name, address, telephone number, e-mail, sex, date of birth, etc.))</li></ul>
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	<ul style="list-style-type: none"> <li>▪ Occupation and employment</li> <li>▪ Training courses and education</li> <li>▪ National register number or identification number</li> <li>▪ Financial data (such as bank account number, solvency investigation, etc.)</li> <li>▪ Family composition</li> <li>▪ Memberships</li> <li>▪ Photos in case you had attended one of our events</li> <li>▪ Camera images in case you have entered our buildings</li> <li>▪ Marketing preferences (information on the basis of which we send you/do not send you information about our activities)</li> </ul>
<b>Third parties, counterparties, consultants</b>	<ul style="list-style-type: none"> <li>▪ Identification data (such as name, last name, address, telephone number, e-mail, sex, date of birth, etc.)</li> <li>▪ Profession and employment</li> <li>▪ Training courses and education</li> <li>▪ Financial data (such as bank account number, solvency investigation, etc.)</li> <li>▪ Family composition</li> <li>▪ Memberships</li> </ul>
<b>Suppliers</b>	<ul style="list-style-type: none"> <li>▪ Identification data (such as name, last name, address, telephone number, e-mail, sex, date of birth, etc.)</li> <li>▪ Professional information (job designation within the company, website, etc.)</li> <li>▪ Financial data (such as bank account number, solvency investigation, etc.)</li> <li>▪ Camera images in case you have entered our buildings</li> </ul>
<b>prospects</b>	<ul style="list-style-type: none"> <li>▪ Identification data (such as name, last name, address, telephone number, e-mail, sex, date of birth, etc.)</li> <li>▪ Professional information (job designation within the company, website, etc.)</li> <li>▪ Marketing preferences (information that enables or prevents us from informing you about our activities)</li> </ul>
<b>Recruitment</b>	<ul style="list-style-type: none"> <li>▪ Identification data (such as name, last name, address, telephone number, e-mail, sex, date of birth, etc.)</li> </ul>

- Personal information (such as interests and leisure activities)
- Skills (training courses, language skills, education, etc.)
- Curriculum vitae
- Camera images in case you have entered our buildings

## 5 We also process sensitive information in specific cases

In specific cases, it is necessary, in connection with our service, to process sensitive personal data of clients or competitors. Sensitive data refers to personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a person's sex life or sexual orientation.

We only process sensitive data if the processing is necessary for the establishment, exercise or defence of legal claims, or the correct defence of the interests of the clientele.

If so required in connection with our service, we also process personal data relating to criminal convictions and criminal offences, or to related security measures. In such cases, we provide appropriate safeguards to protect your rights and freedoms.

## 6 What data will be processed when you visit our website?

You visit our website ([www.adlex.be](http://www.adlex.be)) exclusively via a secured *https* connection. Thanks to the SSL certificate, all traffic to and from the website is automatically encrypted. In this manner, we ensure a secure connection.

Adlex uses cookies to ensure and follow up the proper functioning of the website. Cookies are small pieces of text that are stored on your device during your visit to [www.adlex.be](http://www.adlex.be). You will find below a description of the cookies that are active on this website:

- Functional cookies: certain cookies, such as a “session cookie”, are used on the website in order to remember the items you have put into your shopping basket or to remember an option you have chosen. Such session cookies will be deleted when you close the browser window and will not collect any further personal data.
- Analysis cookies: We would like to know how [www.adlex.be](http://www.adlex.be) is visited and used, so that we can make the website even better. We can do this thanks to *Google Analytics*, and this as well requires cookies. These analysis cookies are provided by Google. The IP addresses are anonymised and Google may not share the data from our Analytics with third parties. For more information, please visit the following website: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>
- Tracking cookies: with tracking cookies, we can measure whether the visitor has viewed a particular service or website, and they also allow us to present customised data to you such as advertisements that are relevant to you, for example with *Facebook Ads* or *Google Adwords*. These tracking cookies are only active if you give your consent in the cookie bar below to store all cookies.

You can easily change your consent. For this, you need to clear the browsing data in your browser. Thereafter you will again see the cookie bar on the website where you can give your consent or refuse.

Google Chrome Ctrl+Shift+Del  
 Microsoft Edge Ctrl+Shift+Del  
 Firefox Ctrl+Shift+Del  
 Safari Command+Option+E

You can remove or disable cookies in the settings of any modern browser. The website will still be accessible, but not all services may function unless you allow functional cookies. We require these functional cookies to login to a secure page or to place an item in a shopping basket, for example.

**7 For what purposes do we use your personal data?**

We obviously do not process your personal data directly. The reasons for which we process your personal data depend on the relationship between yourself and our firm. We shall provide you with a category-wise list of all the purposes for which we process your personal data.

<p><b>Clientele</b></p>	<ul style="list-style-type: none"> <li>▪ The preparation and further management of a file</li> <li>▪ To communicate with you</li> <li>▪ To protect your interests</li> <li>▪ To provide our services</li> <li>▪ For marketing purposes</li> <li>▪ To inform you of the latest news and our events</li> <li>▪ To invite you to our events</li> <li>▪ To improve the quality of our service</li> <li>▪ To prevent and detect fraud or crime (for example, anti-money laundering)</li> <li>▪ To ensure the safety of our buildings</li> <li>▪ For statistical purposes</li> <li>▪ To comply with the provisions of the law</li> <li>▪ To protect our own interests</li> </ul>
<p><b>Third parties, counterparties, consultants</b></p>	<ul style="list-style-type: none"> <li>▪ Management of a file in the interest of our clientele</li> <li>▪ To communicate with you or your lawyer within our code of ethics</li> <li>▪ To comply with the provisions of the law</li> <li>▪ To protect our own interests</li> </ul>
<p><b>Suppliers</b></p>	<ul style="list-style-type: none"> <li>▪ To communicate with you</li> </ul>

	<ul style="list-style-type: none"> <li>▪ For our supplier management</li> <li>▪ For drawing up and entering into contracts for the delivery of goods and/or services</li> <li>▪ For marketing purposes</li> <li>▪ To ensure the safety of our buildings</li> <li>▪ For statistical purposes</li> <li>▪ To comply with the provisions of the law</li> <li>▪ To protect our own interests</li> </ul>
<b>prospects</b>	<ul style="list-style-type: none"> <li>▪ Building up a customer relationship</li> <li>▪ To communicate with you</li> <li>▪ For marketing purposes</li> <li>▪ To ensure the safety of our buildings</li> <li>▪ For statistical purposes</li> </ul>
<b>Recruitment</b>	<ul style="list-style-type: none"> <li>▪ Recruitment</li> <li>▪ Building up a recruitment reserve</li> <li>▪ To communicate with you</li> <li>▪ To ensure the safety of our buildings</li> <li>▪ For statistical purposes</li> </ul>

## 8 What is the legal basis on which we process your personal data?

As a controller, we can only process your personal data if we have a legal basis to do so. We rely on the following legal basis to process the aforesaid personal data:

- **Your consent:** In a number of cases, we shall only process your personal data if you have given us your consent for the same. In that case, we shall always inform you of the purpose for which we use your personal data. Your consent shall then apply specifically to those purposes. Such consent need not necessarily be given in writing. You may also give us your consent verbally (for example via a telephone conversation). You also have the right to revoke your consent at any time. Your consent shall be requested in case of prospecting and recruitment.
- **Implementation of an agreement to which you are a party or taking measures on your request prior to the conclusion of an agreement:** The personal data of clientele and suppliers are primarily processed on this legal basis.
- **Legal obligation:** In specific cases, we are bound by law to process your personal data. Thus for example, we are bound to process specific personal data in connection with the anti-money laundering and taxation legislation.

- **Vital interests:** in a limited number of cases, we process personal data because this is necessary to protect your vital interests. We are regularly assigned judicial mandates such as those of official receiver, debt mediator and administrator. In such cases, it is our task to protect your vital interests. If in such cases we process sensitive data, and you are physically or legally incapable of giving your consent, we again rely on this legal basis.
- **Our legitimate interests:** In a number of cases, processing is necessary for our legitimate interests. Our legitimate interests are mainly based on the one hand in developing our economic activities and protecting our economic interests in the widest sense of the term, and on the other, to improve our services and further support our clientele. For these reasons we issue a periodic newsletter (direct marketing). In order to realise our interests, we keep our clientele and prospects updated concerning interesting developments and invite them to our events. If you no longer wish to receive updates, you may always unsubscribe via our unsubscribe module.

The legal basis on which we process your personal data depends on the relationship between yourself and our firm. We shall provide you with a category-wise list of all the legal bases based on which we process your personal data.

<b>Clientele</b>	<ul style="list-style-type: none"> <li>▪ Implementation of the Agreement</li> <li>▪ Legal obligation</li> <li>▪ Vital interests</li> <li>▪ Our legitimate interests</li> </ul>
<b>Third parties, counterparties, consultants</b>	<ul style="list-style-type: none"> <li>▪ Our legitimate interests</li> <li>▪ Legal obligation</li> </ul>
<b>Suppliers</b>	<ul style="list-style-type: none"> <li>▪ Implementation of the Agreement</li> <li>▪ Legal obligation</li> <li>▪ Our legitimate interests</li> </ul>
<b>prospects</b>	<ul style="list-style-type: none"> <li>▪ Your consent</li> <li>▪ Our legitimate interests</li> </ul>
<b>Recruitment</b>	<ul style="list-style-type: none"> <li>▪ Your consent</li> <li>▪ Implementation of the Agreement</li> <li>▪ Our legitimate interests</li> </ul>

## 9 Do we share your personal data with third parties?

In specific cases, we have to share your personal data with third parties. This may be necessary in order to ensure the provision of our service. Such third parties may on the one hand be the sole recipient of your personal data or on the other, we may commission them to process your personal data (in that case, we utilise the services of “processors”). In the latter case, we always ensure that we enter into specific agreements with each processor about how they may process your personal

data. We also ensure that our processors implement all the necessary measures in order to ensure the safe processing of your personal data.

We may engage the services of the following third parties:

- External service providers: accountants, banks, other lawyers, civil-law notaries, bailiffs, security professionals, information services, out network administrators, etc.
- Governmental and judicial authorities.
- Other data subjects involved in legal proceedings, such as competitors, among others.

In principle, we process all your personal data in Belgium. If we pass on your personal data to third parties who are not established in the European Union, we offer appropriate safeguards and ensure that you have enforceable rights and effective legal remedies.

## 10 What security measures do we take when processing your personal data?

We take the protection of your data very seriously and implement technical and organisational measures in order to prevent misuse, loss, unauthorised access, accidental disclosure and unauthorised changes. If you have the impression that your data are not properly protected or there are indications of misuse, we request you to report the same to us.

We also implement appropriate technical and organisational measures to determine whether a breach of your personal data has taken place and promptly notify you and the supervisory authority concerning the same. We have drawn up a *data breach policy* in this connection.

## 11 How long do we retain your personal data?

We do not store your personal data for longer than is strictly necessary for the purposes for which it was collected. The retention period depends on the personal data and your relationship with our firm. In addition, we also have to take into account specific legal obligations that describe the period for which we are required to retain certain data. We shall provide you with a category-wise list of all the storage periods.

<b>Clientele</b>	▪ 10 years after the termination of our services
<b>Third parties, counterparties, consultants</b>	▪ 10 years after the termination of our services
<b>Suppliers</b>	▪ 10 years
<b>prospects</b>	▪ 2 years after the last contact
<b>Recruitment</b>	▪ 2 years after the last contact

## 12 What are your rights?

As regards our firm, you can enforce the following rights:

- **Right of access:** You have the right to obtain clear information about whether or not processing of your personal data shall take place and, if so, to access such personal data. In that case, we provide you with a copy of the personal data that are processed.

- **Right to rectification:** You shall have the right to request rectification of your data. Taking into account the purposes of the processing, you have the right to complete incomplete personal data, among other things by providing a supplementary statement..
- **Right to erasure:** In specific circumstances, you have the right to demand that we delete the personal data that we have about you. Other laws that require you to preserve specific data shall prevail over this rule. This is also sometimes called ‘the right to be forgotten’. We take the necessary measures, if possible, to delete your personal data and if not, to inform you that such data deletion is not possible.
- **Right to restriction of processing:** Under certain circumstances, you have the right to restrict the processing of your data.
- **Right to data portability:** You have the right to obtain your personal data that you have provided to us in a structured, commonly used and machine-readable form, and you have the right to transfer this data to another controller.
- **Right to withdraw your consent:** You have the right to withdraw your consent at any time. Withdrawal of consent shall not prejudice the legality of the processing on the basis of the consent prior to its revocation.
- **Right to object:** You have the right at all times to object to the processing of your personal data for reasons that relate to your specific situation. In that case, we shall suspend the processing of the personal data unless we are able to provide compelling legitimate grounds for the processing that outweigh your interests, rights and freedoms or that are related to the establishment, exercise or substantiation of a legal claim.
- **Right to complain:** You have the right to lodge a complaint with the competent supervisory authority. In Belgium, this is the Data Protection Authority. The registered office of the Data Protection Authority is located at 35 Drukpersstraat, 1000 Brussels.

There are specific rights that cannot be directly exercised by you and which are subject to a number of conditions stipulated in the applicable privacy legislation.

### **13 Who is our contact point?**

If you have any questions concerning the processing of your personal data, or if you wish to exercise one of your rights, you may contact our *Privacy manager*:

Mr. Jan Verlinden

Adlex Advocaten cvba  
Grotestraat 122  
3600 Genk  
Belgium

VAT BE 0859.633.695  
Telephone number: +32 89 46 32 23 00  
E-mail: [privacy@adlex.be](mailto:privacy@adlex.be)