

# Privacy Policy

With this Privacy Policy Stibbe wants to inform any visitor of [www.stibbe.com](http://www.stibbe.com) and [www.werkenbijstibbe.nl](http://www.werkenbijstibbe.nl) which personal data are being processed and why. This Privacy Policy is dated 1 June 2020 and will be updated from time to time to reflect any changing regulatory requirements, processing practices or new functionalities that we might add. Any such changes to the Privacy Policy will be posted on the relevant website and will be effective upon posting. See our Cookie Policy for more information about the usage of cookies.

## Introduction

The privacy policy applies to the processing of personal data of:

- clients;
- suppliers;
- visitors;
- recruitment candidates;
- parties to proceedings and their counsel.

This is the Privacy Policy of the Stibbe Network consisting of:

1. **Stibbe BV/SRL**, a company incorporated in Belgium, registered with the Crossroads Bank for Enterprises of Belgium under number RLE 0429 914 688 - VAT number BE0429914688 whose registered office is located at 1000 Brussels, Loksumstraat 25, (hereinafter "**Stibbe Brussels**")
2. **Stibbe N.V.** a company established in the Netherlands registered in the trade register of the Dutch Chamber of Commerce under 34198700 whose office is located at 1077 WM Amsterdam, Beethovenstraat 10, (hereinafter "**Stibbe Amsterdam**")
3. **Stibbe B.V.** a service company of Stibbe N.V., established in the Netherlands registered in the trade register of the Dutch Chamber of Commerce under 33170864 whose office is located at 1077 WM Amsterdam, Beethovenstraat 10, (hereinafter "**Stibbe B.V.**")
4. **Stibbe Avocats** an unincorporated law partnership under Luxembourg law, whose office is located at L-2411 Luxembourg, 26, Boulevard F.W. Raiffeisen, (hereinafter "**Stibbe Luxembourg**")
5. **Stibbe London B.V.** a company established in Amsterdam, registered in the Trade Register of the Dutch Chamber of Commerce under number 34206454 and with the Registrar of Companies for England and Wales at Companies House under numbers FC025331 and BR007672, whose office is located at London, EC2M 1JJ, 53 New Broad Street (hereinafter "**Stibbe London**")

The Stibbe Network is jointly responsible for the collection and processing of your personal data in the absence of a territory preference or when you set EU as preference. It is possible to select either Belgium, the Netherlands, or Luxembourg as your preferred country, whereupon Stibbe B.V., Stibbe BV/SRL, respectively Stibbe Avocats, will be the entity responsible for the collection and processing of your personal data.

## The personal data we collect and process

The personal data that we collect and process from you may include the following information (any such data hereinafter referred to as “personal data”):

- **Identity data** including name, surname, date of birth, passport number, etc.
- **Contact data** including billing address, email address, phone number.
- **Professional information** including your employer, your title or position, your professional history, your preferred language, the practice areas, jurisdictions and industries you are interested in, your relationship to a person.
- **Financial data** including bank account details.
- **Usage data** such as Information that we derive from your visits to our website [www.stibbe.com](http://www.stibbe.com), applications, systems and online platforms (including MyStibbe, social media channels), such as your IP address, the pages you visit, the browser you are using, the website you have previously visited, demographic information, and the time and duration of your visit.

Marketing data such as Information that you provided to us or that we collected as part of your registration for events, marketing materials such as newsletters and alerts, attending meetings and events, including access and details of visits to our offices and dietary requirements.

- **HR data** including Information that you provided to us when applying for a job at Stibbe in order to assess your profile and skills.

In rare circumstances, depending on the situation, Stibbe may:

- process personal data relating to criminal convictions and offences.
- process special categories of personal data such as e.g. religious or philosophical beliefs, political opinions, trade union membership, information about health.
  - We might e.g. process this personal information for cases related to employment law or criminal law; regulatory purposes.

## How we collect your personal data

- Your personal data might be collected directly from you when you provide us your personal data.

E.g.: You request our service; you provide us with personal data that are necessary for a client service, you give us your business information on a client event of Stibbe; you participate to one of our events, etc.

- Your personal data may be collected from third parties when we:

E.g.: When another party sends us your personal data; in order to do background checks; when we interact with government or other public authorities; when we receive documents of the parties to proceedings and their counsel.

- Your personal data may be collected by using publicly available resources, including:

E.g.: public register of companies, public register of individuals, etc.

## How do we use your personal data?

Stibbe might process your personal data in the following circumstances:

- **To performance of a contract:** when the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
- To comply with a **legal obligation**.
- For its **legitimate interest:** when necessary for the interest of Stibbe or a third party and your fundamental rights are not overridden by such interests. These legitimate interests include organising our internal operations, handling our matters, ensuring proper administration, ensuring appropriate security, and the like.
- **Consent:** where you have provided your consent or explicit consent to the processing of the personal data.

## For which purposes do we process your personal data?

Your personal data will be processed for the following purposes:

- To provide legal advice or other services to our (potential) clients and to manage our business relationships with you or your organisation (including for billing, accounting, auditing, collection, payments, employment, and other support services).
- To handle our matters and to get in touch with parties to proceedings and their counsel.
- To act in compliance with our legal and regulatory obligations, including with respect to Know Your Customer, anti-money laundering and sanction checks.
- To manage and secure access to our offices, website [www.stibbe.com](http://www.stibbe.com), applications, systems and online platforms.
- To inform you about job vacancies and opportunities at Stibbe that we consider suitable for you.

Additionally, we may process your personal data for the following purposes:

- Communicating with you with respect to legal developments, events, products or services provided by Stibbe and that are relevant to you (including via newsletters, alerts, event invitations, etc.).
- Distributing surveys or marketing materials.
- In addition, if you consent by clicking on our website's cookie notice, we automatically process personal data for technical and functional management of our website and to ensure it is easy to use. [More information about cookies can be found in our cookie policy.](#)

We will store your data no longer than necessary as defined by the purposes for which the data is stored.

Personal data processed within the context of a recruitment process are kept for six years. Personal data processed during a recruitment event are kept for two years.

## Exchange of your personal data

Any personal data we collect from you, may be transferred to and exchanged with Stibbe's various entities, affiliates and offices, both inside and outside the European Union. For the processing of personal data between these entities, we have arranged for contractual safeguards.

Any personal data we collect from you, may also be transferred to third parties (including (sub)contractors, other counsel, legal directories, and third parties involved in your matter), both based inside and outside the European Union, in order to execute a processing agreement, based upon your consent or because required by applicable law and regulations.

For data processed outside the European Union or European Economic Area, Stibbe applies the standard contractual clauses defined by the European Commission.

## Security

Stibbe secures your personal data through various technical and organisational measures, such as firewalls, secured servers, and data processing agreements with third parties.

## Social media – other websites

If you share the content from Stibbe's website [www.stibbe.com](http://www.stibbe.com), applications, systems and online platforms (including MyStibbe, social media channels) via social media, your personal data will be visible to the visitors of your personal pages on these social media websites. We are not responsible or liable for any processing of your personal data via such media.

Stibbe's website [www.stibbe.com](http://www.stibbe.com), applications, systems and online platforms (including MyStibbe, social media channels), may provide references – including hyperlinks – to websites, channels or social media or external content from other companies/persons. Stibbe is not responsible or liable for any processing of your personal data via these websites, channels or media. This Privacy Policy does not apply to the use of such websites, channels or media.

## Your rights

Subject to the terms and conditions provided for by the applicable law, you may contact Stibbe to exercise the following rights:

- You have a right to be informed about how we process your personal data.
- You have a right to access your personal data – You have a right to receive confirmation as to whether or not your personal data is processed, and where that is the case, you can access your personal data.
- You always have the right to have your personal data corrected. This allows you to rectify or correct, inaccurate or incorrect personal data Stibbe processes.
- You have the right to have your personal data erased. This allows you to permanently delete personal data which Stibbe processes. Stibbe is not always obliged to delete your personal data at your request – this right only applies in the situations and to the extent provided for by law.
- You have the right to restrict the processing of personal data related to you. This allows you to freeze the use of your personal data by Stibbe, without deleting it. Stibbe is not always obliged to limit your personal data at your request – this right only applies in the situations and to the extent provided for by law.
- You always have the right to withdraw your consent whenever the processing of your personal data takes place on the basis of your consent.

- You always have the right to object to the processing of your personal data for direct marketing purposes. You can withdraw your consent or change your preferences regarding newsletters, alerts and invites at any time by clicking the “unsubscribe” or “change profile” button at the bottom of our newsletters, invitations or through our website [www.stibbe.com](http://www.stibbe.com) or our online platforms.
- You have the right to data portability. This allows you to easily move, copy or transfer your personal data from one controller to another. This right may only be exercised whenever the processing takes place on the basis of an agreement with you.

Should you have any questions or complaints about this Privacy Policy or if you wish to exercise any of your rights in respect of your personal data processed by Stibbe, please send your request

- for Stibbe B.V. (the Netherlands) to [ASD.GDPR@stibbe.com](mailto:ASD.GDPR@stibbe.com)
- for Stibbe BV/SRL (Belgium) to [BRU.GDPR@stibbe.com](mailto:BRU.GDPR@stibbe.com)
- for Stibbe Avocats (Luxembourg) to [LUX.GDPR@stibbe.com](mailto:LUX.GDPR@stibbe.com)

or by post to the Stibbe entity responsible for the processing of your data.

If you believe that your rights as a data subject have been infringed, please be aware that you have the right to lodge a complaint with the relevant supervisory authority. Depending on the responsible entity, this will be the *Autoriteit Persoonsgegevens* (for the Netherlands), *Gegevensbeschermingsautoriteit / l'Autorité de protection des données* (for Belgium) or National Commission for Data Protection (for Luxembourg).

# Cookie Policy

With this Cookie Policy Stibbe wants to inform any visitor of [www.stibbe.com](http://www.stibbe.com), , and [www.werkenbijstibbe.nl](http://www.werkenbijstibbe.nl) which cookies are being used and why. This Cookie Policy is dated 1 June 2020 and will be updated from time to time to reflect any changing regulatory requirements, processing practices or new functionalities that we might add. Any such changes to the Cookie Policy will be posted on the relevant website and will be effective upon posting. See our Privacy Policy for more information about our policies regarding the processing of personal data.

## What are cookies?

Cookies are small text files that are placed on your computer or mobile device when visiting one of our websites and which will store certain user information. Cookies are composed of unique codes that will help to recognize you when visiting our website again and will enhance your user experience.

There are different types of cookies, distinguished according to functionality, source and / or storage period.

## Regarding their functionality

**Necessary or essential cookies:** are cookies that are necessary for the optimal operation of the website and enable you to use the features of our website.

**Functional cookies:** ensure that the website functions properly. Examples of these are cookies that remember your login details, that ensure the security of your login details, that ensure the uniformity of the layout of the website.

**Analytical cookies:** are used for analytical purposes, i.e. to measure visits to the website. These cookies show how the website is used. For example, we know how many times a particular page is read, how much time someone spends on our website, etc. Statistical analyses are made from the information we receive and these analyses enable us to improve the structure, navigation and content of our website, to enhance the functionality and user experience of our website and associated services. We also use this data to enhance our service offering (by tailoring and adapting the content of our website with topics that are relevant to our visitors).

## Regarding their source

**First-party cookies:** are created and managed by Stibbe.

**Third-party cookies:** are created and managed by third parties and materialise when visiting the website. The cookies will send information regarding your visit to third parties.

**Social media cookies:** are third party cookies that allow you to directly share content from the website on social media, such as Twitter, Facebook, LinkedIn, YouTube or Spotify by using the respective buttons. Through these buttons, the social media may collect information about you and track your activities across websites to build a user profile, even if you make no use of these buttons. Because the privacy and cookie statements of social media, such as Twitter, Facebook, LinkedIn, YouTube or Spotify are often subject to change, we advise to regularly consult the privacy and cookie policies of the social media in question.

## Regarding their storage period

**Session cookies:** the information is only temporarily stored in your browser or application and session cookies expire as soon as you close your browser or application.

**Permanent cookies:** remain on your computer or mobile device, even if you close the browser or the application. Permanent cookies store information between different visits to the website and make it possible to recognise you during subsequent visits to our website. This data allows the website to recognize you as a returning visitor and to respond accordingly, for example by saving your language preferences. Permanent cookies remain on your device until their end date is reached, until a new cookie is installed, or until you delete them in your settings of your browser or application (their lifespan is determined by the website).

## Which cookies do we use?

Stibbe uses the following **essential cookies**. Given the fact that these cookies are essential for the technical functioning of our website, these cookies are placed as soon as you access our website. You cannot disable these cookies if you want to read our website.

Name	Storage period	Content	Purpose
ASP.NET_SessionId	Session cookie	Session information	Keep track of the current session
_hjIncludedInSample	Session cookie	Third-party essential cookie Hotjar - Session information	This session cookie uniquely identifies a visitor during a single browser session and lets Hotjar know whether a specific visitor is included in an audience sample.

Stibbe uses the following functional cookies. These cookies are installed if you consent by clicking on our website's cookie notice.

Name	Storage period	Content	Purpose
AllowCookies	180 days	No-follow cookie	If you do not consent to the use of analytical cookies, we will place this functional cookie on your computer or device to remember your choice.

Stibbe uses the following **analytical cookies** for analytical purposes and to enhance the functionality and user-experience of our website. The permission of every visitor is required for the placement of these cookies which implies that you can refuse to place these cookies.

Name	Storage period	Content	Purpose
_hjid	7 days	Third party analytical cookie Hotjar	This performance cookie is set when the visitor first lands on a page with the Hotjar script. It is used to persist the random Hotjar User ID, unique to that site

			on the browser. This ensures that behavior in subsequent visits to the same site will be attributed to the same user ID.
_ga	2 years	Third-party analytical cookies Google Analytics of Google Inc.	These are performance cookies which we use to collect information about how our visitors use the website. We use this information to compile reports and to improve our website experience. The cookies collect information such as: the number of visitors to the website, where visitors have come from and the pages they visited.
_gat_UA	1 minute		
_gid	1 day		

## Managing cookies

You can enable or disable functional or analytical cookies at any time by amending the cookie settings of your browser. How to do this can be found in the help-function of your browser. In your browser you can view and delete the current cookies on your computer or mobile device and choose not to accept them in the future.

**Google Chrome:** browser > Chrome-menu > settings > Privacy and security > Content settings > cookies

**Internet Explorer:** browser > Tools > Internet options > Privacy:

- Set the protection level with the slider
- Click 'advanced' and set the protection level manually

**Firefox:** Menu > Options > Privacy & Security > Cookies and Site Data

**Safari:** Preferences > Privacy > Remove all website data or Details

## Questions or complaints?

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or by post to the Stibbe entity responsible for the processing of your data.