

PRIVACY and COOKIE POLICY

As a law firm Florent B.V. (hereinafter: 'Florent' or 'we') processes personal data, always with your privacy in mind. This privacy and cookie policy explains how Florent handles your personal data, what your rights are regarding the personal data we collect, how you can exercise those rights and where to direct your questions. This privacy and cookie policy applies to all forms of data processing by or on behalf of Florent.

EU Regulation 2016/679 ([General Data Protection Regulation](#)) qualifies us as controller. Please find our contact details below, including the e-mail address to which you can send your privacy-related questions:

Florent B.V.
Gustav Mahlerlaan 1236
1081 LA Amsterdam
privacy@florent.nl

What Personal Data We Collect

We collect the following personal data of **clients** (or their contacts):

- contact details (name, first names, initials, titles, gender, address, post code, city);
- other contact details (telephone number, e-mail address and similar data required for communications);
- car registration number if clients would like to use our car park;
- data regarding your case or the settlement of a dispute, including data regarding the opposing party and third parties;
- information required to compute and record allowances and expenses, to make payments and to collect claims, such as bank account numbers;
- other data that must be processed or are required under the applicable laws and regulations, such as ID's, if necessary to comply with the Money Laundering and Terrorist Financing (Prevention) Act (Wwft).

We collect the following personal data of persons from whom we purchase products or services or who work for our **suppliers**:

- contact details (name, first names, initials, titles, gender, address, post code, city);
- other contact details (telephone number, e-mail address and similar data required for communications);
- car registration number if suppliers would like to use our car park;
- in some cases, depending on the type of services provided: a certificate of conduct and ID;
- data required to place orders or purchase services;

- information required to compute and record allowances and expenses, to make payments and to collect claims, such as bank account numbers;
- other data that must be processed or are required under the applicable laws and regulations.

We collect personal data of **job applicants**:

- contact details (name, first names, initials, titles, gender, address, post code, city);
- other contact details (telephone number, e-mail address and similar data required for communications);
- bank account numbers and travelling expenses (commuting distance);
- nationality, date of birth;
- availability, CV and employment history (copies of diplomas, certificates, letters of reference), motivation letter;
- references, data on the position for which the candidate has applied, notes on job interviews and written communications with the applicant;
- car registration number if applicants would like to use our car park.

we collect the following personal data of **third parties** (such as non-clients whose personal data appearing in our files, lawyers and other advisors with whom we are in touch, visitors to our website);

- contact details (name, first names, initials, titles, gender, address, post code, city), if provided;
- other contact details (telephone number, e-mail address and similar data required for communications), if provided;
- information collected on visits to the website www.florent.nl, including IP-address, as specified under '**Cookies**';
- data regarding electronic messages from or intended for third parties and data required to keep in touch with those third parties;
- other data obtained from public sources or provided by clients or third parties as part of a case that we handle or dispute resolution;
- car registration number if third parties would like to use our car park.

Purpose of Data Processing

We use the personal data we collect for the purposes listed below:

- to provide the legal services requested;
- to keep records and accounts, for instance to compute or register allowances or benefits, income and expenditure, to pay and collect claims (including the engagement of collection agencies or bailiffs);
- to handle complaints and disputes about our services;
- to communicate and keep in touch with you; this includes communications for marketing purposes and related activities such as seminars and newsletters;

- to consider job applications;
- to place orders or purchase services;
- to perform audits and other internal inspections;
- to grant access to the office and to ensure corporate security;
- to grant access to our website and to secure our website;
- to implement or apply laws and regulations.

Basic Principles

We process personal data based on one or more of the legal principles listed below:

- if necessary for the execution of an agreement or the performance of pre-contractual acts at your request;
- if necessary to comply with legal obligations;
- for legitimate interests;
- with your consent.

If processing personal data based on consent, Florent will ask your consent separately. You may withdraw your consent at any time. Such withdrawal does not affect the legitimacy of the processing of your personal data before you withdrew your consent.

For How Long Do We Keep Your Personal Data?

We will not keep your data for longer than necessary for the purposes stated in this privacy and cookie policy based on the principles above.

Florent retains the personal data provided as part of your job application up to four weeks after the application procedure has been completed. With your consent, we will retain your personal data up to one year after completion of the procedure. This enables us to contact you about future job vacancies at Florent. If you enter Florent's employment, your personal data will become part of your personnel file.

We furthermore keep your data to comply with our statutory duties of retention, such as our duty to keep certain accounting particulars for seven years. As required by the [Handleiding Archivering op het Advocatenkantoor](#) we keep case files for a ten-year period.

With Whom Do We Share Your Personal Data?

Florent does not share your data with third parties (called 'recipients' in privacy legislation), unless necessary to realise the purposes of processing as set out in this privacy and cookie policy. All third parties to whom Florent provides your personal data are required to treat those data with care. If those parties qualify as 'processors' as defined in privacy legislation, Florent will enter into data processing agreements with those parties.

We may share **clients'** personal data with:

- staff of Florent (on a need-to-know basis);

- suppliers (such as translators, couriers, bailiffs, software suppliers, etcetera);
- opposing parties, other lawyers or advisors in the context of our services;
- other parties if required by law or with your consent.

We may share **suppliers'** personal data with:

- staff of Florent (on a need-to-know basis);
- other parties if required by law or with your consent.

We may share **job applicants'** personal data with:

- staff of Florent (on a need-to-know basis);
- suppliers (e.g. the supplier of our competency assessment test);
- other parties if required by law or with your consent.

We may share **third parties'** personal data with:

- staff of Florent (on a need-to-know basis);
- suppliers (e.g. translators, couriers, bailiffs, Google Inc. for website user statistics, see '**Cookies**' below);
- opposing parties, other lawyers or advisors in the context of our services;
- other parties if required by law or with your consent.

We may have to transfer your personal data to recipients in countries outside the European Economic Area that offer a lower level of protection of personal data than the European regulations. In that case Florent will ensure that the transfer complies with the applicable laws and regulations, for instance by entering into specific model agreements drawn up and approved by the European Commission.

Security Measures

In our opinion it is important that your personal data are safe. For that reason, we will ensure that appropriate technical and organisational measures are taken to protect your personal data against unauthorised use as much as reasonably possible. Our staff members are bound by a duty of confidentiality and must comply with specific instructions to adequately protect your personal data.

Regrettably, sending information via the Internet is never completely secure. We make every effort to protect and secure your personal data, but as we cannot guarantee that transmitting your data to us is completely secure, you always do so at your own risk

When sending data to you and others, we use secure connections. If you have more questions about the protection of your personal data or suspect abuse, please send an e-mail to privacy@florent.nl.

We will reply to your message as soon as possible and take appropriate action if necessary.

Cookies

Our website uses cookies. Cookies are small data files that are stored by your browser on your computer, tablet or mobile phone and read out when you use our website. Below we will explain the different types of cookies used by our website.

Functional Cookies

Florent uses several functional cookies that ensure that our website works properly, and remember your preferences, such as your chosen language.

Analytical Cookies

To modify our website to suit the wishes and interests of our visitors and to enhance your user experience.

Florent uses Google Analytics of Google Inc. ('Google'). Google Analytics helps us understand how visitors use our website. These are user statistics such as the number of visitors, the frequently viewed pages and the average duration of website visits. For this, we use the Recommendations for privacy-friendly settings of [Google Analytics of the Dutch Data Protection Agency](#). This means that we have instructed Google to remove the last three digits of your IP-address (which makes it more difficult to trace the IP-address to a specific visitor) and that we have disabled the standard settings to share data with Google.

In addition, Florent has entered into a data processing agreement with Google. We do not use any other Google services in combination with Google Analytics cookies. The limited information shared with Google through the use of Google Analytics is transferred to Google, and stored on servers in the United States. Google is certified under the [EU/US Privacy Shield](#), which means it guarantees an appropriate protection level for the processing of personal data.

The table below shows a full overview of the cookies we use on our website:

Name	Application	Purpose	Domain	Duration
_ga	Google Analytics	Collecting statistics about the website to enhance user experience	Florent.nl	24 months
_gid	Google Analytics	Distinguishing different visitors to our website.	Florent.nl	24 hours
_gat_gtag_UA_76410339_29	Google Analytics / Tag Manager	Limiting requests.	Florent.nl	24 hours
wpml_browser_redirect_test	WPML language-switch plug-in (option to switch	Testing whether cookies are enabled	Florent.nl	Removed as soon as browser is closed.

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	languages on the website)			
wpml_browser_redirect_test	WPML language-switch plug-in (option to switch languages on the website)	Testing whether cookies are enabled.	Florent.nl	Removed as soon as browser is closed.
_icl_visitor_lang_js	WPML language-switch plug-in (option to switch languages on the website)	Stores the language chosen before the website is displayed.	Florent.nl	24 hours
_icl_current_language	WPML language-switch plug-in (option to switch languages on the website)	Stores the language in which the website is displayed.	Florent.nl	24 hours
_icl_current_admin_language_{hash}	WPML language-switch plug-in (option to switch languages on the website)	Stores the current WordPress administration area language.	Florent.nl	24 hours
cookie_notice_accepted	Cookie Notice plug-in (upon acceptance of cookies)	Remembers that cookies have been accepted on the website	Florent.nl	1 month

Removing Cookies

You can adjust your browser settings on your computer, tablet or mobile phone to delete or disable cookies. This is different for each browser. For Google Chrome, please click [here](#) and for Internet Explorer [here](#) to learn how to remove the different types of cookies. If you do not wish Google to collect and use Google Analytics data, you can download and install the browser plug-in here: <https://tools.google.com/dlpage/gaoptout>.

More information on removing cookies is available on the site of [Consumentenbond](#).

Your Privacy Rights

You have the following rights regarding the processing by Florent of your personal data:

- the right to request whether we process your personal data, and if so, to access those personal data;
- the right to have your personal data rectified if incorrect or incomplete;
- the right to have your personal data deleted (the right to be forgotten);
- the right to object to the processing of your personal data or to restrict the processing of your personal data;
- the right to withdraw your consent for the processing of your personal data if based on your consent;
- the right to obtain your personal data or have them moved to a third party designated by you in a structured, common and machine-readable form (right to data portability);
- the right to file a complaint with the competent supervisory authority. In the Netherlands this is the Data Protection Authority. If you live or work in another country in the European Economic Area, you can file a complaint with the competent authority of that country.

You can file requests to exercise your rights by post or e-mail using the contact details stated above. Florent will inform you within one month of receipt whether Florent can honour that request. Under the privacy laws Florent may refuse your request under certain circumstances. In that case we will explain why. For more information about privacy rights, please go to <https://autoriteitpersoonsgegevens.nl/en>.

Version of Information

This privacy and cookie policy was amended most recently on 11 September 2018. We reserve the right to change this privacy and cookie policy and will always publish the most recent version on our website, stating the effective date of the changes. If there are substantial changes that could have a major impact, we seek to inform the parties concerned directly.