

GLOBAL PRIVACY POLICY

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1. Who and what is covered by this Privacy Policy?

Advocatenkantoor Reliance cvba – company number 821.045.612 - («Reliance» or «we, us, and our») respects and values your privacy and we share our methods and approach to protecting your personal information with you in this policy (“Privacy Policy”).

Our Privacy Policy along with our [Terms of Use](#) and [Disclaimer](#) describe why and how we process your personal data when we perform our activities, including through your use of our website www.reliancelaw.be (“Website”), when you contact or request information from us, when you engage our legal or other services or as a result of your relationship with one or more of our staff and clients.

This Privacy Policy also describes how we use Cookies.

Please read our Privacy Policy carefully. By using our services or our Website, you consent to our collection and use of your information as described in this Privacy Policy.

This Privacy Policy may change from time to time (see section titled “Changes to our Privacy Policy”) and your ongoing use of our services or this Website will be deemed your acceptance of such changes, so please check this Privacy Policy regularly for updates.

This Privacy Policy applies to the processing of personal data by Reliance in connection with:

- (Contact person of) clients: provision of services by Reliance to actual and prospective clients.
- (Contact person of) supplier or visitors: provision of products and services to Reliance by suppliers or services providers and provision by Reliance of facilities (including networking – WIFI) to visitors to any Reliance’s offices.
- Website visitors: any personal data a Website visitor may provide through the use of our Website or in case of sign-up to receive newsletters, blog posts, register for events or use contact forms.
- Recruitment: candidate or individual (whether by such candidate or individual or by a third party, such as a recruitment agency) for a position at Reliance.

- Contact persons receiving legal updates and invitations to events.
- Counterparties or rival bidders to, or litigants in legal proceedings involving, our actual or prospective clients.

However, some personal data must remain strictly confidential subject to professional secrecy obligations that bind lawyers and are covered by specific rules (see section entitled “Professional secrecy”).

This Privacy Policy does not cover information collected by any other company, affiliate, or, third-party site or by any third-party application that may link to or be accessible from our Website. When linking to any such sites, we strongly recommend that you review the privacy statements on these sites, before disclosing any personal information.

2. Professional secrecy

Reliance (the firm as a whole, its individual lawyers and its employees) is bound by statutory obligations governing professional secrecy.

Such professional secrecy covers all confidential information that our lawyers receive or discover in the execution of their tasks (identity of the client, all types of correspondence and annexes, all information about the client or about other persons or parties, etc.).

Confidential information that is covered by professional secrecy, may only be disclosed to courts, arbitral courts and third parties, to the extent that the disclosure of this information is relevant, is in the interest of the client, is not legally prohibited and if the client agrees with the disclosure.

This Privacy Policy does not apply to the processing of personal data which must remain strictly confidential subject to the obligations of professional secrecy of lawyers, as described above.



3. What personal data do we collect about you?

Depending on how you interact with us and/or our Website, we may collect several types of information about you, including:

- Contact information, such as address, email, phone number, and other related information requested in our relationship or on our online forms.
- Business contact information, such as your name (including name prefix or title), the company you work for, your title or position and your relationship to a person.
- Your status as a client of Reliance, now or in the past, or of another firm and identification and background information provided by you or collected as part of our business acceptance processes.
- Accounting/financial information, such as payment-related information.
- Technical information, such as information from your visits to our Website or applications or in relation to materials and communications we send to you electronically.
- Details of your visits to our Website, including, but not limited to, traffic data, location data, logs and other communication data, and the resources you use, as well as information about your computer and internet connection, including your IP address, operating system and browser type, for system administration and to report aggregate information.
- Information you provide to us for the purpose of attending meetings and events, including access and dietary requirements.
- Details of transactions you carry out through our Website and of the fulfilment of your orders.
- Records and copies of your correspondence, if you contact us.
- Information we receive from third parties, for example, our business partners, suppliers and vendors that provide services such as webinars, videos, training materials, books and other services.
- Any other information relating to you which you may provide to us.

4. How do we obtain your personal data?

We may obtain your personal data through the channels set out below:

- Direct interactions: the personal data we hold in our database were provided to us by you (e.g. by speaking to us in person or over the telephone, whilst visiting our offices, by filling in forms on our Website, by corresponding with us by email or post, by giving us your business card, registering for an event, etc.).
- Website, cookies and marketing: when you use our Website or review the publications or marketing material we send you.
- Third-party sources: (i) we receive Technical Data from analytics provider such as Google based outside the EU (see section titled “third-parties cookies”); (ii) we may also receive your data from third-parties when we provide our client services or other parties send us your personal data to enable the provision of those service or when you provide your personal data to a third-party for the purpose of sharing it with us, for instance recruitment agencies and consultants may provide your personal data to us for recruitment activities; (iii) we may receive personal data when we interact with governmental or regulatory bodies or other authorities in relation to you or on your behalf.
- Publicly available sources: we may collect or receive information about you from other sources, such as keeping the contact details we already hold for you accurate and up to date using publicly available sources.

5. What are your personal data used for?

We use information that we collect about you or that you provide to us in the following ways:

- Deliver information requested by you.
- Provide and improve our services to you and/or to our clients, including handling the personal data of others on behalf of our clients.
- Promote our services, including sending legal updates, publications and details of events and send you marketing material.
- Manage and administer our relationship with you and our clients.
- Fulfill our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims.
- Respond to your inquiries regarding advertised job positions.
- Respond to your requests for proposals/tenders.
- Allow you to subscribe to our news, blogs and emails.
- Enhance our Website offerings and capabilities.

I. Legal and other services

We collect, create, hold and use personal data in the course of and in connection with the services we provide to our clients. We will process identification and background information as part of our business acceptance, finance, administration and marketing processes, including anti-money laundering, conflict, reputational and financial checks. We will also process personal data provided to us by or on behalf of our clients for the purposes of the work we do for them.

We will also collect and process personal data about you in relation to your attendance at our offices or at an event or seminar organized by Reliance. We will only process and use special categories of personal information about your dietary or access requirements in order to cater for your needs and to meet any other legal or regulatory obligations we may have. We may share your information with service providers involved in organizing or hosting the relevant event.

II. Marketing

Your personal data may be used for marketing purposes related to the services provided by Reliance.

If you are a client, we send our updates and invitations in the context of our existing client relationship, which is in our legitimate interest. Given the existing client relationship, we consider that it is included in our service and that you are happy with this service we deliver to you to keep you updated.

If you are not a client or not related to it, we will send our updates and invitations based on your consent.

We will not use your personal data to send you marketing material if you have requested not to receive such. If you request that we stop processing your personal data for marketing purposes, we shall acquiesce.

You can make such a request via the forms and links provided for that purpose in the marketing material we send you or by contacting us at info@reliancelaw.be. Alternatively, you may make any such request through your usual contact at Reliance.

We never share your personal data with any organizations outside Reliance for marketing purposes.

III. Website, Cookies and social media

WEBSITE

When you use our Website, we obtain information about you. We only process your personal data for legitimate business reasons such as (i) the provision and good organization of our (online) services; (ii) dealing with enquiries, requests and complaints



(e.g. sent via our online contact form); (iii) gathering statistics about the use of the Website; (iv) improving the Website's performance and design.

When you use our "Calculation notice" tool on our Website, you are asked to enter several data (status of the employee, name employee, start date, date of departure from the company, date of birth, resignation or dismissal, salary and benefits, working time percentage). These data will only be processed in order to deliver the requested online services (calculation of the notice) and will not be stored by Reliance in any way.

COOKIES

We also obtain information about your use of our Website by using cookies. Cookies are small text files that are stored on your computer when you visit web pages. The owner of the cookie (who may not be directly connected to the web page that set it – see section entitled "Third-Party Cookies") can access the information that is stored in that cookie when you view web pages that include the cookie owner's code. Cookies are widely used, are necessary for the correct function of many websites and can enrich the user experience. They may also be used to track user behaviour.

We use different types of cookies to help us improve our Website and deliver a better and more personalized service by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- recognize you when you return to our Website.

OUR COOKIES

We use cookies to help us make our Website accessible and some of these cookies are essential for its functioning. For example, we use cookies to help resize images for mobile browsers, to indicate if users have java script.

THIRD-PARTY COOKIES

We allow carefully selected third-parties to place cookies via our Website. These are cookies that are owned by external organizations. Below is a list of the third parties who may set cookies when you visit our Website:

- Google Analytics and Google Tag Manager place cookies to track your use of our Website. This tracking is anonymous and the data is used so that we can understand how our Website is used and how to improve the experience that we offer our visitors.
- AddToAny, a provider of social plugins services, places cookies directly and through other, affiliated third parties to allow you to share content via social media, including Twitter LinkedIn or Facebook.
- Other cookies are always used

Since the third-party cookies we use are set up and managed by third parties, we suggest that you check the third-party websites for more information about their cookies and how to manage them. Here are links to help you:

- Google Analytics and Google Tag Manager
- AddToAny

OTHER WAYS TO MANAGE COOKIES

You can also control or disable cookies through your web browser. How you disable cookies depends on which browser you use. All modern browsers allow you to change your privacy settings to prevent websites from planting cookies.

These settings will typically be found in your browser's "options" or "preferences" menu or by using the 'Help' option. In order to understand these settings, the following links may be helpful.

- Internet Explorer

- Firefox
- Chrome
- Safari web

If you configure your browser to refuse to accept cookies, you may be unable to access certain parts of our Website or it may not function as intended.

CONSENT TO COOKIES

We use cookies to improve your overall web experience. By using our Website, you consent to our use of cookies in accordance with our Privacy Policy. If you want to withdraw your consent for us to use cookies, you will need to delete your cookies using your Internet browser settings.

SOCIAL MEDIA AND THIRD-PARTY WEBSITES

We include links to social media sites, such as LinkedIn, Facebook or Twitter, on our Website. These links and pointers to third-party websites are not part of our Website. Reliance does not make any representations or warranties regarding any third-party websites. If you follow links to these websites or services, any information you contribute will be governed by the terms of use or privacy policies for those third-party websites and may be visible to others. You should never share or post personal, financial or sensitive information or any information you expect to be treated confidentially through those websites. Reliance is not responsible for any losses or damages in connection with the information, security, privacy, down time, content or accuracy of materials of any third-party websites.

6. On what basis do we use your personal data?

We will only process your personal data on the following bases:

- To execute a contract: when necessary for the execution of contracts to which you are party or in order to take steps at your request prior to entering into a contract (such as engaging with an individual to provide legal or other services).
- When necessary for compliance with our legal and regulatory obligations.
- For the establishment, exercise or defense of legal claims or proceedings.
- For the purposes of the legitimate interests of Reliance or for legitimate business purposes.
- In some specific situations, we will only process your data to the extent that we have obtained your unambiguous consent (for example, marketing purposes without being a client – see sections entitled "Marketing" and more generally "What are your personal data used for?").

7. How long do we keep your personal data?

The retention periods of your personal data depend on the category of the data. Those periods are based on the requirements of applicable data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and Reliance's business purposes.

As a general rule:

- Your personal data will not be retained longer than what is necessary for the purposes described above.
- Personal data obtained through our Website are stored for a period of five years,
- Personal data obtained from (a contact person of) a client are stored for a period of 10 years as from the end of contractual relationship,
- Personal data obtained from a candidate are stored for a period of two years,



- We may however retain your personal data for another period, depending on one of the following periods: (i) as long as is necessary for our daily business; (ii) any retention period that is required by law; or (iii) the end of the period during which litigation or investigations might arise.

8. Who we share your personal data with and in what countries?

We may share your personal information with certain trusted third-parties in accordance with contractual arrangements in place with them, including:

- Our professional advisers and auditors.
- Suppliers to whom we outsource certain support services such as word processing, translation, photocopying and document review.
- IT service providers to Reliance.
- Third-parties engaged in the course of the services we provide to clients and with their prior consent, such as barristers, local counsel and technology service providers like data room and case management services.
- Third parties involved in hosting or organizing events or seminars.
- Where necessary, or for the reasons set out in this Privacy Policy, personal information may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavors to notify you before we do this, unless we are legally restricted from doing so.

In order to provide our services, we may need to transfer your personal information to locations outside Belgium or where you are viewing our Website for the purposes set out in this Privacy Policy. This may entail a transfer of your information from a location within the European Economic Area (the “EEA”) to outside the EEA, or from outside the EEA to a location within the EEA. The level of protection in countries outside the EEA may be less than that offered within the EEA. Where this is the case, we will implement appropriate measures to ensure that your personal data remains protected and secure in accordance with applicable data protection laws.

9. How do we protect your personal data?

We have implemented technical and organizational security measures to protect your personal data from accidental loss and from unauthorized access, use, alteration and disclosure. These measures include:

- Training relevant staff to ensure they are aware of our privacy obligations when handling personal data.
- Administrative and technical controls to restrict access to personal data on a ‘need to know’ basis (passwords).
- Technological security measures, including fire walls, encryption and anti-virus software.
- Login access blocks in case of loss or theft of devices.
- Physical security measures, such as security badges to access our premises.
- Allowing limited access to those who we believe reasonably need to come into contact with the personal data in order to carry out their jobs.

Unfortunately, the transmission of personal data - especially via the internet (including by email) - is never completely secure. Although we try to protect your personal information, we cannot guarantee the security of your personal information transmitted to us or by us. Any transmission of personal information is at your own risk.

10. What are your rights regarding your personal data and how do you exercise your rights?

You have several rights concerning the personal data we hold about you. You may thus:

- Obtain confirmation that we are processing your personal data and request a copy of the personal data we hold about you.
- Ask that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete.
- Ask that we delete personal data that we hold about you, or restrict the way in which we use such personal data if you believe that there is no (longer a) lawful ground for us to process it.
- Insofar the data processing is based on consent, you have the right to withdraw this consent, without prejudice to the legitimacy of the processing based on this consent prior to its withdrawal.
- Receive a copy of the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or a contract).
- Object to our processing of your personal data for which we use legitimate interest as a legal basis, in which case we will cease the processing unless we have compelling legitimate grounds for the processing.
- Object at any time to the processing of personal data for direct marketing purposes. If you do not want to continue receiving any direct marketing material from us, you can contact us or click on the unsubscribe function (see section entitled “Marketing”). In that event, the personal data shall no longer be processed for such purposes.
- Avail of the right to file a claim with the supervisory authority; i.e. Belgian Data Protection Authority (www.privacycommission.be).

11. Changes to our Privacy Policy

Reliance reserves the right to amend this Privacy Policy at any time, for any reason, without notice, other than the posting of the amended Privacy Policy on its Website. You should check our Website regularly to view our current Privacy Policy that is in effect and any updates that may have been made to it. The provisions contained herein supersede all previous notices or policies regarding our privacy practices that govern this Website. With regard to the most current version, the date this Privacy Policy was last revised is identified at the bottom of this web page.

12. How to contact us

To ask questions or make comments about this Privacy Policy and our privacy practices, including any disclosures for direct marketing purposes, or to access or amend your information, please contact us at: info@reliancelaw.be.

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