

## Privacy and Cookie statement Liber Dock B.V.

Liber Dock B.V. (hereinafter 'Liber Dock' or 'we') processes personal data in the context of our service provision. We also process personal data when you visit our website. The term 'personal data' includes all information about an identified or identifiable natural person. In the processing of personal data, Liber Dock qualifies as controller and we adhere to the [General Data Protection Regulation \(EU\) 2016/679](#) ('GDPR'), the [Implementing Act GDPR](#) and the [Telecommunications Act](#). Below you will find our contact information including the e-mail address on which we can be reached for privacy-related questions:

Liber Dock B.V.  
Attn. the GDPR Committee  
Jollemanhof 12a  
1019 CW Amsterdam  
T: + 31 (0)20 235 11 50  
[privacy@liberdock.com](mailto:privacy@liberdock.com)

In this Privacy and Cookie statement we explain:

- Which personal data we process;
- For which purposes and based on which grounds we process your personal data;
- To whom we provide your personal data;
- How long we retain your personal data;
- How your personal data is protected;
- Which cookies we use on our website
- What your privacy rights are;
- How you can file a privacy complaint;
- How we handle changes to this Privacy and Cookie Statement.

### Which personal data do we process?

We process the following (categories of) personal data of (contract persons of) **clients**:

- Name and address details (name, first names, titles, gender, address, postal code and place of residence);
- Other (contact) data (date of birth, telephone number, e-mail address and the like for data required for communication);
- Data in view of the hearing of a case or the settlement of a dispute, including data regarding the other party and third parties;
- Data for calculating and recording fees and expenses, making payments and recovering claims, including the bank account number;
- When you use our knowledge portal: company name, name, e-mail address, login details.
- When you visit our meetings or events and if relevant: information regarding accessibility requirements and/or dietary requirements;



- Other data obtained from public sources or provided to us by third parties in the context of the handling of a case or the settlement of a dispute.
- Other data that must be processed in order to comply with applicable legislation, such as the processing of data relating to an identity document.

We process the following (categories of) personal data of persons from whom we purchase products or services or who work at our suppliers (hereinafter '**suppliers**').

- Name and address details (name, first names, titles, gender, address, postal code and place of residence);
- Other contact data (telephone number, e-mail address and the like for data required for communication);
- In some cases, depending on the type of service provision: a certificate of good conduct and data relating to an identity document.
- Data in view of making orders or purchasing services;
- Data for calculating and recording fees and expenses and making payments, including the bank account number;
- Other data, the processing of which is required or necessary to comply with applicable legislation.

We process the following (categories of) personal data of **job applicants**:

- Name and address details (name, first names, titles, gender, address, postal code and place of residence);
- Other contact data (telephone number, e-mail address and the like for data required for communication);
- Bank account number and travel expenses data (distance commuter traffic);
- Nationality, date of birth;
- Availability, CV and employment history, training history (copies of diplomas, certificates, certificates), motivation letter;
- References, information on the job applied for, notes on job interviews and written communication with the applicant.

We process the following (categories of) personal data of **third parties** (such as persons who are not clients of whom we have personal data in our files, lawyers and other advisors with whom we have contact, website visitors):

- Name and address details (name, first names, titles, gender, address, postal code and place of residence), as far as notified to us;
- Other (contact) data (telephone number, e-mail address and the like for data required for communication), as far as notified to us;
- Data in connection with a visit to the website [liberdock.com](http://liberdock.com), including your IP-address, as further explained under '**Cookies**';
- Data relating to electronic messages originating from or intended for third parties and data necessary to maintain contact with these third parties;
- Other data obtained from public sources or provided to us by clients or third parties in the context of the handling of a case or the settlement of a dispute.



## On what grounds and for which purposes do we process your personal data?

We process your personal data on the basis of one or more of the following legal grounds:

- a) When this is necessary for the performance of an agreement to which you are a party or for the performance of pre-contractual acts at your request;
- b) When this is necessary to comply with a legal obligation;
- c) When this is necessary to promote our legitimate interests or the interests of a third party;
- d) With your consent.

If we process your personal data on the basis of your consent, we will request this separately from you. You may withdraw your consent at any time. Please note that the withdrawal of your consent does not affect the lawfulness of the processing of your personal data prior to the withdrawal of your consent.

We use the above personal data for the purposes set out below and for each purpose we have stated how we do this based on the abovementioned grounds (a through d). If processing takes place on the ground of a 'legitimate interest', we explain this interest briefly. If you have specific questions about this, you can always contact us.

### *Purposes with associated grounds:*

- to be able to provide the requested legal services, including the provision of access to our knowledge portal (a, b and c: *to offer and improve our service provision*);
- for our administration, including calculating or recording fees or payments, income and expenditures, the payment and collection of claims (including the use of collection agencies or bailiffs) (a, b and c): *our interest in being able to keep correct records*);
- to be able to handle any complaints and disputes about our services in accordance with our [complaints procedure](#) (a, b and c: *to defend our rights and to improve our services*);
- to contact you and to communicate with you; including communication for marketing, relationship management and business development activities such as invitations to events and sending newsletters and other marketing communication that may be relevant to you; (a, b, c: *our interest in bringing our services to the attention of existing customers and d: consent if we do not have a customer relationship with you yet but you have subscribed to our newsletter, for example*);
- for processing your job application (a, b, c: *our legitimate interest in assessing whether you are suitable for the vacancy and d: permission if you wish to remain in the portfolio for a longer period of time, see the heading: 'How long do we retain your data?*
- for placing orders or purchasing services (a, b and c: *our interest in being able to keep correct records*);
- for performing audits and other internal controls (a, b and c: *our interest in being able to keep correct records*);
- to give you access to our office and for the purposes of security service; (a, b and c: *our interest in protecting our property and the data we have at our disposal*);
- to provide you with access to our website, for generating statistics concerning the use of our website, for the analysis and improvement of our website and for securing our website; (a and c: *our interest in being able to offer a well-functioning website*);



- to comply with our legal and regulatory obligations (*b, c: our interest in being able to comply with our obligations*).

### To whom do we provide your personal data?

Liber Dock does not disclose your information to third parties ('recipients' within the meaning of privacy legislation), unless necessary for the proper performance of the purposes described in this Privacy and Cookie Statement. The third parties to whom the personal data is made available are obliged to treat your personal data confidentially. If these parties are regarded as 'processors' within the meaning of the privacy legislation, Liber Dock will ensure that a processing agreement is concluded with these parties that meets the requirements set out in the GDPR.

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

- Liber Dock employees (on a need-to-know basis);
- Suppliers (e.g. translation agencies, courier services, bailiffs, our software suppliers, such as BaseNet Internet Project B.V. ("BaseNet") when you use our knowledge portal, etc.);
- Other parties, other lawyers or advisers in the context of our services;
- Courts and government agencies;
- Other parties, such as supervisory authorities and other authorities if required by law or with your consent.

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

- Liber Dock employees (on a need-to-know basis);
- Suppliers;
- Other parties, such as supervisory authorities and other authorities if required by law or with your consent.

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

- Liber Dock employees (on a need-to-know basis);
- Suppliers;
- Other parties, such as supervisory authorities and other authorities if required by law or with your consent.

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

- Liber Dock employees (on a need-to-know basis);
- Suppliers (e.g. translation services, courier services, bailiffs, Google Inc. for the purpose of user statistics of our website, see below under 'Cookies');
- Other parties, other lawyers or advisers in the context of our services;



- Courts and government agencies;
- Other parties, such as supervisory authorities and other authorities if required by law or with your consent.

In order to provide our services, it may be necessary for us to transfer your personal data to a recipient in a country outside the European Economic Area that offers a lower level of protection of personal data than that provided by European legislation. In that case Liber Dock will ensure that such a transfer of personal data is in accordance with applicable legislation, for example by concluding a model contract drawn up and approved for that purpose by the European Commission.

### **How long do we retain your data?**

Liber Dock will not retain your personal data in an identifiable form for any longer than is necessary for the purposes set out in this Privacy and Cookie Statement.

The personal data you provide us with for your application will be kept for four weeks after the end of the application process. If you give us your consent, we will keep your personal data in the portfolio for one year after the end of the selection procedure. This gives us the opportunity to approach you for any future vacancies at Liber Dock. When you join Liber Dock, the personal data you have provided in connection with your application will become part of your personnel file.

If you use our knowledge portal as a client, we will store the required personal data for 3 months after the client relationship has ended.

In accordance with the [Archiving Manual of the Netherlands Bar Association](#), we will keep the files of the cases handled by us at least five years and longer if required by law.

Personal data processed in accordance with our Office Complaints Procedure will be deleted no later than two years after the complaint and/or the resulting legal proceedings have been resolved.

In addition, we retain personal data in order to comply with statutory retention obligations, such as the retention of certain accounting data for a period of 7 years in connection with our fiscal retention obligation.

This also means that the specific retention periods referred to above may become longer if such legal retention obligations apply/become applicable. We may also retain personal data for a longer period of time if necessary for the purpose of settling legal disputes.

### **Protection**



Liber Dock has taken appropriate technical and organizational measures to protect your personal data from unauthorized or unlawful processing and from loss, destruction, damage, alteration or disclosure. Our employees are bound by confidentiality and are bound by instructions aimed at the adequate protection of your personal data. When you use our knowledge portal you log in to a secure page of BaseNet and all data is sent by BaseNet in encrypted form by means of SSL (secure socket layer) protection.

If you have any questions about the protection of your personal data, or if you suspect or have any indications of misuse, please contact us at [privacy@liberdock.com](mailto:privacy@liberdock.com).

## Cookies

Our website uses cookies. Cookies are small text files that are placed on your computer, tablet or mobile phone via our website and are read when you use our website. Below you will find an explanation of the different types of cookies our website uses.

### *Functional cookies*

Functional cookies are necessary for the proper functioning of (parts of) Liber Dock websites and make it possible, for example, to remember the language in which you want to consult our website.

### *Analytic cookies*

In order to be able to adapt our website to the wishes and interests of our visitors and to offer you a pleasant website experience, we use analytical cookies.

Liber Dock uses Google Analytics from Google Inc. ('Google'). Google Analytics gives us insight into the way in which our website is used. This includes user statistics such as the number of different visitors, the pages that are frequently visited and the average duration of a visit. We have followed the [Manual for Privacy Friendly Google Analytics Settings](#) of the Dutch Data Protection Authority. This means, among other things, that we have instructed Google to delete the last three digits of your IP address (making it difficult to trace the IP address to a specific visitor) and that we have disabled the default settings for sharing data with Google.

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

In the table below you will find a complete overview of the cookies that are used on our website:

Name	Application	Purpose	Domain	Duration
_ga	Google Analytics	This cookie is	liberdock.com	24 months



		placed to collect statistics about the website in order to improve its usability.		
_gid	Google Analytics	This cookie is used to distinguish between different users of the website.	liberdock.com	24 hours
_git	Google Analytics	This cookie is used to analyse the request speed.	liberdock.com	1 minute.
NID	Google Maps	This cookie is placed in order to be able to show you where Liber Dock is located via Google Maps.	google.com	24 months
_icl_current_language	WPML	This cookie saves the language selected for the website.	liberdock.com	24 hours

### *Refusing and deleting cookies*

You can use your browser settings to delete the cookies on your computer, tablet or mobile phone and refuse the placement of new cookies. However, we would like to point out that in that case you may not be able to use all the features of our website. The way in which you can refuse or delete cookies can vary per browser. For Google Chrome, see this [link](#) and for Internet Explorer, see this [link](#) for how to delete the different type of cookies. Also, if you do not want Google Analytics data to be collected and used by Google, you can download and install the browser plugin that is available under: <https://tools.google.com/dlpage/gaoptout>.

More information on how to remove cookies can be found at the [Consumers' Association](#).

### **Your privacy rights**

You have the following rights with regard to the processing of your personal data by Liber Dock:

- the right to request whether we process your personal data and, if this is the case, to inspect your personal data;



- the right to rectification of your personal data if they are incorrect or incomplete;
- the right to have your personal data deleted ('right to be forgotten');
- the right to object to the processing of your personal data or to limit the processing of your personal data;
- the right to withdraw consent for the processing of your personal data, if the processing is based on your consent;
- the right to receipt or transfer of your personal data by or to a third party designated by you in a structured, customary and machine-readable form ('right to data portability');

In order to exercise your rights you can contact us via [privacy@liberdock.com](mailto:privacy@liberdock.com) or by post via:

Liber Dock B.V.  
Attn. the GDPR Committee  
Jollemanhof 12a  
1019 CW Amsterdam

Always make it clear who you are, so that we can be sure that we do not modify or delete data of the wrong person. Do not forget to make your BSN (citizen service number) and passport photo unreadable on the copy when you identify yourself by means of a copy of your identity document. You can use the ['CopyID' app](#) for this, for example.

Within a month after receipt of your request, we will inform you whether we can comply with your request. Based on privacy legislation we can refuse your request under certain circumstances. If we do so, we will explain the reasons for the refusal. You can find more information about your privacy rights on the website of the [Dutch Data Protection Authority](#).

## Complaints

If you have a complaint about the processing of your personal data by Liber Dock, we will try to resolve it with you. If this does not lead to the desired result, you have the right to lodge a complaint with the competent supervisory authority. In the Netherlands, it is the [Dutch Data Protection Authority](#). If you live or work in another country of the European Economic Area, you can file a complaint with the supervisory authority in that country.

## Changes

This Privacy and Cookie Statement was last amended on 27 August 2018. We reserve the right to change this Privacy and Cookie Statement and will always post the most recent version of this Privacy and Cookie Statement on our website. If substantial changes are made that could significantly affect one or more data subjects we will strive to inform the relevant data subjects immediately.

