

PRIVACY AND COOKIE STATEMENT

Welcome to the privacy and cookie statement (the **Statement**) of law firm FlexIEbel B.V. (hereinafter also referred to as **FlexIEbel**, **we**, **us** and **our**). We respect your privacy and are committed to protecting your personal data.

In this Statement, we inform you about the personal data we process in our role as data controller as defined in the General Data Protection Regulation (the **GDPR**). This Statement also contains information about the types of cookies we use.

It is important that you read this Statement carefully. As we may amend this Statement from time to time, we recommend that you check this web page regularly to keep up to date with any changes.

If we wish to use your personal data for any purpose other than those described in this Statement, we will of course inform you of this in advance.

This Statement was last amended on 13 August 2025.

1. Who are we?

FlexIEbel B.V. is a private limited company located at Velperplein 23-25, 6811 AH in Arnhem and registered in the Trade Register of the Chamber of Commerce under number 72681373. You can contact us by email at:info@flexiebel.nl and by telephone on: 026 – 800 12 10.

2. What do all these terms in the GDPR mean?

The GDPR contains numerous definitions, the most important of which we will explain below:

- personal data: any information relating to a natural person (the data subject), including you, who can be identified or identifiable. This includes names, addresses, telephone numbers, financial details and IP addresses.
- <u>processing</u>: any operation or set of operations performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction of processing or erasure or destruction of personal data.
- o <u>controller</u>: a natural or legal person, such as us, who alone or jointly with others determines the purposes and means of the processing of personal data.
- o <u>processor</u>: a natural or legal person who processes personal data on behalf of the controller, such as us.

3. What personal data is processed?

The personal data we may process about you includes:

- General (contact) details, such as first and last name, gender, date of birth, title(s), address, telephone number and email address;
- Information about your capacity or position, such as your job title and the company you work for;

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- o Financial details, such as your bank account number and VAT number;
- Personal data that you provide to us when you apply for a job with us, such as education and career details;
- Technical data, such as your IP address, data about the device you use to visit the website and the web pages you view; and
- All other personal data that we obtain from or about you and that we use for the purposes listed below.

4. How do we obtain your personal data?

We obtain your personal data in various ways, but mainly from you. This is the case, for example, if you place an order for services with us in your own name or on behalf of your company, if you visit our website (www.flexiebel.nl), send us an email, apply for a job with us or give us your business card.

In addition, FlexIEbel may have obtained your personal data from publicly available sources (such as the register of the Chamber of Commerce or the internet) or from third parties with whom it cooperates in the context of a file (other lawyers, bailiffs and authorised representatives).

FlexIEbel may also have obtained your personal data because a client has provided it to us in the context of the contract for services concluded or to be concluded between FlexIEbel and the client.

5. Why do we process your personal data?

We process your personal data for the following purposes:

o <u>Legal services</u>

The main reason why we process your personal data is to provide legal services in order to execute the contract for services concluded with you or to prepare or finalise it. We only process your data to the extent necessary in the context of the services, including maintaining contact about files to be handled by FlexIEbel on your behalf, performing the requested and required work in that context and associated invoicing.

Events and courses

If you register for an event or course organised by FlexIEbel, we will ask you to provide certain personal data for the purpose of confirming your registration, keeping track of registrations already received and informing you about further details of the event/course (such as time and location). When registering for one of our events, we ask for your personal data.

Feedback

In order to provide the best possible service, we may ask our clients to provide us with feedback, for example by completing an evaluation form after an assignment has been completed or at the end of an event/course.

We may also ask you further questions about the feedback you have provided in order to make the best possible use of it. This feedback is linked to you and therefore contains



personal data, including at least your contact details.

Advertising purposes

In order to maintain and expand our circle of (potential) clients, partners and suppliers, we may contact you with information that we believe may be of interest to you or your company, including news, publications or invitations to events.

Ease of use and improvement of the website

In order to monitor and improve the content and use of our website, we collect and analyse the surfing behaviour of visitors to our website.

Job applications

If you apply for a job at FlexIEbel, you will provide certain personal data that we will use to assess your application and contact you about it. We will retain the data you provide in this context for up to four weeks after the end of the application procedure, unless you give us permission to retain this data for longer.

Legal obligations and professional rules

FlexIEbel also processes personal data in order to comply with the legal obligations and professional and conduct rules applicable to lawyers. This concerns in particular the processing of personal data for the purpose of identifying clients, verifying the information provided and complying with certain administrative requirements.

6. On what basis are personal data processed?

FlexIEbel processes your personal data on the basis of the following principles from the GDPR:

- To prepare or execute an agreement (contract) concluded with you or the company you work for:
- Because of a legitimate interest, whereby we have carefully weighed our interest against your interest in the protection of your personal data;
- Due to a legal obligation; and/or
- With your consent.

7. Who do we share personal data with?

In some situations, it may be necessary for us to share your personal data with third parties for the purposes listed in paragraph 5 of this Statement.

For example, for the purpose of conducting the practice of a law firm, to provide support at events, to initiate legal proceedings or to comply with a legal obligation.

With regard to these third parties to whom we disclose your personal data, two situations may arise:

the third party is also a controller and therefore responsible for the processing of that data. This applies, for example, to other law firms to which FlexIEbel refers cases or with which FlexIEbel collaborates.

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o the third party acts as a processor for FlexIEbel, in which case we enter into a processing agreement with this third party that complies with the conditions set by the GDPR. Examples include the supplier of FlexIEbel's document management, CRM and invoicing system, namely Basenet Internet Projects B.V.

The third parties to whom we provide your personal data are, like FlexIEbel, bound by the GDPR as controllers or processors.

8. How is personal data secured?

FlexIEbel has taken appropriate technical and organisational measures to prevent a security breach that accidentally or unlawfully leads to the destruction, loss, alteration or unauthorised disclosure of or access to data that has been transmitted, stored or otherwise processed. These security measures include confidentiality agreements with third parties, two-factor authentication, IP security and encryption.

9. How long do we retain personal data?

FlexIEbel does not retain your personal data for longer than is necessary for the purposes for which it was collected or obtained. However, FlexIEbel may retain personal data for longer if it is required to do so by law (including tax legislation) and the rules of conduct applicable to it, or if and for as long as it has a legitimate interest in doing so in connection with the defence against possible (legal) claims or disciplinary complaints. For example, we are required by tax legislation to retain invoice and payment details for a period of seven years.

10. What are your rights as a data subject?

As a data subject, you can request FlexIEbel to allow you to view the data we process about you. You also have the right to request FlexIEbel to change or delete your personal data if it is no longer correct or if its processing is no longer justified, or to withdraw your consent. You can also object to the processing of personal data or have it restricted. Furthermore, you can request FlexIEbel to transfer your personal data to a third party.

We will always assess each request on its own merits to determine whether we can comply with your request under the GDPR and inform you of the outcome of this assessment. If your request is rejected, FlexIEbel will explain the reasons for the rejection to you. A reason for rejection may be, for example, that a legal obligation of confidentiality prevents us from complying with the request.

You always have the right to lodge a complaint with the supervisory authority, the Dutch Data Protection Authority (www.autoriteitpersoonsgegevens.nl), about the way in which FlexIEbel processes your personal data.

11. Which cookies are placed?

Cookies are small (text) files that are sent along with websites and stored on your computer, tablet or mobile devices (such as a smartphone). When you use the website, FlexIEbel sends cookies



to your devices and they are stored there. Cookies that have already been placed on your devices can also be read.

Functional cookies

The FlexIEbel website only uses functional cookies or similar techniques, hereinafter referred to collectively as **cookies**. These are cookies that are necessary to display the website properly and to increase its ease of use, such as cookies that detect whether you are viewing the website from a desktop or mobile device and adjust the display of the website accordingly. No consent is required for the use of functional cookies.

o Social media buttons & third-party websites

The Website contains certain social media buttons, including at least those of LinkedIn, which allow you to view FlexIEbel's LinkedIn profile quickly and easily. The website may also contain links to (other) third-party websites.

FlexIEbel is not responsible for the processing of personal data via these social media channels and (other) third-party websites, including the placement of cookies via these channels and websites, and this Statement does not apply to them. Visiting such channels and websites is therefore at your own risk and FlexIEbel advises you to consult the applicable privacy statements when visiting social media channels and third-party websites.

Deleting cookies

You can easily delete cookies via your own browser settings, which will also withdraw any consent you may have given previously. However, please note that deleting cookies may reduce the ease of use of the website.

11. Who can I contact if I have questions?

If you have any questions, comments or complaints about this Statement, the processing of personal data and/or the use of cookies, please send an email to <u>info@flexiebel.nl</u> or call us on +31 (0)26 800 12 10.