

## General

HABITAT CONNECT B.V. respects your personal data and ensures that the personal information provided to us or otherwise obtained is treated confidentially. Personal data refers to all information about a person. Data that indirectly says something about someone is also personal data. The following implements the obligation to inform the data subject(s) whose personal data HABITAT CONNECT B.V. processes, as laid down in the [AVG/GDPR \(EU\) 2016/679](#).

## Controller and communication

HABITAT CONNECT B.V. processes personal data in order to provide services, to improve services and to communicate personally with you as a data subject.

## Processing of personal data in the office administration

HABITAT CONNECT B.V. uses the CENTRAL SERVICES B.V. online software package as processor to process personal and file data. A processor agreement has been entered into with this processor that includes a duty of confidentiality.

## Processing of personal data through reviews

For the evaluation of our services and marketing purposes, HABITAT CONNECT B.V. makes use of THE FEEDBACK-COMPANY. As a data subject, you yourself choose to participate in this and to this end to leave personal data on the website of THE FEEDBACKCOMPANY. The use of this facility is subject to the Internal Regulations of THE FEEDBACK-COMPANY.

The personal data you enter may be used for marketing purposes via digitally linked social media, THE FEEDBACK-COMPANY's website and our HABITAT website(s). The website of THE FEEDBACKCOMPANY includes an option to submit a review either anonymously or with a limited amount of personal data.

## Processing of personal data through the HABITAT website(s)

HABITAT CONNECT B.V. offers the possibility to leave personal data on digital contact or information pages through our HABITAT website(s). HABITAT CONNECT B.V. cooperates with external processors for the safe and reliable receipt and processing of this data. Processing agreements have been concluded with these processors.

Contact and information forms are processed via the forms platform FORMDESK.

Digital payment options via our HABITAT websites and e-mail messages are processed via the payment platform MOLLIE and/or software made available by Dutch banks.

You as a data subject will make your own choice to use these forms of service.

## Purpose of processing personal data

HABITAT CONNECT B.V. processes the personal data mentioned below exclusively for the purposes mentioned below:

- Providing legal services, including the execution of an agreement and conducting (legal) proceedings;
- obtaining and executing outsourcing orders from insurance companies;
- collecting invoices;
- advising, mediating and referring;
- complying with our legal and statutory obligations; - marketing and communication activities;
- recruitment and selection (job application).

### What personal data are processed?

HABITAT CONNECT B.V. processes - as far as necessary for the purpose - the following (types or categories of) personal data for the purpose of providing its services or which are provided by the person concerned on his/her own initiative:

#### Natural persons

Surnames and first names, titles, business addresses, private addresses, place of residence, date and place of birth, sex, nationality, (mobile) telephone numbers, Skype, Facetime and social media accessibility, proof of identity, social security number, alien's number, family composition and marital status, municipality of registration, insurance details for legal assistance insurance, medical information, explicitly only insofar as relevant for handling the case, and information from public sources such as the Chamber of Commerce and the Land Registry.

#### Legal entities

Company information from public sources such as the Chamber of Commerce and the Land Registry and on websites, board members, contact persons and employees in accordance with the personal data for natural persons, insurance details legal expenses insurance.

HABITAT CONNECT B.V. processes the aforementioned personal data because they have been provided by you as a data subject on your own initiative, within the scope of the provision of services, or have been made known to us by third parties, including counterparties, or through public sources.

Personal and company data can be requested or obtained or provided via email and social media, HABITAT website(s) and website(s) of processors, telephone, fax, letter or verbally.

### Basis for processing personal data

HABITAT CONNECT B.V. processes the above-mentioned personal data exclusively on the basis of the following grounds as referred to in Article 6 of the AVG:

- legal obligation
- execution of an agreement
- consent obtained from data subject(s) - legitimate interest

### Sharing of personal data with third parties

HABITAT CONNECT B.V. will only share your personal data with third parties to the extent necessary to provide services in accordance with the above purposes. This could be, for example, the replacement of the practice by another lawyer, the performance or commissioning of an expert examination or the engagement of another third party on behalf of and by order of HABITAT CONNECT B.V., such as an IT and telephony supplier, but also the provision of your personal data in connection with (legal) proceedings, correspondence with the opposing party or the organisation and implementation of a HABITAT | COLLECT, Raad voor Rechtsbijstand and legal aid insurance.

In addition, HABITAT CONNECT B.V. may provide personal details to a third party, such as a supervisory authority or any other body entrusted with public authority, insofar as there is a legal obligation to do so.

A processor's agreement will be concluded with the third party that processes your personal data on behalf of and under the instructions of HABITAT CONNECT B.V., which third party will also be bound to comply with the AVG. Third parties engaged by HABITAT CONNECT B.V. who provide services as data controllers are themselves responsible for the (further) processing of your personal data in compliance with the AVG. This includes, for example, an accountant, notary public, other third parties engaged for the purpose of a second opinion or expert report.

### Protection of personal data

HABITAT CONNECT B.V. attaches great importance to the security and protection of your personal data and, taking into account the state of the art, will take appropriate technical and organisational measures to ensure a level of security appropriate to the risk. In the event that HABITAT CONNECT B.V. makes use of the services of third parties, such as an IT supplier, HABITAT CONNECT B.V. will lay down agreements about adequate security measures in a processing agreement for the protection of personal data.

### Retention period of personal data

HABITAT CONNECT B.V. retains personal data for no longer than is necessary for the aforementioned purposes of data processing or as required by law and regulations. For clients, the retention periods are included in HABITAT | General Terms and Conditions. For the other categories of personal data and contacts that have not led to an assignment, a retention period of up to 2 years applies.

### Privacy rights of data subject

You can send a request for inspection, correction, restriction, opposition, transferability of data, deletion of your personal data or withdrawal of previously given permission via the contact details below. You will receive further information from us within four weeks of receipt of your request. There may be circumstances under which HABITAT CONNECT B.V. cannot or cannot fully comply with your request as a data subject. These include, for example, the duty of confidentiality of lawyers and statutory retention periods.

You may send your requests as referred to above by e-mail to: [helpdesk@omgeving.nl](mailto:helpdesk@omgeving.nl)

Upon receipt of your request, you will be contacted within two working days so that we can jointly examine how your request can be complied with. To ensure that we are providing the personal data in question to the correct person on the basis of your request, we will ask you to submit a copy of a valid passport, driving licence or identity document with a screened passport photo and BSN number for verification. HABITAT CONNECT B.V. will only deal with requests relating to your own personal data.

### Use of social media

On the HABITAT website(s) buttons (also called buttons) and / or links are included to promote or share HABITAT web pages on social (media) networks or websites of third parties, such as Twitter, LinkedIn or Facebook.

HABITAT CONNECT B.V. does not monitor and is not responsible for the processing of your personal data by and through such third parties. The use of such media is therefore at your own risk. Before you make use of the services of third parties, it is advisable to read the privacy statement of those third parties first.

### Statistics and cookies

HABITAT CONNECT B.V. collects user data of the HABITAT website(s) for statistical purposes.

The personal data collected in this way are, in principle, anonymous and are never sold by HABITAT CONNECT B.V. to third parties.

In order to increase the ease of use of the HABITAT website(s), we use so-called "cookies". A cookie is a small text file that is placed on your computer, tablet or smartphone when you visit the HABITAT website(s). You can refuse the use of these cookies at any time, although this may limit the functionality and ease of use of the HABITAT website(s).

The HABITAT website(s) use cookies from Google Analytics in order to track, in broad terms, user behaviour and general trends, and to obtain reports. This helps to improve the functioning of the website(s). Google may provide this information to third parties if Google is legally obliged to do so or if third parties process the information on Google's behalf. The HABITAT website(s) also use cookies for (re)marketing purposes in order to increase the findability of the website(s). Cookies are also placed through the use of buttons and/or links, as described above under 'Use of social media'. HABITAT CONNECT B.V. has no influence on the placement and use of cookies by these third parties.

By using the HABITAT website(s), you consent to the processing of data about you by Google in the manner and for the purposes set out above. You can read more about cookies and how to block or delete them on the website of the Authority Consumer and Market (<https://www.consuwijzer.nl/telecom-post/internet/privacy/uitleg-cookies>).

On the HABITAT website(s), HABITAT CONNECT B.V. may offer a blog or forum that is freely accessible. All information posted on these can be read, collected and used by anyone, i.e. any third party. A request to remove personal data from a blog or forum can be made using the contact details under 'Privacy rights of data subjects'. In some cases, HABITAT CONNECT B.V. is not able to remove personal data from a blog or forum. In such cases, HABITAT CONNECT B.V. will indicate in a reply to your aforementioned request that it was unable to do so and for what reason. In the event that you, as a data subject, post personal data via an application of a third party (via social media), then that third party or the administrator of the application will be the point of contact for such requests for deletion or other privacy questions.

### Adaptation of the privacy statement

HABITAT CONNECT B.V. has the right to change the contents of this privacy statement at any time without prior notice. Adjustments to the privacy statement will be published on the HABITAT website(s). Therefore, please consult our website(s) regularly.

### Questions & Contact

If you have any questions or comments about the processing of your personal data and this privacy statement, please send an e-mail to [helpdesk@omgeving.nl](mailto:helpdesk@omgeving.nl). Upon receipt of your email, you will be contacted within two working days to jointly consider how your question or comment can be followed up.

This version of the [HABITAT | Privacy statement](#) was adopted on 15 September 2018.