

## **Privacy Statement ITL Attorneys Netherlands**

### 1. Introduction

The private company with limited liability International Transport & Logistics Netherlands B.V. (hereinafter: "ITL Attorneys Netherlands") processes personal data. ITL Attorneys Netherlands considers it important that this processing can take place in a lawful, proper, secure and transparent manner. Personal data is processed by ITL Attorneys Netherlands in accordance with Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data: the General Data Protection Regulation / GDPR (hereinafter: "the GDPR"). The GDPR is applicable from 25 May 2018 and replaces the Personal Data Protection Act in force until then. This privacy statement will explain which data is processed by ITL Attorneys Netherlands and for what purpose the data is processed. It also explains what rights data subjects have and how these rights can be exercised. This privacy statement applies to the entire organization and all processes and parts of ITL Attorneys Netherlands. For questions about this privacy statement and/or about the personal data processed by ITL Attorneys Netherlands, please contact us at [netherlands@itla.eu](mailto:netherlands@itla.eu).

### 2. Terms

In this privacy statement, the following terms are given the following meaning:

*Data subject:* Data subject within the meaning of the GDPR: an identified or identifiable natural person to whom the data relate.

*ITL Attorneys Netherlands:* International Transport & Logistics Attorneys Netherlands Advocaten B.V., established in (2023 SD) Haarlem, the Netherlands, at Sint Joriseveld 10, registered in the trade register of the Chamber of Commerce under number 34124562 and also maintaining an office in Breda at Iabc 5190 (4814 RA).

*Personal data:* Personal data within the meaning of the GDPR: all information about an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

*Criminal personal data:* Criminal personal data within the meaning of the GDPR: all information regarding criminal convictions and offenses or related security measures, as well as personal data regarding a prohibition imposed by the court as a result of unlawful or disruptive behaviour. These personal data fall under the category of sensitive data within the meaning of the GDPR.

*Controller:* Controller within the meaning of the GDPR: a natural or legal person, a public authority, a service or another body that, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, it may specify who the

controller is or according to which criteria it is designated. In this GDPR Privacy statement, the controller means ITL Attorneys Netherlands.

*Processor:* Processor within the meaning of the GDPR: a natural or legal person, a public authority, a service or another body that processes personal data on behalf of the controller.

*Processing:* Processing within the meaning of the GDPR: an operation or a set of operations relating to personal data or a set of personal data, whether or not carried out by automated processes, such as collecting, recording, organizing, structuring, storing, updating, or changing, retrieving, consulting, using, providing by means of forwarding, distributing or otherwise making available, aligning or combining, blocking, deleting or destroying data.

### 3. Data subjects:

ITL Attorneys Netherlands processes the personal data of:

- clients and their representatives;
- potential clients and their representatives;
- anyone who shows an interest in ITL Attorneys Netherlands or its services, including - but not limited to - the users of the contact form on the website [www.itla.eu](http://www.itla.eu), as well as the users of the contact form on [www.rijbewijsingenomen.nl](http://www.rijbewijsingenomen.nl);
- users who indicate via the contact form on the website [www.inloopspraakuuradvocaat.nl](http://www.inloopspraakuuradvocaat.nl) that they wish to get in touch with ITL Attorneys Netherlands;
- data subjects who have registered for the ITL Attorneys (Netherlands) newsletter;
- cooperation partners;
- staff;
- data subjects via social media channels;
- anyone who seeks contact in any way (written/digital) with ITL Attorneys Netherlands.

### 4. Which personal data

ITL Attorneys Netherlands processes personal data provided directly or indirectly to ITL Attorneys Netherlands by data subjects. Personal data that is provided directly to ITL Attorneys Netherlands are, for example, name, address, place of residence, telephone number, e-mail address and bank details. Data is stored indirectly if a data subject uses websites of or affiliated with ITL Attorneys Netherlands. Examples of data that are indirectly provided to ITL Attorneys are, for example, IP addresses, functional, analytical and tracking cookies. ITL Attorneys Netherlands will specifically ask to use cookies if it is legally obliged to do so. If hyperlinks are used on ITL Attorneys Netherlands's website(s), ITL Attorneys Netherlands is not responsible for the (content and protection level of the) websites to which these hyperlinks refer. This also applies to websites that provide (unsolicited) information about ITL Attorneys Netherlands.

## 5. Authority to process personal data

ITL Attorneys Netherlands is authorized to process personal data if:

- ITL Attorneys Netherlands has permission from the data subject;
- The processing is necessary for the performance of the agreement between ITL Attorneys Netherlands and the data subject;
- ITL Attorneys Netherlands is legally obliged to process the data;
- ITL Attorneys Netherlands has a legitimate interest in the processing of personal data.

## 6. Purpose of processing and retention period

Purpose of the processing:

- Data of the data subject that is provided to ITL Attorneys Netherlands for the benefit of its services;
- Provision of legal services / execution of the agreement;
- Establishing and maintaining contact;
- Administrative purposes;
- Complying with our legal obligations;
- Keeping track of our client file;
- The identification details of former clients are kept to prevent any conflict of interest;
- Improving and analysing our services.

Type of data:

- Information we receive from other parties;
- Provision of legal services / execution of the agreement;
- Complying with our legal obligations;
- For example: data from the Public Prosecution Service (such as judicial documentation), data from the Chamber of Commerce, etc.;
- For example: data we receive from companies to whom you have given permission to share data (such as Transport in Nood, A1 Automotive, Info Instruments, Smarttacho, Roadsoft, or other partners).

Mailing list with email addresses:

- Sending the newsletter, announcements of seminars and other events;
- NB. Processing for this purpose only takes place if the data subject has given permission for this.

Data of persons who fill in the contact form via the website:

- Establishing and maintaining contact;
- Provision of legal services / execution of the agreement;
- Administrative purposes;
- Keeping track of our client file;
- Improving and analyzing our services.

IP addresses of visitors to the websites:

- Improving and analyzing our services;
- Marketing research.

Cookies:

A cookie is a small amount of data that is automatically stored when a data subject visits ITL Attorneys Netherlands's website(s). ITL Attorneys Netherlands does not use cookies to identify data subjects, but to track and improve visitor experiences.

Personnel data (internal):

- Execution of the employment contract;
- Administrative purposes/maintaining personnel file;
- Compliance with legal obligations.

Retention period:

- The personal data processed by ITL Attorneys Netherlands will be kept for as long as they are necessary for the processing purposes referred to in this article and no longer than permitted by law;
- For example: if you fill in a contact form on our website or send us an e-mail, this information will be stored by us in order to contact you and/or respond to your request. This data will be kept after the contact and will be deleted if no (additional) services are offered to you. In any case, you can request that your data be deleted at any time. We can only comply with this if we have no legal obligation to keep the data;
- Application data will be deleted no later than 4 weeks after the end of the application procedure, unless the data subject has given permission to keep the data longer because a suitable position may be available at a later date. In that case, the data will be kept for a maximum of 3 years after the application procedure has ended.

In addition to the foregoing, administrative data subject to a fiscal retention obligation is retained for seven years on the basis of the statutory obligation.

## 7. Processing criminal personal data

Furthermore, criminal personal data is processed by ITL Attorneys Netherlands if and insofar as this is necessary for its legal services. This will be the case, for example, if ITL Attorneys Netherlands assists a suspect, a victim or a third party in criminal proceedings.

## 8. Security

ITL Attorneys Netherlands is committed to respecting and protecting your privacy and the security of personal data. ITL Attorneys Netherlands takes technical and organizational measures to protect personal data in an appropriate manner against unauthorized or unlawful processing or loss. The scope of the measures taken is in a reasonable proportion

to the risks of the processing and the nature of the data and insofar as this is possible with proportionate effort and at reasonable costs with the current state of the art.

#### 9. Access to Personal Data

The starting point is that no one has access to the personal data that ITL Attorneys Netherlands processes, unless:

- ITL Attorneys Netherlands has given permission for this;
- ITL Attorneys Netherlands is (or will be) obliged to provide the data on the basis of the applicable laws and regulations.

Within ITL Attorneys Netherlands, only persons have access to your personal data who, in view of their position, need it and are authorized to do so. All of these persons have a duty of confidentiality or a derivative duty of confidentiality.

#### 10. Provision of personal data to third parties

In principle, ITL Attorneys Netherlands does not share your personal data with others. ITL Attorneys Netherlands only does this if there is a good reason or obligation.

Your personal data can be exchanged between the various parts of ITL Attorneys Netherlands. For example, because you ask ITL Attorneys Netherlands to do so or because you also use the services of another firm of ITL Attorneys, such as the firm in Belgium, France or Poland etc., or cooperation partners in other European countries.

Your personal data will be passed on to third parties if ITL Attorneys Netherlands is legally obliged to do so. For example, to (European) supervisors, the tax authorities or the police and judicial authorities.

In addition, it is sometimes necessary to share your personal data with third parties because ITL Attorneys Netherlands has to perform an agreement with you or uses another service provider.

ITL Attorneys Netherlands sometimes engages other parties/business partners who process personal data on behalf of ITL Attorneys Netherlands (or 'processors'). These parties must first be deemed sufficiently reliable by ITL Attorneys Netherlands. These parties are only engaged if this is in line with the processing purpose for which we have processed your personal data. In addition, this other party will only receive our assignment if it makes certain agreements with us and has demonstrably taken appropriate security measures.

If ITL Attorneys Netherlands passes on your data to parties outside the European Union, ITL Attorneys Netherlands will take extra measures to protect your data. Not all countries outside the European Union apply the same rules to protect your data as is mandatory within Europe. Do we use third parties outside the EU? And does the country where this party is located offer insufficient protection in the processing of personal data, according to the European Commission? Then ITL Attorneys Netherlands will only pass on personal data if there are other appropriate safeguards, such as contractual agreements approved by the

European Commission or on the basis of the 'Privacy Shield' (United States). In all other cases, ITL Attorneys Netherlands always asks for your permission.

#### 11. Use social media

The ITL Attorneys Netherlands website(s) contain buttons (also called buttons) and/or links to promote or share web pages on social (media) networks or third-party websites, such as Twitter, LinkedIn or Facebook. ITL Attorneys Netherlands does not monitor and is not responsible for the processing of your personal data by and through such third parties. The use of those media is therefore at your own risk. Before using those third-party services, it is advisable to read the privacy statement of those third parties.

#### 12. Rights of Data Subjects

Data subjects have the following rights:

- the right to information about what happens to their personal data and why;
- right of access to the data collected by ITL Attorneys Netherlands from the data subject;
- right to rectification if the personal data collected by ITL Attorneys Netherlands are incorrect;
- right to erasure of data, for example when the processing is unlawful, and by extension the right to be forgotten;
- right to restriction of data processing, which gives data subjects the option to request ITL Attorneys Netherlands to temporarily 'stop' the processing of their personal data;
- the right to object to data processing, on the basis of which the data subject may, under certain circumstances, object to (further) processing of his personal data;
- right to portability of the data that the data subject has provided to ITL Attorneys Netherlands. The copy is provided in a structured commonly used format;
- the right to withdraw a given consent to the processing of personal data at any time.

If a data subject wishes to invoke one or more of the aforementioned rights, this can be done in writing by sending an e-mail to [netherlands@itla.eu](mailto:netherlands@itla.eu). Within four weeks after sending this e-mail, the data subject will receive a response received from ITL Attorneys Netherlands.

A data subject also has the right to submit a complaint to the Dutch Data Protection Authority in the event that it is of the opinion that his or her personal data are being processed by ITL Attorneys Netherlands in violation of applicable laws and regulations.

#### 13. Changes, Feedback and Complaints

This privacy statement was drawn up on September 1, 2023 and updated on January 1<sup>st</sup> 2026.

ITL Attorneys Netherlands is entitled to change this privacy statement from time to time. Changes to this privacy statement will be communicated via [www.itla.eu/conditions/privacy-cookie-policy](http://www.itla.eu/conditions/privacy-cookie-policy) under the button "Netherlands/Nederland", but ITL Attorneys Netherlands also advises those involved to regularly consult this privacy statement.

Any questions and/or comments regarding this privacy statement can be directed to [netherlands@itla.eu](mailto:netherlands@itla.eu) with the subject "privacy statement". You can also send an e-mail to this e-mail address to exercise your rights as referred to in Article 11 of this privacy statement.

You can send a complaint about this privacy statement or the processing of personal data by ITL Attorneys Netherlands to [netherlands@itla.eu](mailto:netherlands@itla.eu) with the subject "complaint privacy".