Privacy and cookies

Last modified on: 9 February 2022

This is the Privacy and Cookie Statement ("Statement") of Turing Advocaten B.V., also trading under the name turing law (hereinafter referred to as "turing", "we" or "us"). We explain, among other things, which personal data of which categories of persons we process and for what purpose we do so. In addition, we explain which cookies we use and why. We recommend that you read this Statement carefully.

Modifications

This Statement may be modified by us at any time. The most current version of this Statement can always be found on this website. We recommend you to consult this Statement regularly so that you are aware of these modifications.

From whom do we process personal data?

As a law firm, turing processes personal data. This includes personal data of:

Applicants or other persons who are interested in a job or internship at turing (hereinafter: "Applicants");

persons who are clients of turing or who are employed by our clients (hereinafter: "Clients");

persons from whom turing purchases products or services or who are employed by our suppliers (hereinafter: "Suppliers");

visitors to our website (hereinafter: "Website Visitors"); and

third parties, such as persons who are not clients, but whose personal data do appear in the files we are handling (including counterparties) and other lawyers, attorneys and/or experts with whom we cooperate (hereinafter: "Third Parties").

What personal data do we process? For what purposes? And on what legal basis?

1. Applicants

We process the following personal data of Applicants:

a) Contact details (such as name and address details, telephone numbers and e-mail addresses), date of birth, place of birth, nationality and gender;
b) Completed education, courses and internships;
c) Data relating to the nature and content of the current employment and any termination thereof;

d) Other information which may be relevant to the performance of the position one has applied for, such as information contained in a resume or letter of application, references or results of a competency test;
e) Where applicable, bank details (bank account number and account holder name); and
f) Other data that are required or need to be processed with regard to the application of laws or regulations.

The table below shows for what purposes and on what legal basis we process Candidates' personal data:

	Purposes	Legal basis
a)	In order to establish the Applicant's identity and be able to make contact with regard to the application procedure	Performance of a contract (pre contractual fase) Legal obligation
b), c) and d)	The assessment of the Applicant's suitability for a vacant position and internal company security.	Performance of a contract (pre contractual fase) Legitimate interest
e)	Reimbursement of any travel expenses incurred	Performance of a contract (pre contractual fase) Consent
f)	The implementation or application of laws or regulations	Legal obligation Legitimate interest

2. Clients

We process the following personal data of Clients:

a) Contact details (such as name and address details, telephone numbers and e-mail addresses), date of birth, gender and, where applicable, an identity document;
b) Data for the purpose of handling the case or settling the dispute, including data of counterparties or third parties;
c) Data for the purpose of calculating and recording fees and expenses, making payments and collecting claims, such as bank and salary data; and
d) Other data that are required or need to be processed with regard to the application of laws or regulations.

The table below shows for what purposes and on what legal basis we process Client's personal data:

	Purposes	Legal basis
a)	In order to establish the Client's identity, carry out client research and to communicate for the purpose of providing legal services to the Client	Legal obligation Performance of a contract (pre contractual phase) Legitimate interest

b)	Providing legal services and legal advice, including the handling of disputes and conducting legal proceedings.	Legal obligation Performance of a contract (pre contractual phase) Legitimate interest
c)	Making payments and collecting claims (including placing them in the hands of third parties), calculating or recording fees or benefits and having an audit by an accountant or other type of audit carried out.	Legal obligation Performance of a contract (pre contractual phase) Legitimate interest
d)	The implementation or application of laws or regulations	Legal obligation Legitimate interest

3. Suppliers

We process the following personal data of Suppliers:

a) Contact details (such as name and address details, telephone numbers and e-mail addresses) and gender;
b) Data for the purpose of placing orders or purchasing services;
c) Data for the purpose of calculating and recording expenses and making payments, such as bank details; and
d) Other data that are required or need to be processed with regard to the application of laws or regulations.

The table below shows for what purposes and on what legal basis we process Supplier's personal data:

	Purposes	Legal basis
a)	Maintaining contact and communicating on behalf of orders placed and services purchased	Performance of a contract (pre contractual phase) Legitimate interest
b)	Placing orders and purchasing services, among other things for our internal business operations	Performance of a contract (pre contractual phase) Legitimate interest
c)	Calculating and recording income and expenditure, making payments and having carried out audits.	Legal obligation Performance of a contract (pre contractual phase) Legitimate interest
d)	The implementation or application of laws or regulations	Legal obligation Legitimate interest

4. Website Visitors

We process the following personal data of Website Visitors:

a) Data provided by means of the contact form on our website, such as a name, telephone number, e-mail address and the content of the message; and
b) Data provided through another form on our website in connection with a subscription to a newsletter, an application for a course or other event

organized by us, such as a name, telephone number, email address, and the content of the message; and

c) Data relating to a visit to our website, such as visitor's preferred, functional settings.

The table below shows for what purposes and on what legal basis we process Website Visitor's personal data:

	Purposes	Legal basis
a)	Maintaining contact and communicating about any question, the distribution of our newsletter or other (information) request.	Performance of a contract (pre contractual phase) Legitimate interest Consent
b)	Maintaining contact and disseminating information about a course or other event, such as the time of commencement and the location.	Legitimate interest Consent
c)	Improving the quality and accessibility of the website.	Legitimate interest

5. Third Parties

We process the following personal data of Third Parties:

a) Contact details (such as name and address details, telephone numbers and e-mail addresses), date of birth, place of birth and gender if and to the extent that they have been made known to us;

b) Content of (electronic) messages originating from or intended for third parties;

c) Data for the purpose of calculating and recording fees and expenses, making payments and collecting claims, such as bank details; and

d) Other data provided to us by clients or third parties or obtained from public sources in the context of the handling of a case.

The table below shows for what purposes and on what legal basis we process Third Parties' personal data:

	Purposes	Legal basis
a)	Maintaining contact and communicating in relation to our legal services	Performance of a contract (pre contractual phase) Legitimate interest Legal obligation
b)	Providing legal services and legal advice, including the handling of disputes and conducting legal proceedings	Performance of a contract (pre contractual phase) Legitimate interest Legal obligation
c)	Calculating and recording income and expenditure, making payments and having carried out audits.	Performance of a contract (pre contractual phase) Legitimate interest

d)	The implementation or application of laws or regulations	Legal obligation Legitimate interest

Processing on the basis of consent

If the processing of your personal data is based on consent, you have the right to withdraw this consent at any time. This does not affect the lawfulness of processing based on consent before this withdrawal.

With whom do we share personal data?

We may share Applicants' personal data with:

- personnel or executives involved in the application process; and
- others, with consent of the Applicant (such as a referent) or if there is a legal obligation.

We may share Clients' personal data with:

- personnel or executives involved in the handling of a case;
- Suppliers, such as external translation agencies;
- Third parties, such as counterparties, lawyers, attorneys and experts in connection with our services; and
- others, with consent of the Client, or if there is a legal obligation.

We may share Suppliers' personal data with:

- personnel or executives involved in the ordering or provision of services by the Supplier; and
- others, with consent of the Supplier, or if there is a legal obligation.

We may share Websites Visitors' personal data with:

- personnel or executives involved in maintaining contact with Websites Visitors and disseminating information about our newsletters, courses or other events;
- Suppliers, e.g., the party that tracks statistics for our websites; and
- others, with consent of the Websites Visitor, or if there is a legal obligation.

We may share Third Parties' personal data with:

- personnel or executives involved in the handling of a case;
- Clients or other third parties, such as counterparties or other lawyers, in the context of our services;
- Suppliers, such as external translation agencies; and
- others, with consent of the Third Party, or if there is a legal obligation

In the event of the disclosure of personal data to a another party, we will, if necessary, enter into a (data processing) agreement with that party, that meets all the requirements of the General Data Protection Regulation. We do not provide personal data to other parties for commercial purposes.

Do we transfer personal data to countries outside the EEA?

Sometimes we have to transfer personal data to a country outside the European Economic Area (EEA). For example when a judgment has to be enforced abroad or when we purchase services from Suppliers located outside the EEA. If such a situation arises and your personal data is transferred to a country which provides a lower level of protection for your personal data than countries within the EEA, we will put in place appropriate safeguards to protect your personal data, such as the conclusion of the EU Standard Contractual Clauses with the recipient of your personal data.

What security measures do we apply?

When processing personal data, we maintain at all times a level of security which, given the state of the art and the costs of implementation, is appropriate, among other things, to prevent unauthorised access, alteration, disclosure, loss or any other form of unlawful processing of personal data.

How long do we retain personal data?

We do not retain your personal data longer than necessary for the purposes for which they are processed, unless the data must be kept longer in order to comply with legal obligations, such as a statutory retention period. Below are a few examples:

- Personal data of Applicants will be deleted four weeks after the end of the application process, unless the Applicant will take up employment or gives us consent to keep his or her data for a longer period of time;
- Our financial records will be retained for seven years in connection with the tax retention obligation;
- Our dossiers are kept for twenty years in connection with the statutory limitation period for professional misconduct.

What rights do you have with regard to your personal data?

You have the right to request us access to (including a copy), rectify and/or delete your personal data, to restrict the processing of your personal data, as well as the right to object to the processing or to request the transfer of the personal data you have provided to us.

Insofar as the processing of your personal data takes place for direct marketing purposes, we will always honour your right to object. If it concerns processing for other purposes, we will make a new balance of interests and determine whether we have compelling legitimate grounds that override your interests.

You can contact us for this via privacy@turing.law.

In order to prevent misuse, we may ask you to identify yourself adequately before we process your request. Circumstances may arise as a result of which we cannot, or cannot fully, comply with your request. Examples are the professional secrecy of

lawyers and statutory retention periods. If such a circumstance arises, we will report it to you. In principle, we will respond to your request within one month of receipt.

What cookies and website analytics software do we use?

A cookie is a small text file that is sent with a page of the website and stored on the hard drive of your computer, tablet or phone via your browser. A cookie may be used to collect personal data. On the website of turing we only use functional cookies to remember your chosen settings and entered data, so that your use of the website will be easier on your next visit.

You can decide for yourself whether to accept or reject cookies or whether you want your browser to notify you when a cookie is placed. To do this, you need to adjust the settings in your browser. You always have the possibility to remove cookies already placed from the hard disk of your computer, tablet or phone.

To get critical information about the behaviour of our visitors, we use Simple Analytics. This analytics software gives us insight about our visitors only in general, but not about individuals by itself, as it does not track visitors and does not store any personal identifiable information. Go to their documentation to find out what Simple Analytics collects (and most importantly what they don't).

Our social media profiles and other third party websites

Our website contains hyperlinks to websites of other parties and social media buttons to our social media profiles. Turing is not responsible or liable for the way in which these third party websites and social media providers handle your (personal) data. We therefore advise you to consult the privacy and cookie policies of these websites and providers if you want to visit these websites and our social media pages.

Do you have any questions, remarks or complaints?

We will be happy to help you if you have any questions, comments or complaints regarding this Statement. You can do so by mailing or by calling to the contact details provided below. You also have the right at all times to lodge a complaint with the Dutch Data Protection Authority, or if you live or work in another country, to the supervisory authority of that country. If your complaint does not relate to the processing or protection of your personal data by our office, we refer you to our office complaints procedure.

Contact details

Turing Advocaten B.V.
Zuid-Hollandlaan 7
2596 AL The Hague
+31 88 <>
privacy@turing.law