

Eversheds Sutherland (Belgium) Privacy Notice – Third Parties

A customer of an Eversheds Sutherland client or a supplier of Eversheds Sutherland

About this notice

This notice explains how and why Eversheds Sutherland (Belgium) CV (also referred to as “**Eversheds Sutherland**”, “**we**”, “**our**” and “**us**”) uses your personal data in connection with our legal advice and related services and our general business operations.

You should read this notice if you are not an Eversheds Sutherland (International) LLP or an Eversheds Sutherland Brussels client but you are dealing with us in relation to any service that we provide, where you are providing us with a service or where you are a different type of third party in communication with us.

For the purposes of the processing activities set out in this notice, we are a “**controller**” in relation to our use of your personal data. This is a legal term – it means that we make decisions about how and why we use your personal data and, because of this, we are responsible for making sure it is used in accordance with applicable data protection laws, in particular with the provisions of the General Data Protection Regulation (“**GDPR**”) and the Belgian Act of 30 July 2018 on the protection of individuals with regard to the processing of personal data. The controller in respect of personal data processed in connection with the www.eversheds-sutherland.com website is Eversheds Sutherland (International) LLP.

In this notice, when we talk about **personal data** we mean any information that relates to an identifiable natural person. Your name, address, contact details and matter information are all examples of your personal data, if they identify you.

The term “**process**” means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

You should read this notice, so you know what personal data we collect about you, what we do with it and how you can exercise your rights in connection with it.

What types of personal data do we collect and where do we get it from?

We collect your personal information from various sources. The table below sets out the different types of personal information that we collect and where we get it from.

Category	Types of personal data	Collected from
Contact Information	<ul style="list-style-type: none"> • First Name, Last Name • Address • Telephone number • E-mail address • Organisation details (e.g. your place of work, job title and organisation contact information) • Your signature 	<ul style="list-style-type: none"> • Our clients • You • Publicly available resources such as LinkedIn and Google
Identity and Other Regulatory Information	<ul style="list-style-type: none"> • Date of birth • Identification information (e.g. passport, utility bill and/or bank statement) 	<ul style="list-style-type: none"> • You • Third party systems used for our regulatory checks

Matter Information

- Details relating to your matters, enquiries and other dealings with us or our clients (including matter related communications with you)
- Our clients
- You
- Third parties also working on your matter

Browsing and Device Usage Information

- Information automatically generated through your use of our websites and other digital platforms
- IP address
- Information revealing the location of your electronic device
- You and your use of our digital platforms

Please note that if you do not provide us with your contact information we may not be able to provide you with any information you request, and if you are a supplier or prospective supplier and you do not provide us with your Contact Information, Identity and Other Regulatory Information or Matter Information, we may not be able to enter into a contract with you.

What do we do with your personal data, and why?

We process your personal data for a number of different purposes. We must always have a “lawful basis” (i.e. a reason, prescribed by law) for processing your personal data. The table below sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

Purposes of processing	Lawful basis			
	Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
Matter related purposes				
Responding to your enquiries		✓		✓ (It is important that we can respond to your enquiries)
Resolving any complaints from or disputes with you				✓ (We need to be able to try and resolve any complaint or dispute you might raise with us)
Performing identity checks (including those against third party sources) for identity verification purposes			✓	✓ (We need to verify the identities of people we deal with)
Carrying out various tasks and services in connection with our clients’ matters which may involve you (e.g. arranging for monies due to you to be paid, sending you documents in relation to a court case or consulting and further processing documents which relate to you)				✓ (We need to be able to carry out the tasks required in connection the provision of legal advice to our clients and other related services)
Legal and regulatory compliance and reporting				
Monitoring our systems and processes to identify, record, and prevent			✓	✓ (We need to be able to monitor our systems in this

fraudulent, criminal and/or otherwise illegal activity		way to help protect them, us and you from illegal activity)
Complying with instructions, orders and requests from law enforcement agencies, any court or otherwise as required by law	✓	
Complying with our general regulatory and statutory obligations (including our responsibilities under codes of conduct and anti-bribery laws)	✓	
Purchasing, maintaining and claiming against our insurance policies	✓	(It is in our interests to protect our business against specified losses)
General business requirements		
Training our staff	✓	(Sometimes, it is appropriate for us to use your personal information so that we can provide our staff with training to manage risk and improve the quality of our services)
Continuously reviewing and improving our products and services (including by seeking and obtaining your feedback) and developing new ones		(We have a legitimate interest in making sure that we are continuously improving our service offering)
Complying with instructions from our clients in relation to their regulatory obligations		
Obtaining legal advice, and establishing, defending and enforcing our legal rights and obligations in connection with any legal proceedings (including prospective legal proceedings)		(We must be able to establish and defend our legal rights and understand our obligations, and seek legal advice in connection with them)
Managing the proposed sale, restructuring, transfer or merging of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organisation	✓	(We have a legitimate interest in being able to sell any part of our business)
Maintaining the security and integrity of our systems, platforms, premises and communications (and detecting and preventing actual or potential threats to the same)	✓	(We need to make sure our that our business processes are secure)

We also process certain special categories of personal data (including details relating to your health when you visit our premises) and information relating to your criminal record (referred to as “**Sensitive Personal Data**”). We are required by law to treat such personal data with even more care than usual. For these categories of personal data, different lawful bases apply. We only process your Sensitive Personal Data where it is necessary for the establishment, exercise or defence of a legal claim against us or where it is necessary for reasons of substantial public interest.

Who do we share your personal data with, and why?

Sometimes we share your personal data with third parties where permitted by law, including the following:

- other companies in or branches or offices of the Eversheds Sutherland network of firms where necessary in connection with the legal matters we are instructed on or with our business operations.
- our clients, other law firms and courts, service providers and the courts as applicable in the context of the legal services we provide to our clients;
- courts/clerks and other judicial or official bodies, where we are asked to respond to an order or other binding requests;
- Bailiffs;
- regulatory bodies and law enforcement agencies, where necessary for any investigations or to respond to enquiries in relation to our compliance with applicable law or regulations or in connection with criminal investigations, or where otherwise permitted or required by applicable law; and
- professional advisors (such as third party law firms and accountants) and third parties in connection with our legitimate business activities.

These organisations will also use your personal data as a “controller” – they will have their own privacy notices which you should read, and they have their own responsibilities to comply with applicable data protection laws.

We also ask third party service providers to carry out certain business functions for us. These include IT support, cloud platform and data hosting providers who help us with the operation of our websites, mobile applications, data rooms, document and workflow management systems and other systems and applications.

We will have in place an agreement with our service providers which will restrict how they are able to process your personal data and impose appropriate security standards on them.

Where is your personal data transferred to?

Since Eversheds Sutherland is a network of different law firms operating globally, we will sometimes need to transfer your personal data to recipients in jurisdictions other than your own. Some of these jurisdictions may not provide the same level of protection to your personal data as provided in your jurisdiction. If we transfer your personal data outside the European Union (including to the United Kingdom), we will only make that transfer if:

- the recipient country ensures an adequate level of protection for your personal data;
- the recipient or recipient country is subject to an approved certification mechanism or code of conduct with binding and enforceable commitments which amount to appropriate safeguards for your personal data;
- we have put in place appropriate safeguards to protect your personal data, such as a contract with the person or entity receiving your personal data which incorporates specific provisions as directed by the European Commission;
- the transfer is permitted by applicable laws;
- you explicitly consent to the transfer; or
- another exception applies (for occasional transfers)

If you would like to see a copy of any relevant safeguards used by us to protect the transfer of your personal data, please contact **dataprotectionoffice@eversheds-sutherland.be**

How do we keep your personal data secure?

We will take specific steps (as required by the abovementioned data protection laws) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

However please note that, in relation to any personal data you submit to us online or via e-mail, we cannot guarantee the security of data sent to us in this way. Transmission of data over the Internet is at your own risk.

How long do we keep your personal data for?

We will only retain your personal data for a limited period of time, and for no longer than is necessary for the purposes for which we are processing it for. This will depend on a number of factors, including:

- any laws or regulations that we are required to follow;
- whether we are in a legal or other type of dispute with each other or any third party;
- the type of information that we hold about you; and
- whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

What are your privacy rights and how can you exercise them?

Depending on the circumstances, you may have the right to:

- access your personal data and to be provided with certain information in relation to it, such as the purpose for which it is processed, the recipients or categories of recipients to whom it is disclosed and the period for which it will be stored;
- require us to correct any inaccuracies in your personal data without undue delay;
- require us to erase your personal data;
- require us to restrict processing of your personal data;
- receive the personal data which you have provided to us, in a machine readable format, where we are processing it on the basis of your consent or because it is necessary for your contract with us and where the processing is automated; and
- object to a decision that we make which is based solely on automated processing of your personal data.

Where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time, without this affecting the lawfulness of processing based on consent before its withdrawal.

Where our processing of your personal data is based on the **legitimate interests** lawful basis, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Please contact us at dataprotection@eversheds-sutherland.be if you would like to exercise any of your privacy rights.

You also have the right to lodge a complaint with your local Data Protection Authority. For Belgium, this is the Belgian Data Protection Authority (*'Gegevensbeschermingsautoriteit'/'l'autorité de protection des données'*).

Cookies and similar technologies

For more information regarding how we use cookies and similar technologies in connection with your use of our platforms, please read our [Cookies Policy](#).

Updates to this notice

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this

notice by email and we will publish revised versions of this notice on www.eversheds-sutherland.be.

Contact

Eversheds Sutherland (Belgium) CV

De Kleetlaan 12A

1831 Diegem

Belgium

Registered with the Crossroads Bank for Enterprises under company number 0817.550.246.

If you have any queries about how we process your personal data, please contact us by sending an e-mail to [**dataprotection@eversheds-sutherland.be**](mailto:dataprotection@eversheds-sutherland.be).

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