



PRIVACY STATEMENT

1. General

LegalAIR B.V. operates an online knowledge platform on the legal and ethical aspects of data and AI: legalair.nl (hereinafter: "**the Website**"). Users can visit the Website, create an account and/or use the other services offered by LegalAIR on the Website. In doing so, LegalAIR processes information about identifiable individuals, also referred to as "personal data". In such cases, LegalAIR is regarded as a data controller within the meaning of the General Data Protection Regulation. LegalAIR processes personal data in accordance with the applicable privacy laws and regulations.

This privacy statement explains how LegalAIR processes your personal data. We therefore advise you to read this privacy statement carefully.

2. Personal data

2.1. LegalAIR processes the following personal data:

- Name;
- Title;
- Contact details;
- Communications between the user and LegalAIR;
- Username and password;
- Data relating to the device used by the data subject, such as IP and/or MAC address;
- Information obtained through cookies.

2.2. LegalAIR collects and/or processes personal data:

- i. When the data subject provides personal data to LegalAIR via the Website, for example when creating an account or subscribing to the newsletter;
- ii. Because the person concerned contacts LegalAIR's helpdesk or question box;
- iii. By this data being generated on the basis of the use of the Website or LegalAIR's services, including through cookies;
- iv. From third parties, including data provided to LegalAIR by its knowledge partners.

3. Purposes and bases for processing personal data

3.1. LegalAIR processes personal data on the basis of one or more of the following processing bases from the General Data Protection Regulation:

- a. Consent of the data subject;
- b. Performance of an agreement to which the data subject is a party;
- c. Legitimate interest of LegalAIR or a third party, insofar as the interest of the data subject is not outweighed.



3.2. If LegalAIR processes personal data on the basis of a legitimate interest, such processing relates to analysing and/or carrying out marketing activities, going through application procedures and further optimising the Website or the services offered by LegalAIR.

3.3. LegalAIR processes personal data for the following purposes:

Goal	Processing basis
i. Enabling users to access and use the Website (e.g. general functioning of the Website and account creation).	- Consent of the data subject; - Performance of a contract to which the data subject is a party.
ii. Allowing users to get in touch with LegalAIR's enquirer, helpdesk or any other employee via the contact form or email address listed on the website.	- Consent of the data subject; - Performance of a contract to which the data subject is a party.
iii. Sending users a periodic newsletter.	- Consent of the data subject; - Execution of a contract to which the data subject is a party.
iv. To analyse and carry out various marketing activities.	- Legitimate interest.
v. Further optimising the Website and the services offered by LegalAIR.	- Legitimate interest.
vi. Going through application procedures with persons who have responded to a vacancy of LegalAIR.	- Legitimate interest.

4. LegalAIR's Website and services

4.1. LegalAIR operates an online knowledge platform on which it posts content and provides services. To make use of this, one needs to create a personal account. In doing so, LegalAIR processes the following personal data of users:

- i. Name;
- ii. Contact details;
- iii. Username and password;
- iv. Data relating to the device used by the person concerned, such as an IP and/or MAC address.



4.2. LegalAIR processes these personal data on the basis of the agreement it concludes with its users or on the basis of consent given by the user when creating the account and using the Website and/or the services offered on it.

5. Contact

5.1. Users may contact the helpdesk or an employee of LegalAIR. To do so, please use the contact form on the Website. In order to be able to assist you as effectively as possible, we require the following personal data from you:

- i. Name;
- ii. Title;
- iii. Contact details;
- iv. Communication between User and LegalAIR.

5.2. LegalAIR processes this personal data based on the consent the user has given by using the contact form. Once we have served you and we no longer need the personal data, we will delete this data.

6. Newsletter

6.1. Users can subscribe to LegalAIR's periodic newsletter on the Website. This keeps you informed of the latest news about the Website and LegalAIR's services. To send our newsletter, we require the following personal data:

- i. Name;
- ii. Title;
- iii. Contact details.

6.2. LegalAIR processes this personal data on the basis of the consent given by the user when subscribing to the newsletter.

7. Marketing

7.1. LegalAIR is constantly looking for new opportunities to further promote the LegalAIR Website and services. In doing so, LegalAIR uses the following personal data:

- i. Name;
- ii. Title of address;
- iii. Contact details;
- iv. Data relating to the device used by the data subject, such as an IP and/or MAC address;
- v. Information obtained through cookies.

7.2. LegalAIR processes these personal data on the basis of its legitimate interest to be able to continue to offer the Website and/or services or to further develop this offer.



8. Optimisation of the Website or services

8.1. LegalAIR continuously tries to further optimise the Website and its services. To this end it requires the following personal data:

- i. Name;
- ii. Contact details;
- iii. Username and password;
- iv. Communications between user and LegalAIR;
- v. Data relating to the device used by the data subject, such as an IP and/or MAC address;
- vi. Information obtained through cookies.

8.2. LegalAIR processes these personal data based on its legitimate interest to further optimise the Website and/or services it offers.

9. Job application procedure

9.1. LegalAIR processes applicants' personal data that could possibly be relevant for going through an application process, including information about the applicant's level of education and their employment history. This data is processed because LegalAIR has a legitimate interest in being able to assess whether the applicant's qualities match the job description.

9.2. Personal data received by LegalAIR in the context of a job application procedure will be deleted no later than 4 weeks after the end of this procedure, unless the applicant requests this earlier or if LegalAIR has obtained permission to keep the data longer. In case the application procedure leads to the conclusion of an employment contract, the personal data will be kept for as long as necessary.

10. Provision of personal data to third parties

10.1. LegalAIR will not provide personal data to third parties, unless:

- a. they are provided to a processor engaged by LegalAIR, who will process the personal data on behalf of LegalAIR in accordance with this privacy statement and its purposes. LegalAIR will then conclude an agreement with processor obliging it to take sufficient technical and organisational measures in order to provide adequate guarantees for the intended data processing; or
- b. LegalAIR is obliged on the basis of a legal obligation to hand over the data to a competent authority for that purpose.

10.2. In order to provide services, LegalAIR may be required to transfer personal data to countries outside the European Economic Area (EEA). In that case, LegalAIR will take appropriate safeguards to protect the personal data, including using approved certification mechanisms, the standard contractual clauses approved by the European Commission (Implementing Decision (EU) 2021/914) and/or only processing and/or transferring personal data to countries in respect of which the European Commission has taken an adequacy decision. In principle, however, LegalAIR does not provide Personal Data to parties located in countries outside the EEA.



11. Rights of the data subject

11.1. If LegalAIR processes personal data about you, as a data subject you have a number of rights:

- **Right to information:** You have the right to receive information about how and why LegalAIR processes your personal data.
- **Right of inspection:** You have the right to inspect and obtain copies of the personal data LegalAIR processes about you.
- **Right to rectification:** You have the right to rectify and/or supplement the personal data relating to you if these data are incorrect or incomplete.
- **Right to restrict processing:** You have the right to request LegalAIR to (temporarily) restrict the processing of your personal data if any of the following situations occur:
 - you dispute the accuracy of the personal data relating to you. The processing will be restricted for the period LegalAIR needs to verify the correctness of your personal data;
 - the processing of your personal data is unlawful, and you oppose the erasure of your personal data and instead request that the processing of the personal data be restricted;
 - LegalAIR no longer needs the personal data for the processing purposes, but you need them for the establishment, exercise and support of a legal claim;
 - you have objected to the processing and are awaiting an answer as to whether LegalAIR's legitimate grounds outweigh yours.
- **Right to data portability:** you have the right to obtain your personal data processed by LegalAIR, in structured and commonly used (digital) format, in order to transfer it to another processing controller without interference.
- **Right to object:** you have the right to object to the processing of your personal data, if the processing is based on one of the following processing grounds: 'performance of a task carried out in the public interest' and/or 'representation of the legitimate interests of LegalAIR'. LegalAIR will cease processing personal data if it cannot cite legitimate grounds for processing that outweigh the interests, rights and freedoms of the data subject.
- **Right to data erasure:** You have the right to request LegalAIR to delete your personal data. LegalAIR will comply with this request if any of the following situations arise:
 - your personal data are no longer necessary for the purposes for which they were collected or are otherwise processed;
 - you have withdrawn your consent to the processing of your personal data and there is no other legal basis for the processing;
 - you have raised legitimate objections to the processing of your personal data;
 - your personal data have been processed unlawfully.

11.2. If you have consented to the processing of your personal data, you have the right to withdraw this consent at any time. All processing of personal data that took place prior to the withdrawal of consent shall be deemed to have taken place validly.



11.3. You can unsubscribe from our newsletter by sending an e-mail to: info@legalair.nl or by clicking on the unsubscribe link at the bottom of the newsletter.

11.4. You can submit your request to exercise the above rights or powers in writing to LegalAIR using the contact details at the bottom of this privacy statement. LegalAIR will process your request within one month. If the request is complex or large in number, LegalAIR may choose to extend this period by two months.

11.5. If you have a complaint about the processing of your personal data, you can report it to us using the contact details at the bottom of this privacy statement. You can also submit your complaint to the Dutch Personal Data Authority:

Dutch Personal Data Authority
PO Box 93374
2509 AJ The Hague
www.autoriteitpersoonsgegevens.nl

12. Retention period

12.1. LegalAIR retains the personal data for the period for which it needs it to fulfil the purpose for which the personal data were initially collected, unless LegalAIR is obliged to retain the personal data for a longer period under a statutory provision.

13. Changes to this privacy statement

13.1. LegalAIR reserves the right to amend this privacy statement. Any amendment will be announced on this page. LegalAIR therefore advises the data subject to regularly check this page for any amendments to this privacy statement. The current version of this privacy statement was updated on 27 July 2023, Version 2.0.

14. Contact

14.1. If you have any questions or comments as a result of this privacy statement, please contact us at:

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