PRIVACY POLICY

All personal data that Cassius receives from you as (contact person of a) client will be processed in accordance with applicable data protection regulations, in particular the General Data Protection Regulation 2016/679 of April 27, 2016 ("**GDPR**"), as well as this privacy policy.

In case you have any questions regarding the processing of your personal data, you can always contact Stéphanie Cassimon.

ARTICLE 1 OBJECTIVES

1.1 General- interpretation whose personal data is collected

1.2 General- purposes

Cassius processes the personal data of

- (potential) clients
- Persons who provide their business card or other contact information to Stéphanie Cassimon or Cassius
- Service providers of Cassius
- Third parties as necessary to carry out a legal assignment entrusted by clients

Cassius processes your personal data for the following purposes

- Legal services to clients
- Compliance with money laundering prevention and anti-fraud laws
- Newsletters and other commercial communications
- Invoicing and accounting
- Dispute resolution
- Supplier management

1.3 Provisions common to all purposes for processing your personal data

1.3.1 Cassius obtains personal data directly from you and/or indirectly through a third party.

1.3.2 Your personal data will be kept for 10 years after the closure of the file (plus a 1-year verification period), unless it needs to be kept longer in a specific context.

1.3.3 Third parties may have access to the personal data being processed, including but not limited to:

- Service providers acting as processors for Cassius: IT providers, software vendors, including those offering artificial intelligence, translation agencies;
- Professional counsel such as outside law or accounting firms;
- Third parties involved in Cassius's services to clients including but not limited to bailiffs, mediators, notaries, opposing parties, opposing counsel, witnesses and (court) experts;
- Third parties involved in Cassius's services to clients including but not limited to banks, insurance brokers;
- Government agencies such as courts, clerks' offices, police departments, prosecutors' offices;
- the President of the Bar.

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1.4 Legal services to clients

1.4.1 For the purpose of providing legal services to its clients, Cassius may process the following client and third party data: personal identification data (name, (business) address, e-mail address, telephone number), government-issued identification data (identity card number, passport number, driver's license number, pension number, license plate number, company number, VAT number, excerpt from the National Register), personal characteristics (gender, date of birth, place of birth, language nationality), family data (possibly also data relating to minors), financial data (bank account number, method of payment, attachment notices, cadastral data), image and voice material insofar as recordings are made of discussions and any other information provided to Cassius for the handling of the file (incl. potentially special categories of personal data such as personal data indicating your racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, biometric data, data concerning your health or data concerning your sex life or sexual orientation or personal data relating to criminal convictions and offenses).

1.4.2 The processing of these personal data allows Cassius to provide legal advice, draft legal deeds and documents, represent its clients in court, in arbitration or before administrative or similar bodies, assist in negotiations and/or the conclusion of contracts, assist in mediation, assist in a police or similar interrogation, ensure follow-up in the event of the cessation of its activities, etc.

1.4.3 The legal basis for processing your personal data is based on the conclusion and performance of a contract for legal services with the client (Art. 6.1, b) GDPR).

1.4.4 If Cassius transfers your personal data to banks and insurance companies, a technical adviser, a notary, a judicial administrator or any other judicial mandatary at the request of these third parties, Cassius will ask for your consent to do so (Art. 6.1, a) GDPR), unless there is a court order requiring the transfer.

1.4.5 If Cassius transmits your personal data to the succeeding lawyer in the event of cessation of her professional activity, it requests your consent to do so (article 6.1, a) GDPR).

1.4.6 The legal basis for the processing of special categories of personal data and/or criminal personal data is based on the institution, exercise or substantiation of legal proceedings (article 9.2, f) GDPR) respectively on the defense of the interests of Cassius its clients (article 10 GDPR *in conjunction with* article 10.1, 2° Personal Data Protection Act).

1.4.7 Cassius shares this personal data only as necessary with third parties with whom it cooperates in the context of its legal services (court and police departments, bailiffs, opposing party's attorney(s) or an opposing party acting without the assistance of an attorney, successor attorney, banks and insurance companies, health care institutions, a technical adviser, a court psychologist, expert or a judicial mandatary (e.g., notary public, judicial administrator) appointed by judgment or decree).

1.5 Compliance with money laundering prevention and anti-fraud laws

1.5.1 In order to comply with money laundering prevention and anti-fraud legislation,[1] Cassius may process your personal identification data (name, (business) address, e-mail address, telephone and fax number), national registration number, government-issued identification data (identity card number, passport number company number, VAT number), financial data (transactions for or on behalf of the client), personal characteristics (date of birth, place of birth, gender, language, nationality), court data (convictions, pending litigation) and any other information Cassius may need to request and/or receive in this context.

[1] Including but not limited to the obligation (i) on identification and verification, (ii) on identification of client characteristics and the purpose and nature of the business relationship or occasional transaction, (iii) on ongoing vigilance, (iv) on increased vigilance, and (v) on analysis of atypical transactions.

1.5.2 Processing this personal data allows Cassius to comply with money laundering prevention and anti-fraud laws, among other things.

1.5.3 The legal basis for the processing of your personal data is based on the legal obligation as defined in the Act of September 18, 2017 on the prevention of money laundering and terrorist financing (article 6.1, c) GDPR) and- to the extent that the processing goes beyond what is strictly necessary for the fulfilment of these legal obligations (e.g. in the context of the general obligation to identify oneself)- Cassius's legitimate interest to be vigilant against money laundering in the context of its legal services (article 6.1, f) GDPR).

1.5.4 Cassius shares this personal data only as necessary with third parties with whom it cooperates in the context of compliance with money laundering prevention and anti-fraud legislation (government departments, court and police departments, attorney, the President of the Bar).

1.5.5 In order to ensure that attorneys, Presidents of the Bar and the CTIF-CFI (Belgian Financial Intelligence Processing Unit) can fulfill their money laundering prevention obligations without compromising the objectives of the money laundering prevention obligation the following rights granted by the GDPR to individuals whose data is processed are entirely limited:

- the rights and obligations established in article 12 GDPR regarding the transparent information to be provided to the data subject and the modalities for the exercise by this person of the rights established in that article;
- the information to be provided under article 13 GDPR to the data subject from whom the personal data are collected;
- the data subject's right of inspection, as provided for in article 15 GDPR;
- the right of the data subject to obtain rectification of inaccurate personal data concerning him according to article 16 GDPR;
- the notification obligation imposed by article 19 GDPR on controllers with respect to recipients to whom personal data have been disclosed if the data subject has requested the rectification or erasure of their personal data or the restriction of the processing of such data;
- The right to object laid down in article 21 GDPR;
- the data subject's right under article 22 GDPR not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or significantly affects him or her in any other way, as provided for in article 22 GDPR;
- the obligation to communicate to the data subject infringements relating to personal data that pose a high risk to the rights and freedoms of the data subject in accordance with article 34 GDPR.

1.6 Newsletters and other commercial communications

1.6.1 For the purpose of sending newsletters and other commercial communications, Cassius may process your personal identification data (name, (business) address, e-mail address, phone number), information about occupation and job (position).

1.6.2 The processing of this personal data allows Cassius to send newsletters and other commercial communications to its clientele, such as updates on legal developments, information on the lawyer's products and services, Christmas cards, etc.

1.6.3 The legal basis for processing your personal data is based on Cassius's legitimate interest in promoting its products and services to (contacts at) clients (article 6.1, f) GDPR).

1.6.4 The Client may, of course, unsubscribe from Cassius's communications at any time. In this case, Cassius will stop processing personal data for this purpose.

1.6.5 Cassius only shares this personal data with third parties with whom it collaborates in the context of sending newsletters and other commercial communications (suppliers of software used by Cassius to send commercial communications, providers of marketing tools).

1.7 Invoicing and accounting

1.7.1 For the purpose of invoicing and its accounting obligations, Cassius may process your personal identification data (name, (business) address, e-mail address, phone number), identification data issued by the government (company number, VAT number), financial data (bank account number, method of payment) and services/services rendered.

1.7.2 The processing of this personal data allows Cassius to prepare its invoices, maintain its accounting records and comply with accounting obligations, including the preparation of financial statements. This is necessary to comply with Cassius's accounting obligations.

1.7.3 The legal basis for processing your personal data is based on various legal obligations, including those contained in the Economic Law Code (article I.1 ELC, article III.82 ELC, article III.89 ELC and article III.90 ELC), the KB WVV (double-entry bookkeeping), the Companies and Associations Code (article 3:1 CAC) and the Income Tax Code (article 320 ITC) (article 6.1, c) GDPR) and- to the extent that the processing goes beyond what is strictly necessary to comply with these legal obligations- on the legitimate interest of Cassius to keep its accounts (article 6.1, f) GDPR).

1.7.4 Cassius only shares this personal data with third parties with whom it cooperates in the context of its billing and accounting (accounting firm, external auditor, government agencies, banking and insurance companies).

1.8 Dispute resolution

1.8.1 For the purpose of resolving potential disputes, Cassius may process your personal identification data (name, (business) address, e-mail address, telephone number), identification data issued by the government (identity card number, passport number, driver's license number, pension number, license plate, etc.), information on occupation and job, financial data, judicial data and any other information that may be relevant to the management of a (potential) dispute.

1.8.2 The processing of these personal data allows Cassius to defend its legitimate interests in all forms of dispute resolution and to administer them.

1.8.3 The legal basis for processing your personal data is based on Cassius's legitimate interest to safeguard its (contractual and extra-contractual, legal and other) rights (Art. 6.1, f) GDPR).

1.8.4 For purposes of Cassius's dispute resolution and dispute management, Cassius will retain your personal data for up to 5 years after the expiration of the last term of appeal (longer if necessary, for example, to comply with legal obligations) (plus a 1-year verification period).

1.8.5 Cassius only shares this personal data with third parties with whom it cooperates in the context of its dispute management (external legal advisors) and with other parties if necessary (government departments, court and police departments, banking and insurance companies, its accounting firm, bailiffs and collection agencies).

1.9 Supplier Management

1.9.1 For the purpose of supplier management, Cassius processes your personal identification data (name, (business) address, e-mail address, phone number), financial data and any other information that may be relevant to supplier management.

1.9.2 The processing of these personal data permits the normal operations of Cassius.

1.9.3 The legal basis for processing your personal data is based on Cassius its legal obligations and legitimate interest (Art. 6.1, f) GDPR).

1.9.4 For purposes of Cassius its suppliers, Cassius keeps your personal data for 10 years after the termination of the agreement.

1.9.5 Cassius shares this personal data with other parties only when necessary (government agencies, banking and insurance companies, its accounting firm).

ARTICLE 2 SECURITY

2.1 Cassius has implemented appropriate technical and organizational measures to maintain the confidentiality of your personal data and protect your data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access.

2.2 Cassius has made the necessary contractual arrangements with the third parties with whom it works and does not transfer your personal data outside the European Economic Area without the guarantee that your data also enjoys an equivalent level of protection there.

ARTICLE 3 RIGHTS

3.1 You may always contact Cassius at the communication channels listed in the footer of the privacy policy, for the exercise of the following rights to the extent that the exercise of these rights does not conflict with Cassius's obligations to honor the purposes of the Money Laundering Prevention Act:

- a request to inspect or rectify your personal data;
- a request for erasure of your personal data;
- a request to restrict the processing of your personal data;
- an objection to the processing of your data;
- a request to withdraw your consent;
- an opposition to fully automated individual decision-making without any human intervention that significantly affects you; and
- a complaint if you believe that Cassius is not acting in accordance with applicable data protection legislation. You may also file a complaint with the Belgian Data Protection Authority.

3.2 For those purposes for which the legal basis for processing personal data is a legitimate interest, you can always request Cassius more information about the balancing of interests carried out in that context.

3.3 For those purposes for which the legal basis for the processing of personal data is a task of public interest or legitimate interest, you may at any time exercise your right to object to the processing of your personal data, stating the reasons pertaining to your particular situation. Cassius will cease processing your personal data unless it considers that there are compelling legitimate grounds which outweigh the interests, rights and freedoms you claim.

3.4 To properly handle and respond to your requests, Cassius processes your personal data in accordance its legal obligations under Chapter III *in conjunction with* Art. 5.2 GDPR (Art. 6.1, c) GDPR).

3.5 Cassius may request that you to justify your request and/or provide proof of identity, such as a copy of the front of your identity card.

ARTICLE 4 UPDATES

This privacy policy may be amended from time to time, within the limits of applicable data protection regulations. Upon implementation of changes, the amended version will be transmitted to you without delay.