

PRIVACY POLICY

Updated on 01/08/2024

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I. PRIVACY POLICY

1. Parties and Purpose

KIKLEGAL SRL (hereinafter "**KIKLEGAL**" or the "**Data Controller**")
Rue Lesbroussart 22, 1050 Brussels (Ixelles)
Company number / VAT : BE1001012383
Mail : info@kiklegal.com
Phone : **+32 (0)491 32 66 72**

KIKLEGAL establishes this Privacy Policy, the purpose of which is to inform in a transparent manner the Users of the website hosted at the following address: www.kiklegal.com, (hereinafter the "**Site**"), the way in which personal data is collected and processed by KIKLEGAL.

The term "**User**" refers to any user, whether a natural or legal person, who visits or interacts in any way with the Site.

In this respect, KIKLEGAL determines all the technical, legal and organizational means and purposes of processing the personal data of the Users. KIKLEGAL undertakes to take all necessary measures to ensure the processing of personal data in accordance with the Law of 30 July 2018 on the protection of individuals with regard to the processing of personal data (hereinafter, "**the Law**") and the European Regulation of 26 April 2016 on the protection of personal data relating to the processing of personal data and the free movement of such data (hereinafter, the "**Regulation**").

KIKLEGAL is free to choose any natural or legal person who processes the personal data of users at its request and on its behalf (hereinafter the "**Processor**"). Where appropriate, KIKLEGAL undertakes to select a Processor offering sufficient guarantees as regards the technical and organizational security measures for the processing of personal data, in accordance with the Law and the Regulation.

2. Processing of personal data

The use of the Site by Users may result in the communication of personal data. The processing of this data by KIKLEGAL, in its capacity as Controller, or by service providers acting on behalf and for the account of KIKLEGAL, will comply with the Law and the Regulation. Personal data will be processed by KIKLEGAL, in accordance with the purposes mentioned below, via: An automated procedure; forms; the use of cookies; Sending a request;

questionnaire; Content sharing (other than the content exchanged between the user and their lawyer or representative).

3. Purpose of processing personal data

In accordance with article 13 of the Regulation, the purposes for which personal data is processed are communicated to the User and are as follows:

1. Ensure the performance of the services offered and agreed on the Site;
2. Monitor the performance of the services offered;
3. Answer the User's questions;
4. Compile statistics to improve the website, the services offered and the internal operating organization;
5. Improving the quality of the Site and the products and/or services offered by the Data Controller;
6. Allow better identification of the User's interests

4. Personal data that may be processed

The User consents, when visiting and using the Site, that KIKLEGAL collects and processes, according to the modalities and principles described in this Privacy Policy, the following personal data:

1. Information about the Users that they provide for contractual purposes and to enable the proper performance of reciprocal obligations, namely name, surname, address, IBAN number and bank details; and more generally, any information voluntarily given by the User;
2. Information about Users by filling out forms or contacting us by telephone, email or other means, for example the name, email address and phone number of Users;
3. With respect to each of the users' visits on the Site, the information automatically collected is:
 1. IP address and browser type and model, time zone, operating system;
 2. all the information regarding the pages that the User has consulted on the Site, including the URL, the time of navigation.

5. Consent

By accessing and using the Site, the User declares that he has read and given his free, specific, informed and unambiguous consent to the processing of personal data concerning him. This agreement covers the content of this Privacy Policy.

Consent is given by the positive act by which the User has checked the box offering the Privacy Policy in hyperlink. This consent is a prerequisite for carrying out certain operations on the Site or for allowing the User to enter into a contractual relationship with KIKLEGAL. Any contract between KIKLEGAL and a User relating to the services and goods offered on the Site is subject to the acceptance of the Privacy Policy by the User.

The User consents to the Data Controller processing and collecting, in accordance with the terms and principles included in this Privacy Policy, his personal data that he communicates on the Site or in connection with the services offered by KIKLEGAL, for the purposes indicated above.

The User has the right to withdraw his consent at any time. The withdrawal of consent does not compromise the lawfulness of processing based on prior consent.

6. Duration of storage of the personal data of the Users

In accordance with Article 13 §2 of the Regulations and the Act, the Data Controller shall retain personal data only for as long as is reasonably necessary to enable the purposes for which it is processed.

This duration is in all cases less than: 5 years

7. Recipients of data and disclosure to third parties

Personal data may be transmitted to KIKLEGAL employees, collaborators, subcontractors or suppliers who offer adequate guarantees of data security, and who collaborate with KIKLEGAL in the marketing of products or the provision of services. They act under the direct authority of KIKLEGAL, and are responsible for collecting, processing or sub processing these data.

In all cases, the recipients of the data and those to whom this data has been disclosed comply with the content of this Privacy Policy. KIKLEGAL assures that they will process these data for the intended purposes only, in a discreet and secure manner.

In the event that the data is disclosed to third parties for direct marketing or prospecting purposes, the User will be informed beforehand so that he expresses his consent to the use of these personal data.

8. Rights of Users

At any time, the User may exercise his rights by sending an e-mail to the following address: info@kiklegal.com or a letter by direct mail, attaching a copy of his ID card to the following address: Rue Lesbroussart 22, 1050 Brussels (Ixelles).

a. Right of access

In accordance with article 15 of the Regulation, KIKLEGAL guarantees the right of access to the User's personal data. The User has the right to obtain access to said personal data as well as the following information:

- the purposes of processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular those established in third countries or international organizations;
- where possible, the intended retention period for personal data or, if not possible, the criteria used to determine that period;
- the existence of automated decision-making, including profiling, referred to in Article 22 paragraphs 1 and 4 of the Regulation, and, at least in such cases, relevant information concerning the logic of the nature of the data subject, as well as the significance and expected consequences of this processing for the data subject
- the Data Controller may charge a reasonable fee based on administrative costs for any additional copies requested by the User.

- when the User makes this request electronically (via e-mail address for example), the information is provided in an electronic form of common use, unless the User requests otherwise.
- the copy of his data will be communicated to the User at the latest within one month after receipt of the request.

b. Right to rectification

KIKLEGAL guarantees the right of rectification and erasure of personal data to the user.

In accordance with Article 16 of the Regulations, incorrect, inaccurate or irrelevant data may be corrected or deleted at any time. The User first makes the necessary changes himself from his user/other account, except if they cannot be made independently, in which case the request can be made to KIKLEGAL.

In accordance with Article 19 of the Regulation, the Data Controller shall notify each recipient to whom personal data has been communicated of any rectification of personal data, unless such communication is impossible or requires disproportionate effort. The controller shall provide the data subject with information about these recipients if the data subject requests it.

c. Right to erasure

The User has the right to obtain the deletion of his personal data as soon as possible in the cases listed in article 17 of the Regulations.

When the Data Controller has made the personal data public and is obliged to delete them under the previous paragraph, the Data Controller, taking into account the available technologies and implementation costs, takes reasonable steps, including technical measures, to inform the other controllers processing such personal data that the data subject has requested the deletion by those controllers of any link to such personal data, or any copy or reproduction thereof.

The two preceding paragraphs do not apply to the extent that such processing is necessary:

- the exercise of the right to freedom of expression and information;
- to comply with a legal obligation requiring processing under Union law or the law of the Member State to which the controller is subject, or carrying out a task in the public interest or in the exercise of public authority for which the controller is responsible;
- the establishment, exercise or defense of legal rights.

In accordance with Article 19 of the Regulation, the Data Controller shall notify each recipient to whom the personal data have been communicated of any erasure of personal data or any limitation on the processing carried out, unless such communication is impossible or requires disproportionate effort. The controller shall provide the data subject with information about these recipients if the data subject requests it.

d. Right to restrict processing

The User has the right to obtain the limitation of the processing of his personal data in the cases listed in article 19 of the Regulation.

In accordance with article 19 of the Regulation, the Data Controller notifies each recipient to whom personal data has been communicated of any limitation on the processing carried out, unless such communication is impossible or requires disproportionate effort. The controller shall provide the data subject with information about these recipients if the data subject requests it.

e. Right to data portability

In accordance with article 20 of the Regulation, Users have the right to receive from KIKLEGAL personal data concerning them in a structured, commonly used and machine-readable format. Users have the right to transmit these data to another controller without KIKLEGAL hindering it in the cases provided for by the Regulation.

When the User exercises his right to data portability pursuant to the preceding paragraph, he has the right to have personal data transmitted directly from one controller to another, where this is technically possible.

The exercise of the right to data portability is without prejudice to the right to erasure. This right does not apply to processing necessary for the performance of a public interest task or in the exercise of the public authority vested in the controller.

The right to data portability does not infringe the rights and freedoms of third parties.

f. Right to object and automated individual decision-making

The User has the right to object at any time to the processing of his personal data due to his particular situation, including the automation of data carried out by KIKLEGAL. In accordance with Article 21 of the Regulation, KIKLEGAL will no longer process personal data, unless there are legitimate and compelling grounds for processing that prevail over the interests and rights and freedoms of the User, or for the establishment, the exercise or defense of legal rights.

When personal data is processed for the purpose of prospecting, the User has the right to object at any time to the processing of personal data concerning him for such prospecting, including profiling as far as it is related to such prospecting.

If the data subject objects to processing for the purpose of prospecting, the personal data will no longer be processed for this purpose.

g. Right to complain

The User has the right to lodge a complaint regarding the processing of his personal data by KIKLEGAL with the Data Protection Authority, competent for the Belgian territory. Further information can be found on the website: <https://www.autoriteprotectiondonnees.be>.

The address for lodging a complaint is:

Data Protection Authority

Rue de la Presse 35, 1000 Brussels

Tel. + 32 2 274 48 00

Fax. + 32 2 274 48 35

E-mail: contact@apd-gba.be

The User may also lodge a complaint with the court of first instance of his domicile.

II. COOKIES

9. Cookies

The Site uses cookies to distinguish Users of the Site. This allows to provide the Users with a better browsing experience and an improvement of the Site and its content. The purposes and terms of cookies are contained in this article.

a. General principles

A "Cookie" is a file that is temporarily or permanently deposited on the User's hard drive when visiting the Website for a subsequent connection. Thanks to cookies, the server recognizes the user's computer.

Cookies may also be set by third parties with whom KIKLEGAL collaborates.

Some of the cookies used by KIKLEGAL are necessary for the proper functioning of the Site, others allow to improve the user experience.

The User can customize or disable cookies by setting their browser.

By using the Website, the User expressly agrees to the management of cookies as described in this article.

b. Type of cookies and purposes pursued

Different types of cookies are used by KIKLEGAL on the Site :

- **Technical cookies** : they are necessary for the operation of the Website, allow the communication of data entered and are intended to facilitate the navigation of the User;
- **Statistical and audience measurement cookies** : these cookies allow the recognition of the User and are used to count the number of Users of the Website over a certain period. As long as they also indicate the browsing behavior, they are an effective way to improve the User's navigation by displaying proposals and offers that may be of interest to him. They also allow KIKLEGAL to identify possible bugs on the Website and correct them.
- **Functional cookies** : these cookies facilitate the use of the Website by retaining certain choices entered (for example, user name or language);
- **Tracking cookies** : KIKLEGAL uses tracking cookies via Google Analytics, to measure the interaction of Users with the content of the Site and produce anonymous statistics. These statistics allow KIKLEGAL to improve the website. Google provides the following explanation of these cookies: http://www.google.com/intl/en_uk/policies/privacy/

c. Cookie retention period

Cookies are kept for the time necessary to fulfil the purpose pursued. The cookies that may be stored on the User's hard drive and their retention period are the following: 5 years

d. Management of cookies

If the User does not want the Website to place cookies on his hard drive, it is easy for him to manage or delete them by changing the settings of his browser. The browser programming also allows the User to receive a notice or notification whenever a Website uses cookies and thus decide to accept this, or to refuse it.

If the User deactivates certain cookies, he accepts that the Website may not function optimally. Some parts of the Website may not be usable, or be partially usable.

If the User wishes to manage and/or delete certain cookies, he can do so using the following link(s):

For users with as a browser:

- Internet Explorer : <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>
- Microsoft Edge : <http://windows.microsoft.com/en-gb/windows-10/edge-privacy-faq>
- Chrome: <https://support.google.com/accounts/answer/61416?hl=en>
- Firefox : <https://support.mozilla.org/fr/kb/activer-desactiver-cookies-preferences>
- Safari: https://support.apple.com/kb/ph21411?locale=en_CA

If the User refuses to allow the use of Google Analytics cookies, he is invited to set his browser accordingly on the following website: <http://tools.google.com/dlpage/gaoptout>.

10. Limitation of liability of the Data Controller

The website may contain links to other websites owned by third parties not related to KIKLEGAL. The content of these sites and their compliance with the Law and the Regulation are not the responsibility of KIKLEGAL.

The holder of parental authority must give his or her express consent for the minor under 16 to disclose personal information or data on the website. KIKLEGAL strongly advises persons exercising parental authority over minors to promote a responsible and safe use of the Internet. The Data Controller cannot be held responsible for having collected and processed information and personal data of minors under 16 years of age whose consent is not effectively covered by that of their legal parents or for incorrect data -age- brought in by minors. In no case will personal data be processed by the Controller if the User states that he is under 16 years old.

KIKLEGAL is not responsible for the loss, corruption or theft of personal data caused by the presence of viruses or following computer attacks.

11. Safety

The Data Controller implements organizational and technical measures to ensure an appropriate level of security for processing and collecting data. These security measures depend on the implementation costs in relation to the nature, context and purposes of personal data processing.

The Data Controller uses standard encryption technologies within the IT sector when transferring or collecting data on the Site.

12. Changes to the Privacy Policy

KIKLEGAL reserves the right to modify this Privacy Policy in order to comply with legal obligations in this matter. The user is therefore invited to regularly consult the Privacy Policy in order to become aware of changes and adaptations. Such modification will be posted on the Site or sent by email for the purpose of enforcement.

13. Applicable law and competent jurisdiction

This Privacy Policy is governed exclusively by Belgian law. Any dispute will be brought before the courts of the judicial district of the registered office of KIKLEGAL.

14. Your rights

If you are a European resident, you have the right to access the personal information we hold about you and to request that it be corrected, updated or deleted. If you wish to exercise this right, please contact us using the details below. In addition, if you are a European resident, please note that we process your information in order to fulfil our obligations to you.

15. Contact

For any questions or complaints regarding this Privacy Policy, the User may contact the Data Controller at the following address: info@kiklegal.com