

LIME – PRIVACY POLICY

LIME is committed to protect your privacy and takes its responsibilities regarding the security of clients' personal data very seriously.

This privacy policy aims to inform clients, prospects or any other person whose data LIME processes, about the carried out processing, the purposes of said processing and the rights that any person has in this regard in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC) (the “**GDPR**”) and the E-privacy Directive (Directive (EC) 2002/58 of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector).

1. Contact –

The entity responsible for the processing of personal data described in this policy is LIME SRL (“LIME”), a limited liability company organised under Belgian law whose registered office is situated rue de la Senne 19, 1000 Brussels and registered in the Crossroads Bank for Enterprises under number 0685.607.381 (RLE Brussels).

Lawyers practicing within the firm are registered either with the French speaking Bar Association of Brussels or with the Dutch speaking Bar Association of Brussels.

Any question or request regarding the processing of personal data can be sent by email to the address info@lime.law.

2. Data collected –

2.1. Clients

LIME collects the following data from its clients: identification data of the contact person (email address, telephone number, address, etc.); if applicable, a copy of their identity card; financial data (bank account, billing data, etc.); any information in relation with the file, whether it concerns the client or third parties; any information collected that can be useful to handle the file and/or to answer the question asked; identification of any stakeholder relevant to the case; people's interests; etc.

2.2. Prospects and marketing

LIME collects the following data from potential prospects and/or other lawyers: identification data of the contact person (email address, telephone number, address, etc.); people's interests; history of contacts and participation in events organised by LIME, and all information voluntarily given by the prospect and/or other lawyer.

2.3. Management of received emails

LIME collects personal identification data (last name, first name, email address, telephone number, etc.) voluntarily disclosed when an e-mail is sent by a person to a LIME email address or whenever someone calls the office number.

3. Purposes –

LIME collects personal data for several reasons, which are detailed hereafter.

3.1. *Clients' relationship management*

LIME collects data from its clients (*supra*, 2.1) to handle the existing relationship with those clients (execution of the mission entrusted by the client, verification of conflicts of interests, issue and collection of invoices, fight against money laundering).

This processing purpose is based on the execution of the contract binding the client and LIME, the execution of the lawyer mission pursued by LIME's lawyers (including the fight against money laundering) as well as on the legitimate interests of LIME to process said data in order to ensure the best representation of the client ((art. 6, § 1st, b), c) and f) of the GDPR).

3.2. *Prospect and marketing relation management*

LIME collects data from prospects and other lawyers (*supra*, 2.2) in order to handle the relation with said prospects (invitations, sharing of legal information relevant for the prospects, calls for tenders, forms of requests, verification of conflicts of interests, management of the LinkedIn page and the online presence of the law firm).

This processing purpose is based on the legitimate interests of LIME to process those data for marketing purposes and potentially in the management of the pre-contractual relationship (art. 6, § 1st, b), and f) of the GDPR).

The consent of the persons whose data are processed will be requested when the specific rules relating to direct marketing by email apply (art. XII.13 of the Code of Economic Law and Royal Decree of 4 April 2003).

3.3. *Management of received emails*

LIME gathers data from the people who contact LIME (*supra*, 2.3), in order to be able to answer to them.

This processing aim is based on the legitimate interests of LIME to process those data to answer to the emails that would be sent to LIME ((art. 6, §1st, f) of the GDPR).

3.4. *Archiving and internal documentation*

LIME is required by law to archive its files when they are closed and those files can contain personal information data entrusted by the clients (*supra*, 2.1).

This processing purpose is based on LIME's legal obligation to keep its archives for a period of five (5) years (art. 6, § 1st, c) of the GDPR). Furthermore, LIME has a legitimate interest in keeping documents in electronic form linked to a file, after archiving, for internal documentation purposes (models of conclusions, contracts, letters, re-use of analyses, consultations and knowledge-doing, training, etc.) (art. 6, § 1st, f) of the GDPR).

4. Data transfers to third parties –

LIME only transfers personal data collected when such a transfer is necessary to fulfil the purposes detailed in paragraph 3, and only to:

- i. subcontractors (software suppliers, document hosting services, computer system suppliers, accountant, translators, consultants);
- ii. actors of the justice system (courts and tribunals, administrative authorities, notaries, bailiffs, curators, experts, other lawyers);
- iii. public authorities (in the event of a legal request on their part, including in application of the law on the prevention of money laundering and the financing of terrorism);
- iv. other interested third parties (with the consent of the concerned person, data may be transferred in case of transactions).

5. Storage period –

Except for the files necessary for internal documentation (*supra*, 3.4) and data necessary for the prevention of money laundering, the personal data processed by LIME are kept for a period of five (5) years from the end of the contractual relation or the last contact with the person concerned.

The files necessary for internal documentation (*supra*, 3.4) are kept indefinitely but any personal data is deleted when such deletion is technically possible.

The data necessary for the fight against money laundering is kept for ten (10) years from the operation subject to the law on the prevention of money laundering and the financing of terrorism.

6. Rights of data subjects –

The following rights are recognised to data subjects, it being understood that their exercise may not affect the code of ethics, the professional confidentiality, the mission of the lawyer and/or the rights and freedoms of others.

6.1. Right of access

Any data subject can access the following information concerning them: categories of personal data collected, processing carried out and purposes thereof, categories of persons to whom the data have been or will be communicated, period of storage, rights relating thereto and the source of the data (when they were not collected directly from the data subject).

6.2. Right of rectification

Any data subject can ask LIME to correct and/or update personal data concerning them processed by LIME.

6.3. Right of deletion

Any data subject can ask LIME to erase personal data concerning them processed by LIME in the following situations:

- i. personal data is no longer necessary for the reasons it was collected or processed;
- ii. the data subject has withdrawn their consent (when the processing carried out was based on said consent);
- iii. when the data subject considers that one of the processing operations being carried out does not comply with the GDPR, infringes their privacy and/or causes them excessive damage;

- iv. when the person concerned no longer wishes to receive commercial solicitations from LIME;
- v. when personal data must be erased in order to comply with a legal obligation which is provided by European Union law or by national law to which LIME is subject.

However, LIME may not be able to grant a request for erasure (balance with other important rights or values, such as freedom of expression, compliance with a legal obligation to which LIME is subject or significant public interest grounds).

6.4. Right to limit the processing operations

Any data subject can ask for the limitation of the processing operations of their data in the following cases:

- i. the accuracy of the data in question is disputed;
- ii. the data is not processed according to the GDPR and the Belgian law;
- iii. the data is no longer necessary to reach the purposes initially intended but cannot be deleted yet for legal reasons (as for instance, the exercise or the defence of rights in court);
- iv. the decision on a request to oppose the processing is pending.

In case of limitation of processing operations, the personal data in question will no longer be subject to any processing without the prior consent of the person concerned, except for the storage.

Said personal data may nevertheless still be processed for the establishment, exercise or defence of rights in court, or for the protection of the rights of another legal or natural person, or even for important reasons of public interest.

6.5. Right of opposition

Any data subject concerned may object to the use of their personal data for commercial solicitation purposes. Such a request cannot be granted if the processing carried out is necessary for the conclusion or execution of a contract, if it has been required by law or if it is necessary to establish, exercise or defend rights in court.

6.6. Right to data portability

Any data subject can recover any personal data processed by LIME for their personal usage or ask LIME to transfer any personal data to another company if such a transfer is technically possible. This right does not apply to data that would have been created by LIME. Such a request cannot be granted if this right violates the rights and freedoms of third parties.

7. Exercise of rights and questions –

Any request or question can be sent to info@lime.law and must contain the following details: the right that the person concerned wishes to exercise or the question asked, the reasons for the request and, when requested, a front/back copy of the identity card.

LIME shall answer to any request within a month (subject to an additional two (2) months in case of a request that needs to be further investigated).

Anyone concerned obviously retains the right to directly contact the Belgian data protection authority (DPA) whose contact details can be found on the following website: <https://www.autoriteprotectiondonnees.be/>

8. Various –

This Privacy Policy is applicable in conjunction with the Terms and Conditions of LIME. However, any clause or condition shall constitute a separate and independent provision. If a provision is considered invalid or unenforceable, all other provisions shall remain in force.

This Privacy Policy may be amended from time to time, particularly to reflect changes in legislation or the evolution of our services. Such changes, if they are substantial (in particular those that alter the purpose of a processing or the way in which data subjects can exercise their rights), will be brought to the attention of the data subjects.

LIME encourages individuals to regularly review this Privacy Policy to learn how LIME protects their personal data.