

Privacy statement Lakarsk

Lakarsk is responsible for the processing of personal data as shown in this privacy statement.

Contact details

The partners keep a watchful eye and are the first point of contact within our firm with regard to the processing of personal data. The partners can be reached via the information below:

Lakarsk
Charlotte van Pallandtlaan 4
2272 TR Voorburg
info@lakarsk.nl
Telephone number: 070 359 6538

Personal data we process

Lakarsk processes personal data of clients when they use our services and/or when clients provide these data to us themselves.

Below you will find an overview of the personal data we process with regard to the following categories:

1. Clients.
2. Job applicants.
3. Payroll administration.

The purposes for which the processing takes place and who has access to the personal data are also recorded per category.

1. *Clients*

1. Processing only takes place for the following purposes:
 - a) identification;
 - b) drawing up a risk profile within the framework of the Money Laundering and Terrorist Financing (Prevention) Act (Wwft);
 - c) maintaining contacts with clients;
 - d) carrying out work as agreed with clients;
 - e) the implementation or application of another law.
2. The only data that will be processed are:
 - a) surname, first names, initials, title, gender, date of birth, address, postal code, place of residence, telephone number and similar information required for communication, as well as the bank account number and citizen service number (BSN) of the data subject;
 - b) copy proof of identification document;
 - c) data other than those referred to under (a) to (b), the processing of which is required pursuant to, or necessary in view of, application of the law.
3. The personal data are only provided to:
 - a) those, including third parties, who are charged with or manage the activities referred to in the first paragraph or who are necessarily involved in these activities;
 - b) others, in cases where there is a legitimate basis under the General Data Protection Regulation (AVG).

2. *Job applicants*

1. Processing only takes place for the following purposes:
 - a) the assessment of the suitability of the data subject for a position that is or may become vacant;
 - b) settlement of the job applicant's expenses;
 - c) internal control and company security;
 - d) the implementation or application of another law.

2. The only data that will be processed are:
 - a) surname, first names, initials, title, gender, date of birth, address, postal code, place of residence, telephone number and similar information required for communication, as well as the bank account number of the data subject;
 - b) a file number that does not contain any information other than that referred to under (a);
 - c) nationality and place of birth;
 - d) data as referred to under (a), of the parents, guardians or carers of underage applicants;
 - e) details of training courses and programmes and internships followed and to be followed;
 - f) data relating to the position applied for;
 - g) information concerning the nature and content of the current employment relationship, as well as the termination thereof;
 - h) information concerning the nature and content of the previous employment relationships, as well as the termination thereof;
 - i) data relating to the motivation for the position and the organization;
 - j) other information with a view to fulfilling the position, which has been provided by the data subject or which is known to him/her;
 - k) data other than those referred to under (a) to (i), the processing of which is required pursuant to, or necessary in view of, application of another law.
3. The personal data are only provided to:
 - a) those, including third parties, who are charged with or manage the activities referred to in the first paragraph or who are necessarily involved in these activities;
 - b) others, in cases where there is a legitimate basis under the General Data Protection Regulation (AVG).

3. ***Payroll administration***

1. Processing only takes place for the following purposes:
 - a) calculating and recording salaries and allowances to, or for the benefit of, the data subject;
 - b) calculating and recording taxes and premiums for the benefit of the data subject;
 - c) the settlement of entitlements to benefits in connection with the termination of employment;
 - d) the implementation or application of another law.
2. The only personal data that will be processed are:
 - a) surname, first names, initials, title, gender, date of birth, address, postal code, place of residence, telephone number and similar information required for communication, as well as the bank account number of the data subject;
 - b) a file number that does not contain any information other than that referred to under (a);
 - c) nationality and place of birth;
 - d) data as referred to under (a), of the parents, guardians or carers of underage employees;
 - e) data with a view to calculating, recording and paying salaries, allowances and other sums of money and remuneration in kind to, or for the benefit of, the persons referred to in the first paragraph;
 - f) data with a view to calculating, recording and paying taxes and premiums for the benefit of the data subject;
 - g) data, including data concerning family members and former family members of the data subjects, which are necessary with a view to an agreed employment condition;
 - h) data other than those referred to under (a) to (d), the processing of which is required pursuant to, or necessary in view of, application of another law.
3. The personal data are only provided to:
 - a) those, including third parties, who are charged with or manage the activities referred to in the first paragraph or who are necessarily involved in these activities;
 - b) others, in cases where there is a legitimate basis under the General Data Protection Regulation (AVG).

Special and/or sensitive personal data that we process

Lakarsk processes the following special and/or sensitive personal data about you:

- Race (if a copy of an identification document is stored in a file when we have a legal obligation to do so).
- Citizen service number (BSN).

These personal data are only used for the purposes/services agreed with the Client.

If goals or services change, this will be renegotiated with the data subject.

Wwft

Lakarsk is obliged under the Dutch Anti-Money Laundering and Anti-Terrorist Financing Act (Wwft) to collect and process, in certain cases, your first name(s) and surname, date of birth, address, place of residence, type, number, date and place of issue of the identification document you used (and in some cases a copy of the document). Lakarsk is also required to report unusual transactions to the Financial Intelligence Unit Netherlands (FIU-Netherlands) and, in such cases, must provide the collected information.

On what basis and for what purpose do we process personal data

Lakarsk processes personal data for the following purposes:

- Your consent, such as when sending our newsletter for the purpose of being able to send you the newsletter.
- Performing the agreement, so that we can call you or send you an email if this is necessary to provide our services.
- Legal obligation, because we are obliged by law and regulations, partly from our professional organization the Netherlands Institute of Chartered Accountants (NBA), to ensure sufficient files are compiled in the execution of our work. In addition, we also process personal data when, for example, handling tax returns for our clients.

How long do we keep personal data

Lakarsk stores personal data no longer than is strictly necessary to achieve the purposes for which data are collected or to comply with the legal retention periods. We use the following retention periods for the following (categories) of personal data:

- A retention period of 30 days applies to cookies on our website.
- Data of a potential client (e.g. sent to our firm via the website) will be deleted after 30 days if the potential client does not ultimately become a client of our firm. If a potential client does become a client of our firm, the data will be kept as long as necessary for the provision of services to the client.
- For the recording of personal data in applications and files for the purpose of the provision of services to the client, our firm complies with the legal retention period, which in many cases is 7 years.
- Lakarsk retains the information collected under the Wwft for a period of at least five years after the end of the business relationship in connection with which the data was collected, and in the event a report has been filed, for five years after the submission of the report.

Sharing personal data with third parties

Lakarsk does not sell clients' personal data to third parties and only provides them if this is necessary for the performance of the agreement we have with the client or to comply with a legal

obligation. This also includes the right of inspection of authorities such as the Tax Authorities. We enter into a processing or sub-processing agreement with organizations that process data for our clients on our behalf, in order to ensure the same level of security and confidentiality of clients' personal data. Lakarsk remains responsible for these processing operations.

In special cases, we may provide personal data to external experts such as a civil-law notary, lawyer or pension specialist in the context of an assignment agreed with the client for these external expert(s). In that case, we will not provide these data to this/these external expert(s) without the client's consent.

These data will not be used for commercial purposes.

Transfer

Lakarsk processes clients' personal data within the EU and does not share personal data with third parties that process data outside the EU.

Website

With regard to your visit to our website, the following applies with regard to personal data.

Cookies, or similar techniques, that we use

Lakarsk uses functional cookies, including through Google Analytics. A cookie is a small text file that is stored in the browser of the device used during the first visit to this website. Lakarsk uses cookies with purely technical functionality. These ensure that the website functions properly and can be optimized.

No personal data is collected when placing the cookies. Only functional cookies are used to enable the website to operate, not for analysis purposes. Google Analytics is configured in a privacy-friendly manner, meaning that no IP addresses are collected. As a result, it is not necessary to obtain user consent.

View, modify or delete data

Data subjects (the persons whose personal data we process) have the right to inspect personal data and to request their correction or deletion. In addition, data subjects have the right to withdraw any consent for data processing or to object to the processing of personal data by Lakarsk, and data subjects have the right to data portability. This means that data subjects can submit a request to us to send the personal data we process in a computer file to the data subject or another organization specified by the data subject.

Data subjects may send a request for inspection, correction, deletion, data transfer of their own personal data or a request for withdrawal of consent or objection to the processing of the personal data to info@lakarsk.nl.

To ensure that the request for inspection has been made by the data subject, we ask that a copy of an identity document be enclosed with the request. In this copy, black out the passport photo, if applicable the MRZ (machine readable zone, the strip with numbers at the bottom of the passport), the document number and the Citizen Service Number (BSN). This is to protect privacy. We will respond to the request as soon as possible, but at the latest within one month.

Lakarsk would also like to point out to the data subjects that they have the possibility to submit a complaint to the national supervisor, the Dutch Data Protection Authority. This can be done via the following link: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

How do we secure personal information

Lakarsk takes the protection of personal data seriously and takes appropriate (technical) (security) measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized modification. If data subjects have the impression that your data are not properly secured or there are indications of misuse, please contact the partners. The contact details are listed at the top of this privacy statement.