

Privacy statement STP Tax Lawyers

Personal data is collected and cookies placed via www.stp.nl (hereinafter referred to as 'the website'). Privacy is of great importance to Sajat Telting & Partners B.V. (hereinafter referred to as: 'STP Tax Lawyers'). We therefore abide by privacy legislation and regulations. This means that your data is safe with us and that we always process it properly. Below we set out exactly how we do this, what personal data we collect from you and to what ends.

Use of personal data

When you access our website, we receive certain data from you. This could be personal data. We retain and use exclusively the personal data provided by you directly in the context of the service you request (for example via the contact form on the website) or where it is clear that you are providing the data to us for processing. We will not use your personal data for other purposes unless we have your prior consent or we are permitted or are required to do so under the law or the agreement.

To provide you with the best possible service, in certain cases it is necessary for STP Tax Lawyers to use your personal data. STP Tax Lawyers uses your personal data to:

- grant access to our website and its security;
- contact you if you request us to do so;
- offer our account environment (possibly in the future);
- carry out our services, accompanying agreements and transactions;
- inform you of the services that it offers to its existing and potential clients;
- send the newsletter if you have subscribed to it;
- where necessary uncover unlawful conduct in relation to STP Tax Lawyers, its clients and its employees;
- using cookies:
 - to use the functionalities on our website;
 - to obtain an insight into the use of our website;
 - to make the internet service more interesting by showing adverts that match your interests (tracking cookies).

Contact form

You can use the contact form to ask us questions or submit requests. You are required to enter your e-mail address and a message on the form. We retain this information until we have contacted you and answered your question. If the response to your question leads to us providing additional services, we will ask you to provide the personal data necessary and will retain and process it in the context of our services.

Newsletter

To send our newsletter, we process your name and e-mail address. We send you these newsletters only if you have given us permission to do so. We will retain the data we process for this purpose until you unsubscribe from the newsletter or for up to one year after the last newsletter we sent you.

Services

We offer a range of services. Below is a general overview of the services we offer, the data we process and the retention periods we apply. **Please be aware:** there may be departures from this privacy and cookie statement given that we can make separate agreements with you. You can contact us with any specific questions you have.

Tax returns

To prepare your tax returns, we process your name and address, contact details, income data, company data, VAT number, citizen service number and all other financially relevant information. We do this to carry out an agreement we have entered into with you. In principle, we will retain this data for up to seven years after the end of the financial year to which the tax return related, or for as long as required under the tax and other legislation of foreign states, which legislation applies to the tax return/returns in question and/or if we require this data for longer in the context of pending legal proceedings or if we have made alternative arrangements with you.

Advisory practice

We can advise you on a variety of topics and issues. The data we receive from you for this purpose can therefore vary widely. We process the data we receive from you for this purpose solely to give good legal advice and retain this data in principle for up to seven years after the end of the financial year to which the return related, or for as long as required under tax and other legislation of foreign states, which legislation applies to the tax return/returns in question and/or if we require this data for longer in the context of pending legal proceedings or if we have made alternative arrangements with you.

Retention periods

We do not retain your personal data for any longer than is necessary to achieve the goals referred to in these privacy and cookie statements and that the law prescribes.

We retain the data of existing and future clients in any case for a period of seven years after the last client contact, the end of the agreement or termination of services. In addition, client data can be retained for longer if necessary for STP Tax Lawyers in connection with its defence in the case of a dispute and/or if there is a statutory obligation on STP Tax Lawyers to retain the personal data for longer than the aforementioned retention period.

Confidentiality and disclosure to third parties

We treat your personal data confidentially. We do not disclose the personal data we collect to third parties for the direct marketing purposes of these parties. We disclose your personal data to other business or institutions only if it is necessary to carry out the agreement (such as the Tax Office, law firms or other service providers) if we have received your permission to do so or if we are obliged to do so by law or have a legitimate interest in doing so.

To provide our services, we work with:

- External ICT providers;
- The parties that deliver cookies, see below.

We have entered into a processing agreement with these business where necessary to ensure that they treat your data with due care.

Data security

STP Tax Lawyers uses careful security procedures to protect the processed data, including to prevent unauthorised individuals from gaining unintended access to this data. This is how we ensure that only the necessary individuals have access to your data and that the access to your personal data is protected.

Cookies

We use cookies on our website. A cookie statement is attached to this privacy statement in which we explain how we deal with cookies.

Third-party cookie statements/privacy statements

This privacy statement and the cookie statement of STP Tax Lawyers do not apply to third-party websites, even if STP Tax Lawyers has placed a hyperlink or link on its website to these other websites (e.g. social media). STP Tax Lawyers accepts no responsibility and liability whatsoever in relation to how these third parties deal with personal data and cookies. We recommend that you consult the privacy and cookie statements of these websites before you visit them.

Your rights

STP Tax Lawyers processes your personal data. You have the following rights:

- To receive an explanation of which personal data we have and what we do with it;
- To access the precise personal data we have;
- To correct any mistakes;
- To remove obsolete personal data;
- To withdraw permission;
- To object against a specific use;
- Portability of data.

If you have any questions about this, you can always contact us via the contact form, by e-mail via info@stp.nl, or telephone on + 31 (0)88-5060600 from Mondays to Fridays between 9 am and 6 pm. To prevent fraud, we can ask you to provide identification.

The best and most practical option, however, is to remove your browser cookies. Resetting your browser suspends the processing of your personal data (see also the cookie statement below under point 1 “refuse cookies”).

Transfer of data outside the European Economic Area

Any personal data we process as a result of the services we offer is not transferred to countries outside the European Economic Area (“EEA”). Personal data processed as a result of installing cookies (see the cookie statement below) is provided to countries outside the EEA in a number of cases, albeit only to countries and parties with which we have agreements, so that your personal data is as well protected as if it had remained within the EEA.

Changes in this privacy and cookie statement

This privacy and cookie statement can be amended from time to time, for example, because of a change in legislation and regulations. You can always find the most recent privacy and cookie statement on the website. We therefore recommend consulting this statement regularly so that you are aware of any changes. Changes to the privacy and cookie statement apply when the changes have been published. You can find the date of the privacy and cookie statement below.

File a complaint

We are of course happy to help you further if you have a complaint about the processing of your personal data. Under privacy legislation, you are also entitled to file a complaint against how we process your personal data with the Dutch Data Protection Authority. You can [contact](#) the Dutch Data Protection Authority to do this.

Contact details

If you have any further questions, or would like to know what personal data we keep for you, please contact us using the following contact details:

| | |
|--------------------------|--|
| Name: | STP Tax Lawyers B.V. |
| Address: | Claude Debussylaan 42 1082 MD, Amsterdam |
| Chamber of Commerce no.: | 34289463 |
| E-mail: | info@stp.nl |
| Telephone: | + 31 (0)88 5060600 |

Amsterdam, September 2019

Cookie statement STP Tax Lawyers

In this cookie statement we explain what cookies are, what type of cookies we use, to whom we pass on cookies and what your rights are. The cookie statement relates to the website of STP Tax Lawyers (www.stp.nl) (hereinafter referred to as 'the website').

1. The use of cookies

What are cookies?

We use cookies and similar technology. Cookies are small files of information that can be stored or read automatically from your device (including a PC, tablet or smartphone) when you visit a website. This happens via the device's web browser. The information that a cookie obtains about your use of the website is transferred to STP's own secure servers or to third-party servers. Our website can recognise your computer with cookies. Technology that is similar to cookies includes beacons and scripts.

Refuse cookies

You can decide whether you wish to accept cookies or whether you want your browser to notify you when a cookie is installed. You will have to adjust your browser settings for this. Each browser is different. The best thing to do is to consult your browser's manual to find out how this works in your browser. You can also always remove installed cookies from your computer, tablet or smartphone. However, most cookies have an expiry date. This means that they expire automatically after a certain period and data from your site visit is no longer registered. In addition, it is important to note that lots of websites do not operate optimally if cookies are disabled.

2. Type of cookie

STP uses functional, analytical and marketing cookies.

Functional cookies

The functional cookies ensure that the website operates properly and that navigating our website is a pleasant experience. These cookies can also be used to store data temporarily, enhancing the usability of the website. For example, if you adjust a web page to your personal preferences or if you navigate in a website, thanks to cookies the settings and preferences you have chosen are remembered for future use. We use the following functional cookies:

| URL page | Originates from | Data goes to | Name of cookie | Type | Retention period | Purpose of cookies |
|---|-----------------|--------------|----------------|------|---------------------------------|--|
| https://www.stp.nl/nl/home | stp.nl | Germany | PHP-SESSID | HTTP | Expires after session has ended | Retains the status of the user session on the page visit. |
| https://www.stp.nl/nl/home | stp.nl | Ireland | CookieConsent | HTTP | 1 year | Stores the cookie status of the user for the current domain. |

Analytical cookies

We use analytical cookies so that we can analyse how the website is used. For example, we can analyse which pages of the website you visit and when. The analytical cookies enable the website use to be analysed and optimised. We use the following analytical cookies:

| URL page | Originates from | Data goes to | Name of cookie | Type | Retention period | Purpose of cookies |
|---|-----------------|-----------------|----------------|------|------------------|--|
| https://www.stp.nl/nl/home | flixel.com | Canada | _ga | HTTP | 2 years | Registers a unique ID that is used to generate statistical data about how the user uses the website. |
| https://www.stp.nl/nl/home | stp.nl | The Netherlands | _ga | HTTP | 2 years | Registers a unique ID that is used to generate statistical data about how the user uses the website. |
| https://www.stp.nl/nl/home | flixel.com | Canada | _gat | HTTP | 1 day | Used by Google Analytics to slow down request speed. |
| https://www.stp.nl/nl/home | stp.nl | The Netherlands | _gat | HTTP | 1 day | Used by Google Analytics to slow down request speed. |
| https://www.stp.nl/nl/home | flixel.com | Canada | _gid | HTTP | 1 day | Registers a unique ID that is used to generate statistical data about how the |

| | | | | | | |
|---|----------------------|-----------------|---------|-------|---------------------------------|--|
| | | | | | | user uses the website. |
| https://www.stp.nl/nl/home | stp.nl | The Netherlands | _gid | HTTP | 1 day | Registers a unique ID that is used to generate statistical data about how the user uses the website |
| https://www.stp.nl/nl/home | google-analytics.com | The Netherlands | collect | Pixel | Expires after session has ended | Used to send data to Google Analytics about the device and the behaviour of the user. Traces the user on different devices and marketing channels. |
| https://www.stp.nl/nl/home | typekit.net | Germany | p.gif | Pixel | Expires after session has ended | Keeps track of special fonts used on the website for internal analysis. The cookie does not register user data. |

Google Analytics

The table shows that we use Google Analytics, a service of Google Inc. Google Inc. uses the Google Analytics services to generate an up-to-date insight into the use of the website and Google Inc. also puts anonymous reports of the website into use. We have set the Google Analytics cookies to 'privacy friendly' as prescribed by the Dutch Data Protection Authority. You can find out more here (<https://www.google.nl/intl/nl/policies/technologies/cookies/>) about the cookies used by Google Inc.

You can select Google Inc.'s opt-out option, which means that your data is longer used by Google Analytics. If you wish to select the opt-out option, click here:

<https://tools.google.com/dlpage/gaoptout?hl=nl>.

Marketing cookies

Marketing cookies are used to link to social media, such as LinkedIn and Twitter. The content of the website can be shared on social media using these buttons. For these buttons to work, cookies from social media players or a third party who acts for the social media players are used so that they recognise you when you want to share something on our website.

The marketing cookies related to social media are not installed by STP, but by the parties or party acting for them. STP accepts no liability or responsibility in relation to these cookies. We use the following marketing cookies:

| URL page | Originates from | Data goes to | Name of cookie | Type | Retenti on period | Purpose of cookies |
|---|-----------------|-----------------|-------------------|-------|---------------------------------|--|
| https://www.stp.nl/nl/home | embed.ly | United States | _cfduid | HTTP | 1 year | Used by the Cloudflare content network to identify trusted web traffic. |
| https://www.stp.nl/nl/home | google.com | The Netherlands | Ads/ga-audience s | Pixel | Expires after session has ended | Used by Google AdWords to commit users who will probably convert to clients based on the visitor's online behaviour on various websites. |
| https://www.stp.nl/nl/home | google.com | United States | NID | HTTP | 6 months | Registers a unique ID that identifies the device of a returning user. The ID is used for |

| | | | | | | |
|---|------------|---------------|-------|------|---------------------------------|---|
| | | | | | | targeted adverts. |
| https://www.stp.nl/nl/home | google.com | United States | rc::a | HTML | permanent | This cookie is used to make a distinction between people and robots. This is beneficial for the website to prepare valid reports on the use of their website. |
| https://www.stp.nl/nl/home | google.com | United States | rc::b | HTML | Expires after session has ended | This cookie is used to distinguish between humans and robots. |
| https://www.stp.nl/nl/home | google.com | United States | rc::c | HTML | Expires after session has ended | This cookie is used to distinguish between humans and robots. |