

Privacy Notice

I. Introduction

This privacy notice sets out how the professional partnership Axon Advocaten (“Axon Lawyers”) (“we”, “us”, “our”) handles your personal data in accordance with the General Data Protection Regulation (“GDPR”) when you visit www.axonlawyers.com, interact with us through our website or otherwise contact our firm or apply for a job with us. With personal data, we mean all information directly or indirectly identifying a natural person, the data subject.

This Privacy Notice is structured in a general and a more specific section:

1. **General section (part 1):** applies to everyone who visits our website or contacts us. This section sets out who we are, what your rights are and how we handle security and data transfers.
2. **Specific sections (part 2):** Each section describes one specific category of processing activities, including the associated purposes, legal basis and retention period. You only need to read the sections that apply to you.

We have categorized our processing activities as follows:

- A. Clients
- B. Counterparties and third parties involved in client matters
- C. Engagement of external experts and service providers
- D. Business prospects and contact requests
- E. Participation in our events and webinars
- F. Receipt of our newsletter
- G. Applying for a job with Axon Lawyers
- H. Interacting with Axon Lawyers via social media
- I. Visiting our website

Axon Lawyers also processes personal data in the context of providing legal services to its clients. Such processing falls outside the scope of this privacy notice and is governed by a separate privacy notice.

II. General

II.1. Controllers

Axon Lawyers is a professional partnership (“Maatschap Axon Advocaten”) registered in the registers of the Dutch Chambers of Commerce (KvK: 53846745), consisting of:

- Praktijkvennootschap Carine van den Brink B.V. (KvK: 34297647),

- Erik Vollebregt Legal Services B.V. (KvK: 58563512), and
- Karin Verzijden Legal Services B.V. (KvK: 80105505),

which jointly act as controllers of the GDPR with respect to your personal data. Pursuant to Article 26 of the GDPR, the joint controllers have agreed that all rights and obligations under the GDPR are exercised and fulfilled collectively through the professional partnership Axon Lawyers. The joint controllers, hereinafter jointly referred to as “Axon Lawyers”, are established at Piet Heinkade 183 in Amsterdam (1019HC), the Netherlands. They can be contacted via info@axonlawyers.com

II.2. Sharing of personal data with third parties

In the execution of its activities, Axon Lawyers involves both parties that process personal data (“processors”) on behalf of Axon Lawyers as well as parties that act as independent controllers of the processing data involved. Independent data controllers concern other lawyers engaged on behalf of our clients in the context of a collaboration or a specific request for advice, counterparties, our accountant, our professional liability insurer, judicial authorities, governmental authorities, administrative bodies and supervisors. We inform our clients about this individually where this is relevant for our clients.

Axon Lawyers uses the services of the following processors:

- IT service providers, including hosting providers
- Couriers
- Compliance technology and regulatory technology providers (for anti-money laundering and customer due diligence purposes)
- Customer relationship management (CRM) provider
- Electronic signature service providers
- Communication Service Provider
- Event Management providers
- Translators
- Bailiffs

II.3. Processing outside the EEA

We store our client data in the European Union. To provide legal services, we may transfer your personal data to countries outside of the European Economic Area (“EEA”), which do not provide the same level of data protection as the European Union and for which the European Commission has not established an adequate level of data protection in the form of a so-called adequacy decision. These countries may have different data protection regimes than the EEA, which may - at times - be less protective.

We only transfer your personal data to these countries if this is necessary for the services that we provide to you or for the operation of our firm, for example because your company is

established outside of the EEA, because we are negotiating a contract on your behalf with a party outside of the EEA, because we use processors or service providers that process personal data outside of the EEA (such as electronic signature service providers), or where such transfer is necessary for the establishment, defense or exercise of legal claims. We take steps to ensure that your personal data remains protected and will ensure that either an adequacy decision applies or that the recipient is subject to standard contractual clauses, or that a derogation under article 49 GDPR applies. A copy of the standard contractual clauses will be made available upon request.

II.4. Automated Decision making

Axon Lawyers does not use automated decision-making, including profiling, which produces legal effects concerning the data subject or similarly significantly affects him or her within the meaning of Article 22 of the GDPR.

II.5. Data subject rights

You have the following rights regarding your personal data:

- The right of access. You have the right to obtain information as to whether or not personal data concerning you is being processed and, where that is the case, request a copy of your personal data
- The right to rectification. You have the right to correct inaccurate or incomplete personal data
- The right to erasure (“Right to be forgotten”). You have the right to request the deletion of personal data concerning you, if, among other things, the personal data are no longer necessary in relation to the purposes for which they were collected, you withdraw your consent or the personal data has been unlawfully processed.
- The right of restriction. Under certain circumstances, you may restrict the processing of personal data concerning you. This is, for example, the case where you contest the accuracy of the personal data or where the processing is unlawful, but you do not wish the data to be deleted.
- The right to data portability. You have the right to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format and to transmit those data to another controller. This only applies to data that we process on the basis of your consent or on a contract, and by automated means.
- The right to object. Where we base the processing of your personal data on our legitimate interest and you object to the processing of personal data concerning you, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or where the processing is necessary for the establishment, exercise or defence of legal claims.

- The right to withdraw consent. Where we process personal data concerning you based on your consent, you may withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on your consent before its withdrawal. The personal data that Axon Lawyers has processed up to that moment will be removed, unless another processing basis is applicable to the processing that justifies the storage of the personal data.

If you wish to exercise your rights under the GDPR, please reach out to your contact at Axon Lawyers or our office manager via info@axonlawyers.com. The aforementioned rights are not absolute. The GDPR provides for a number of exceptions and exemptions that may apply depending on the circumstances. Where an exemption or restriction applies when you exercise your rights under the GDPR, Axon Lawyers shall inform you of the reasons for its refusal or restriction.

If you do not agree with how we process your personal data, you have the right to lodge a complaint with a data protection supervisory authority. As we are a Dutch law firm, the Dutch Data Protection Authority (“Autoriteit Persoonsgegevens”, www.autoriteitpersoonsgegevens.nl) acts as supervisory authority. We would, however, appreciate the chance to address any concerns you may have before you approach the authority. We are committed to working with you to find a satisfactory resolution to any concern you may have.

II.6. Obligation to provide personal data to us

In order for Axon Lawyers to provide its services, you may be required to provide certain personal data to us, such as your name, contact details, signature, and other details necessary for the performance of our services. Without such information, Axon Lawyers may not be able to provide its services to you or your company.

II.7. Information from Other Sources

In addition to personal data obtained directly from you, Axon Lawyers may collect personal data about you from other sources. These sources include, but are not limited to, your employer and/or colleagues, who involve you in a matter we are advising on, our clients, who may provide us with your contact details in the context of a matter in which you are involved as a counterparty, signatory or other relevant third party, opposing parties, and publicly accessible sources such as company websites, trade registers and professional networking platforms. The categories of personal data obtained from such sources may include your name, job title, employer and business contact details. The processing of such personal data is based on the legitimate interest of Axon Lawyers in maintaining accurate and current contact information for the purposes of providing its services and maintaining its professional network.

II.8. Changes to this privacy notice

Axon Lawyers reserves the right to amend this privacy notice. Any material changes to this privacy notice will be communicated to you in writing or by e-mail. Where the processing of your personal data is based on your consent and the related processing activity is materially altered, we shall seek your renewed consent. The most recent version of this privacy notice shall at all times apply to the processing of your personal data.

You can verify when we last updated our privacy notice by reviewing the date at the bottom of this privacy notice.

III. Specific part

Axon Lawyers processes personal data of various external contacts. Hereinafter, we will address the legal basis and purpose for the processing of personal data of such contacts.

III.1. Clients

Axon Lawyers processes the following personal data of its clients and their representatives, and insofar as is relevant other parties involved in a client case:

- First and surname;
- Work or, in case our client is a private person, private address;
- job title;
- telephone number(s);
- e-mail address;
- company/employer;
- Relation to our client;
- Relationship or contact number assigned by Axon Lawyers;
- Any information our clients or their representatives provide to Axon Lawyers for the purpose of obtaining legal counsel from Axon Lawyers.
- information provided to it by third parties, including counterparties, insofar as this holds relevance to the performance of the services.

Axon Lawyers does so for the below purposes.

Provision of services and running a law firm

Axon Lawyers processes the aforementioned personal data of its clients, their representatives, opposing parties and their representatives on the basis of its legitimate interest within the meaning of Article 6(1)(f) of the GDPR. This legitimate interest consists of the provision of legal services to its clients and the operation and administration of its law firm in connection therewith, including invoicing for services rendered, conflict-of-interest checks and complaints and claims handling. Personal data processed for the purpose of providing legal advice and/or

conducting legal proceedings shall be retained for a period of twenty (20) years on the basis of the conditions imposed on Axon Lawyers by virtue of its professional liability insurance. The aforementioned period of twenty (20) years shall commence from the moment a case is closed by the attending attorney-at-law. A case shall be deemed closed when the attending attorney-at-law is of the opinion that the client's specific request for advice has been fulfilled and no further work can be expected in the case. The case shall be considered to have been closed from the moment a closing letter is sent to the client or from the moment that the client has the file transferred to another lawyer.

Fulfilling of legal obligations as attorneys-at-law

The Dutch Counter Terrorism and Money Laundering Act ("Wet ter voorkoming van witwassen en financieren van terrorisme") ("Wwft") and the rules of the Dutch Bar Association require Axon Lawyers to verify the identity of its clients and their representatives prior to entering into an engagement with them. In such cases, you may be required to provide a copy of your identification document to us. In certain cases, such as where a client, its ultimate beneficial owner or a person holding a prominent public function qualifies as a politically exposed person ("PEP") within the meaning of the Wwft, Axon Lawyers is required to conduct enhanced due diligence. This may entail the processing of additional personal data, including information relating to the political or public function held, the origin of funding and the source of funds used in the business relationship, as well as information concerning family members and known close associates.

Personal data processed for the purposes of client identification and due diligence under the Wwft shall be retained for a period of five (5) years after the end of the business relationship or the execution of the relevant transaction.

Under the EU sanctions regulations and the Dutch Sanctions Act 1977 ("Sanctiewet 1977"), Axon Lawyers is required to screen its clients, their representatives and ultimate beneficial owners against applicable European sanctions lists. This involves the processing of personal data, in particular the name of the person concerned and, where necessary to confirm or rule out a potential match, additional identifying information such as date of birth, necessary to establish whether a person is subject to restrictive measures under applicable EU sanctions regulations.

For these purposes, we process additionally the following information:

- a copy of a representative identification document, date of birth and, where applicable in the context of enhanced due diligence under the Dutch Counter Terrorism and Money Laundering Act ("Wet ter voorkoming van witwassen en financieren van terrorisme") ("Wwft"), information relating to the political or public function held, the origin of funding and the source of funds used in the business relationship, as well as information concerning family members and known close associates;

- name, date of birth and, where necessary to confirm or rule out a potential match, additional identifying information necessary to establish whether a person is subject to restrictive measures under applicable EU sanctions regulations.

Personal data processed for the purposes of sanctions screening shall be retained for a period of five (5) years after the end of the business relationship or the execution of the relevant transaction, in accordance with the retention period applicable under the Wwft. Failure to provide the information required under the Wwft or to cooperate with the aforementioned screening obligations means that we will be legally barred from providing our services.

We process your personal data for these purposes to fulfil our legal obligations under the aforementioned laws.

Legal proceedings

Where a client fails to pay outstanding fees, Axon Lawyers may process personal data of the client and its representatives for the purpose of collecting such fees, including through legal proceedings. In addition, Axon Lawyers may process personal data for the purpose of defending against complaints, including complaints filed with the Dutch Bar Association and proceedings before disciplinary tribunals.

This processing is based on the legitimate interest of Axon Lawyers in recovering fees due for services rendered and in defending itself against complaints and in disciplinary proceedings. The personal data processed for these purposes concerns the name and contact details of the client and its representatives, invoicing and payment records, correspondence relating to the outstanding fees, complaint, or disciplinary proceedings, and any other personal data relevant to the complaint or disciplinary proceedings concerned.

Personal data processed for the purposes of collecting outstanding fees and defending against complaints and disciplinary proceedings shall be retained for a period of twenty (20) years from the date on which the relevant matter is concluded, in accordance with the conditions imposed on Axon Lawyers by virtue of its professional liability insurance. Where legal proceedings, complaint procedures or disciplinary proceedings are pending at the expiry of this period, the relevant personal data shall be retained until such proceedings have been finally concluded and the applicable appeal periods have expired.

Transfer of the practice

In the event of a change in the composition of the professional partnership Axon Lawyers, including the admission of a new partner, the acquisition of the practice of one of the partners by another partner or third party, or the transfer of the entire practice to another law firm, Axon Lawyers can share your personal data to the incoming partner or the acquiring law firm. Such exchange of personal data may include all personal data processed in connection with the provision of legal services, as referred to in this Section III.

The legal basis for this processing is the legitimate interest of Axon Lawyers in ensuring the continuity of legal services provided to its clients and the orderly transition of the practice. Where required by applicable law or professional regulations, Axon Lawyers shall inform you of such transfer in advance and, where applicable, provide you with the opportunity to object to the transfer of your personal data to the acquiring party.

III.2. Counterparties and third parties involved in client matters

In the course of providing legal services to its clients, Axon Lawyers processes personal data of counterparties, their representatives and other third parties involved in client matters, such as witnesses, experts and other relevant persons. Axon Lawyers processes the following personal data of such persons, to the extent relevant to the matter concerned:

- First and surname;
- Work address or, where relevant, private address;
- Job title;
- Telephone number(s);
- E-mail address;
- Company or employer if relevant to the case;
- Relationship or contact number assigned by Axon Lawyers;
- Any other personal data relevant to the matter in which you are involved, including information provided to Axon Lawyers by its clients or by other parties.

Axon Lawyers processes these personal data on the basis of its legitimate interest within the meaning of Article 6(1)(f) of the GDPR. This legitimate interest consists of the provision of legal services to its clients, including the conduct of legal proceedings and the preparation and settlement thereof. Where personal data concerning health or another special category is involved with respect to the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity, we process such personal data based on Article 9(2)(f) of the GDPR.

Personal data processed for this purpose shall be retained for a period of twenty (20) years from the moment the relevant case is closed, in accordance with the conditions imposed on Axon Lawyers by virtue of its professional liability insurance. A case shall be deemed closed when the attending attorney-at-law is of the opinion that the client's specific request for advice has been fulfilled and no further work can be expected in the case.

Axon Lawyers typically obtains the personal data of counterparties and third parties from its clients, from the counterparties or their representatives themselves, from publicly accessible sources or from documents and correspondence exchanged in the context of the matter concerned.

III.3. Engagement of external experts and service providers

Axon Lawyers processes the following personal data of external experts and other service providers engaged by Axon Lawyers:

- First and surname;
- Company
- Work address
- Business e-mail address
- Business phone number and business mobile phone number
- Relationship or contact number assigned by Axon Lawyers;
- Registration numbers with professional associations;
- Resumes, if shared with Axon Lawyers
- Any other personal data the expert shares with Axon Lawyers;

We process such personal data for the purpose of providing legal services to our clients, including for the purpose of conducting legal proceedings and the preparation and settlement thereof, and for the purpose of running a law firm, including the sending and collecting invoices in connection with work performed by Axon Lawyers.

We also process personal data of external experts for the purpose of collaborating with external experts for the preparation of external presentations, training sessions and publications and to maintain the Axon Lawyers supported network of life science lawyers as well as our network of external experts.

For personal data that have been processed for providing legal advice and/or conducting legal proceedings, a retention period of 20 years applies on the basis of the conditions that are imposed on Axon Lawyers by virtue of its professional liability insurance. The aforementioned term of 20 years shall apply from the moment a case is closed by the attending attorney-at-law. A case will be closed when the attending attorney-at-law is of the opinion that the client's specific request for advice has been fulfilled and no further work can be expected in the case. The case shall be considered to have been closed from the moment a closing letter is sent to the client or from the moment that the client has the file transferred to another lawyer.

Without prejudice to the foregoing, if the external expert forms a part of Axon Lawyers' Life Sciences Alliance or is part of our informal network of experts to whom we regularly refer cases, we retain their personal data for the duration of our engagement agreement with the external expert concerned and for a period of two (2) years following the termination or expiry of such agreement.

III.4. Participation in our events and webinars

Axon Lawyers regularly organises seminars and webinars to address (new) legal developments and strategies. Live seminars also serve as networking meetings. During these

seminars and webinars, relevant developments are discussed. Axon Lawyers invites its clients and interested parties for these seminars and webinars through newsletters and public posts. In addition, any person may contact Axon Lawyers directly or reach out to individual employees to be placed on the participant list for a seminar or to receive a link to a webinar.

If you sign up for a webinar or seminar or request access to a webinar, we process your name, job title, company name, and – where you sign-up per e-mail – your e-mail address. For live seminars, we also use your name and company name to prepare name stickers for participants to facilitate the networking as part of our event. In connection with the organisation of live seminars, Axon Lawyers may also process dietary requirements and accessibility needs, to the extent voluntarily provided by the participant. Such information may qualify as health data within the meaning of Article 9 of the GDPR and is processed on the basis of your explicit consent. You are under no obligation to provide such information. Axon Lawyers does not share participant lists with other participants or third parties.

If you sign up for a webinar or seminar, we process your personal data based on our legitimate interest to organise and facilitate the webinar or seminar, manage registrations and communicate with participants about the webinar or seminar, and in case of a seminar, to facilitate networking among participants. With your consent, we may add your contact details to our invitation list for future events organised by Axon Lawyers. You may withdraw your consent to being included on this list at any time by contacting us at info@axonlawyers.com. Where a webinar is recorded, we will inform participants prior to the start of the webinar. The recording may be made available to registered participants and, where applicable, published on our website or shared via our newsletter. If you do not wish to be visible or audible in a recording, you may participate with your camera and microphone turned off.

For the purpose of organising and facilitating the event, we retain your personal data for the duration of the event plus two weeks. If you have consented to being added to our invitation list for future events, we retain your contact details until you withdraw your consent. Webinar recordings are retained for as long as they remain relevant to our knowledge-sharing activities.

III.5. Business prospects and contact requests

If you reach out to us with a query, for example because you are interested in engaging Axon Lawyers to provide services to you, either per e-mail or phone, we process the personal data provided in that e-mail or call, including at a minimum your name, e-mail address and contact details.

If you submit an enquiry by phone or send us an e-mail without an existing client relationship with Axon Lawyers, we will process the personal data you provide, including your name, e-mail address, telephone number and the content of your message. These personal data are processed on the basis of the legitimate interest of Axon Lawyers in responding to your enquiry

and, where applicable, for the purpose of taking steps at your request prior to entering into an agreement.

Your personal data will be retained for as long as is necessary to handle your enquiry and, if no client relationship is established, will be deleted within one year after the enquiry has been resolved.

III.6. Receipt of our newsletter

For sending out our newsletter, we process the following personal data:

- Recipient name;
- E-mail address;
- Employer (if part of the e-mail address).

Clients

Axon Lawyers sends its client newsletters to inform them of relevant legal developments as well as invites to our events. We do so based on our legitimate interest in maintaining and developing our professional relationship with our clients and bringing relevant legal developments and services to their attention.

You have the right to object at any time to the use of your personal data for marketing purposes. Unsubscribing is possible by using the link at the bottom of the newsletters/invitations or by sending an e-mail to info@axonlawyers.com

We retain your personal data for this purpose until your company is no longer our client, you are no longer employed by our client or until you unsubscribe from our communications, whatever happens first.

Newsletter subscribers

If you subscribe to our newsletter, we process your personal data based on your consent. You have the right to object at any time to the use of your personal data for marketing purposes. Unsubscribing is possible by using the link at the bottom of the newsletters/invitations or by sending an e-mail to info@axonlawyers.com.

We will process your personal data for this purpose until you withdraw your consent by unsubscribing from our newsletter.

III.7. Applying for a job with Axon Lawyers

If you apply for a position with Axon Lawyers, we process personal data as provided by you in connection with your application. We process the following personal data if you apply for a position with us:

- First and last name
- E-mail address
- Phone number
- Address information if included on your curriculum vitae
- Date of birth or age if included on your curriculum vitae
- Curriculum vitae: career history, educational and training history
- LinkedIn URL (optional)
- Information included in your cover letter
- References
- Your photo, if included on your curriculum vitae
- Any other information included in your application.

We ask that you do not include any personal data from a special category, such as health data or a photograph that may reveal racial or ethnic origin, in your application.

Axon Lawyers processes personal data for the purposes of screening, interviewing, and assessing the suitability of candidates on the basis of our legitimate interest to recruit and select suitable candidates. Where we conduct reference checks, we do so on the basis of your prior consent. You may withdraw your consent to reference checks at any time, without affecting the lawfulness of processing based on consent before its withdrawal and without negative effect for the procedure. If you do not provide or withdraw such consent, we will not contact your references.

Where Axon Lawyers enters into negotiations with a specific candidate regarding the terms of employment, the processing of personal data takes place on the basis of Article 6(1)(b) of the GDPR, being the taking of steps at the request of the data subject prior to entering into a contract. To the extent that Axon Lawyers is required to carry out compliance-related checks, such as the verification of the right to work or obtaining a Certificate of Good Conduct (Verklaring Omtrent het Gedrag), the processing of personal data takes place on the basis of a legal obligation to which Axon Lawyers is subject. We will inform you about the relevant legal obligation upfront.

If we ask you to undergo an assessment as part of the application procedure and you agree to this, we share your data with the assessor on the basis of our legitimate interest to recruit and select suitable candidates. The assessor processes your personal data as an independent controller and may be subject to professional confidentiality obligations. If the assessor obtains your consent to share the assessment outcomes with us, we will process such outcomes on the basis of our legitimate interest to assess suitability of an application as part of the application process.

Axon Lawyers shall retain the personal data of unsuccessful candidates for a maximum of four (4) weeks following the date of rejection of the application. Personal data of selected candidates that are relevant to the employment relationship shall be transferred to an

employment file. All other application data shall be deleted upon the signing of the employment agreement.

III.8. Interacting with Axon Lawyers via social media

Axon Lawyers maintains a presence on LinkedIn. If you interact with Axon Lawyers on LinkedIn (for example, by following, connecting, commenting or sending a direct message to our company profile), Axon Lawyers has access to personal data that you make available through LinkedIn, such as your name, profile information and the content of your interaction.

Axon Lawyers processes this personal data on the basis of its legitimate interest in maintaining its professional network, communicating with contacts and promoting its services. Axon Lawyers does not store personal data obtained through social media interactions in its own systems outside of the relevant platform. Please note that LinkedIn acts as an independent controller with respect to the processing of your personal data on its platform. We recommend that you review the privacy policy of LinkedIn for further information on how your personal data are processed by that platform.

III.9. Visiting our website.

Our website does not use cookies or similar tracking technologies.

Our website contains a contact function that operates by opening your default e-mail application to send an e-mail to Axon Lawyers directly. Axon Lawyers does not collect any personal data through this function other than the personal data contained in the e-mail you choose to send.

Server logs

Our website is accessible exclusively via a secure connection (https). If you request the website without https or with "www", you are automatically redirected to the correct address. Only this single redirect request is recorded in the server log; your subsequent visit to the website is not logged. The following personal data is recorded in this log entry: your IP address, the time (UTC), the requested URL (including any search term), the referring page (to the extent your browser sends this), and the version of your browser and operating system. A similar log file (the error log) additionally records requests that are rejected by the server behind our website.

We process this data solely for the purpose of the technical management and security of our website, for example to detect and address misuse, malfunctions, or attacks. The legal basis for this processing is our legitimate interest in secure and properly functioning website management. The data is not used for statistics, analytics, or any other purpose. The logs are only consulted manually, in the event of a website malfunction or incident.

The log files are rotated daily; 52 previous versions are retained per log file, meaning the data is retained for a total of approximately 52 to 53 days. At the end of this period, the data is automatically and permanently deleted. No copy or backup of the log files is made.

Google Maps

Our website features an embedded Google Maps hyperlink that displays the location of our office. By clicking on it, you are taken to the Google Maps website. When you interact with Google Maps, Google may process personal data (such as your IP address and location data) in its capacity as an independent controller, in accordance with Google's privacy policy (available at <https://policies.google.com/privacy>). Axon Lawyers does not receive any personal data from Google in connection with your use of Google Maps.

Last updated: 2 September 2026