

Srouji Avocats Privacy Policy

Srouji Avocats is a law firm incorporated under the French law, with its registered address at 215 rue du Faubourg Saint-Honoré, 75008 Paris. Srouji Avocats is registered with the Paris Bar and has a clientele of companies and individuals who are residents in Europe, the United Kingdom and in third-member states, and collects and processes Personal Information as part of its day-to-day business operations.

Srouji Avocats respects the privacy rights of any person whose Personal Information it collects and processes and complies with the EU General Data Protection Regulation (GDPR) and the French Data Protection Law (*Loi n°78-17 du 6 janvier 1978, relative à l'informatique, aux fichiers et aux libertés modifiée*).

Srouji Avocats's Privacy Policy ("Policy") explains the relevant data privacy components for the protection of Personal Information and Srouji Avocats' commitment to data protection compliance.

To Whom this Privacy Policy Applies and What it Covers

The Policy covers all Personal Information collected, processed, shared, or otherwise used by Srouji Avocats. It applies to all partners, associates and employees (current and former, including candidates) of Srouji Avocats, and to third parties who may collect and process Personal Information on behalf of Srouji Avocats. The Policy is effective as of 1 January 2019.

Purposes of the Data Processing

This Policy sets out how Srouji Avocats collects, handles, stores and protects information about its clients when Srouji Avocats processes it for the following purposes:

- Providing legal and judicial services to its clients as part of their relationship with Srouji Avocats.
- For marketing purposes by sending e-mails and letters under the form of newsletters and information letters to prospects, clients, former clients and business partners.
- Providing business updates to prospects, clients, former clients and business partners as part of our business development.

What Information We Collect

The Personal Information Srouji Avocats collects may include: name; age; date of birth, gender; home address; email address; telephone number; other contact details; family member personal details including dependents; country of residence; and passport number and other national ID numbers.

If needed for the performance of the legal services, we may collect or process Sensitive Personal Information as defined by the GDPR.

The Legal Grounds for Processing Personal Information

We use Personal Information based on the following legal grounds:

- (a) to perform our contractual obligations to clients, or to take pre-contractual steps at the prospects' request as part of our legal and judicial services.
- (b) for legal and/or regulatory obligations

Sharing Personal Information

Personal Information is not shared due to attorney-client privilege. It may be shared in enumerated cases:

- When exercising a mandate of representation and with the consent of the client
- In case of indictment of Srouji Avocats or one of its collaborators in a criminal case
- in the event of a search for the personal liability of Srouji Avocats
- In case of fee dispute procedure

Data Transfers

In regards to Personal Information transferred from the European Union to a country not having an adequate level of Data Protection according to EU standards, Srouji Avocats will ensure that the principles of the Policy are fully applicable in compliance with the GDPR.

In the case of transfers of Personal Information to third parties, Srouji Avocats will, where applicable:

- Determine if there is a legitimate justification for the transfer of Personal Information (e.g., valid business reason).
- Follow local legal requirements (e.g., notice to the individual, use of contractual safeguards such as EU model clauses...).

How Long We Keep Personal Information

We retain Personal Information for only as long as strictly necessary to fulfil the purpose for which it was collected or as may be required to comply with legal and regulatory requirements.

Protection of personal information

We use a range of technical and organization measures to ensure that we keep Personal Information secure, accurate and up-to-date. These measures serve to mitigate the risks of accidental or unlawful destruction or loss, alteration, unauthorized disclosure or access, or any other unlawful or unauthorized forms of processing.

Your Rights and How to Contact Us

As may be applicable according to relevant data protection law, you have various rights in relation to your Personal Information. In particular, you have a right to the following, notwithstanding the limitations as stipulated in the GDPR:

- Accessing Personal Information.
- Rectification of Personal Information.
- Erasure of Personal Information.
- Objecting to or restricting the processing of your Personal Information.
- Data portability.
- Withdrawing consent to our processing of your Personal Information.
- Providing instructions regarding the management of your Personal Information posthumously.

You may exercise your rights by contacting info@sroujiavocats.com.

or writing to Srouji Avocats 215 rue du Faubourg Saint-Honoré, 75008, Paris, France.

You also have a right to lodge a complaint to the French Supervisory Authority, the *Commission nationale de l'informatique et des libertés* (CNIL), if you consider that the processing of your personal data infringes the GDPR.

Changes to This Privacy Statement

We may modify or amend this privacy statement from time to time.

Any future changes or additions to the processing of your Personal Information as described in this notice affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.