

## **Privacy Policy of Cabinet SHEFET**

This Privacy Policy of Cabinet SHEFET (hereinafter also the “Firm”) concerns the website [www.shefet@shefet.com](http://www.shefet@shefet.com) (hereinafter the “Site”). The Site is published by the data controller Cabinet SHEFET Selarl, a company with a capital of 300,000 euros, incorporated under number 483 934 725 with EU VAT number FR 46483934725. Its registered office is located at 140 rue du Faubourg Saint Honoré – 75008 Paris.

We respect your privacy and your personal data. Our Firm is committed to the protection of personal data and this Privacy Policy reflects our values and commitments.

### **General information**

In accordance with European Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and the French implementation Law 2018-493 of 20 June 2018 on the protection of personal data, the purpose of this Privacy Policy is to inform you – beforehand – of the way in which the Firm collects, processes and/or stores your personal data. This Privacy Policy also informs you of the rights you have over your personal data.

#### **Article 1. Definition of « personal data »**

A personal data is any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### **Article 2. Types of data collected**

We make a point of not collecting and using personal or even sensitive data through our website.

#### **Article 3. No processing of data through the Site**

Cabinet SHEFET does not collect or process personal data from the Site that can identify you.

We guarantee that when browsing our Site, your data is not collected nor processed. Similarly, we do not use cookies to track your activity (see Article 9 below).

More specifically, the Site does not collect your personal data because it does not suggest a subscription service (newsletter), an exchange platform or a contact form.

For all practical purposes, it is specified that you can decide to provide your personal data by contacting the Firm through the Site which how to contact us by disclosing our email address: [shefet@shefet.com](mailto:shefet@shefet.com).

#### **Article 4. Processing of personal data in the context of the Firm’s activities**

##### **4.1. Basis of processing**

The processing operations described below have the legitimate interest of Cabinet SHEFET as their legal basis.

The processing of our clients' personal data is also based on the retainer signed with each of our clients and/or the prior consent of our clients.

#### 4.2. Types of data processed

As part of our activity as a law firm, we are required to collect and process the personal data of our clients, our subcontractors, our colleagues, court officers and more generally of any person with whom we come into contact in this framework.

In this context, the personal data concerning you may include your personal data (surnames and first names), your identity (marital status, place and date of birth, sex and any other information mentioned on your identity card), your personal or professional contact details (email address, postal address, telephone number, etc.), the information necessary to accompany you and assist you with your legal needs or in a litigation, as well as all the information of a personal nature provided or otherwise generated in the context of our interactions.

#### 4.3. Purposes of processing

As part of our mission as a law firm and in the context of administering our clients' cases, we are required to process your personal data. This processing is carried out in order to fulfill our advising duty.

In addition, as part of our activities, we may contact our clients, in particular by electronic mail, in order to inform them of relevant legal news. The purpose of this processing is to maintain our relations with our clients and is legally based on our legitimate interest in carrying out such communications.

Moreover, we may receive applications for a position within Cabinet SHEFET. This processing is carried out in order to manage the applications received and to contact the candidates.

The following circumstances may also require us to process personal data:

- Ensure the defense of our rights and compliance with our legal, regulatory, social or tax obligations.
- Where necessary, to protect our legitimate interests (or the legitimate interests of a third party) if this does not override your legitimate interests and fundamental rights.
- Comply with legal and regulatory obligations.

### **Article 5. Data recipients**

Your data is strictly reserved for the use of the associates of Cabinet SHEFET working on the case as well as the administrative staff of the Firm. All persons who may have access to your personal data are bound by an obligation of confidentiality. This information will not be communicated to external recipients with the exception, where applicable, of other attorneys also bound by professional secrecy or parties and for the sole purposes of performing our legal task.

The Firm may also communicate personal data to cooperate with administrative and judicial authorities.

This data will not be transferred outside the EU.

### **Article 6. Data retention**

Cabinet SHEFET (its associates and its administrative staff) retains your data only for the duration necessary to perform what motivated the collection, processing and storage of your data and in compliance with our obligations under the regulations in force. In any case, your data is not retained for more than 3 years after our last interaction.

### **Article 7. The Firm's confidentiality duty**

In accordance with our ethical rules, we undertake never to communicate or share your personal data with third parties. As such, in compliance with our attorney-client legal privilege we do not communicate information of which we become aware in the context of our professional activity.

## **Article 8. Your rights**

### **8.1. Right to information and access**

You have the right to know what data the Firm processes, where it comes from and for what purposes it is used. In addition, you can be informed of the duration for which we keep your data and of the recipients of these.

### **8.2. Right to rectification or erasure**

If the personal information that the Firm has collected about you is inaccurate, incomplete or irrelevant, you are entitled to request to have it rectified or erased (except where exceptions apply based on the law or another legal basis).

### **8.3. Right to restrict processing**

If you dispute the accuracy of the information that the Firm has collected about you or if you object to the processing of this information in accordance with Article 18 of the General Data Protection Regulation and Articles 70-18 and 70-19 of Law No. 78- 17 of 6 January 1978, you can request that the Firm limit the processing. The processing is then limited to the retention of the data until the accuracy of the information or the overruling interest of the Firm can be verified.

### **8.4. Right to object**

You have the right to object to the processing of your personal data.

### **8.5. Right to withdraw consent**

Where we rely on your consent as a legal basis for processing your personal data, you have the right to withdraw your consent at any time.

### **8.6. Right to data portability**

When the Firm processes your data on the basis of your consent you are entitled to request to receive your data in an electronic format.

If you wish to exercise your rights, please contact our DPO by email at [shefet@shefet.com](mailto:shefet@shefet.com) or by post at the following address: DPO Cabinet SHEFET, 140 rue du Faubourg Saint Honoré – 75008 Paris.

## **Article 9. About cookies**

A cookie is a text file generated by the server of the website that an Internet user visits or by the server of a third-party application (advertising network, internet traffic analysis software, etc.). Cookies are used to store the behavioral data of users of a website. We do not use any cookies on the Site. This decision is commanded by our values that oppose the collection of data for statistical purposes.

## **Article 10. Complaint regarding the processing of your data**

If you are unhappy with the way we process your personal data, you can lodge a complaint.

The data controller is:  
Cabinet SELARL SHEFET  
140 rue du Faubourg Saint Honoré

75008 Paris

The Data Protection Officer (DPO) can be contacted at following address: [shefet@shefet.com](mailto:shefet@shefet.com).

You can also file a complaint with the *Commission Nationale de l'Informatique et des Libertés* located at 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.