

## PRIVACY POLICY

WTS SELARL (« **WTS** ») is a French law firm which is registered with Paris Bar Association.

WTS is the data controller responsible for your personal information.

On this purpose, WTS has implemented a privacy policy which explains how we handle and process your data when you:

- register or visit our website: [www.wtsf.fr](http://www.wtsf.fr) (the « **Site** »)
- or engage with us to use the products or services that WTS provides (our « **Services** »).

It also includes information about individuals whose personal information we may process as a result of providing the Services to third parties and individuals who apply to work at WTS.

Please also note that this Privacy Policy only applies to the use of your personal information collected by us.

### 1. PURPOSE OF THIS POLICY

This Privacy Policy (« **Privacy Policy** ») explains our approach to any personal information that we collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. It also sets out your rights in respect with our processing of your personal information.

This Privacy Policy will inform you of the nature of your personal information that is processed by us and how you can request that we delete, update, transfer and/or provide you with access to it.

This Privacy Policy is intended to assist you in making informed decisions when using the Site and our Services and/or to understand how your personal information may be processed by us as a result of providing the Services to third parties or when you apply to work at WTS.

Please take a moment to read and understand it.

### 2. WHAT PERSONAL INFORMATION DO WE COLLECT?

We may process the following personal information about you:

#### 2.1. If you are a visitor of the Site:

- Name and job title.
- Contact information including the company you work for, email address and social media account where appropriate.
- Demographic information such as your address, preferences and interests.
- Other information relevant to the provision of Services.

**WTS – un réseau international présent dans plus de 100 pays**

WTS Selarl  
57, avenue de Villiers  
75017 Paris  
France

T +33 (0) 1 42 27 05 38  
F +33 (0) 1 42 27 05 39  
[www.wtsf.fr](http://www.wtsf.fr)  
Toque : P345

Société d'avocats  
Au capital de 525 000 €

No TVA FR 67 790617013  
RCS Paris 790 617 013  
IBAN : FR 76 3006 6108 4600 0201 3670 186  
BIC : CMCIFRPP

## 2.2. If you are an individual client in receiving our Services or prospective individual client:

- Name and job title.
- Contact information including the company you work for and email address, where provided.
- Payment information.
- Information that you provide to us as part of our Services providing to you, which depends on the nature of your instructions to WTS.
- Relevant information as required by Know Your Client and/or Anti-Money Laundering regulations and as part of our client intake procedures.
- This may possibly include evidence of source of funds, at the outset of and possibly from time to time throughout our relationship with clients, which we may request and/or obtain from third party sources. The sources for such verification may comprise documentation which we request from you or through the use of online sources or both.
- Information you provide to us for the purposes of attending meetings and events, including dietary requirements which may reveal information about your health or religious beliefs.
- Other information relevant to provision of Services.

WTS is primarily engaged by corporate entities and as such those instructors are not data subjects. However, as part of such instructions personal information may be provided to us (e.g. personal information relating to any of our corporate clients' or prospective clients' officers or personnel, any opponent or vendor or purchaser or personal information relating to their legal advisors or personnel, as relevant or similar).

## 2.3. If you are an individual whose personal information is processed by us as a result of providing the Services to others (including individual clients and corporate clients) we will process a variety of different personal information depending on the Services provided.

- This may include personal information relating, without limitation, to any of our corporate clients' or prospective clients' officers or personnel, any opponent or vendor or purchaser personal information including personal information relating to their legal advisors, other advisors or personnel as relevant or similar.
- For instance, if we are providing pensions advice to trustees, we may be provided with and then process (amongst other information) details of benefit entitlement, pensionable service, pensionable salary, contact information, date of birth and gender in respect of members of pension schemes.
- We might also need to process personal information in relation to other third parties instructed either by our own clients or other persons or companies involved with us providing the Services to our client (for instance other law firms, experts etc.).

This is a non-exhaustive list which is reflective of the varied nature of the personal information processed as part of a law firm providing legal services.

## 2.4. For clients and prospects,

We also collect information to enable us to market our products and Services which may be of interest to you:

- Name and contact details.
- Other business information such as job title and the company you work for.
- Areas or topics you might be interested in.
- Additional information may be collected such as events you attend and if you provide it to us, dietary preferences which may indicate data about your health or religious beliefs.

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## 2.5. If you are a potential recruit to join WTS:

- Name and job title.
- Contact information including email address.
- Resume, including your age and/or gender if you provide it to us, your education, employment history and similar matters and similar information that you may provide to us.
- Other information relevant to potential recruitment to WTS.

## 3. WE MAY USE YOUR INFORMATION FOR THE FOLLOWING PURPOSES:

We may collect personal information from you in the course of our business, including through your use of our Site, when you contact or request information from us, when you engage our legal or other services or as a result of your relationship with one or more of our staff or clients.

Our primary goal in collecting personal information from you is to help us:

- verify your identity
- deliver our Services
- improve, develop and market new Services
- carry out requests made by you on the Site or in relation with our Services
- investigate or settle inquiries or disputes
- comply with any applicable law, court order, other judicial process, or the requirements of a regulator
- enforce our agreements with you
- protect the rights, property or safety of us or third parties, including our other clients and users of the Site or our Services
- with recruitment purposes, and
- use as otherwise required or permitted by law.

## 4. WHAT IS OUR LEGAL BASIS TO USE OR PROCESS YOUR PERSONAL INFORMATION ?

It is necessary for us to use your personal information;

- In connection with recruitment and at your request to enter into a contract with us, we may have an legitimate interest to use your personal information to ensure that we can make the best recruitment decisions for WTS.
- To perform our obligations in accordance with any contract that we may have with you.
- When it is in our legitimate interest or a third party's legitimate interest to use personal information in such a way to ensure that we provide the Services in the best way that we can.
- When it is our legal obligation to use your personal information to comply with any legal obligations imposed upon us.

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## 5. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

Basically we do not send personal data which we record over these web pages to countries outside of the European Union or the European Economic Area (third countries), except if it is required for the contract performance and if an adequate data protection level exists with the agency in the third country or suitable guarantees exist to ensure an adequate level of data protection.

## 6. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We may also share personal information with a variety of the following categories of third parties as necessary:

- Our professional advisers such as lawyers and accountants.
- Government or regulatory authorities.
- Professional indemnity or other relevant insurers.
- Regulators/tax authorities/corporate registries.
- Third parties to whom we outsource certain services such as, without limitation, document processing and translation services, confidential waste disposal, IT systems or software providers, IT Support service providers, document and information storage providers.
- Third parties engaged in the course of the Services we provide to clients such as counsel, arbitrators, mediators, clerks, witnesses, cost draftsmen, court, opposing party and their lawyers, document review platforms and experts such as tax advisors or valuers.
- Third parties postal or courier providers who assist us in delivering our postal marketing campaigns to you, or delivering documents related to a matter.

Please note this list is non-exhaustive and there may be other entities we may need to share your personal information with in order to provide the Services as effectively as we can.

## 7. THIRD PARTY CONTRACTORS AND OTHER CONTROLLERS

As mentioned above, we may appoint sub-contractor data processors as required to deliver the Services, such as, without limitation, document processing and translation services, confidential waste disposal, IT systems or software providers, IT Support service providers, document and information storage providers, who will process personal information on our behalf and at our direction.

We conduct an appropriate level of due diligence and put in place contractual documentation in relation to any sub-contractor to ensure that they process personal information appropriately and according to our legal and regulatory obligations.

Further, we may appoint external data controllers where necessary to deliver the Services (for example, but without limitation, accountants, barristers or other third party experts).

When doing so we will comply with our legal and regulatory obligations in relation to the personal information, including but without limitation, putting appropriate safeguards in place.

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## 8. COOKIES

### 8.1. What are cookies ?

Cookies are small text files that a website sends to the user's web browser. They are then stored on the user's computer. Cookies enable a website to collect information about the user such as his/her browsing behavior on the website or his/her preferred language, in order to improve his/her browsing experience and the functionalities of the website.

### 8.2. There are different types of cookies :

- Session cookies which disappear as soon as the user leaves the website ;
- Permanent cookies which remain on the user's computer until they expire or until the user deletes the cookies using the browser settings.

The User is informed that, during his/her visits on the Website, cookies may be installed on his/her computer.

### 8.3. What kind of cookies are on the Website?

Cookies to measure the traffic patterns:

In order to adapt the Website to Users' demands, the Law Firm measures the number of visits, the number of pages visited, the activity of the Users on the Website and how frequently Users return.

For this purpose, the Law Firm uses Google Analytics, a statistical tool developed by Google, that generates a cookie with a unique identifier, with a 6 months lifespan. For more information, the Users may consult the Google "Data privacy & Security" page at this address: <https://support.google.com/analytics/answer/6004245?hl=en-GB>

### 8.4. How can the User accept, refuse or delete cookies with his/her browser?

At anytime, the User may disable the cookies installed through the Website.

In order to disable the aforementioned cookies, the process is as follows:

#### 8.4.1. In Internet Explorer :

To set your browser to block the placing of cookies:

- Open Internet Explorer, click "Tools", and then choose "Internet Properties".
- Click the "Privacy" tab, and then move the slider on the option of your choice and click on OK. Internet Explorer gives a description of the types of cookies that are blocked or not at each level of confidentiality.

If you decide to block cookies, some pages of websites may not function properly.

For more information, the User may consult the following page: <http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies>

To delete cookies :

- Open Internet Explorer, click "Internet properties". On the General tab, click "Delete" under Browsing History in the Internet Properties dialog box.
- In the "Delete Browsing History" dialog box, click to clear all of the check boxes except for the cookies check box, and then click "Delete".

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#### 8.4.2. In Firefox:

To set your browser to block the placing of cookies:

- Open Firefox, click "Tools", and then choose "Options".
- In the Privacy panel, in history options, set "Firefox will" to "Use custom settings for history".
- Check mark "Accept cookies" from sites to enable Cookies, and uncheck it to disable them.
- Check how long cookies are allowed to be stored :
- Keep until: they expire: Each cookie will be removed when it reaches its expiration date, which is set by the site that sent the cookie.
- Keep until: I close Firefox: The cookies that are stored on your computer will be removed when Firefox is closed.
- Keep until: ask me every time: Displays an alert every time a website tries to send a cookie, and asks you whether or not you want to store it.

For more information, the User may consult the following page: <https://support.mozilla.org/fr/kb/activer-desactiver-cookies>.

To delete cookies :

- Open Firefox, click "Tools", and then on "Options".
- In the Privacy panel, click "Clear recent history", select "Cookies" and click "Clear now".

#### 8.4.3. In Safari :

To set your browser to block the placing of cookies:

- Open Safari. Choose "Safari" and then "Preferences".
- In the Preferences tab, click "Privacy".
- In the "Block cookies" section, specify if and when Safari should accept cookies from websites.

To delete cookies :

- Open Safari. Click "Safari" and choose "Reset Safari".
- In the new window, select "Remove all cookies". Click "Reset" to confirm.

#### 8.4.4. In Google Chrome :

To set your browser to block the placing of cookies:

- Click the "Chrome" menu on the browser toolbar.
- Select "Settings".
- Click "Show advanced settings".
- In the "Privacy" section, click the "Content settings" button.
- In the "Cookies" section, you can change the following cookies settings:
- Block cookies by default.
- Keep cookies and site data by default until you quit your browser.
- Make exceptions for cookies from specific websites or domains.

To delete cookies :

- Click the Chrome menu on the browser toolbar.
- Select Settings.
- Click Show advanced settings.
- In the "Privacy" section, click the Content settings button.

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- In the "Cookies" section, you can delete cookies :
- Click "All cookies and site data" to open the "Cookies and site data" dialog box.
- To delete all cookies, click "Remove all" at the bottom of the dialog box.
- To delete a specific cookie, hover over the site that issued the cookie with your mouse, then click the X that appears on the right corner.

For more information, the User may consult the following page: <https://support.google.com/chrome/answer/95647?hl=fr>

#### 8.4.5. In Opera :

The User may consult the following page: <http://help.opera.com/Windows/10.20/fr/cookies.html>

## 9. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR

### 9.1. For visitors of the Site

We will keep any relevant personal information for at least three years from the date of our last interaction with you and in compliance with our obligations under the EU General Data Protection Regulation or similar legislation around the world, or for a longer period of time if we are required to do so according to our regulatory obligations or professional indemnity obligations.

### 9.2. For Service provision to any client

We will keep any relevant personal information for at least six years from the date of our last interaction with that client and in compliance with our obligations under the EU General Data Protection Regulation or similar legislation around the world, or for a longer period of time as we are required to do so according to our regulatory obligations or professional indemnity obligations. We may then destroy such files without further notice or liability.

If personal information is only useful for a short period e.g. for specific marketing campaigns we may delete it as soon as it is no longer useful to us

## 10. CONFIDENTIALITY AND THE SECURITY OF YOUR PERSONAL INFORMATION

We are committed to keeping the personal information provided to us secure and we have implemented appropriate information security policies, rules and technical measures to protect the personal information that we have under our control from unauthorized access, improper use or disclosure, unauthorized modification and unlawful destruction or accidental loss.

All of our partners, employees, consultants, workers and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are under the obligation to respect the confidentiality of such personal information.

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## 11. HOW TO ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS

You have the following rights in relation to the personal information we keep about you:

### 11.1. Your right to access

If you ask us, we will confirm whether or not we are processing your personal information and, if necessary, we will provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee to do so

### 11.2. Your right to rectification

If the personal information we keep about you is inaccurate or incomplete, you are entitled to request to have it rectified. If you are entitled to rectification and if we have shared your personal information with others, we will let them know about that you have exercised your rectification right where possible. If you ask us, where possible and lawful to do so, we will also inform you of who we have shared your personal information with so that you can contact them directly.

### 11.3. Your right to deletion

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to deletion and if we have shared your personal information with others, we will let them know about the deletion where possible. If you ask us, where it is possible and lawful for us to do so, we will also inform you of who we have shared your personal information with so that you can contact them directly.

### 11.4. Your right to restrict processing

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you object to us. If you are entitled to restriction and if we have shared your personal information with others, we will let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we will also inform you of who we have shared your personal information with so that you can contact them directly.

### 11.5. Your right to data portability

You have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this personal information to a third party of your choice.

### 11.6. Your right to object

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing;
- or processing your personal information for direct marketing purposes.

### 11.7. Your right to withdraw consent

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

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### 11.8. Your right to lodge a complaint with the supervisory authority

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact our Data Protection Officer (DPO) whom address is mentioned below in Article No. 13.

If you have a concern about any aspect of our privacy practices, including the way we have handled your personal information, you can also report it to the relevant Supervisory Authority (CNIL 3, Place de Fontenoy 75334 PARIS CEDEX 07, +33 (01) 53 73 22 22, [www.cnil.fr](http://www.cnil.fr))

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the data or where data may be exempted from disclosure due to reasons of legal professional privilege or professional secrecy obligations.

## 12. . CHANGES TO THIS PRIVACY POLICY

We may make changes to this Privacy Policy from time to time. To ensure that you are always aware of how we use your personal information we will update this Privacy Policy from time to time to reflect any changes to our use of your personal information.

We may also make changes as required to comply with changes in applicable law or regulatory requirements. Where it is practicable, we will notify you by email of any significant changes. However, we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.

## 13. . CONTACT

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact our Data Protection Officer by:

- sending an email to: [joana.dipalma@wtsf.fr](mailto:joana.dipalma@wtsf.fr); with a copy of your ID or Passport attached or
- sending a regular mail to: SELARL WTS c/o Ms. Joana di Palma – 57 avenue de Villiers – 75017 Paris (France), with a copy of your ID or Passport in appendix.

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