

## POLICY REGARDING PROCESSING OF PERSONAL DATA

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### 1. TYPES OF PERSONAL DATA PROCESSED

- 1.1 When various individuals are involved in connection with assignments we manage, for example clients, clients' employees, counterparties, counterparties' employees or other relevant parties, personal data is provided to or collected by us.
- 1.2 In other words, we process personal data provided to or collected by us within the framework of our activities, i.e. in connection with assignments, or during the preparation and administration of assignments. We may also receive personal data in connection with recruitment and marketing, and when we handle personal visits, emails and phone calls.
- 1.3 Some form of personal data is provided in connection with more or less all forms of communication with us.
- 1.4 Personal data is all data that refers to an identified or identifiable person and that can directly or indirectly identify a person. Examples of personal data includes names, contact details, images, social security numbers, email addresses, audio and video recordings and billing information.
- 1.5 We usually collect personal data directly from the individuals concerned, although sometimes, within the scope of our activities, we may receive information regarding relevant individuals from sources other than the individuals themselves. It may sometimes be necessary to collect additional data from relevant registers and other sources.
- 1.6 Collection and processing of personal data also occurs in conjunction with contact with service providers and other external parties.
- 1.7 There is normally no obligation to provide us with personal data, although refusal or failure to do so may mean that we are unable to undertake an assignment as we therefore cannot comply with obligations such as the performance of necessary checks regarding judicial disqualification or money laundering.
- 1.8 Öresund Advokat Malmö AB, company registration number 559360-9372 ("Öresund Advokat", "us", "we") is the controller in relation to the personal data processing.
- 1.9 We are responsible for ensuring that personal data is processed correctly and in accordance with applicable personal data legislation.
- 1.10 This policy applies to all our employees and consultants at all times.

- 1.11 Personal data legislation consists of a number of regulations, including the EU's General Data Protection Regulation (*Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016*), commonly referred to as GDPR.

### 2. PURPOSE OF PROCESSING

- 2.1 Personal data provided to or collected by us in connection with assignments is processed for the purpose of managing, administering and performing the assignments we undertake, and for the purpose of fulfilling our obligations.
- 2.2 Processing of personal data also occurs for the purpose of managing and administering relationships with service providers and other external parties, as well as on specific occasions for marketing or recruitment purposes.
- 2.3 Personal data provided to or collected by us in connection with personal visits to our office is processed for the purpose of managing and administering the visit, as well as for security reasons.

### 3. LAWFUL BASIS

- 3.1 The lawful basis for the processing of personal data, in relation to clients, is to enable us to perform the assignments we undertake and to perform the contract that has been entered into with a client. Processing of personal data in relation to clients' consultants, representatives, witnesses, counterparty representatives, etc. is based on our legitimate interest in performing our assignments.
- 3.2 The basis for the processing of personal data in connection with the performance of checks regarding judicial disqualification or money laundering, or in connection with archiving, is to ensure that we comply with our legal obligations.
- 3.3 Processing of personal data in relation to service providers and other external parties is based on our legitimate interest in managing and administering relationships with such parties and performing contracts.
- 3.4 We also process personal data when we have other legitimate interests in processing such data, e.g. to carry out recruitment processes and market our legal services.

#### 4. DISCLOSURE OF DATA

- 4.1 Access to personal data is only provided to individuals who need to process personal data for a relevant purpose.
- 4.2 Personal data is processed confidentially, and we implement appropriate security measures to protect the data.
- 4.3 We do not disclose personal data to third parties other than in the following circumstances: (i) a specific agreement has been reached between us and the data subject whose personal data is being processed; (ii) the disclosure is necessary within the scope of a specific assignment in order to safeguard our clients' interests; (iii) the disclosure is necessary to enable us to comply with our legal obligations; (iv) we engage the services of external service providers who perform services on our behalf; or (v) the disclosure is otherwise permitted by law.
- 4.4 Within the scope of our activities, personal data may be disclosed to parties in countries outside the EU/EEA. In such circumstances, we always ensure that the personal data remains adequately protected according to applicable personal data legislation, e.g. through written agreements.

#### 5. SAVING OF PERSONAL DATA

- 5.1 Personal data is only saved for as long as necessary in order to fulfil the purpose of the personal data processing, or for as long as we are obligated to store the data by law or according to other applicable regulations. The data is thereafter erased in accordance with our data culling procedure.
- 5.2 Personal data processed in connection with the performance of assignments is saved during the processing period and, in accordance with the Swedish Bar Association's rules on archiving obligation, for a period of ten years from the date of conclusion of the matter, or for a longer period if necessary taking into account the nature of the assignment in question.

#### 6. RIGHTS

- 6.1 The data subject whose personal data is processed has the following rights in relation to us:
- 6.1.1 *Right to information* – right to information when personal data is collected. The requirements we must meet vary depending on whether the information has been collected from the data subject him- or herself or from a third party.

- 6.1.2 *Right of access (register extract)* – right to obtain information about the personal data we process concerning the data subject.
- 6.1.3 *Right to rectification* – right to obtain rectification of inaccurate or incomplete data.
- 6.1.4 *Right to object* – right to object to processing of personal data supported by legitimate interest as a legal basis, e.g. if data has been processed for direct marketing.
- 6.1.5 *Right to erasure* – right to in certain circumstances obtain erasure of personal data, e.g. when consent is the legal basis for the processing and such consent has been withdrawn.
- 6.1.6 *Right to restriction of processing* – right to request restriction of the personal data processing, e.g. when the data subject objects to the correctness of data, he or she can request that the processing of such data is restricted while the correctness of the data is investigated.
- 6.1.7 *Right to data portability* – right, in certain circumstances, to transmit personal data from one controller to another, if the processing is based on an agreement or consent. The right only applies to personal data which the data subject himself or herself has provided to us.
- 6.2 Please note that the above rights may be restricted on account of the duty of confidentiality and archiving obligation with which lawyers are obligated to comply, or due to the provisions of other applicable laws and regulations.
- 6.3 Restriction of personal data may also mean that we are unable to fulfil our undertakings.
- 6.4 We have routines for the identification, management and follow-up of privacy risks.
- 6.5 If you have any questions or objections, you can contact us via email at [info@oresundadvokat.se](mailto:info@oresundadvokat.se).
- 6.6 If you feel that our processing is not in accordance with applicable personal data regulations, you have the right to submit a complaint to the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten, IMY), which is the supervisory authority for our personal data processing, or to other relevant authority in countries outside the EU.