

PRIVACY POLICY

INFORMATION REGARDING FYLGIA'S PROCESSING OF YOUR PERSONAL DATA

The ambition of Advokatfirman Fylgia KB (hereinafter referred to as “we” “us” “Fylgia”) is to make sure you always feel safe when we process your personal data. This Privacy Policy explains how we process (i.e., collect, use, share and otherwise process) personal data about you as a client, adversary, contact person to client or other such person that has any relation to a legal assignment. This Privacy Policy also explains how we process personal data about you as a job applicant, a contact person for any of our suppliers or partners, a subscriber to our newsletter or if you have participated in or subscribed to our events or seminars. We always process your personal data in accordance with applicable legislation and this Privacy Policy.

This Privacy Policy is divided into headings, of which sections 1-5 describe specific categories of persons, which we process personal data about in our external activities. Sections 6-8 concern every person whose personal data we process. Our Privacy Policy is sectioned as follows:

- 1. Clients and other persons that have any relation to a legal assignment**
This section applies to anyone whose personal data we process in connection with one of our legal assignments, for example clients, adversaries, agents of adversaries, witnesses, contact persons, etc.
- 2. Job applicants**
This section applies to anyone whose personal data we process in connection with our recruitment processes.
- 3. Contact person for suppliers and partners**
This section applies to anyone whose personal data we process as a contact person to our one of our suppliers or partners.
- 4. Events, seminars, and newsletters**
This section applies to anyone who is subscribed to our newsletter or who has visited one of our events or seminars.
- 5. Visitors on our website**
This section applies to anyone who has visited our website or who has used our contact tool.
- 6. Fylgia's use of e-mail correspondence**
This section applies to anyone whose personal data we process according to sections 1-5 above.
- 7. Your rights**
This section applies to persons who are affected by one, or more, of the sections 1-5 above.

8. Contact information

Contact details to Fylgia for questions about Fylgia's processing of personal data.

1. CLIENTS AND OTHER PERSONS THAT HAVE ANY RELATION TO A LEGAL ASSIGNMENT

Fylgia is personal data controller for all personal data processed in connection with the assignment or otherwise processed when the assignment is being prepared or administered (hereinafter referred to as the “**Assignment**”). Regardless of your relationship with Fylgia (client, counterparty, counterparty agent, witnesses, etc.) we always treat your personal data with security and respect.

What personal data do we manage and from where are they collected?

The personal data that is collected by us may vary depending on the purpose, scope, and nature of the Assignment. Therefore, if we do not receive the requested personal data we have assessed will be required for the performance of the Assignment; consequently, Fylgia will not be able to undertake any Assignment with you or the company for which you are a contact person. *Generally*, the following information is collected by us:

- a) *Client (natural person)*: Name, social security number or other identification number, contact details (such as address, e-mail address and telephone number), copy of passport or other identity document, bank and billing information (such as account number, previous billings or any billing reminders), information about the Assignment, information about the client, information about anyone related to the client or known coworkers to the client being a person in a politically exposed position and, if that is the case, the name, occupation/position of such politically exposed person.
- b) *Client (legal person)*: Name, title, employer, social security number or other identification number, contact details (such as address, e-mail address and telephone number), copy of passport or other identity document, information about the Assignment, information about any employee at, or in connection with, the client, being a person in a politically exposed position and, if that is the case, name, occupation/position of the politically exposed person.
- c) *Adversaries (natural person)*: Name, social security number or other identification number, contact details (such as address, e-mail address, and telephone number) as well as information about the Assignment.
- d) *Adversaries (legal person)*: Name, title, employer, social security number or other identification number, contact details (such as address, e-mail address, and telephone number) for contact person of the adversary and information about the Assignment.
- e) *Other persons appearing in the Assignment (e.g. contact person to the client or adversaries, witnesses, partner, etc.)*: Name, title, employer, and contact details (such as address, e-mail address, and telephone number).
- f) Occasional and specific data if a client, a contact person, or principal for a client or someone that acts behalf of, or in relation to, the Assignment has been convicted of crimes, had a business ban, or several bankruptcies behind him, had poor publicity regarding business relationships or may otherwise be deemed to be unreliable, or occasional and specific data that the Assignment constitutes, or is suspected of being a part of, money laundering or any other criminal offense.

- g) Depending on the nature of the Assignment, sensitive data may also be processed (i.e. disclosure of racial or ethnic origin, political opinion, religion or beliefs, trade union membership, genetic or health status or sexual orientation), for example when the Assignment concerns resignation or termination due to personal reasons or alleged discrimination.

Personal data are often collected by the person to whom the personal data belongs to but may also be obtained from another person connected to the Assignment, such as the client, adversary or the agent of adversary. We may also supplement personal data by collecting information from publicly available registers, public authorities, credit rating agencies, banks or other companies. In some cases, personal data may also be retrieved from your employer or other party when you are a contact person for a client of ours.

Why do we process your personal data and based on what legal basis do we process such data?

The personal data above are processed by us to comply with mandatory conflict of interest control and, when applicable, money laundering and other safety measures before the Assignment is accepted by us to evaluate and decide whether we can perform the Assignment as well as to fulfill our legal obligations in general.

The personal data are further processed to perform invoicing, accounting of the Assignment and fees, Debt Collection and, in addition, to utilize Fylgia's rights related to the Assignment. Processing of personal data is also done in order to fulfill our obligations under law, rules (especially the Swedish Bar Association's Guiding Rules of Conduct) and other regulations and also for us to establish, enforce or defend Fylgia's or our client's legal claims. Contact information can also provide basis for our market and client analyzes, business and method development, as well as statistics and risk management.

Personal data for these purposes are processed by Fylgia on the basis of Fylgia's and the client's legitimate interest, to perform the contract with the client as well as to comply with legal obligations that Fylgia is subject to. Processing based on a balance of interests is according to our assessment necessary for Fylgia's legitimate interest to:

- fulfill the Assignment with the client in an efficient, functional and service-oriented way and with good communication with the client;
- perform effective and correct billing, assignment and commission accounting and in other ways utilize the rights of Fylgia in connection with the assignment;
- be able to follow and develop the business; and
- be able to determine, claim or defend the client's or Fylgia's legal claims

Personal data referred to in point (g) are processed on the basis of and only to the limited extent, it is necessary to protect the client's **legitimate interest**.

Storage duration

Fylgia never stores personal data for longer than is necessary for the purposes for which the personal data are processed. Fylgia continuously screens the personal data processed by us and deletes any personal data that are no longer necessary. Your personal data will be stored by Fylgia, in accordance with the obligation imposed on us under the guidelines for generally accepted legal practice, for a period of 10 years from the date of completion of the Assignment or the length of time invoked by the nature of the Assignment. Tasks

processed for the purpose of developing and analyzing Fylgia's operations are stored for a period of one year after the last contact.

With whom do we share your personal data?

Personal data may be transferred between the law firm's group or sister companies for the purpose of performing conflict of interest and money laundering control, for information and knowledge exchange and resource allocation. We will not disclose personal data to third parties other than in cases where (i) it is specifically agreed between Fylgia and you, (ii) when it is necessary within the scope of the Assignment to utilize your rights, (iii) if necessary in order for us to comply with statutory obligation or to comply with government decisions or court decisions, or (iv) if we hire third party service providers who perform an assignment on our behalf. The information may be disclosed to courts, authorities, counterparties, and counterparty agents if necessary to protect your rights.

Transmission to third countries

We are always striving for your personal data to be processed within the EU/EEA. However, depending on the nature of the assignment and other circumstances, it may be required that we process personal data outside the EU/ EEA.

Regardless of the country in which your personal data are processed, we take reasonable legal, technical, and organizational measures to ensure that the level of protection corresponds to that within the EU/EEA. If personal data are processed outside the EU/EEA, the level of protection is guaranteed either by a decision by the EU Commission that the country in question ensures an adequate level of protection or through the use of appropriate safeguards.

2. JOB APPLICANTS

Fylgia is controller for all personal data processed in connection with recruitment for our business. The personal data collected by us may vary depending on the scope and nature of the job in scope. You can use our recruitment tool to choose if you want to make a spontaneous job application, where your personal data is saved for any future recruitment, or a specific job application. If you do not provide us with the requested personal data, Fylgia will consequently not have the opportunity to receive your work application.

What personal data do we process and where are they from?

The personal data we may process in a recruitment process is name, contact details (address, telephone number, and e-mail address), the job in scope, information contained in your personal letter, CV or other documents you provide, reference information, test results from recruitment tests, notes from interviews and conversations during recruitment, as well as notes and analyzes of you made by recruitment consultants or other service providers employed in connection with the recruitment process.

Personal data are provided to us by you through our digital recruitment tool or by recruitment consultant or other service provider employed in connection with the recruitment. Personal data can also be collected from specified references, through tests you do during the recruitment process and publicly available records, past employers, and public authorities.

Why do we process your personal data and on what legal basis?

Personal data are processed for the purpose of conducting the recruitment process. Personal data are processed on the basis of Fylgia's legitimate interest in effective and successful recruitment. When submitting personal data through our recruitment tool, you may agree that we retain your personal data for future recruitment. If you consent to this, your personal data for the above purpose shall be treated on the basis of such consent.

Storage duration

Fylgia never stores personal data for longer than is necessary for the purposes for which the personal data are processed. Fylgia continuously screens the personal data processed by us and deletes any personal data that are no longer necessary. Your personal data may be stored by Fylgia during a period of nine months, or a longer period if called for, in order to utilize Fylgia's rights against legal claims. If you agreed that we may process the data for future recruitment, the data can instead be kept for one year after the consent has been given, or a longer period if necessary, in order to utilize Fylgia's rights against legal claims.

With whom do we share your personal data?

We will not disclose personal data to third parties other than in cases where (i) it is specifically agreed between Fylgia and you, (ii) if it is necessary for us to fulfill a legal obligation or comply with governmental decisions or order of a court, or (iii) in case we hire third-party service providers who perform tasks on our behalf.

Transmission to third countries

We do not transfer your personal data to countries outside the EU/EEA.

3. CONTACT PERSON FOR SUPPLIER OR COOPERATION PARTNER

When you are a contact for a supplier or partner we work with, we will process your personal data. Fylgia is the controller for all personal data processed about you as a contact. You are always entitled to object to any direct marketing. To do this, simply click on "unsubscribe" at the bottom of each e-mail.

What personal data do we treat and where are they from?

The personal data that we can process about you as a contact person consists of name, title, employer, contact details (such as address, e-mail address, and telephone number), information about participation in our seminars and events, as well as notes and summaries of meetings we have had with you.

The personal data are given to us by you, the supplier, the partner or anyone who mediates the contact between us or retrieved from such persons or from private or public records or other sources.

Why do we process your personal data and on what legal basis?

Personal data may be processed for the purpose of administering, maintaining, and developing the relationship with the supplier / partner and for marketing Fylgia, including our services, events, and seminars, as well as the mailing of our newsletter. Personal data for these purposes are processed by Fylgia on the basis of Fylgia's legitimate interest in

managing relations with our suppliers and partners, in order to preserve and develop relations with our suppliers and partners as well as to market Fylgia.

Storage duration

Fylgia never stores personal data for longer than is necessary for the purposes for which the personal data are processed. Fylgia continuously screens the personal data processed by us and deletes any personal data that are no longer necessary. Your personal data will be stored by Fylgia for up to one year after the suppliers or partner relationship has been terminated by us or by the supplier or partner or after it has come to our notice that your employment with the supplier or partner has expired. You may object to our use of your personal data for direct marketing purposes. However, this will not limit our processing of your personal data for the rest of the above purposes.

With whom do we share your personal data?

Personal data may be disclosed to a client, supplier or partner or potential client, supplier or partner, if (i) it is specifically agreed between Fylgia and you, (ii) it is necessary for us to comply with statutory duty or comply with governmental decision or decision by court, or (iii) in case we hire third-party service providers who perform assignments on our behalf.

Transmission to third countries

We do not transfer your personal data to countries outside the EU / ESS.

4. EVENTS, SEMINARS AND NEWSLETTERS

Fylgia has various events and seminars where we process personal data. Furthermore, Fylgia has a newsletter for which subscription can be made where we update the subscriber for news regarding Fylgia and legal developments in Sweden and abroad. Fylgia is controller for all personal data in connection with events, seminars and newsletters. You may object to all direct marketing we send to you. To do this, simply click on "unsubscribe" at the bottom of each mailbox.

What personal data do we process and where are they from?

The personal data we may process consists of the name, title, employer, contact details (such as address, telephone number, and e-mail address), information about the designated areas of interest for newsletters and other mailings and about the required participation in seminars or events and, if food is to be served at the seminar or event, special food preferences.

Why do we process your personal data and on what legal basis?

Personal data may be processed for the purpose of administering invitations to seminars, events and newsletters, and to administer and conduct such seminars or events if you choose to participate. Personal data for these purposes are processed by Fylgia on the basis of Fylgia's legitimate interest in administering mail to you in accordance with your specified wishes as well as administering the implementation of the seminar or event with you as a participant in accordance with your specified food preferences.

Storage duration

Fylgia never stores personal data for longer than is necessary for the purposes for which the personal data are processed. Fylgia continuously screens the personal data processed

by us and deletes any personal data that are no longer necessary. Your personal data may be stored by Fylgia for two years or until you unsubscribe from our seminars, events, newsletters, and other mailings. Information about your food preferences will be deleted as soon as the current seminar or event has been completed.

With whom do we share your personal data?

At events or seminars, personal data may be shared with other participants in the current event or seminar, if (i) it is specifically agreed between Fylgia and you, (ii) it is necessary for us to comply with statutory duty or comply with authority decisions or decisions by court, or (iii) in case we hire third-party service providers who perform assignments on our behalf.

Transmission to third countries

We do not transfer your personal data to countries outside the EU / ESS.

5. VISITORS OF OUR WEBSITE

For you as a visitor of our website, www.fylgia.com (hereafter "Visitors") your personal data is processed by us. You as a visitor also have the opportunity to contact us on our website by clicking on the "Contact" tab. There you can ask general questions about our legal areas of expertise, future seminars that may be of interest to you, our processing of your personal data or any other questions you may have about our law firm. We also use "Cookies" on our website, you will find our Cookie Policy on our website. Fylgia is controller for all personal data processed in connection with your use of our website.

What personal data do we process and where are they from?

The information we may process consists of name, company, email address, phone number, information you provide regarding your question to us (which may include information regarding a potential case), IP address, visited pages, timing and duration for visits as well as cookies. The personal data is provided to us by you filling in information in our contact tool and collected by cookies through your use of our website.

Why do we process your personal data and on what legal basis?

Personal data may be processed for the purpose of enabling an effective and easy contact point between Fylgia and potential clients or other persons as well as for analyzing the use of our website and developing the website. Personal data for these purposes are processed by Fylgia on the basis of Fylgia's and Visitors' legitimate interest as well as the consent of the Visitors. Processing based on interest balancing is necessary for Fylgia's legitimate interest in effectively managing potential future clients and providing efficient service.

Storage duration

Fylgia never stores personal data for longer than is necessary for the purposes for which the personal data are processed. Fylgia continuously screens the personal data processed by us and deletes any personal data that are no longer necessary. Your personal data may be stored by Fylgia up to two years after your visit to our website depending on the type of information provided. Information provided to us through our contact tool may be stored for a longer time if you choose to become a client with us. In such cases, the information you provided to us will be saved in accordance with section 1 above.

With whom do we share your personal data?

We will not disclose personal data to third parties except for in cases where (i) it is specifically agreed between Fylgia and you, (ii) it is necessary for us to comply with statutory duty or to comply with governmental decisions or court decisions, or (iii) in case we hire third-party service providers who carry out assignments on our behalf.

Transmission to third countries

We always strive for your personal data to be processed within the EU / EEA. However, because we use Google Analytics, certain data may be stored outside of the EU / EEA.

Regardless of the country in which your personal data are processed, we take reasonable legal, technical, and organizational measures to ensure that the level of protection corresponds to that within the EU / EEA. If personal data is processed outside the EU / EEA, the level of protection is guaranteed either by a decision of the EU Commission that the country in question ensures an adequate level of protection or through the use of appropriate safeguards.

External links

Notwithstanding the above, if any part of our website links you to other websites, these links are not covered by this Privacy Policy. We are not controller for such processing and we therefore recommend that you read the privacy statements published on these other websites so that you understand their procedures for collecting, processing and disclosing personal data.

6. FYLGIA'S USE OF E-MAIL CORRESPONDENCE

Fylgia will, in its communication with persons whose personal data are processed according to this Privacy Policy and all other persons that have any relation to a legal assignment or otherwise in relation to our business, use unencrypted e-mail correspondence unless special circumstances call for alternate means of communication or you inform Fylgia that you do not agree to the use of unencrypted e-mail correspondence.

7. YOUR RIGHTS

You have certain rights in relation to Fylgia's processing of your personal data in accordance with the EU Data Protection Regulation. These rights include i.a the right to delete your personal data, the right to object to the processing of your personal data, the right to request that we limit the processing of your personal data or the right to request your personal data.

In addition, you are entitled to object to our direct marketing promotion at any time. You can exercise this right by clicking "unsubscribe" in the promotional emails we send to you.

Likewise, you are entitled to withdraw your consent at any time, in the event that our processing of your personal data is based on your consent. Canceling your consent does not affect the legality of processing based on consent, before it is revoked, nor the processing of your personal data based on legal basis other than consent.

We answer all requests we receive from those persons whose personal data we process and who wish to exercise their rights regarding our processing of their personal data. There may be associated conditions and limitations in relation to these rights and due to the fact that Fylgia has several obligations by law, rules (in particular the Swedish Bar Association's Guiding Rules of Conduct) and other regulations, which implies that these rights to a certain extent may be limited.

You can always file a complaint with the Swedish Public Prosecutor or in the country where you live or work regarding our processing of your personal data. You will find more information about performing such a complaint here: [File a GDPR-complaint \(imy.se\)](https://imy.se).

8. CONTACT DETAILS

Do you have questions about our processing of your personal data? Do not hesitate to get in touch with us. You will find our contact information below.

Advokatfirman Fylgia KB, Company registration no. 969633 – 9994

Trading address:

Box 55555, 102 04 Stockholm

Visiting address:

Nybrogatan 11, 5th floor, 114 39 Stockholm

Contact:

info@fylgia.se

+46 (0)8-442 53 00