

Norburg & Scherp

PROCESSING OF PERSONAL DATA INFORMATION ACCORDING TO GENERAL DATA PROTECTION REGULATION (2016/679/EG)

1. Norburg & Scherp Advokatbyrå AB, Reg. No. 556945-8051, (“**Norburg & Scherp**”) is controller for the personal data we collect in connection with our assignments or that are otherwise processed during the preparation or administration of an assignment. We also process personal data provided to us voluntarily, e.g. when the law firm is contacted by email or other channels, e.g. in connection with events arranged by the law firm or in connection with job applications.
2. The personal data we process are, e.g., name, contact details, title and personal security number, which are provided to us by the person himself or herself, the client, the client’s representative or counterparties. These data may be supplemented by data obtained from other sources, such as companies’ public websites as well as public and licensed databases, such as Swedish Companies Registration Office’s (Sw. *Bolagsverket*) search service or InfoTorg. You are not obligated to provide us with personal data but if we do not receive certain personal data we will not be able to accept an assignment, since we will not be able to comply with our obligations, *inter alia*, to perform conflict of interest and money laundering controls. Our support organisation also collects and processes personal data, *inter alia*, when in contact with suppliers and other external parties.
3. Norburg & Scherp cares about protecting personal data and processes personal data in accordance with the data protection legislation (EU) 2016/679 and other applicable legislation for the protection of personal integrity.
4. We only process personal data if there is a legal basis for the processing. This means that we process personal data to perform mandatory conflict of interest and (where applicable) money laundering controls, to perform and administer the assignment, to safeguard your interests and for accounting and billing purposes. The data is processed on the basis of our duty to perform the contract with our client and our legitimate interest in delivering legal services as well as our duty to comply with our legal obligations and the obligations that are imposed on Norburg & Scherp under the statutes and rules of the Swedish Bar Association.
5. Our support organisation also processes personal data, so that we can handle and administer our relationships with our suppliers and other external parties. The information may also be used for business and method development, market analysis, statistics and risk management. The data that are processed for the purpose of developing and analysing the business are processed on the basis of our legitimate interest to develop the business and communicate with our contacts as well as maintaining a business relationship with the person whose personal data is processed.
6. We will not disclose personal data to anyone outside the law firm except where (i) it has been agreed between you and the law firm; (ii) it is necessary within the scope of a given assignment to safeguard our clients’ rights and interests; (iii) it is necessary in order for us to fulfil a statutory obligation or comply with a decision of a public authority or a court of law or the rules issued by the Swedish Bar Association; or (iv) if we engage an external service provider or

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business partner who performs services on our behalf. The data may be disclosed to courts, authorities, counterparties and counterparties' counsel if necessary to safeguard your rights.

7. In case personal data may be transferred to a country outside the EU/EEA, this is made in line with the applicable legislation, which, *inter alia*, requires that the country in question has an adequate level of protection or that sufficient safety measures are taken, e.g. that the transfers are based on the EU-Commission's standard contractual clauses, see <http://eur-lex.europa.eu/legal-content/SV/TXT/?uri=CELEX:32010D0087>.
8. The personal data are saved for at least ten (10) years from and including the date the assignment was concluded, or for a longer period as required by the nature of the assignment in accordance with Norburg & Scherp's obligations under the Code of Conduct of the Swedish Bar Association. Data, that is processed for the purpose of developing, analysing and marketing the law firm's business as well as data that are processed for the purpose of administering relationships and maintaining business relationships with suppliers and other external parties, are saved as long as it is justified with regard to the purpose of the processing, unless the information shall or may be saved longer according to law.
9. Norburg & Scherp employs appropriate technical and organisational security measures to ensure that personal data are protected against unauthorised access, disclosure, changes or destruction. We require same security measures from our external suppliers that may be engaged by us to ensure that personal data are protected.
10. You have the right to request information from Norburg & Scherp about the use of your personal data. Upon your request or our initiative, we will rectify or erase inaccurate or incomplete data or restrict the process of such data. Further, you have the right to object to specific processing of personal data and request that the processing of personal data be restricted. You are also entitled to receive personal data provided by you in machine-readable format or, if technically possible, have the data transferred to another party you have indicated. Please note that the rights above may be limited by the duty of confidentiality and archiving obligation applying to members of the Swedish Bar Association.
11. If you are dissatisfied with how we process personal data, you are entitled to report this to a supervisory authority, which in Sweden is the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*, www.imy.se). You can also contact the supervisory authority in the country where you live or work.
12. If you have any questions about how we process your personal data, you are welcome to contact us by email at info@norburgscherp.se or the address below.
13. Norburg & Scherp Advokatbyrå AB, Reg. No. 556945-8051, Birger Jarlsgatan 15, SE-111 45 Stockholm, +46 8 420 035 00, www.norburgscherp.se, info@norburgscherp.se, is the controller of the personal data.
14. This policy may be altered. The latest version is always available at our website.

Adopted by the board of Norburg & Scherp Advokatbyrå AB on 19 September 2018