

Information regarding Advokatfirman Ulfsdotter AB:s ("Ulfsdotter", "we", "our" or "us") process of personal data (version 2019:1 E).

Ulfsdotter cares about privacy and protecting the personal data processed by us. All personal data is processed in accordance with applicable data protection legislation

1. What personal data do we process?

Since a large part of our communication is done by telephone and e-mail all contact with us would most likely result in a processing of personal data. The personal data we process can for instance be contact information (for example, name, address, telephone number and e-mail address), identification information (for example, passport information and date of birth/social security number) and billing information (such as bankaccount number and tax details).

The personal data we collect and process is commonly derived from yourself or from your employer. We also collect personal data from external sources such as public company and address registers, public websites and from credit reporting agencies.

You have no obligation to provide us with personal data. In cases where we ask for certain personal data and do not receive certain personal data, this may cause that we will not be able to accept an engagement, since we will not be able to comply with our obligations, inter alia, to perform conflict of interest and money laundering checks.

The personal data Ulfsdotter processes can be summarized in three different categories:

- (i) Contact persons for clients, counterparties or other stakeholders with whom we communicate in connection with assignments or which we treat when the assignment is prepared, handled or otherwise administered.
- (ii) Contact persons for potential clients and other law firms.
- (iii) Employees and people seeking employment.

2. What are the purposes of our processing of personal data?

We process personal data provided or obtained in connection with engagements so we can fulfill our obligations and safeguard our clients' interests, and also for administration in connection with engagements, as well as obligations which follow from law or the rules issued by the Swedish Bar Association.

Personal data can also be used for other legitimate purposes such as business and method development, marketing, market analysis, statistics, recruitment and risk management.

3. What is the legal basis for our processing?

We process personal data because it is necessary for us to be able to (i) fulfill agreements with you or to be able to take action before the contract is concluded, (ii) fulfill a legal obligation that is incumbent upon us, and / or (iii) meet a legitimate interest in which we judged that the legitimate interest weighs heavier than the data subject's interests or fundamental rights and freedoms.

When we process personal data in order to analyse and develop our business, and for marketing communication, processing is based on our legitimate interest in improving and marketing our business.

4. Who has access to the personal data that we process?

We employ appropriate technical and organisational security measures to help protect the personal data we process from loss and to guard against, inter alia, access from unauthorised persons.

It is necessary for us to transfer your personal data to external IT service providers who store and have access to personal data on our behalf. The data is also in this case protected against external security threats and losses.

Otherwise, we will not disclose personal data to external parties except in cases where:

- (i) it is specifically agreed between you and us,
- (ii) it is necessary within the scope of a given assignment to safeguard the rights and interests of your or our clients, and
- (iii) it is necessary for us to comply with statutory obligation, comply with a decision of a public authority or a court of law or the rules issued by the Swedish Bar Association.

Personal data may also be disclosed to courts, authorities, and counterparties when necessary to safeguard your or our clients' rights.

In cases where data transfers outside the EU / EEA take place, this is done in line with applicable data protection laws and for the purposes specified in Clause 2.

Transfers to countries outside the EU/EEA may also occur within the scope of a given engagement insofar as it is necessary to establish, exercise or defend our client's legal claims.

5. How long will we keep personal data?

We do not save the personal data longer than necessary given the purpose of the processing, unless otherwise required or permitted by law.

The personal data that may be processed before and during the performance of an engagement are subsequently saved in accordance with our obligations under the Swedish Bar Association Code of Conduct. This means that the personal data are saved for at least ten years from and including the date the engagement was concluded, or for a longer period as required by the nature of the engagement.

Personal data processed for the purpose of developing, analyzing and marketing our business is saved for a period of one year after the last contact with you.

Personal data about job applicants is saved during the ongoing recruitment process and another year after the recruitment process was completed.

Otherwise, we only store personal data as long as it is necessary for the purposes for which we process the personal data.

6. What are the rights of the data subject?

Advokatfirman Ulfsdotter AB, reg. nr. 559176-4781, having the address Box 5102, 102 43 Stockholm, is the controller of the personal data processing as described above. This means that we are responsible for ensuring that the personal data are processed correctly and in accordance with applicable data protection laws.

You have the right to request information from us, free of charge, regarding our processing of personal data that concerns you. We will, at your request or on our own initiative, correct or delete personal data that is incorrect or limit the processing of such personal data. You also have the right to request that your personal data should not be processed for direct marketing purposes. You also have the right, under certain conditions and to a certain extent, to get access to your personal data in a machine-readable format.

Note that the above rights may be limited by the duty of confidentiality and archiving obligation applying to members of the Swedish Bar Association. Restriction or erasure of personal data may mean that we are unable to meet our commitments.

If you are dissatisfied with our processing of personal data, you can file a complaint to the Swedish Data Protection Authority (www.datainspektionen.se).

If you have any questions or complaints about how we process your personal data or wish to exercise any of your rights set out above, you are welcome to contact us by email at info@ulfsdotterlaw.com or by post to the address above.