

## PRIVACY NOTICE

### SNELLMAN ADVOKATBYRÅ AB

Your privacy is important to us, and we make it a priority to keep our clients and contacts informed on how we process their personal data. We at Snellman Advokatbyrå AB (below also referred to as “Snellman,” “we,” “us” or “our”) are committed to process your personal data and other data relating to you reliably, securely, and in a transparent manner. In this Privacy Notice, we describe how we collect and process personal data of our clients, potential clients, and other business contacts as well as visitors on our website (“you”).

For information on how we process personal data of job applicants, please refer to our recruitment privacy notice on our Career pages.

#### **1 Who is the Data Controller?**

The controller of your personal data, as described herein, is Snellman Advokatbyrå AB, business ID 556757-2101, in Sweden. If you have any questions relating to the processing of your personal data, or if you wish to exercise your rights related to your personal data, please contact us at [privacy@snellman.com](mailto:privacy@snellman.com).

Further contact details can be found at [snellman.com](http://snellman.com).

#### **2 How Do We Collect Personal Data?**

As a law firm, we regularly receive and process several types of personal data in connection with our business operations, for example, in connection with our matter intake process and when performing and managing assignments from our clients. We will also process information about visitors on our website and about those attending meetings, events, and/or seminars/webinars organised by us.

“Personal data” refers to data that can be used to identify you or data that can otherwise be linked to you.

We mainly process personal data that we obtain from you directly, for example when you send emails to us or communicate with us through other channels, when you sign up for newsletters or other marketing materials, or when you sign up for an event organised by us. Where applicable, we also process your personal data obtained from publicly available sources, such as your employer’s website or publicly available databases, and personal data that accumulates from your use of our website.

On some occasions we may also collect your personal data from an external party we collaborate with to organise an event.

#### **3 Why Do We Process Your Personal Data?**

We process the personal data for the following purposes:

##### **3.1 To manage and administrate our business relationship with you and/or your organisation**

When we engage in a business relationship with you, we need to process certain information to manage, perform and complete the assignment. The processing relates to the management of the assignment and provision of services, as well as, for example processing of payments, accounting, auditing, billing and other support related services.

In addition to client assignments, we also engage in business relationships with other business partners, service providers and suppliers, and process the personal data of their contact persons and/or other representatives.

The processing for this purpose is further specified in the table below.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li data-bbox="277 555 785 703">&gt; <b>Contact information</b>, such as your name, your contact details (email, address, phone number(s)), your employer, your title or position.</li> <li data-bbox="277 712 785 1048">&gt; <b>Identification and background information</b>, such as passport details provided by you or collected by us as part of our client approval and conflict of interest processes in accordance with the applicable Swedish Bar Association rules and other applicable laws (such as anti-money laundering regulations).</li> <li data-bbox="277 1057 785 1124">&gt; <b>Special categories of data</b>, which may include racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or data concerning health or sexual life) or individual data relating to breaches of the law.</li> </ul>	<p data-bbox="809 555 1431 813"><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest of managing and administrating our relationship with client employees as well as contact persons and/or other representatives of other business partners, service providers and suppliers with whom we have any engagements or agreements with.</p> <p data-bbox="809 837 1431 943"><i>Contract.</i> The processing is necessary to fulfil our contract with you, i.e., what we are obliged to provide under the agreement between you and us.</p> <p data-bbox="809 967 1431 1115"><i>Legal obligation.</i> The processing is necessary to fulfil our legal obligations as a law firm, such as anti-money laundering and sanctions checks, please also refer to section 3.5.</p>
	<p data-bbox="809 1153 1362 1189"><b>Exemption for special categories of data</b></p> <p data-bbox="809 1225 1431 1330"><i>Legal obligation.</i> The processing is necessary to fulfil our legal obligations as a law firm, such as anti-money laundering and sanctions checks.</p>
<b>Retention period</b>	
<p data-bbox="277 1442 1431 1585">Your personal data will be stored for as long as we have a meaningful business contact or other contact or as may otherwise be required by law. Furthermore, under the Swedish Bar Association’s Code of Conduct, we are obligated to archive personal data related to client assignments for at least ten (10) years.</p>	

### 3.2 To handle assignments from our clients

Our role as a legal service provider entails that we will be processing personal data needed to handle the assignments for our clients. Depending on the relevant matter this may include information relating to our clients, their matters, their counterparties etc and may include a wide range of information including correspondence, evidence, contacts. contact details, titles etc. In relation to such personal data any rights granted to the data subject may be limited due to our obligations under the Swedish Bar Association’s Code of Conduct (such as our duty of confidentiality).

The processing for this purpose is further specified in the table below.

<b>Categories of personal data</b>	<b>Legal basis</b>
<ul style="list-style-type: none"> <li>&gt; <b>Matter related data</b>, Personal data provided to us by or on behalf of our clients, partners, counter parties and employees or generated by us in the course or providing services for the purpose of handling a matter.</li> <li>&gt; <b>Special categories of data</b>, which, depending on the matter at hand, may include racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or data concerning health or sexual life) or individual data relating to breaches of the law.</li> </ul>	<i>Legitimate interest</i> . The processing is necessary to fulfil our and/or our client's legitimate interest to establish, exercise or defend the legal claim, for example in connection with a dispute or legal process.
	<b>Exemption for special categories of data</b>  Special categories of personal data, including criminal data, are only processed to fulfil our legitimate interest of establishing, exercising or defending legal claims.
<b>Retention period</b>	
Under the Swedish Bar Association's Code of Conduct, we are obligated to archive personal data related to client assignments for at least ten (10) years.	

### 3.3 To enable business development and marketing

We process personal data for business development and marketing purposes. This includes e.g., (i) communicating with you with respect to legal developments, announcements, newsletters, events, training, and our other services which may be of interest to you; (ii) maintaining our contact lists, and (iii) compiling statistics and improving our services and communications, for example by gathering information regarding your preferences through methods such as website analytics or the tracking of our client publications to improve the quality of our communications and interaction with you.

The processing for this purpose is further specified in the table below.

<b>Categories of personal data</b>	<b>Legal basis</b>
<ul style="list-style-type: none"> <li>&gt; Log data (e.g., in connection with when you visit our websites) and IP address.</li> <li>&gt; Personal data provided to us by or on behalf of our clients, partners, and employees or generated by us in the course or providing services.</li> <li>&gt; Contact information and any other information relating to you which you may provide to us.</li> </ul>	<i>Consent</i> . We collect information via the use of cookies based on your consent. For more information about our use of cookies, please read our Cookie Policy.
	<i>Legitimate interest</i> . The processing is necessary to fulfil our legitimate interest of providing you with a better experience and maintaining a business relationship between us.
	<b>Exemption for special categories of data</b>  N/A

<b>Retention period</b>
Your personal data will be stored for as long as we have a meaningful business contact or other contact or as may otherwise be required by law.

### 3.4 Invitations to and participation in meetings, events and seminars

We process your personal data in order to send you invitations to our meetings, events and seminars as well as for the purposes of arranging the meetings, events and seminars. We may also process personal data when maintaining certain information, such as recordings, after the meeting, event or seminar.

The processing for this purpose is further specified in the table below.

Categories of personal data	Legal basis
> Contact information, such as your name, your contact details (email, address, phone number(s)), your employer, your title or position.	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest of inviting you to and arranging and organizing our meetings, events and seminars. The processing is also necessary to fulfil our legitimate interest of maintaining certain information, such as recordings, after the meeting, event or seminar.
> Information regarding dietary preferences when such information is necessary for serving food and refreshments.	
> Photos as well as video and voice recordings for information purposes (e.g., sharing a seminar digitally afterwards).	<b>Exemption for special categories of data</b>
> Any other information relating to you which you may provide to us.	N/A
<b>Retention period</b>	
Personal data is retained for as long as it is necessary to arrange the meeting, event or seminar or to maintain the information thereafter. Information which is not necessary after the meeting, event or seminar will be deleted or anonymised.	

### 3.5 Fulfilment of legal obligations

We will process your personal data for the fulfilling of legal obligations within the area of e.g., book-keeping, anti-money laundering and the Swedish Bar Association's Code of Conduct.

The processing for this purpose is further specified in the table below.

Categories of personal data	Legal basis
> Personal data provided to us by or on behalf of our clients, partners, and employees or generated by us in the course or providing services.	<i>Legal obligation.</i> The processing is necessary to fulfil our legal obligations.
	<b>Exemption for special categories of data</b>

> Any other information relating to you which you may provide to us.	Special categories of personal data, including criminal data, are only processed to fulfil our legal obligations.
<b>Retention period</b>	
Personal data is retained for as long as necessary to fulfil the legal obligations that we are subject to. Under the Swedish Bar Association's Code of Conduct, we are obligated to archive personal data related to client assignments for at least ten (10) years. Personal data processed for book-keeping purposes must also be retained for at least seven (7) years.	

### 3.6 Establish, exercise and defend our legal claims

For the purpose of establishing, exercising and defending legal claims, (for example in connection with a dispute or legal process) we may process your personal data.

The processing for this purpose is further specified in the table below.

<b>Categories of personal data</b>	<b>Legal basis</b>
> Contact information for example your name, your contact details (email, address, phone number(s)), your employer, your title or position.	<i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to establish, exercise or defend the legal claim, for example in connection with a dispute or legal process.
> Any other information relating to you which you may provide to us.	<b>Exemption for special categories of data</b>
	Special categories of personal data, including criminal data, are only processed to fulfil our legitimate interest of establishing, exercising or defending legal claims.
<b>Retention period</b>	
Personal data is retained during the period necessary to establish, exercise and defend the legal claim. Personal data for this purpose is not stored for longer than ten years from the end of the legal process in question.	

## 4 How We May Share and Transfer Your Data

We will not disclose personal data to any third party except from the following scenarios:

- (i) when included in documentation and/or communication to counterparties, courts, authorities and similar in the course of the provision of our legal services;
- (ii) when necessary to comply with a legal obligation of ours or to exercise and defend legal claims;

- (iii) with our suppliers when they perform services on our behalf or to maintain and support our IT systems. Such suppliers are obliged to process the data on our behalf and for the aforementioned purposes, only;
- (iv) otherwise as required or permitted by applicable law.

The personal data we process are not regularly transferred outside the European Union (“EU”) or the European Economic Area (the “EEA”). We may, however, e.g., need to transfer personal data to third parties, such as other counsels, advisors, and third parties involved in your matters, including third parties based outside the EU and the EEA. If we transfer your personal data outside the EU or the EEA, such transfer will be performed only when necessary for the services we provide you, including if required for the use of our service providers located in a third country. Such transfers are subject to appropriate safeguards required by applicable data protection laws and regulations, such as the European Commission’s Standard Contractual Clauses combined with supplementary technological and organisational protection measures including encryption and anonymization/pseudonymization.

## 5 Measures to secure personal data

We take appropriate technical and organisational measures against unauthorised or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data in accordance with our internal security procedures covering the storage and destruction of personal data as well as access to personal data. We regularly check our security policies and procedures to ensure our systems are secure and protected. Only the personnel who need to process your personal data for the purposes mentioned above have access to your personal data.

## 6 How Long We Will Store Your Data

Your personal data will be stored for the purposes mentioned above for as long as we have a meaningful business contact or other contact or as may otherwise be required by law. When the processing of your personal data is no longer necessary for the purposes they were collected, we will securely destroy the personal data relating to you in accordance with applicable laws and regulations. Under the Swedish Bar Association’s Code of Conduct, we are obligated to archive personal data related to client assignments for at least ten years.

If you want to learn more about our specific retention periods for your personal data, you may contact us at [privacy@snellman.com](mailto:privacy@snellman.com).

## 7 Your Rights and How to Exercise Them

You, as a data subject, have certain rights in relation to the processing of your personal data. To the exercise the rights, described herein, please submit requests to the [privacy@snellman.com](mailto:privacy@snellman.com).

<b>Access</b>	You may request confirmation whether personal data about you is processed by us and, if that is the case, access your personal data and additional information regarding the operation, such as the purposes of the processing. You are also entitled to receive a copy of the personal data undergoing processing.
<b>Object to certain processing</b>	You have the right to object to the processing of your personal data based on a legitimate interest for reasons which concern your particular situation. In such a situation, we will stop using your personal data

	where the processing is based on a legitimate interest, unless we can show that the interest overrides your privacy interest or that the use of your personal data is necessary to manage or defend legal claims.
<b>Rectification</b>	You have the right to obtain from us the rectification of inaccurate personal data concerning you.
<b>Erasure</b>	You may have your personal data erased under certain circumstances, such as when your personal data is no longer needed for the purposes for which it was collected.
<b>Restriction of processing</b>	You may ask us to restrict the processing of your personal data to only comprise storage of your personal data under certain circumstances, such as when the processing is unlawful, but you do not want your personal data erased.
<b>Withdrawal of consent</b>	You have the right to at any time withdraw your consent to the processing of personal data to the extent the processing is based on your consent.
<b>Data Portability</b>	You have the right to receive the personal data concerning you which you have provided to us, in a structured, commonly used, and machine-readable format and ask for the information to be transferred to another data controller (where possible).

Click [here](#) to read more about the rights that you have in relation to the processing of your personal data.

Please note that your rights may be limited due to our obligations under the Swedish Bar Association's Code of Conduct (such as our duty of confidentiality). Please also note that if we restrict or delete your personal data, this may result in us not being able to provide you with the communications and invitations described above. We might also be obliged to prevent you from exercising your rights if the personal data relates to our client work or when confidentiality and other obligations under applicable law and/or the Swedish Bar Association's rules apply.

If you consider that your rights under the applicable data protection laws have been infringed, you may lodge a complaint with the competent supervisory authority (*Integritetsmyndigheten*).

## 8 Updates And Contact Information

We may amend this Privacy Notice from time to time to reflect changing legal requirements or our processing practices. We will keep you informed of such updates where appropriate.

If you have any questions or concerns regarding the processing of your personal data, please contact us at [privacy@snellman.com](mailto:privacy@snellman.com). Further contact details can also be found at our website [snellman.com](http://snellman.com).