

## **Information concerning Åstenius Advokatbyrå AB's (the "Law Firm") processing of personal data**

### *Collection of personal data*

The Law Firm collects and processes personal data in connection with requests for, acceptance of, managing and administrating assignments and the performance of our obligations connected therewith. When someone is in contact with the Law Firm, or otherwise occurs in connection with the assignments we manage, this entails that personal data is provided to or collected by us. This could relate to, among others, clients, witnesses, counterparties, experts, lawyers, consultants, external partners as well as their representatives and counsels.

The Law Firm also collects and processes personal data in the administration and marketing of the business, primarily related to contact persons with our suppliers and other external parties, potential clients and their representatives.

Personal data is generally collected from the individual concerned. However, in connection with assignments, we sometimes receive information about individuals involved without the information being provided by them and collect information from external sources.

The personal data we process could be contact information, including information about position, identification information (such as date of birth/ ID number, passport details), invoicing information (including tax details), and financial information. In connection with certain assignments, we sometimes collect and process information about, among other things, course of events, witnesses and other persons and other information that is relevant for the assignment.

Normally, there is no obligation to provide us with personal data. However, 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 checks. It may also prevent us from entering into agreements such as supply and cooperation agreements.

### *Processing of personal data*

The Law Firm processes data that is collected in connection with assignments to perform conflict of interest and money laundering checks, perform and administer assignments and other contractual obligations, to safeguard our clients' interests, to maintain contact with our clients and others, for accounting and invoicing purposes and to comply with requirements that follow from law and the rules of the Swedish Bar Association.

In relation to clients that are private individuals, the legal basis for processing personal data is performance of the contract that governs the assignment. In relation to (if private individuals) witnesses, counterparties, experts, lawyers, consultants, external partners as well as their representatives and counsels, our processing of personal data is normally based on a balancing of interests. This entails that we consider it necessary to process the personal data for purposes that concern our client's or our legitimate interests and that these outweigh any opposing interests or fundamental rights and freedoms. The processing of personal data in connection with the conflict of interest and money laundering checks and archiving of documents are based on our duty to comply with our legal obligations (e.g. under accounting and anti-money laundering legislation, as well as the Swedish Bar Association Code of Conduct). The Law Firm also processes personal data for performance of contracts where the data subject is a party or representative for a party and to perform on the request of the data subject before a contract is concluded. We may have additional grounds for the processing of personal data in certain situations.

# ÅSTENIUS ADVOKATBYRÅ AB

[www.asteniusadvokat.se](http://www.asteniusadvokat.se)

In the administrative part of the business, we process personal data for accounting and invoicing purposes, management of contracts, business and method development, marketing analysis, statistics, risk management and marketing. This data is processed based on a balancing of interests and our legitimate interest in being able to develop and market our business, communicate with our contacts and comply with applicable rules such as bookkeeping and accounting. Processing of personal data relating to suppliers or their representatives and other external parties is based on our legitimate interest in administrating the relationship and performing our contractual obligations.

## *Transfer of personal data*

The Law Firm will not disclose personal data to third parties with the exceptions of (i) where there is an agreement between us and the data subject, (ii) in the event we deem it necessary to safeguard our client's rights within the scope of a specific assignment or otherwise to perform our assignments, (iii) where it is necessary for the Law Firm to perform an obligation that follows from law or applicable rules or to comply with decisions of authorities, courts, or arbitral tribunals (iv) in the event we engage third party suppliers or partners to perform services or (v) where it otherwise is permitted by law.

Insofar as it is necessary to establish, exercise or defend our client's legal claims, transfers to countries outside the EU/EEA may occur within the scope of an assignment.

## *How long we keep personal data*

Personal data will be saved in accordance with our obligations pursuant to law and the Swedish Bar Association Code of Conduct. In the latter case, it is at least ten years from conclusion of an assignment, or such longer period that is called for by the nature of the assignment. Contact information is saved as long as it is necessary to maintain a professional relationship with the data subject or the entity that the data subject represents. Personal data processed to develop, analyze and market our business is saved for one year after the most recent contact unless applicable rules require a longer period.

## *The rights of the data subject*

Data subjects have the right to request information concerning what personal data we process about them and how it is used as well as to require that we erase or rectify incorrect or incomplete personal data about them. Data subjects may further object to certain processing of personal data and request that processing of personal data is restricted. Data subjects also have the right to request that personal data is not processed for direct marketing purposes. Finally, data subjects have the right to receive their personal data, in machine-readable format, and, if technically possible, have the data transferred to another party responsible for data processing. The rights in this paragraph only apply to the extent not prevented or restricted by our duty of confidentiality and archiving that applies to members of the Swedish Bar Association or otherwise pursuant to law. Restrictions or erasure of personal data may mean that we are unable to meet our commitments.

Anyone dissatisfied with how we process their personal data is entitled to report this to the Swedish Data Inspection Board (Sw. Datainspektionen) ([www.datainspektionen.se](http://www.datainspektionen.se)), or the supervisory authority for processing of personal data in the country where the data subject lives or works.

If you have any questions about our processing of personal data, please contact us at [niklas@asteniusadvokat.se](mailto:niklas@asteniusadvokat.se) or the address below.

Åstenius Advokatbyrå AB, Reg. No. 556954-2300, is the controller of the personal data processing. Our address is Gyllenvägen 5A, 237 35 Bjärred, Sweden, Tel: +46 707 27 81 31
--