landahl
advokatbyrå

PRIVACY POLICY

Information about Landahl Advokatbyrå's processing of personal data in accordance with the General Data Protection Regulation (2016/679), GDPR

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References to Article 2016/679 of the General Data Protection Regulation (GDPR) are made below with the abbreviation art.

1 Responsibility for handling personal data

Landahl Advokatbyrå AB /556852-5082/ and Landahl Advokatbyrå KB /969793-1302/ (together below called the Law Firm) are joint controllers of the personal data we receive in connection with requests for assignments, the execution of assignments, in marketing, seminars and the like, through our website, on social platforms or otherwise processed when assignments are prepared, administered and performed, in all communication with us, when recruiting, administration when you are employed and when requesting contact information for relatives.

2 Contact information

Contact information to the Law Firm is: Box 19143, SE-104 32 Stockholm, tel. +46 8 66 66 700, e-mail: gdpr@landahl.se.

The Law Firm has not appointed anyone responsible for the data protection.

3 It is important for the Law Firm to protect your personal data

The law firm ensures that your personal data is handled carefully and continuously reviews internal procedures and data security to achieve this. We take all measures we can to ensure that your personal data is fully protected and that the General Data Protection Regulation (GDPR) and other data protection legislation are complied with by everyone working at the Law Firm.

4 Obligation to provide us with personal data

You are not obliged to provide us with personal data, but without this we cannot take on a case for you or have you as a contact person in the case. We are also unable to invite you to seminars and other events. Furthermore, you cannot be employed at the Law Firm.

We only collect the personal data we need, and the extent depends on the nature of the case and the purpose of the collection.

5 How we obtain personal data

The Law Firm receives contact information and may have the information updated by you providing it or updating it, as well as through the client, representative, counterparty, other external persons, social platforms, clients, employers, partners, the Law Firm's contact person with your employer or other employee of your employer.

In addition to the information we receive in connection with the assignment, we might collect personal data from others (e.g. third parties). The information we collect from third parties is

(i) personal and address information from public registers;

(ii) property data from public registers;

(iii) publicly accessible sources, such as authorities, courts, websites, registers and databases;

(iv) credit information, information on credit worthiness from credit rating agencies, information from the Swedish Tax Authority, the Swedish Enforcement Authority or other information agencies.

In order to ensure that the personal data we process and that you have provided us with is correct, we will, where applicable, obtain data from public or publicly available registers.

6 Whose and what personal data we process

Whose personal data

Clients: Physical person, partners, beneficial owners or anyone who represents or is employed by the Law Firm's client.

Counterparties: Physical persons, partners, beneficial owners or the person who represents or is employed by the counterparty.

Other physical persons connected to an assignment handled by the Law Firm: For example partners, representatives of or employees of a partner, affiliated companies of clients or counterparties, employees of companies that are to be sold or acquired, guarantors, experts, witnesses, employees at authorities, courts, banks and auditors.

A physical person who applies for a position at the Law Firm or someone who is employed by the Law Firm or a relative of an employee of the Law Firm.

A physical person who receives invitations to events, newsletters and other marketing or visits the Law Firm's website.

What personal data

Personal data is information that can directly or indirectly identify you.

The Law Firm processes personal data such as name, social security number, e-mail, telephone number and address, company name/name of the company or organization you belong to, your professional role, ownership share in companies, account number, bankgiro and plusgiro numbers as well as data required for the performance of the case, which may include, among other things, behavior, judgments, financial conditions, allegations of violations of law, injunction or constitution as well as health. Furthermore, all correspondence and communication you provide us with will be handled.

7 Why do we process personal data (the purpose/reason) and the legal basis (the right to process personal data)

The law firm processes personal data within the framework of the law practice in connection with cases we carry out for our clients. Personal data might also be used for business and method development, market analysis, statistics and risk management in order to develop and analyze the business. Furthermore, the personal data might be used for the Law Firm's marketing, for invitations to courses and breakfast seminars.

Below we describe the purpose and legal basis for the processing of your personal data. Please note that the process it is not always relevant for all purposes in each case, but it depends on the reason why we are in contact with you.

Purpose: **To avoid conflicts of interest and manage conflict of interest checks and to meet other requirements in the Swedish Bar Association's Code of Conduct for Lawyers (e.g. archiving).**

Legal basis: Balancing of interests (The Swedish Bar Association's Code of Conduct for Lawyers and art. 6.1 f).

The Law Firm's legitimate interest in avoiding conflicts of interest and obligation to file in accordance with the Code of Conduct for Lawyers.

Purpose: **To assess whether we can undertake and carry out the assignment (e.g. identity check, background check, take credit reports or obtain information about credit worthiness), perform and administer the assignment).**

Legal basis: Balancing of interests (art. 6.1 f).

The Law Firm's legitimate interest in investigating whether we can take on the case within the framework of legal practice and your or the client's legitimate interest in the Law Firm performing the assignment.

Legal basis: Performance of a contract with you (art. 6.1 b).

After the case has begun and there is an agreement between you and the Law Firm.

Purpose: **To fulfil the Law Firm's legal obligations.**

Legal basis: Compliance with our legal obligations (according to applicable law and art. 6.1 c).

The law firm has various obligations under law, such as the Accounting Act, the Money Laundering Act, the General Data Protection Regulation, the Whistleblower Act, etc.

Purpose: **To safeguard clients' legal interests.**

Legal basis: Performance of a contract with you (art. 6.1 b).

When there is an agreement between you and the Law Firm.

Legal basis: Balancing of interests (art. 6.1 f).

The Law Firm's legitimate interest in performing assignments within the framework of legal practice and your or your client's legitimate interest in the assignment performed by the Law Firm.

If special categories of personal data are processed, this is done based on art. 9.2 f. If convictions in criminal cases or violations of the law are handled, this is done based on Section 5 the Regulation (2018:219) with supplementary provisions to the EU's General Data Protection Regulation.

Purpose: **Administer and follow up relationships with our clients and maintain our contact lists.**

Legal basis: Performance of a contract with you (art. 6.1 b).

When there is an agreement between you and the Law Firm.

Legal basis: Balancing of interests (art. 6.1 f).

The Law Firm's legitimate interest in administering and following up the relationship with you or the organization you represent.

Purpose: **To provide information at your request.**

Legal basis: Balancing of interests (art. 6.1 f).

Your and the Law Firm's legitimate interest in complying with your request.

Purpose: **To collect data that you provide and to investigate the use of our website and the use of our social media in general (business and method development, market analysis, statistics and risk management).**

Legal basis: Balancing of interests (art. 6.1 f).

The Law Firm has a legitimate interest in providing and updating the website www.landahl.se as well as social media such as Facebook, LinkedIn and Instagram, and the Law Firm's legitimate interest in developing the business and communicating with our contacts.

Purpose: **To market and communicate our services, through for example e-mails, newsletters, publications and events, as well as to conduct educations.**

Legal basis: Balancing of interests (art. 6.1 f).

The processing takes place based on the Law Firm's legitimate interest in marketing and communicating our services, follow up and evaluate the relationships and maintain a good client relationship.

Purpose: **Recruit personnel to the Law Firm (references, grades, background checks, etc.)**.

Legal basis: Balancing of interests (art. 6.1 f).

The Law Firm's legitimate interest in evaluating applications for employment at the Law Firm and recruiting personnel to the Law Firm, as well as your legitimate interest in the Law Firm employing you.

Purpose: **Administer and communicate with employees and relatives of employees, including communication regarding illness, accident and the like.**

Legal basis: Your employment contract (art. 6.1 b).

When there is an employment contract between you and the Law Firm.

Legal basis: Legal obligation (applicable legislation regarding employees and art. 6.1 c).

The Law Firm has various obligations under law regarding, for example, employment protection, holidays, parental leave and the Discrimination Act.

Legal basis: Legitimate interest (art. 6.1 f).

The processing takes place based on the Law Firm's legitimate interest in being able to administer your employment and to communicate with employees and their relatives in the event of an accident, illness or the like.

Purpose: **Establishing, upholding or defending legal claims.**

Legal basis: Legitimate interest (art. 6.1 f).

The legitimate interest of the Law Firm in establishing, upholding or defending legal claims.

8 Disclosure of personal data

Personal data might be transferred between the Law Firm and limited liability companies that have cooperation agreements with the Law Firm for the purpose of carrying out conflict of interest control and money laundering control, for the purpose of information and knowledge exchange as well as resource allocation.

We will also disclose personal data to third parties in cases where

(i) specifically agreed between the Law Firm and you, for example (**bud**);
(ii) within the framework of a particular case, it is necessary to safeguard your rights. The information may thus be disclosed to, for example, insurance companies (legal protection and liability insurance), counterparties, opposing parties' representatives, witnesses, courts, arbitration tribunals, authorities or consultants;
(iii) we use external service providers and data processors to carry out assignments on our behalf. The information may thus be disclosed to IT supplier, bank or consultant;
(iv) if it is necessary for us to fulfil a statutory obligation (the Accounting Act, the Money Laundering Act (the Financial Police), the General Data Protection Regulation, the Whistleblower Act, etc.), fulfil our obligation under the rules of the Swedish Bar Association, comply with a decision by an authority or a decision by a court, or
(v) to safeguard the legal interests of the Law Firm. Information may thus be provided to, for example, the indemnity insurer, the Law Firm's representative, debt collection company, enforcement authority, court, arbitration tribunal, the Law Firm's auditor or broker regarding liability insurance.

Your personal data is protected with various security measures which are continuously updated. If other companies process personal data on behalf of the Law Firm, a personal data processing agreement is signed with the Law Firm. The agreement is signed so that we can ensure a high level of protection for your personal data with our partners and suppliers.

9 Where and for how long the personal data is stored

Personal data is mainly stored in countries within the EU/EEA. If data is stored outside the EU/EEA, this is done in accordance with the requirements of applicable personal data legislation. An adequate level of protection is at hand.

The personal data is stored, in accordance with the obligation incumbent on the Law Firm according to the Code of Conduct for Lawyers, for a period of ten years from the date of completion of the

case, or such longer period as is required by the nature of the case. If we are unable to take on your case, we will normally only keep your personal data for six months after we have notified you that we cannot take on the case. Data processed for the purpose of developing, analyzing and marketing the Law Firm's operations is stored for a period of 2 years after the last contact. If you unsubscribe from newsletters or similar, the data will be deleted immediately.

10 Your rights

You have rights under applicable data protection legislation in relation to the personal data that we process about you. If you wish to exercise your rights, please contact us at the contact details shown above.

Please note that certain rights may be limited with regard to our obligations under the Swedish Bar Association's rules on good legal practice and rules in law, for example regarding lawyers' duty of confidentiality. This does not include personal data that is processed outside of assignments, such as for marketing or visits on the website.

Right of access (art. 15)

You have the right to request confirmation from us if we are processing your personal data and to receive a copy of your personal data free of charge together with information about the use of the personal data concerning you (register extract). The right to a copy of personal data must not negatively affect the rights of others. Neither if your request is in breach of the Code of Conduct for Lawyers. If information cannot be disclosed, the Law Firm will always let you know why we disclose it.

Right to correction (art. 16), right to restriction of processing (art. 18), right to object to processing (art. 21), right to deletion (art. 17)

You also have the opportunity to request **correction** of incorrect data, request **restriction and object** to the processing and have certain data deleted according to the terms and limitations of the General Data Protection Regulation (GDPR).

The right to correction means that you have the right to request correction or completion of your personal data. However, we may also be entitled to retain historical data if the data was correct when it was registered.

The right to restriction may exist if you dispute the accuracy of the data, the processing is illegal and you request restriction instead of deletion, you need the data for a legal claim, or you have objected to the processing and are awaiting verification.

The right to object includes the Law Firm's processing that takes place based on a balancing of interests (legitimate interest) or for direct marketing. If you raise an objection, the Law Firm must be able to demonstrate that the Law Firm has legitimate reasons that outweigh your interests. The assessment is made against each individual purpose of the processing.

The right to deletion only applies in certain circumstances. The right to deletion applies, for example, if the personal data is no longer needed for the purposes for which it was collected, if your consent is withdrawn by you (if the processing is based on your consent) or if you object to the Law Firm's processing of the personal data and there are no legitimate reasons to continue with the processing, despite your objection, and if the personal data is processed in an illegal manner. There are exceptions to the right to deletion. When the Law Firm is required by law to save personal data or if the data is needed to handle, respond to and assert legal claims against someone, the Law Firm still has the right to use your personal data, even if you request that it should be deleted.

Requests for information, correction, restriction, objection to processing, objection to marketing and deletion, as well as requests for transfer of data as described above, are made through a request to the Law Firm using the contact details above. The request will not be able to be fulfilled if it is contrary to the rules of the Code of Conduct for Lawyers or the law.

Right to data portability (art. 20)

You also have the right to receive your personal data in a machine-readable format or, where technically possible, and in accordance with the terms and limitations of the General Data Protection Regulation (GDPR), transferred to third parties designated by you (data portability). This right is limited to data that you have provided us with yourself.

11 Personal data breach

Under the General Data Protection Regulation (GDPR), a personal data breach is a security incident (an undesirable event) that results in accidental or illegal destruction, loss or alteration or to the unauthorized disclosure of or unauthorized access to the personal data transmitted, stored or otherwise processed.

According to the General Data Protection Regulation (GDPR), the Law Firm is obliged to report personal data breaches to the Swedish Authority for Privacy Protection (IMY) if it is not unlikely that the personal data breach causes a risk to the rights and freedoms of the data subjects, and to inform you of the incident immediately and without undue delay if the personal data breach is likely to result in a high risk to the rights and freedoms of the data subjects.

12 Special information for recruitment

We process personal data within the framework of recruitment of personnel and the hiring of consultants. The data that is processed is the data provided in the application, e.g. cover letter, CV with appendices such as grades, certificates, information from references and, where applicable, results from personality and logic tests. If we request an extract from the criminal record, we will go through it with you and then return it to you.

13 Special information regarding personal data in marketing

The Law Firm has received your contact information either through the Law Firm performing a service for you, or your employer, by another employee of your employer, or by you providing your information yourself. If we become aware of the information being incorrect, we may update it from publicly available information.

The Law Firm handles your name and e-mail, information about which company you are affiliated with for invitations to courses and events, as well as information about allergies or food preferences that you have provided. That processing is carried out based on a legitimate interest. The Law Firm's legitimate interest is to market and develop the business and to be able to offer you meals. You can always object to your personal data being used for direct marketing.

You are not required to providing your name and e-mail or information about allergies or food preferences, but if you do not, the Law Firm will not invite you to courses, seminars and/or meals. If someone else has provided us with your contact information and you notify us that you do not want us to process it, we will immediately delete your information for the purpose of invitations to courses and breakfast seminars.

The personal data is handled internally within the Law Firm and by Paloma AB, which provides the service for newsletters.

The personal data is stored for 2 years after the last contact. If you unsubscribe from newsletters or similar, the data will be deleted immediately. If you want the mailings to you to stop, you can contact us on info@landahl.se or contact details above. You can also contact the person who sent the mailing directly.

14 Special information about out website (landahl.se)

We use various tools to review and keep statistics on visits and use of the Law Firm's website. This is done by cookies. You can refuse the use of cookies at any time through the settings in your browser. However, this can affect the user experience.

When you use certain parts of the website, you may be asked to provide personal information, for example when you register for an event. In these cases, the purpose of the processing of personal data is clear from the context and we use the personal data you provide only for that purpose.

15 Comments, questions or complaints

The law firm is committed to protecting your personal data. If you are dissatisfied with our treatment, please feel free to contact us. You can also file a complaint with a supervisory authority, which in Sweden is IMY (www.imy.se). You can also contact the supervisory authority in the country where you live or work.