

# MarLaw

## PERSONAL DATA POLICY

The Law firm MarLaw AB ("MarLaw") is the data controller of personal data provided, or otherwise processed in connection with or within the framework of assignments, preparatory contacts or administrative matters. Individuals, whose personal data are processed, are referred to as "registered". For questions regarding the processing of personal data, we refer to [svan@marlaw.se](mailto:svan@marlaw.se).

### 1. CATEGORIES OF PERSONAL DATA PROCESSING AND PURPOSE

#### *1.1 Data processing in the execution of assignments*

Before taking a new assignment, MarLaw has to internally check for conflicts of interest. During the assignment, personal data is processed, with the purpose of carrying out the assignment and maintaining contact with persons concerned. This concerns also contact with courts, authorities, partners in Sweden and abroad, as well as any counterparties and their representatives. In addition, personal data is processed as part of administrative work, including contacts and invoicing.

*1.2 Data processing for marketing purposes*  
MarLaw processes personal data for marketing purposes. This consists in promoting events, sending newsletters and contacting presumptive clients.

#### *1.3 Data processing for internal quality assurance and business analysis*

MarLaw internally stores material in the form of established routines, correspondence and notes in order to compile knowledge and reference material. In addition, MarLaw internally carries out various forms of statistics and business analysis, to follow up and streamline their business.

#### *1.4 Data processing, which MarLaw is required to implement*

According to law, the Swedish Bar Association supervises all law firms in Sweden. This means that MarLaw is required to report all data required in a possible supervisory matter to the Swedish Bar Association, and archive client material for a period of ten years after completion of

the assignment. In addition, MarLaw has an obligation to report certain data to authorities, such as the Swedish Tax Agency and law enforcement authorities.

#### *1.5 Other data processing for external contacts*

It is possible to contact MarLaw by email, phone or through the website, regardless of matter. Through communication with external parties, such as media, legal representatives, job-seekers, suppliers and similar, processing of personal data occurs in contact with MarLaw.

### 2. LEGAL GROUNDS FOR PROCESSING

#### *2.1 Processing of necessity for the performance of an agreement with registered*

All processing of client personal data, taken for the execution of client assignments, is done on the basis that processing is necessary for the performance of an agreement with the client. This also applies to external contacts with, for example, courts. If MarLaw needs to process additional personal data within the framework of the assignment, it is in the client's legitimate interests. In this part, MarLaw makes the assessment that the registered interests, fundamental rights and freedoms, do not weigh heavier and require the protection of personal data, but processing may be motivated based on the client's legitimate interests.

#### *2.2 Data processing for marketing purposes, for quality assurance and business analysis*

MarLaw has a legitimate interest in conducting marketing, quality assurance and business development. In the

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processing of personal data for these purposes, MarLaw makes the assessment, that the registered interests, fundamental rights and freedoms do not weigh heavier and require the protection of personal data, but the legitimate interests of MarLaw, as described above, can be justified on the basis of processing under the Legitimate Interests. In this part, MarLaw specifically points out, that no marketing occurs to private individuals.

### *2.3 Data processing for internal quality assurance and business analysis*

Law business is specifically regulated by law and supervised by the Swedish Bar Association. According to the Swedish Bar Association's regulations, MarLaw is required to archive and check for conflicts of interest, and therefore processing of personal data in this section is necessary to perform a matter of public interest. Presentation of data to authorities, is done in order to comply with the legal obligations of MarLaw.

In addition, MarLaw will process personal data in information from suppliers, with the legal basis, that the contractual relationship with the supplier can be completed.

## **3. REGISTERED RIGHTS**

### *3.1 Right to request access to personal data during processing*

Registered are entitled to, free of charge, request access to personal data, processed by MarLaw. If the request is repeated, MarLaw is entitled to charge a reasonable fee for the administration of the request.

The request may be sent by mail to Advokatfirman MarLaw AB, Box 3079, SE-103 61 Stockholm. MarLaw reserves the right to take actions, to ensure the identity of the person requesting an excerpt.

### *3.2 Other rights*

Registered also have the right to request correction of incorrect or incomplete personal data, and to request a transfer of personal data into a generally used

machine-readable format (data portability), for the purpose of transferring data provided to another part. Furthermore, registered have the right to request limitation of processing of personal data, as well as requesting deletion.

### *3.3 General limitations due to the nature of the law firm*

Please note that the request in accordance with the above rights, can only be met, as long as it is approved by the law business regulations and applicable law. This means, in particular, that a large amount of information cannot be disclosed due to legal confidentiality, which follows from the Code of Conduct as well as Guidelines on good lawsuits. This means in particular, that a large amount of data may not be disclosed, due to legal confidentiality, which follows from the Code of Judicial Procedure, as well as indicative rules for Code of Conduct.

## **4. COLLECTION OF PERSONAL DATA**

For assignments, information is provided by the client itself. In some cases, however, supplementary personal data is also obtained from public or private records, such as Bisnode and the Swedish Companies Registration Office. The client is responsible for personal data until delivery to MarLaw, and thus also for such delivery in relation to registered.

## **5. RECEIVER OF PERSONAL DATA**

### *5.1 On assignment*

Depending on the nature of the assignment, personal data may be shared with other recipients, such as clients, courts, authorities, counterparties, representatives and legal partners. MarLaw also uses digital tools for mail handling and administration, which are provided by third-party providers, which will thereby also receive personal data.

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## *5.2 In marketing context*

MarLaw is the sole recipient of personal data in this section, except for third-party providers of client data and client relationship data systems.

## **6. TRANSFER OF DATA OUTSIDE EU / EEA**

In some cases, MarLaw may transfer personal data outside EU / European cooperation area. This may happen when using digital third party services, and in contact with foreign representatives, for example, when registering trademarks internationally. The transfer is made in accordance with the data protection regulations, to maintain the appropriate level of protection for personal data processing. This means, that there is either a decision by the EU Commission, that there is sufficient level of protection for the country in question, or that appropriate protective measures have been taken in another way. Such measures, may be, that the receiving foreign party acts under legally binding standard contract clauses or business rules. If such is missing, MarLaw will obtain explicit consent from registered, before transferring foreign personal data. When consent is requested, the registered will receive appropriate information about any risks associated with the transfer.

For questions regarding transfers of personal data, we refer to [svar@marlaw.se](mailto:svar@marlaw.se).

## **7. AUTOMATIZED DECISION AND PROFILATION**

In processing personal data, MarLaw does not apply automatized decision including profilation (automatized processing of personal data for the assessment of personal characteristics of registered).

## **8. STORAGE PERIOD**

According to the Swedish Bar Association's regulations, MarLaw is required to file, in original or copy, all documents collected or established in connection with the execution

of assignments. This means that MarLaw processes all data during the assignment, and that the obligation to archive the documents applies for ten years after the completion of the assignment.

Accounting documents (which may contain personal data) must, by law, be stored for seven years after the current calendar year. Other data is never processed longer than required for the specific purpose.

Regarding processing for marketing purposes, without a client relationship, personal data will be deleted after one (1) year based on the last contact with MarLaw.

Personal data received from suppliers, is processed, as long as MarLaw has an active contractual relationship with the supplier. We review our data once a year to ensure that only current personal data is processed.

## **9. SPECIAL CATEGORIES OF PERSONAL DATA**

MarLaw does process so called specific categories of personal data according to Article 9 of the EU General Data Protection Regulation. Examples of such specific categories of personal data includes, but is not limited to, data regarding convictions in criminal proceedings and violations, data concerning health, trade union membership, religious or political belief. MarLaw processes special categories of personal data solely on the legal basis of consent from the data subject, or in order to protect vital interests of the data subject, or in order to exercise legal rights and claims.

## **10. COMPLAINTS**

Registered has the right to file complaints regarding personal data processing, by sending a report to the Swedish Data Protection Authority ([www.datainspektionen.se](http://www.datainspektionen.se), tel. 086576100).

*This policy may be modified. Current policy was adopted on September 28, 2018.*