

MarLaw

PRIVACY 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 “data subject”. For questions regarding the processing of personal data, we refer to mail@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 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 the data subject

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 data subject 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

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MarLaw has a legitimate interest in conducting marketing, quality assurance and business development. In the processing of personal data for these purposes, MarLaw makes the assessment, that the data subject 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 interest. 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. RIGHTS OF THE DATA SUBJECT

3.1 Right to request access to personal data during processing

Data subjects 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

Data subjects 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, data subjects 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.

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 the data subject.

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.

5.2 Third-party transfer of personal data

We share your personal data with the IT services we use to be able to provide the

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contact forms and the email tool we use. We may also share personal data relating to accounting information with third parties when we hire a subcontractor for financial services.

We will never sell your personal data to third parties for direct marketing.

When you contact us by phone, email, leave comments or like posts on our social media, MarLaw may receive personal data depending on what your post/comment contains.

6. TRANSFER OF DATA OUTSIDE EU/EEA

In some cases, MarLaw may transfer personal data outside EU/European cooperation area (EEA). This may happen when using digital third-party services, their subcontractors and in contact with foreign representatives, for example, when registering trademarks internationally. It may also happen when MarLaw uses social media.

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.

In a third country outside the EU/EEA, the EU Data Protection Regulation (GDPR) does not apply, which may mean increased risk exposure for your personal data including the possibilities for authorities in third countries to gain access to the personal data and your opportunities to exert your rights as a registrant.

When MarLaw uses third-party services and social media, the United States is often

the third country outside the EU/EEA to which personal data is transferred. The transfer can in these cases be based on standard contract clauses in the contract with the supplier and supplemented by safeguard measures.

MarLaw also strives to inform you as a registrant as far as possible about how your personal data is transferred to third countries, what risks it entails and how your rights are secured. For questions regarding transfers of personal data, we refer to mail@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 the data subject).

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.

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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.

Other specific personal data may also be processed. 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

The data subject has the right to file complaints regarding personal data processing, by sending a report to the Swedish Authority for Privacy Protection (IMY) (www.imy.se, tel. 08 657 61 00).

This policy may be modified. Current policy was adopted on April 22, 2021.