

## PERSONAL DATA POLICY

### 1 INTRODUCTION

- 1.1 Advokatbyrån Kaiding KB (hereinafter "**Kaiding**") is the data controller in respect of the personal data obtained by the firm in conjunction with an engagement (hereinafter the "**Engagement**") or which is otherwise processed when an Engagement is prepared and administered.
- 1.2 This Personal Data Policy (hereinafter referred to as the "**Personal Data Policy**") has been established to assure you that Kaiding, as the data controller, processes your data in accordance with applicable personal data legislation.
- 1.3 While you are not obliged to provide personal data to Kaiding, the firm will not be able to undertake the Engagement if you do not do so since the necessary conflict-of-interest and money-laundering checks cannot be carried out.
- 1.4 If you have any remaining questions, please feel free to contact Kaiding. Information regarding the manner in which you may contact the firm can be found in section 16 below.

### 2 PERSONAL DATA WHICH IS PROCESSED

- 2.1 "Personal data" means every type of information which is directly or indirectly related to a natural, living person (hereinafter referred to as "**Personal Data**").
- 2.2 In order for Kaiding to be able to fulfil and administer an Engagement, the firm must collect Personal Data. Kaiding collects names, personal identification number, addresses, email addresses and telephone numbers. Kaiding also gathers such other information you share on your own initiative with the firm. Kaiding may also supplement the Personal Data by obtaining information from private and public registers.
- 2.3 When you use Kaiding's website, certain technical information may also be automatically collected, e.g. the web address from which you visit the website, information regarding network and unit performance, the type of web browser, language and information regarding identification and operating system.
- 2.4 Kaiding may use cookies and similar technology in order to collect this information. More information regarding this may be found in section 9 below.

### 3 SENSITIVE PERSONAL DATA

- 3.1 Sensitive Personal Data is information which reveals race or ethnic or origin, political views, religious or philosophical convictions, or membership in a union and Personal Data concerning health or sexuality (hereinafter referred to as "**Sensitive Personal Data**"). Health information may consist, for example, of sick leave, pregnancy, and doctors visits.

Depending on the nature of the Engagement and the Personal Data you choose to share with Kaiding, the firm a process Sensitive Personal Data within the context of the Engagement.

### 4 WHAT DOES KAIDING USE THE PERSONAL DATA FOR?

- 4.1 Kaiding will process the Personal Data collected by the firm for the following purposes:
- (i) in order to be able to communicate with you;
  - (ii) to perform and administer an Engagement;

- (iii) to conduct obligatory conflict-of-interest and (where applicable) money-laundering checks in accordance with other applicable legislation;
- (iv) to take measures before an Engagement is accepted;
- (v) to protect your interests;
- (vi) for accounting and invoicing purposes;
- (vii) as otherwise stated in the Personal Data Policy.

4.2 Personal data may also be used for business and methodology development, market analysis, statistics and risk management. The Personal Data processed for the purpose of developing and analysing the business is processed on the basis of Kaiding's legitimate interest in developing the business and communicating with the firm's contacts.

4.3 Personal data is saved in accordance with the Kaiding's obligations in accordance with the Code of Contact of the Swedish Bar Association for a period of 10 years commencing with the conclusion of the Engagement or such longer time as required by the nature of the Engagement. Personal Data processed for the purpose of developing, analysing and marketing Kaiding's business is saved for a period of two (2) years after the firm's last contact with you.

4.4 In the event Kaiding cannot process your Personal Data, the firm cannot accept the Engagement. Your integrity is very important to Kaiding and the firm will process your Personal Data collected in which you share with the firm with the utmost care and in accordance with the firm's best practice, the Personal Data Policy and applicable laws and regulations.

## **5 INFORMATION TO THIRD PARTIES**

5.1 Kaiding will not share the Personal Data you have provided the firm with any third party other than when (i) such as been agreed upon between you and Kaiding, (ii) where necessary to protect your rights, (iii) as required by law, a decision of a governmental authority or a court of law or (iv) where Kaiding retains outside service providers who carry out tasks on behalf of the firm. These service providers may process Personal Data and sometimes require limited access to Personal Data which has been collected by Kaiding. Kaiding shall all times strive to restrict such access to Personal Data and only share information reasonably necessary in order for the service providers to be able to carry out their work or provide their services. Kaiding will also require that such providers (i) protect your Personal Data in accordance with the Personal Data Policy and (ii) do not use or disclose your Personal Data for any purpose other than to provide the agreed service. The Personal Data may be disclosed to courts of law, governmental authorities, opposing parties and counsel for opposing parties were necessary in order to protect your rights.

5.2 Personal data will not be provided to third parties for marketing purposes without your written consent.

## **6 TRANSFER TO THIRD COUNTRIES**

6.1 Kaiding will not transfer Personal Data to third countries, i.e. a country outside the EU/EEA without your written consent.

## **7 RIGHTS**

7.1 You have the right, free-of-charge, to request information from Kaiding regarding the use of the Personal Data concerning you. On your request or on its own initiative, Kaiding will correct or erase Personal Data which is incorrect or restrict the processing of such Personal Data. Furthermore, you have the right to request that your Personal Data not be processed for direct marketing purposes. You are also entitled to receive your Personal Data in machine-readable format or, where technically possible, to obtain the information transferred to a third party designated by you. If you are dissatisfied with Kaiding's processing, you may lodge a complaint with a supervisory authority which, in Sweden, is the Swedish

Data Protection Authority ([www.datainspektionen.se](http://www.datainspektionen.se)). You may also contact the supervisory authority in the country in which you reside or work.

## **8 LINKS**

- 8.1 Links to other websites provided by other companies may appear on Kaiding's website. The Personal Data Policy does not apply in respect of these websites. Accordingly, you should read the personal data policy of such website (or comparable) before you release Personal Data.

## **9 COOKIES**

- 9.1 Kaiding may collect information by means of technology such as cookies, beacons and local storage, e.g. on your web browser or unit. "**Cookies**" means in this Personal Data Policy all technology, including data and text which the firm stores on your web browser or unit.
- 9.2 A cookie is a small text file which is stored on your computer, telephone or other unit when you visit a website. Cookies may, for example, assist Kaiding in recognising you the next time you visit the firm's website, but also make it possible for the firm to offer a secure and more operationally sound website.
- 9.3 Kaiding may use functional Cookies in order to handle certain functions in the website so that your choices and settings will be remembered when you use the website again. In order to maintain and improve the website, Kaiding may use Cookies for analysis in order to measure the manner in which the website is used and functions when it is used.
- 9.4 Most web browsers allow you to choose the manner in which Cookies are handled. You may set your web browser to refuse Cookies or to remove certain Cookies.
- 9.5 If you choose to block Cookies, parts of the website's functionality may deteriorate or disappear.

## **10 SECURITY**

- 10.1 Kaiding takes all suitable technical and organisational security measures necessary in order to protect the Personal Data against unauthorised access, alteration or destruction. However, there is always a risk involved in providing Personal Data via digital channels since it is not possible to completely protect technical systems from encroachment.

## **11 PERSONAL DATA INCIDENTS**

- 11.1 In conjunction with a security incident concerning the Personal Data, e.g. hacking or an unintentional loss of Personal Data, Kaiding must document the incident and notify the same to the Swedish Data Protection Authority within 72 hours. Kaiding may also require information from you, e.g. if there is a risk of ID theft or fraud.

## **12 AMENDMENTS TO THE PERSONAL DATA POLICY**

- 12.1 In the event Kaiding must amend the Personal Data Policy, the firm will give notice on our website as well as when you engage the firm on a subsequent occasion, and will provide you with information regarding the contents of the new provisions.

## **13 INVALID PROVISIONS**

- 13.1 In the event a competent court finds any provision of the Personal Data Policy unlawful, invalid or otherwise without effect, such shall result only in a reasonable adjustment of the provision in question. Such provision may be deemed separate from the other provisions of the Personal Data Policy and thus in no manner or in any respect affect the validity and enforceability of the remaining provisions.

**14 APPLICABLE LAW**

- 14.1 Swedish law shall govern the Personal Data Policy (with the exception of its choice-of-law rules).
- 14.2 Disputes regarding the Personal Data Policy shall be resolved by courts of general jurisdiction in Sweden.

**15 THE SWEDISH DATA PROTECTION AUTHORITY**

- 15.1 For more information regarding applicable legislation, Kaiding's responsibility for the processing of Personal Data, and your rights, please visit <http://www.datainspektionen.se/dataskyddsreformen/>.
- 15.2 Questions concerning the processing of Personal Data, etc., may also be sent directly to the Swedish Data Protection Authority at [datainspektionen@datainspektionen.se](mailto:datainspektionen@datainspektionen.se) or on telephone no. 08-657 61 00.

**16 CONTACT INFORMATION**

- 16.1 If you have any questions regarding the Personal Data Policy or any other question regarding Kaiding's processing, you may contact the firm at:

Advokatbyrån Kaiding KB, company registration no. 994700–9438  
Nygatan 40B  
931 24 Skellefteå  
Telephone: 010-19 90 600  
E-mail: [info@kaiding.se](mailto:info@kaiding.se)

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