



AFH PARTNERS

AFH – Privacy Policy (2019:1)

1.1 Introduction

We are committed to safeguarding the privacy of the personal information that is provided to us or collected by us during the course of our business. This privacy policy explains how we may collect and use any personal information that we obtain about you and your rights in relation to that information. We will only process your personal data for the purposes specified in this privacy policy and in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR).

1.2 Data controller and contact details

AFH Partners Advokat AB is the data controller of any personal information provided to us or collected by us when we agree to provide services to you. If you have any questions about how this privacy policy applies to you or want to make a complaint to us about how we handle your personal information, please contact us in writing at the address set out below.

1.3 Business development and keeping you up to date with relevant information

We collect and process personal data such as name, title, position, email address, phone number, and other information that you may provide when you communicate with us via email or other channels, sign up for newsletters, participate in our events or visit our website. The data may be used for marketing purposes, to invite you to our events and send you newsletters. When processing this type of personal data for such purpose, we rely on our legitimate interests in maintaining business relationships and communicating with you about our operations and our events. If you no longer wish to receive marketing emails relating to our services by email or post, you can unsubscribe at any time by letter to the address set out below or by e-mail to your contact person at AFH Partners.

We may obtain information about your use of our website through “cookies” which enables us to give visitors access to various basic features that facilitate use and enhance the website experience. When you enter our website, we may also collect information about your computer, IP address, operating system and browser type, for example, for statistical purposes or for the purposes of system administration. This information generally comprises data which does not allow individual identification of information related to a specific user.

1.4 Collection of personal data in relation to our legal services

We collect information provided to us by or on behalf of our clients or generated by us in the course of providing legal services to our clients. The type of personal information that we may collect includes current and historical information (such as your name and contact details) and identifiers such as your organisation, positions held and employment history. We will also collect such personal information that you choose to provide to us and information about your other dealings with us and our clients, including contacts we have with you in person, online, by telephone, letter or email.

Your personal data is sometimes supplemented by information retrieved from publicly available sources, eg. for the purpose of confirming your identity and current professional position.

This collection of data is based on our legitimate interest as a law firm when providing legal services. Personal data may also be used to fulfil our statutory duties for example in relation to accounting rules as well as anti-money laundering and know your client (KYC) procedures. In addition, we collect personal data that is needed to fulfil our obligations under the Rules of the Swedish Bar Association in relation to conflicts of interest procedures.

1.5 How we process data

We will only process personal data for the purpose it was collected for and as set out in this privacy policy. Personal data will only be available to authorised employees holding a position that requires them to process personal data to perform their work. We will only retain your personal information for as long as is necessary for the purpose for which it was collected, including the Rules of the Swedish Bar Association (at least 10 years after a matter is closed) and other statutory retention obligations, and otherwise as long as we have a legitimate interest to do so.

1.6 Security measures

We use up to date data storage and security to hold your personal information securely in electronic and physical form to protect your personal information from unauthorised access, improper use or disclosure, unauthorised modification or unlawful destruction or accidental loss. All our employees and third party service providers who have access to confidential information (including personal information) are subject to confidentiality obligations.

1.7 Transfer of data

We will not disclose personal data to any third parties unless (i) you have given your prior consent, (ii) it is required to do so under applicable laws or professional obligations (for example, to comply with anti-money laundering requirements), or (iii) to defend a claim or to perform services for our clients.

However, your personal data may be transferred to and processed by third-party providers which perform services for AFH Partners (data processors) or who provide third party technology services to assist with our work on the matter (for example, the use of word processing

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The terms and conditions applicable to our services are available on www.afh.se.



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software provided by Microsoft). In all cases, the use of such services may require your personal information to be held in the cloud. We will only provide personal data necessary to fulfil the purposes stated in this privacy policy to such data processors and we enter into data processor agreements with all data processors.

1.8 Where is data processed

We primarily process personal data on servers within the EU/EEA. However, we may process personal data in countries outside of the EU/EEA. We will implement appropriate measures under the GDPR to ensure that your personal information remains protected and secure if data is processed outside of the EU/EEA. To ensure that appropriate safeguard measures in accordance with the provisions of GDPR are implemented by a processor outside of the EU/EEA such processing will always be based in on the EU Commission's standard contractual clauses.

1.9 Rights of the data subject

You have certain rights that you can exercise under certain circumstances in relation to the personal information that we hold. These rights are to: (i) request access to your personal information (known as an access request) and request certain information in relation to its processing; (ii) request rectification of your personal information; (iii) request the erasure of your personal information (subject to any other applicable rules); (iv) request that we restrict the processing of your personal information; and (v) object to the processing of your personal information. If you would like to exercise any of these rights, please contact us in writing at the address set out below.

Where you have provided your consent to the collection, processing and/or transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once AFH Partners has received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. If you find the processing of your personal data unlawful, you may lodge a complaint with a supervisory authority. The relevant supervisory authority in Sweden is Datainspektionen (datainspektionen@datainspektionen.se or by letter to Box 8114, 104 20 Stockholm, Sweden).

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