

## RAMBERG'S PRIVACY POLICY

*Enters into force from May 25<sup>th</sup>, 2018, latest updated 2023-02-15.*

### 1. BACKGROUND AND PURPOSE

- 1.1. That personal privacy is respected and that personal data is processed in an adequate and correct manner is of the utmost importance for Ramberg Advokater KB, org. no 969776-1121 ("Ramberg").
- 1.2. Ramberg has adopted this Privacy Policy on the processing of personal data for the purposes of ensuring compliance with the data protection legislation, with EU's General Data Protection Regulation (EU) 2016/679 (GDPR) at the forefront. This document informs our clients and principals, suppliers, business partners and third parties in contact with Ramberg about our processing of personal data within our business and when engaging our services.

### 2. AREA OF APPLICATION AND SCOPE

- 2.1. Ramberg's processing of personal data comprises mainly of the following:
  - a) Processing of personal data attributed to engagement of our services and clients (**Section 3.2**)
  - b) Personal data attributed to our suppliers and partners (**Section 3.3**)
  - c) Processing of personal data attributed to applicants, interns and employment resources (**Section 3.4**)
  - d) Processing of personal data attributed to Ramberg web page users, social media, and market activities (**Section 3.5**)
- 2.2. This Privacy Policy does not cover the processing of personal data that refers to our employees.

### 3. PROCESSING OF PERSONAL DATA

- 3.1. General remarks concerning the processing of personal data
  - 3.1.1. Personal data is information relating to an identified or identifiable natural person. Personal data may be personal name, contact information or geolocation data, alternatively specific information concerning a person's physical, economic, cultural or social state and/or identity.
  - 3.1.2. All processing of personal data is subject to the data protection laws. The term processing means any operation or set of operations which is performed on personal data whether or not by automated means. Processing of personal data in emails and in documents stored on servers, in registers, on the web and in any other unstructured material, is deemed as processing.

- 3.1.3. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation (*Special Categories of Personal Data*) is generally prohibited. Processing Special Categories of Personal Data is allowed if the permitted by law.
- 3.1.4. For more detailed information about our balancing of interests and performed impact assessments, please contact us at the contact details provided in this Privacy Policy.
- 3.2. Processing of personal data attributed to engagement of our services and clients
- 3.2.1. In the event Ramberg is engaged for its services, we may collect and process personal data. Ramberg acts as controller for processing that is carried out by its employees for administration of the engagement. Notwithstanding, Ramberg is the personal data processor for personal data it processes for the purpose of a client engagement or otherwise required to represent the client.
- 3.2.2. The following categories of personal data may be processed by Ramberg:
- a) Contact information (such as names, date of birth, personal numbers, gender, identification documents, address, working place, delivery address, phone number, fax number, e-mail address etc).
  - b) Information related to employment (such as profession, title, professional merits, salary, tax information, CV, benefits, history of holidays, pension, leave, references, job interviews, education, tests and analysis from recruiting experts or HR, documents proving suitability, knowledge and skills, competence etc).
  - c) Financial, legal and administrative information (e.g. customer information, payment history, credit reports, card number, account number, insurances, securities, loans, debts, information relating to rights in rem, communication logs, bank information, invoice information, assignment information, information about whether an immediate family member or a close associate is a politically exposed person (and name, profession and title to that politically exposed person), insider information, beneficial owner, criminal investigations, ban on business activity etc).
  - d) Information related to the commercial relationships (e.g. cadastral, services, products, matters related to rights in rem, bonds, commercial and regulatory agreements, documents of value, disputes, business secrets, intellectual property assets, research and development, financing, business plans and strategies, etc).
  - e) IT and information security information (e.g. web history, software and application information, metadata, system logs, source codes, electronic communication, cookies, IP-addresses etc.).
  - f) Information related to witnesses and experts (e.g. names, titles, employers, contact information, assignment registers, identity handlings, profession, title, CV, sequence of events, etc.).
  - g) Information assignable to courts, authorities, arbitrators, opponents or opponent's counsels (e.g. names, titles, employers, contract information, assignment registers, assignment documents, etc).
  - h) Information about legal offences or special categories of personal data (when the assignment, by its nature, actualizes processing of such personal data) (e.g. criminal

records, criminal penalties, union membership, ethnicity, health care information, etc.)

- 3.2.3. Personal data that is processed within the context of the engagement is generally provided to Ramberg by, or on behalf of, a principal, counterpart, counterpart's counsel or concerned persons occurring in the engagement, or collected by Ramberg from persons or from private or public registers or sources.
- 3.2.4. Ramberg does not actively collect Special Categories of Personal Data or such personal data that Ramberg discretionary considers as sensitive, unless processing of such data is necessary for the purposes and/or a prerequisite of defending our clients' legitimate legal or regulatory interests.
- 3.2.5. Personal data processed when managing clients or assigned engagements may include the following purposes:
- a) Administrating or managing engagements and the clients, carrying out required due diligence such as conflicts of interest, assessing the concerned business engagement, invoicing, accounting, managing claims and otherwise meeting legal or regulatory obligations, and defending our and our clients' rights. The legal basis is Ramberg's legitimate interest to ensure an accurate and conform due diligence, evaluation and management of the engagement, and other actions required by Ramberg to satisfy its legal and regulatory obligations such as compliance with the Swedish Bar Association's Code of Conduct.
  - b) Carrying out and managing engagements in the capacity of their legal and regulatory representative. The legal basis is Ramberg's performance of a contract to which the data subject is party (only if the principal is a natural person) or Ramberg's legitimate interests to ensure effective and accurate administration, management, documentation and evaluation of the engagement, communication with clients, their representatives and/or concerned parties occurring in the specific engagement (such as counterparts, their representatives, counsels, witnesses, experts, arbitrators etc.), and otherwise to establish, submit or defend clients' legal claims.
  - c) Insofar the processing is in conformity with the Swedish Bar Association's Code of Conduct and applicable laws, Ramberg may process personal data for pursues of marketing and surveys (e.g. newsletters, invitations to seminars and events, providing information on Ramberg's services and expertise, client surveys and other correspondence about our services), or as references in the context of procurements or ranking institutes (e.g. Årets Advokat, Chambers and Legal 500). The legal basis is Ramberg's legitimate interest of developing its business and offer competitive services.
  - d) Reviewing and maintaining statistical data and/or otherwise developing and analysing our business performance. The processing is carried out on Ramberg's legitimate interest in following up and developing our business.
- 3.2.6. Processing of personal in the context of the engagement is subject to limitations following instructions from clients, applicable laws, and the Swedish Bar Association's Code of Conduct concerning confidentiality, and disclosure of personal data with third parties may occur:
- a) to the extent it is necessary to perform the engagement,
  - b) according to the client's specific instructions, or

- c) to the extent Ramberg is mandated to disclose personal data subject to applicable law and/or the Swedish Bar Association's Code of Conduct.

By way of example, personal data may be disclosed to counterparts, their representatives, arbitral tribunals and arbitrators, the client's or our insurance representatives, courts and governmental bodies, financial institutes, consultants and experts, auditors, collection agencies, real estate agents, business sector organisations, labour unions, law firm ranking institutes etc.

- 3.2.7. Ramberg does not transfer personal data with connection to the assignment to recipients outside EU/EEA if such transfer is not necessary in relation to the purpose of the processing and the assignment (e.g. instruction to the counsel, counterpart, counterparts' counsels or arbitral tribunals, arbitrators and other persons that has connections to the principal or the assignment in jurisdictions outside EU/EEA) or when the principal instructs Ramberg to transfer personal data to recipients outside EU/EEA. Further information regarding Ramberg's transfer of personal data to recipients outside EU/EEA is set out in **Section 4**.

### 3.3. Personal data attributed to our suppliers and partners

- 3.3.1. Ramberg may collect and process personal data concerning our existing or prospective suppliers and partners. Ramberg acts as controller for the processing of our suppliers' and partners' personal data outside the scope of a client's engagement.

- 3.3.2. The following categories of personal data may be processed by Ramberg:

- a) Contact information (such as name, title, working place, phone number, mobile phone number, fax number, e-mail address etc.)
- b) Supplier information (e.g. tax information, cooperation relationship, accounting information, references, payment history, credit report, account number, insurances, financial information, debts, information on rights in rem, communication logs, bank information, invoice information, assignment registers, ban on business activity etc).
- c) Information on commercial relationships (e.g. matters relating to rights in rem, bonds, commercial and regulatory agreements, valuable documents, disputes, trade secrets, intellectual property assets, research and development, financing, business strategies etc).
- d) IT and information security information (e.g. web history, software and application information, metadata, system logs, source codes, electronic communication, cookies, IP-addresses etc.).

- 3.3.3. Our suppliers' and partners' personal data are generally provided to Ramberg by, or on behalf of, the supplier or the partner, or a person recommending their services, or collected by Ramberg from private or public registers and other sources.

- 3.3.4. Ramberg does not process any Special Categories of Personal Data attributed to our suppliers and partners.

- 3.3.5. Processing of personal data attributed to our suppliers and partners may concern the following purposes:

- a) Administrating or managing business engagements with suppliers and partners, carrying out required due diligence such as conflicts of interest, assessing the concerned business engagement, invoicing, accounting, managing claims and otherwise meeting legal or regulatory obligations, and defending our and our

suppliers' and partners' rights. The legal basis is Ramberg's legitimate interest to ensure an accurate and conform due diligence, evaluation and management of the engagement, and other actions required by Ramberg to satisfy its legal and regulatory obligations such as compliance with the Swedish Bar Association's Code of Conduct.

- b) Insofar the processing is in conformity with the Swedish Bar Association's Code of Conduct and applicable laws, Ramberg may process personal data for pursues of marketing and surveys (e.g. newsletters, invitations to seminars and events, providing information on Ramberg's services and expertise, client surveys and other correspondence about our services), or as references in the context of procurements or ranking institutes (e.g. Årets Advokat, Chambers and Legal 500). The legal basis is Ramberg's legitimate interest of developing its business and offer competitive services.
- c) Reviewing and maintaining statistical data and/or otherwise developing and analysing our business performance. The processing is carried out on Ramberg's legitimate interest in following up and developing our business.

3.3.6. Personal data that relates to suppliers and collaborators may be disclosed to third parties on the basis of the commercial relationship between the parties.

3.3.7. Ramberg does not transfer personal data that refers to suppliers and collaborators to recipients outside EU/EEA, if such transfer is not necessary in relation to the purpose of the processing, and, where applicable, Ramberg's business. Further information regarding Ramberg's transfer of personal data to recipients outside EU/EEA is set out in **Section 4**.

#### 3.4. Processing of personal data attributed to applicants, interns and employment resources

3.4.1. As an employer and prospective employer, Ramberg may collect and process personal data attributed to applicants, interns and employment resources. Ramberg acts as controller for processing of personal data attributed to applicants, interns and employment resources.

3.4.2. The following categories of personal data may be processed by Ramberg:

- a) Contact information (such as name, date of birth, personal number, gender, identity documents, address, workplace, phone number, fax number, e-mail addresses etc.).
- b) Information related to employment (such as profession, title, merits, salary, tax information, CV, references, job interviews, education, tests and analysis from recruiting experts or HR, participation in student activities, documents proving suitability, knowledge and skills etc.).
- c) IT and information security information (e.g. web history, software and application information, meta data, system logs, source codes, electronic communication, cookies, IP-addresses etc.).

3.4.3. Personal data is provided generally to Ramberg directly from, or other on behalf of, applicants, interns or employment resources, alternatively collected by Ramberg from its employees, private or public registers or sources including recruiters, labour unions, applicants' provide references etc.

3.4.4. Ramberg does not process Special Categories of Personal Data that relates to applicants, interns or personal resources.

- 3.4.5. Personal data relating job-seekers, interns or other personnel resources may be processed for the following purposes:
- a) Administering and managing the recruitment process. The processing is based on Ramberg's legitimate interest to ensure an accurate and diligent review and evaluation of prospective applicants, interns and candidates and the overall recruitment process.
  - b) Ramberg may retain and process personal data for prospective recruitment candidates. The processing is based on consent, which is collected directly from the individual applicant, intern or candidate on a case-by-case basis.
  - c) Reviewing and maintaining statistical data and/or otherwise developing and analysing our business performance. The processing is carried out on Ramberg's legitimate interest in following up and developing our business.
- 3.4.6. Personal data attributed to applicants, interns and prospective candidates may be disclosed to recruitment experts in the context of the recruitment process. Ramberg does not actively disclose personal data of applicants, interns or candidates with recipients outside the EU/EEA. Further information regarding Ramberg's transfer of personal data to recipients outside EU/EEA is set out in **Section 4**.
- 3.5. Processing of personal data attributed to Ramberg web page users, social media, and market activities
- 3.5.1. Ramberg may collect personal data when users interact with Ramberg's website, through social media and other digital information platforms, or when partaking in our market activities (newsletters, seminars, market events and other send outs about Ramberg and our services). Ramberg acts as controller for processing of personal data in the context of such activities.
- 3.5.2. The following categories of personal data may be processed by Ramberg:
- a) Personal information (e.g. name, personal or professional interests, allergies etc.).
  - b) Contact information (e.g. name, profession, title, workplace, phone number, mobile phone number, fax number, e-mail address etc.).
  - c) Commercial information (e.g. commercial relationships, communication logs, payment and bank information, invoice information, etc.).
  - d) IT and information security information (e.g. web history, software and application information, meta data, system logs, electronic communication, cookies, IP-addresses, built in functions in social media applications etc.).
- 3.5.3. Personal data is generally disclosed to Ramberg when interacting with Ramberg's digital contents, through social media, or partaking in Ramberg's market activities. Ramberg may also collect personal data from private or public registers or sources.
- 3.5.4. Except for certain food allergy related information for the purpose of Ramberg's events, we do not process any other Special Categories of Personal Data when individuals participate in our market activities. For processing of personal data concerning food allergies, Ramberg collects event participants' consent, which the information is immediately erased upon completion of the concerned event.
- 3.5.5. Personal data may be processed for the following purposes:

- a) Administrating and managing our market activities (such as newsletters, seminars, market events and activities or other send-outs). The processing is based on Ramberg's legitimate interest to ensure an accurate and diligent communication with prospective event participants and persons having an interest in our business and services.
  - b) Securing event participant's food preferences and ensuring their safety during the concerned market event. The processing is based on consent, which is collected directly from the individuals partaking in our marketing activities.
  - c) Reviewing and maintaining statistical data and/or otherwise developing and analysing our business performance. The processing is carried out on Ramberg's legitimate interest in following up and developing our business.
- 3.5.6. Personal data of individuals interacting with our website, social media, market activities or other digital contents is not disclosed to any third parties, notwithstanding event participants' nametags or other system data that is collected or created through Ramberg's digital services, such as cloud services, web-hotels, digital system tools (such as digital services or applications from Microsoft or Google etc.)
- 3.5.7. Personal data may be collected or created by cookies and/or pixel tags when individuals interact with Ramberg's web site or digital contents. For more information on cookies and pixel tags integrated in Ramberg's digital contents and how to set up rules to manage cookies in browsers, please see [Ramberg's Cookie Policy](#).
- 3.5.8. Personal data of individuals interacting with our website, social media, market activities or other digital contents is not shared with recipients outside EU/EEA, unless a transfer is necessary for the intended purpose. Further information regarding Ramberg's transfer of personal data to recipients outside EU/EEA is set out in **Section 4**.

#### **4. TRANSFERS OF PERSONAL DATA TO RECIEPENTS OUTSIDE EU/EEA**

- 4.1.1. Ramberg always provides for adequate protection when transferring personal data to recipients outside EU/EEA. BY way of example Ramberg ensures that the recipient's country is recognised as a country affording adequate level of privacy protection or ensures privacy protection by, *inter alia*, joining an established privacy protection arrangement (such as EU-U.S. Privacy Shield), subscribing to an approved code of conduct, binding corporate rules, certification for conformity with the requirements of a harmonised standards, and/or enter into relevant standard contractual clauses.
- 4.1.2. For further information concerning transfers of personal data to recipients outside EU/EEA, please read the information at the [European Commission's website](#).

#### **5. RETENTION AND ERASURE OF PERSONAL DATA**

- 5.1. Ramberg retains personal data for no longer than is necessary for the purposes for which it was processed, or pursuant to clients' specific instructions and as required under the law or the Swedish Bar Association's Code of Conduct of the Swedish Bar Association, e.g.;
- a) for a period of at least ten years from the conclusion of an engagement, or to the extent warranted by the engagement. Ramberg may retain personal data for a longer period necessary for the purpose of regulatory control and required due diligence, such as conflict of interest controls;

- b) for a period of at least seven years, Ramberg may retain accounting information pursuant to the Swedish accounting and tax legislation;
  - c) for a period of at least three years from the latest correspondence with a registered individual, Ramberg may retain personal data collected for the purpose of developing, analysing or marketing our business or services;
  - d) for period not exceeding a recruitment process, or for a period of two years after conclusion of a recruiting procedure for prospective recruitments subject to the prospective candidate's given consent which may be withdrawn at any time. Ramberg may further retain personal data attributed to unsuccessful employment applicants during the period of limitation for legal claims concerning the recruitment procedure under Swedish employment laws.
- 5.2. For further information on Ramberg's applied principles to retain and erase personal data, and our implemented technical and organisational measures to ensure privacy, please contact us, as provided in this Privacy Policy.

## **6. THE DATA SUBJECTS RIGHTS**

- 6.1. Processing of personal data for which Ramberg acts as controller, you as a data subject may benefit from the following rights:
- a) The right to access your personal data, which means that data subjects are entitled to confirmation on your personal data being processed by the controller, and if verified access to that personal data and additional information on the processing (access right).
  - b) The right to obtain and reuse personal data Ramberg processes in a structured format for your own purposes across different services (data portability);
  - c) The right to rectify inaccurate or incorrect personal data. In some cases, the data subject has the right to object to unwarranted processing of personal data or the right to demand erasure of personal data.
  - d) The right to withdraw or limit given consents (opt-out) for specific processing purposes.
  - e) The right to object to the processing of your personal data in certain circumstances, such as processing based on the controller's legitimate interests. If so, the controller must demonstrate its legitimate interests and how they outweighs your privacy interest.
  - f) The right to object to Ramberg's processing and retention of your personal data and request the restriction or suppression of the processing. If so, Ramberg will refrain from further processing, unless further processing is necessary to ensure conformity with the law or the Swedish Bar Association's Code of Conduct.
  - g) The right to object to processing of personal data for the purposes of direct marketing, in the event Ramberg performs such processing. If so, Ramberg will no longer process your personal data for direct marketing purposes.
  - h) The right to lodge a complaint on Ramberg's processing of your personal data at the competent data protection authority, in Sweden the Swedish Authority for Privacy Protection (Sw: *Integritetsskyddsmyndigheten*) ([www.imy.se/en](http://www.imy.se/en)).



## **7. SECURITY INFORMATION**

- 7.1. Ramberg has implemented technical and organizational security measures aimed to protect personal data processed by our employees or our business from an unintentional or unlawful destruction, loss or alteration. These measures are intended to ensure protection from unauthorised disclosure of, access to, or misuse of personal data, or other processing constituting a breach of law or the Swedish Bar Association's Code of Conduct.
- 7.2. Ramberg monitors actively its digital systems and physical data storage with a view to identify weaknesses and cyber breaches. The monitoring entails security measures such as pseudonymization and encryption, login, backup routines, password-protected wireless networks, updated virus protection, password protection and other types of authorisation functions aimed at ensuring confidentiality, integrity, accessibility to personal data processed in the business.

## **8. OTHER INFORMATION AND CONTACT INFORMATION**

- 8.1. Ramberg's General Terms and Conditions sets out specific provisions detailing Ramberg's processor obligations on processing of personal data in the context of client engagements and processing on third party's behalf. Ramberg's General Terms and Conditions for services is published at our website: [www.rambergglaw.se](http://www.rambergglaw.se).
- 8.2. Ramberg routinely reviews and updates its adopted policy documents, procedures and instructions on processing of personal data, which includes additions and amendments to this Privacy Policy.
- 8.3. This Privacy Policy is published at Ramberg's website and is referred to in our email signatures or in our communications.
- 9.4. Questions on this Privacy Policy, Ramberg's implementation of data protection legislation or request to exercise rights set out in this Privacy Policy may be directed to the following contact details:

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