



W A L T H O N A D V O K A T E R

INTEGRITY POLICY

INFORMATION ABOUT PERSONAL DATA PROCESSING AT WALTHON ADVOKATER

We process your personal data as part of our work. Your integrity is important to us and we are committed to being transparent with the information we process about you and why. We have therefore prepared this privacy policy which describes our processing of your personal data.

This Privacy Policy contains the following information:

- o Personal data processed within the framework of our client assignments
- o Personal data connected to our marketing activities and offers (seminars, events, newsletters or other mailings)
- o Personal data processed in connection with application for employment
- o Personal data relating to employees and contractors of our suppliers
- o Our processing through cookies
- o Transfer of personal data to third countries
- o Your rights

PERSONAL DATA PROCESSED WITHIN THE FRAMEWORK OF OUR CLIENT ASSIGNMENTS

Who is responsible for the processing of your personal data

Walthon Advokater AB, 559138-3426, Box 716, 114 11 Stockholm, "Walthon", is the controller of the processing of your personal data within the framework of the assignment.

How we collect your personal data

We process personal data which has been submitted to us by (i) client, (ii) counterparty, (ii) legal representative of counterparty, (iv) other parties that has a connection to the matter, or (v) which has been collected from public records or other sources.

What personal data we process about you

We process the following categories of personal data about you who are a client of Walthon or in any other way are connected to an assignment performed by us or our lawyers:

Clients



We process personal data relating to employees or contractors at legal entities and clients who are individuals. The data comprise of name, title, employer, personal identification number, contact information, matter designation, matter description, financial information, information regarding if the client or relatives of the client is a person in a politically exposed situation as well as name and profession/position of such a politically exposed individual and billing- and payment information.

Counterparties

We process personal data relating to employees or contractors at legal entities and counterparties which are individuals. The personal data we process in this regard is name, title, employer, personal identification number and matter designation.

Other individuals

We process personal data about other individuals who are of relevance within the framework of our assignments. These individuals may be legal representatives of the counterparty, arbitrators, judges, consultants, witnesses, experts, employees of companies which are sold or acquired, parties of a contract or similar.

Special categories of personal data

Within the scope of our assignments, we may process personal data relating to criminal convictions or other special categories of personal data, which are necessary and relevant for the execution of the assignment. Personal data relating to criminal convictions consist of information regarding trade prohibition, money laundering or other criminal offences. On occasional basis we process special categories of personal data which include racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information relating to health or sex life if relevant for the assignment.

Why we process your personal data

We process your personal data to carry out our assignment and to communicate with counterparties and other individuals connected to the assignment.

We process your personal data for the following purposes to comply with a legal obligation:

- To establish that there is no conflict of interests.
- In order to be able to observe the special rules concerning money laundering and terrorism.

We process your personal data for the following purposes for the performance of a contract:

- In order to manage and administrate billing- and payment services connected to either of the Walthon companies.
- In order to manage and administrate our accounting.



- In order to manage and administrate clients' receivable arising within the scope of an assignment.

We process your personal data for the following purposes on the basis of a balance of interest:

- In order to defend ourselves against legal claims regarding money laundering, terrorism and the EU Market Abuse Regulation.
- In order to comply with the Swedish Bar Association's framework and defend ourselves against legal claims.
- To exercise our rights in other legal claims directed to us.
- To make administration of our fee accounting possible.
- In order to communicate with you via mail, e-mail and phone.
- In order to administrate and book meetings.
- In order to provide effective and accurate documentation, administration and handling of the assignment.

Our legitimate interest is to exercise and protect our rights in case of legal claims, administrate the relationship with you as our client/counterparty/other party within the scope of the assignment and to comply with the ethical requirements put on us as a law firm.

Providing your personal data is not a legal requirement, however it is required in order to enter into an agreement with us as a client. We will not be able to fulfill our agreement or carry out our commitments towards you if you do not provide us with your personal data.

Who has access to your personal data

As law firms are subject to statutory requirements for professional secrecy and confidentiality, we only share your personal data in certain specific cases.

We share your personal data with:

- If necessary, other companies within Walthon. This may be necessary when conducting conflict of interest controls.
- Counterparties within the assignment.

Your personal data will also be shared with parties that process personal data on our behalf, so called processors:

- Suppliers of IT and systems that provide development and support for our systems and cloud services.
- Suppliers who we hire to fulfill our obligation to archive information.



Your personal data will also, when applicable, be shared with the following parties which themselves are controllers of the processing of personal data:

- The client's insurance provider, accountant or others according to the client's instructions.
- Providers of liability insurance to safeguard legal interests.
- Representatives of counterparties within the scope of the assignment.
- If applicable, arbitration tribunal and court.
- Authorities, if such a disclosure is prescribed by law, for example the Enforcement Authority.
- Banks and debt collectors, for example regarding client funds and to safeguard legal interests.
- The police or the financial police, if such disclosure is prescribed by law.
- The Swedish Bar Association if such an obligation exists.

For how long we process and store your personal data

Data that we process in order to fulfill our agreement with you/the client you are employee or contractor of is as a principle rule processed during the period of time it is necessary for us to administrate the contractual relationship, exercise our rights and fulfill our commitments to you/the client you are employee or contractor of. We may however process your personal data for a longer period in order to comply with legal requirements, or because we have a right to do so according to our legitimate interests.

According to the Swedish Bar Association's framework, we are required to process information relating to an assignment for a period of ten (10) years after the assignment is closed or for a longer period if necessary. We will also process a limited amount of personal data to comply with obligations in connection with conducting conflict of interest controls and at the defense against legal claims for ten (10) year due to the period of limitation according to the Swedish statute of limitation.

Any information relating to payment and where processing is required according to the Swedish Accounting Act is processed for seven (7) years in accordance with the Swedish Accounting Act. We also process certain information regarding your purchase in accordance with applicable sales legislation and consumer sales legislation.

PERSONAL DATA CONNECTED TO OUR MARKETING ACTIVITIES AND OFFERS (SEMINARS, EVENTS, NEWSLETTERS OR OTHER MAILINGS)

Who is responsible for the processing of your personal data

Walthon Advokater AB, 559138-3426, Box 716, 114 11 Stockholm, "Walthon", is the controller of the personal data we process about you.



What personal data we process about you

We process your name, e-mail, place of work and other contact information. This personal data has been collected from you in connection to (i) you becoming our client (if you are a client), (ii) you coming into contact with us in another way, or (iii) you expressing a wish to receive invitations/newsletters from us.

Why we process your personal data

We process your personal data to communicate with you and to send marketing to you. This communication comprises of newsletters, information about Walthon and invitations to events and seminars.

We send this information on the basis of a balance of interests and Walthon's legitimate interest to maintain a business relation with you and to communicate with you in your professional capacity regarding information and events that we believe is in your interest. Please contact us if you would like to know more about how we have conducted this balance of interests.

If you have given your consent to our processing, we will instead process your personal data for the above purposes and to send electronic marketing communication based on your consent.

Who has access to your personal data

Your personal data will be processed by the Walthon companies. The information will be shared with IT-providers that process personal data on our behalf, so called processors. For example, cloud service providers may get access to your personal data. We have entered into data processing agreements with our processors inferring, for instance, they are required to process the information in a safe, accurate and confidential manner.

How long we process and store your personal data

If you have given your consent, we process your personal data until you have withdrawn your consent. You can easily withdraw your consent by pressing the link "unsubscribe" which is included in all electronic communication you receive from us. If you have not given your consent, we process your information for as long as you have or your employer or contractor has a business relationship with us and for fifteen (15) months thereafter. You always have the option to, at any time, unsubscribe from receiving mailings from us. If you choose to unsubscribe, we will immediately terminate our processing of your personal data for marketing purposes.

PERSONAL DATA PROCESSED IN CONNECTION WITH APPLICATION FOR EMPLOYMENT

**Who is responsible for processing your personal data**

Walthon Advokater AB, 559138-3426, Box 716, 114 11 Stockholm, "Walthon", is controller of the recruitment process and the processing of personal data related to you as a job applicant.

What personal data we process about you

We process the personal data you provide to us in your application. Such data includes name, personal identification number, address, phone number, e-mail address, image (if any), education, education grades, work testimonial, professional experience and other information that you provide about yourself in your application. For some candidate categories, we perform tests. In these situations, we provide information about the processing of such personal data before initiating the test and ask for your consent to the processing.

Why we process your personal data

Our base our processing on three legal grounds, namely (i) carrying out our obligations and exercising our rights in the field of employment, (ii) a balance of interests (we have balanced our interest of using the information against your interest of privacy), and (iii) consent.

For the following purposes, we process personal data to carry out our obligations and exercising our/ your rights in the field of employment:

- If we were to become subject to claim according to the Swedish Discrimination Act, we process your personal data to exercise and protect our legal rights.

For the following purposes, we process personal data on the basis of a balance of interests:

- To assess and consider different candidates based on experience, qualifications and academic performance.
- To administrate invitations and bookings to interviews.
- To collect and review your resume, personal letter and degree certification.
- We assess that we have a legitimate interest to process your personal data in order for Walthon to be able to recruit new members of the staff to our company.

For the following purposes, we process your personal data on the basis of consent:

- To save your information in a database for candidates for future employments that could suit you.

The provision of your personal data is not a statutory or contractual requirement. You are not obligated to provide the personal data. If you do not provide your personal data to us, we will not have the possibility to carry out our commitments towards you and perform the recruitment process.



Who has access to your personal data

Your personal data will be shared with parties that process personal data on our behalf, so called processors. We share your personal data with:

- If necessary, other companies within Walthon.
- IT-providers that process personal data on our behalf, so called processors.

How long we process and store your personal data

To the extent that our processing is based on a balance of interests, we in general do not process your personal data after the recruitment process is over.

We need to process your personal data after you have participated in a recruitment process to protect our rights under the Swedish Discrimination Act. We therefore save the information in the application documents for two (2) years after the application process is over.

If you consent to the continued processing of your personal data for future recruitment opportunities, we will process your information for this purpose until you revoke your consent or the purpose expire.

PERSONAL DATA RELATING TO EMPLOYEES AND CONTRACTORS OF OUR SUPPLIERS

Who is responsible for the processing of your personal data

Walthon Advokater AB, 559138-3426, Box 716, 114 11 Stockholm, "Walthon", is the controller with regard to the processing of your personal data.

What personal data we process about you

We collect personal data about you such as, name, phone number and e-mail from your employer, or when applicable, your contractor, in connection with the business relationship between us and your employer or contractor or which you have provided us with within the context of the business relationship.

Why we process your personal data

For you who is an employee or contractor of supplier

Your personal data as an employee or contractor of a supplier to us is processed in accordance with the agreement with the supplier for the purposes of invoice- and payment administration, deliveries, to enable communication between the parties as well as other administration needed within the contractual relationship. We process your personal data on the basis of a balance of interests. Our legitimate interest is to be able to administrate the contract and to fulfill our obligations towards our suppliers (your employer or contractor).



If applicable, we process personal data about you who are an employee or contractor of supplier for accounting purposes such as billing or payment of your services or products. This processing is based on a legal obligation according to the Swedish Accounting Act.

If you are a sole trader

If you provide us with your personal data as a sole trader we process your personal data as necessary to fulfill our agreement or to take measures that you have requested before entering into an agreement. We also process your personal data to administrate the agreement, to communicate with you as well as to order and use your company's services.

Providing your personal data is not a legal or contractual requirement. You are not obligated to provide your personal data. If you do not provide us with your personal data, we will not be able to enter an agreement and thereafter fulfil our agreement and administrate the contractual relationship with you.

Who has access to your personal data

We share your personal data with:

- If necessary, other companies within Walthon.

Your personal data is shared with parties that process personal data on our behalf, so called processors. We share your personal data with:

- Suppliers of IT and systems that provide development and support for our systems and cloud services.
- Suppliers who we hire to fulfill our obligation to archive information.

Your personal data is also shared with the following parties which themselves are controllers for the processing of your personal data:

- Authorities, if such a disclosure is prescribed by law, for example the Enforcement Authority.
- Banks and debt collectors.

How long we process and store your personal data

Personal data that we process for the purpose of fulfilling our agreement with you/the supplier to whom you are employee or contractor of is as a principle rule processed during the period of time it is necessary for us to administrate the contractual relationship, exercise our rights and fulfill our commitments towards you/the supplier to whom you are an employee or contractor of. If your employment or contract is terminated with the supplier or in relation to us, we will cease to process your personal data as soon as we have received such information from the supplier.



Any information relating to payment where processing is required according to the Swedish Accounting Act is processed for seven (7) years in accordance with the Swedish Accounting Act.

Inactive agreements containing your personal data are stored for a ten (10) year due to the period of limitation according to the Swedish statute of limitation.

OUR PROCESSING THROUGH COOKIES

Who is responsible for the processing of your personal data

Walthon Advokater AB, 559138-3426, Box 716, 114 11 Stockholm, "Walthon", is the controller of the processing of your personal data that is collected through cookies when you visit Walthon.se.

What personal data we process about you

We process the information created by the cookies which are used when you visit Walthon.se (including your IP-address), such as the duration of your visit, number of pages viewed, the choices you make on www.walthon.se and how you found www.walthon.se.

Why we process your personal data

Your personal data is processed for the purpose of ensuring that the visitors can use the website in the by us intended way and to gather statistics. Your personal data is processed based on a balance of interests. Our legitimate interests of processing your personal data is to give you a good user experience when visiting walthon.se and our commercial interest in receiving information about the visitors of walthon.se. If you do not want to allow the setting of cookies, you can change the settings of your browser to block cookies.

How long we process and store your personal data

The time during which we process your personal data depends on which cookie that is placed on your browser. Permanent cookies remain on your computer until you delete them or the expiry date passes and you return to Walthon.se. Session cookies do not have an expiration date and are store temporarily on your computer during the time you visit Walthon.se. Possible session cookies are removed when you close your browser. Read more about our cookies in our cookie policy.

Who has access to your personal data

Your personal data will be shared with the following parties that are controllers of personal data:

- Google LLC and its subsidiaries. Read more about Google Analytics and Google's processing of your personal data [here](#).



TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

As a principle rule, we, our suppliers and our partners only process your personal data within the EU/EEA. In cases where personal data is processed outside the EU/EEA, such processing is either based on a decision from the Commission establishing that the country in question ensures an adequate level of protection or appropriate safeguards that ensure that your rights are protected.

YOUR RIGHTS

Below follows a description of the rights you have regarding our processing of your personal data. You are welcome to contact us to exercise your rights (see contact information below).

Right to withdraw your consent and object to the processing

You may at any time withdraw the consent you have given us, either as a whole or partly, with effect from the day of the withdrawal.

You may object to our processing of your personal data for marketing purposes. We will then cease to process your personal data. You also have the right to object to the processing of your personal data on the basis of a balance of interests.

Right to access

You are entitled to request information about which personal data we process about you and how the personal data is being processed. You also have the right to request a copy of the personal data we process about you.

Right to rectification

You have the right to without unnecessary delay get inaccurate information corrected and to get incomplete information completed by providing us with correct information.

Right to erasure (right to be forgotten) and limitation

You have the right to at any time request that your data is erased, for example if the processing is no longer relevant in relation to the purpose the information was collected for, or if you object to processing which is based on our legitimate interests (marketing).

You may also request to have certain processing of your personal data restricted, for example if you object to the accuracy of the data.

Right to data portability

If you have given your consent to the processing or if the legal basis for processing is to fulfil an agreement with you, you have the right to obtain the personal data you have provided us



with in a structured, commonly used and machine-readable format and have the right to transmit such to another controller, or get our assistance to transmit the data to another controller when technically feasible.

Right to object

If you have any complaints regarding our processing of your personal data, you have the right to send a complaint to the Swedish Data Protection Authority (www.datainspektionen.se).