

INTEGRITY PROTECTION POLICY

Fröberg & Lundholm Advokatbyrå AB

At Fröberg & Lundholm Advokatbyrå AB we protect your personal integrity. It is important to us that you feel safe providing us information. We therefore process your personal data in a transparent manner with your integrity in focus.

In this Integrity protection policy, which applies to anyone who in any manner uses Fröberg & Lundholm's services and / or otherwise has contact with us, we describe, among other things, how and why we process personal data and what rights you have under the current personal data legislation.

Unless otherwise specifically stated, it is Fröberg & Lundholm Advokatbyrå AB, Reg. No. 556678-0945, Olof Palmes gata 23, 111 22 STOCKHOLM, (hereinafter "Fröberg & Lundholm" or "we") which is responsible for processing your personal data.

You are welcome to contact us if you have any questions regarding this policy or other data protection issues. Contact details can be found at the end of this policy.

1 What is personal data?

"Personal data" is any information that directly or indirectly relate to an identified or identifiable natural person, such as security numbers or addresses.

2 What is "processing" of personal data?

The concept of "processing" is broad and includes most of the things you can do with personal data – everything from collection and storage to alteration, use or erasure constitutes "processing".

3 Why do we process your personal data?

For us to be able to provide services to you, we may need to process your personal data, such as personal data provided or collected by us in connection with an assignment or otherwise processed when an assignment is prepared or administered. There may also be other reasons or purposes for us to process your personal data.

We process personal data primarily in order to:

- carry out (when applicable) conflict of interest and money laundering assessments,
- administer and provide our services,
- send out newsletters, invitations and other information, and
- for accounting and invoicing purposes, etc.

4 What legal basis do we have for processing your personal data?

For us to process your personal data, there must be a legal basis for the processing. Fröberg & Lundholm processes personal data primarily on the following bases.

- When processing of personal data is necessary for us to be able to fulfil an agreement that we have with you – e.g., to provide or administer a service you have purchased.
- When processing is necessary for compliance with a legal obligation, e.g., accounting obligation.
- When we have a legitimate interest in processing your personal data, which may be the case regarding our clients' representatives, partners and consultants, counterparties and their representatives as well as counterparty counsels, etc.
- When processing of personal data is permitted because you have given us your consent.

It should be noted that there may also be other grounds for processing personal data.

5 For how long do we save your data?

We do not save personal data longer than necessary for the purpose of the processing unless the data must or may be stored longer according to law or the Code of Conduct for Members of the Swedish Bar Association (see further below).

The personal data processed before and in connection with an assignment is stored, in accordance with the Code of Conduct for Members of the Swedish Bar Association, for a period of at least ten years from the date of completion of the case, or the longer period required by the nature of the case. Personal data may be saved for a longer period if it is required by law or to safeguard our legal interests, e.g., if there is an ongoing legal process.

Your personal data will be deleted or anonymized when it is no longer relevant for the purposes for which it has been collected.

6 Your rights

As a data subject, you have the right at any time to request correction of inaccurate information or change the personal data you have provided. You also have the right to access the personal data we have registered on you. Please note that this right may be limited or hindered by the duty of confidentiality imposed by law and the Code of Conduct for Members of the Swedish Bar Association.

If we process your personal data on the legal basis of consent, you have the right to withdraw your consent regarding future processing at any time. It should be noted that this could mean that we are unable to fulfill our commitments to you.

Under certain conditions, you have the right to have your personal data deleted or the processing of your personal data restricted. However, this right may be prevented or limited if, for example, we are required by law to retain the data, or if otherwise due to the duty of confidentiality or archiving imposed on the law firm in accordance with the Code of Conduct for Members of the Swedish Bar Association. If you request that the processing of your personal data should be restricted or collected data deleted, it may also mean that we are not able to fulfill our commitments to you.

If you want to transfer your data from us, you also have the right to receive a copy of the personal data concerning you in a structured, commonly used, and machine-readable format (the right to data portability). This right only covers information that you have shared with us.

7 Questions or complaints regarding our processing of your personal data

Should you have questions or be dissatisfied with the manner we process your personal data, we ask you to contact us at info@froberg-lundholm.se.

If you are not satisfied with the manner we handle your complaint, you can submit your complaint to the competent supervisory authority, currently the Swedish Authority for Privacy Protection (Sw. *IMY*).

8 Contact details to the controller

Fröberg & Lundholm Advokatbyrå AB, Reg. No 556678-0945, Olof Palmes gata 23, 111 22 STOCKHOLM, tel. 08-662 79 40, is the controller and therefore responsible for Fröberg & Lundholm's processing of your personal data.

If you have questions about data protection or if you want to exercise your rights as described above, you can reach us most easily at: info@froberg-lundholm.se.

9 Changes to our Integrity protection policy

We reserve the right to make changes to our Integrity protection policy. You will always find the latest version on our website. In the event of updates that are of crucial importance for our processing of personal data (for example, changes to the stated purposes), this will be communicated to you.
