

Nybron Advokater KB's Privacy Policy

1 Background and purpose

- 1.1 Each person has a right to protection of its personal data. Nybron Advokater Kommanditbolag, reg. no. 969796-7587 ("Nybron"), cares about its clients', partners' and employees' privacy and always endeavors to comply with current data protection regulations. Nybron processes personal data in accordance with the General Data Protection Regulation (EU) 2016/679 and other legislation governing privacy protection.
- 1.2 Nybron is the controller of personal data in respect of personal data processed in connection with client engagements and other business contacts. In this privacy policy it is described how Nybron collects, processes and store such personal data. In this privacy policy, the rights that data subjects have in relation to Nybron as data controller is also described.

2 Collection of personal data

- 2.1 Nybron collects personal data in connection with requests for client engagements, when such engagements are received, performed or administered. The same applies in relation to suppliers and other business partners. There is no obligation to provide personal data to Nybron, but if not provided Nybron may be unable to accept an engagement or enter into supply or co-operation agreements since Nybron in such case will not be able to perform necessary conflict- and background checks.
- 2.2 Nybron mainly collects personal data from the individuals concerned, but sometimes Nybron receives information about individuals involved that does not come directly from them. In some cases, Nybron has an obligation to verify the information provided and in such cases information is collected from private or public registers as well as other external sources. In addition, Nybron may in some cases collect and/or supplement personal data by collecting information from other sources such as search results from public available search engines and registers, branch news letters and social media.
- 2.3 Nybron may also collect personal data in the form of sound or image recordings in connection with court or arbitral proceedings or other engagements and events.
- 2.4 The personal data collected by Nybron may consist of contact details (e.g. name, title, employer, postal address, telephone number and e-mail address), identification details (e.g. passport details and date of birth/ID number) and invoicing information (e.g. account number and tax details). In specific

engagements, personal data may also comprise other information such as course of events and other circumstances or information relevant for the engagement.

- 2.5 Nybron's representatives mainly communicate by telephone- or video calls and e-mail, which in principle always means that personal data is collected by Nybron.

3 Processing of personal data

- 3.1 Nybron processes personal data to perform conflict of interest and money laundering checks, to perform and administrate engagements and other obligations, to safeguard the clients' interests and for accounting and invoicing purposes. Personal data is also processed to maintain contact with clients, suppliers and partners, for business and methodology development, for client and market analyses, for statistical purposes, to manage risks, for sending out newsletters and invitations to events, and marketing purposes. Nybron also processes personal data to comply with agreements, legal obligations and duties of public interest. Since Nybron has a legitimate interest in maintaining business contacts and to develop and market its business, personal data is also processed on the basis of balance of interest.

- 3.2 Within the scope of Nybron's business, occasional processing may take place of special categories of personal data (so called sensitive personal data) and regarding violations of law if relevant for performance of the engagement. Occasional sensitive personal data concerning race, ethnic origin, political views, religious or philosophical convictions, health, union membership or sexual orientation may be processed if relevant for performance of the engagement. Information regarding violations of law, which Nybron processes, may involve information concerning bans on trading, money laundering or other criminality, which is relevant for the performance of the engagement.

- 3.3 Nybron will not disclose personal data to anyone outside the firm, except where:

- (a) specifically agreed;
- (b) necessary to protect the client's rights within the scope of a particular engagement;
- (c) necessary to enable performance of a statutory obligation or to comply with a public authority decision or judicial decision; or
- (d) provided to external suppliers of IT or administrative services on behalf of Nybron.

Data may be provided to courts, authorities, counterparties and counsel of counterparties if necessary to perform an engagement.

4 Legal basis for the processing of personal data

- 4.1 Nybron processes personal data to fulfil engagement letters with clients which means preparing, performing and administrating engagements, performing compulsory conflict of interest and money laundering checks, safeguarding the clients' interests and for accounting and invoicing purposes. In conjunction therewith Nybron also processes personal data in relation to the clients' representatives, counterparties, representatives of counterparties and counsels of counterparties. The processing is normally based on Nybron's obligation to fulfil agreements with clients and Nybron's legitimate interest in being able to provide legal services and conduct its business.
- 4.2 Processing of personal data also takes place for the performance of legal obligations on Nybron pursuant to judicial or public authority decisions or pursuant to laws or regulations, for example under accounting and money laundering legislation as well as the Swedish Bar Association's regulations.
- 4.3 In those cases where occasional processing is carried out of special categories of personal data (so called sensitive personal data) or regarding violations of law, this takes place because it is necessary to establish, exercise or defend a legal claim.
- 4.4 Processing of personal data relating to suppliers or their representatives and other external parties is based on Nybron's legitimate interest in administering the relationship and performing Nybron's contractual obligations. Nybron also processes personal data in order to analyse and develop the business. The processing is in such cases based on Nybron's legitimate interest in improving the business.
- 4.5 The processing of personal data for marketing purposes or for the purpose of communication is based on Nybron's legitimate interest in maintaining business relationships, communicating with business contacts regarding Nybron's business and to arrange and administer events. It is Nybron's assessment that Nybron's interest in processing personal data for these purposes outweigh the individual's interest in protecting privacy.

5 Access to personal data

- 5.1 Nybron has taken appropriate technical and organisational security measures to protect the personal data that Nybron processes from loss and unauthorised access, among other things. Only the persons who need to process personal data for the purposes for which they are processed have access to the personal data. Appropriate security measures Nybron has taken include implementation of back up routines, fire walls, password protected wireless network, updated virus

protection, password protection for mobile devices and logging of use of IT systems.

- 5.2 Nybron will not disclose personal data to anyone outside the firm, except where:
- (a) it has been agreed between Nybron and the person whose personal data is processed by Nybron;
 - (b) it is necessary within the scope of a given engagement to safeguard Nybron's clients' rights and interests;
 - (c) it is necessary to enable Nybron to perform a statutory obligation, comply with a decision of a public authority or a court of law or the regulations of the Swedish Bar Association;
 - (d) Nybron engages an external service provider or business partner who performs services on behalf of Nybron, e.g. for the provision of IT services or administrative services, or to arrange events; or
 - (e) it is otherwise permitted under applicable law.

6 Transfer to third countries

Nybron may transfer personal data to countries outside the EU and EES (i.e. third countries) within the scope of an engagement. If so, Nybron will take appropriate measures to ensure that the personal data remain protected in accordance with applicable personal data laws, usually on the strength of standard contract clauses or on the basis that it is necessary to establish, exercise or defend legal claims.

7 Storage of personal data

Nybron stores personal data in accordance with law and the Swedish Bar Association's regulations (in the latter case ten years from the day the engagement is completed or for the longer period required by the nature of the engagement). Contact details are stored for the period that is necessary to maintain the business relationship in question or permitted under applicable law.

8 Rights of data subjects

- 8.1 A data subject whose personal data Nybron processes has the right to:
- (a) know what personal data Nybron processes about it;
 - (b) request that incorrect or incomplete personal data about it is rectified;
 - (c) request that Nybron erase its personal data (e.g. if the personal data is no longer needed for the purpose or if consent is withdrawn) or request that the processing of personal data be restricted;

- (d) object to specific processing of personal data; and
- (e) in some circumstances, to receive the personal data it has provided in machine readable form and to transmit them to another controller.

8.2 Note that the above rights may be limited by the duty of confidentiality and archiving obligation applicable to members of the Swedish Bar Association or other applicable laws and regulations. In some cases, restriction or erasure of personal data may prevent Nybron from fulfilling its obligations.

8.3 Anyone who wants to exercise any of its rights or has questions or comments concerning Nybron's processing of personal data may contact Nybron by e-mail at info@nybronadvokater.se or regular mail at the address below.

8.4 Anyone with objections about, or comments on, the way Nybron processes personal data has the right to file a complaint with the Swedish Authority for Privacy Protection, which is the supervisory authority for Nybron's processing of personal data.

9 Contact

Nybron Advokater Kommanditbolag, reg. no. 969796-7587, with address at Birger Jarlsgatan 33, 111 45 Stockholm, is controller of the processing of personal data described in this privacy policy. This means that Nybron is responsible for that the personal data is processed correctly and in accordance with applicable personal data legislation.

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Adopted by Nybron in March 2022.