

PRIVACY POLICY

for our clients

1. INTRODUCTION

Privacy and data protection are important to us, and in this Privacy Policy we will explain how we process personal data concerning our clients, and to persons whom the clients' matters pertain to.

If you are neither a client to Synch, nor have dealings with one of Synch's clients, you may find information about how Synch processes personal data for other, non-client related, activities in connection to where this Privacy Policy is available.

When Synch processes personal data with client-related matters, Synch is a data controller. This means that Synch is determining the purposes and means for processing the personal data and is the point of contact for the individual whose personal data is being processed by us.

2. CONTACT INFORMATION TO SYNCH

SYNCH ADVOKAT AB Org.no 556955-6656	Phone +46 (0)8 761 35 35	Email privacy@synchlaw.se
	Address P.O. Box 3631 SE-103 59 Stockholm Sweden	Visiting Address Birger Jarlsgatan 6 Stockholm Sweden

3. THE PERSONAL DATA WE PROCESS

In the table below, we set out what types of personal data we process, the purposes for doing so, and the legal grounds upon which we base the processing.

PERSONAL DATA	PURPOSE	LEGAL GROUND
Contact information: <ul style="list-style-type: none">- Full name- Email address	Purpose (1): registering contact persons at the client company. The contact persons may vary from matter to matter. Purpose (2): registering natural persons as clients.	Legal ground (1): legitimate interests pursued by Synch regarding the client's contact persons. Legal ground (2): fulfilment of a contractual obligation towards natural persons.

<p>Contact information:</p> <ul style="list-style-type: none"> - Full name - Email address - Street address - Personal identification number 	<p>Purpose (1): to carry out controls to ensure that there is no conflict of interest.</p> <p>Purpose (2): invoicing the clients.</p> <p>Purpose (3): complying with bookkeeping legislation.</p>	<p>Legal ground for legal persons (1, 2): legitimate interests pursued by Synch's client's contact person.</p> <p>Legal ground natural persons (1): the processing is a necessary step to take in order to enter into a contract, which the natural person has requested.</p> <p>Legal ground natural persons (2): fulfilment of a contractual obligation towards a natural person.</p> <p>Legal ground (3): complying with a legal obligation.</p>
<p>Anti-money laundering (AML) information:</p> <ul style="list-style-type: none"> - A copy of the passport, or other similar document that can be used for identification. - An assessment if the person is a politically exposed person. 	<p>Purpose: complying with AML legislation.</p>	<p>Legal ground: complying with a legal obligation.</p>
<p>Information for WeSynch profiles:</p> <ul style="list-style-type: none"> - Full name - Title - Telephone number - Email address - (optional) short biography 	<p>Purpose: setting up personal profiles in our digital tool WeSynch.</p>	<p>Legal ground: fulfilment of a contractual obligation or legitimate interests pursued by Synch.</p>
<p>Information in connection with legal matters: given the nature of a law firm's daily activities, it is not possible to provide an exhaustive list of types of personal data that will be processed. The below list is intended as an example:</p> <ul style="list-style-type: none"> - Contact information - Meeting notes, and other notes 	<p>Purpose: to handle the client's matter according to the client's instructions, and in accordance with the ethics rules provided by the Swedish Bar Association.</p>	<p>Legal ground (regular personal data for natural persons): For clients who are natural persons, Synch's legal ground is fulfilment of a contractual obligation related to handling the client's matter and in accordance with the given instructions.</p> <p>Legal ground (regular personal data for legal persons): For clients who are legal persons and in relation to the contact person (or other representative) of our</p>



- Mentions of persons in documents that Synch drafts
- Other information that is required when handling the client's case.
- Information uploaded to WeSynch.

clients, the legal ground for processing personal data is the legitimate interests pursued by Synch. Our assessment is that Synch's legitimate interests to handle the client's matter and in accordance with the given instructions override the interests and fundamental rights and freedoms of above-mentioned natural persons.

Legal ground (special categories of personal data, and personal data relating to criminal convictions and offences): Synch will process the aforementioned categories of personal data when doing so is necessary for the establishment, exercise or defence of legal claims.

Synch cannot provide its services unless the contact information and AML information are provided to Synch.

4. RECIPIENTS OF PERSONAL DATA, AND TRANSFERS OF PERSONAL DATA

The personal data may be transferred to the following categories of recipients:

- Courts, and similar judicial entities and/or authorities;
- Other authorities, such as the Swedish Tax Agency;
- Recipients whom Synch has been directed by the client to transfer information to.
- Companies that provide services upon which Synch relies for its core activities (such as data management services, and digital infrastructure).

Synch does not transfer personal data to countries outside of the EU/EEA, unless this is necessary to carry out the assignment given by a client. If so is the case, and there is no decision from the European Commission that the country which the personal data will be transferred to provides adequate data protection legislation to ensure the safety of the personal data, Synch will use relevant safeguards to ensure the safety of the personal data. If you are a client and want to know more about the safeguard we use, please contact Synch for more information.

5. STORAGE AND DELETION OF PERSONAL DATA

In accordance with current guidelines from the Swedish Bar Association, Synch stores all client-related information, and personal data therein, for ten (10) years, after completion of the relevant assignment.



Where the information relates to matters where statutes of limitation are longer than ten years, Synch will store the information, and personal data therein, for the duration of the relevant statute of limitation.

Synch uses professional services to destroy physical documents that ensures the integrity and confidentiality of the information contained in the documents. For handling digital information, Synch uses professional service providers that are specialised in accommodating the needs for digital integrity, confidentiality, and reliance of law firms.

6. YOUR RIGHTS

Synch is a law firm and is as such subject to rules of professional secrecy. This means that Synch is not allowed to disclose information relating to the clients' matters to anyone but the client.

The rights that a person has in regards of their personal data are not absolute, meaning that certain criteria must be at hand for the right to be exercised. Also, there are exceptions to some of the rights. Synch will accommodate requests to the extent that Synch is obliged under data protection laws.

A person has the following rights regarding personal data concerning them:

- **Access:** meaning that you have the right to information about the processing, access to the personal data in question, and the right to obtain a copy of it.
- **Rectification:** meaning that Synch must correct the personal data if it is incorrect.
- **Erasure:** meaning that Synch must erase the personal data in certain circumstances, such as if there is no purpose for processing it any longer.
- **Object to processing:** meaning that you have a right to object to Synch's processing of personal data.
- **Restriction of the processing:** meaning that you the right to have Synch restrict the processing of personal data, but not delete it.
- **Data portability:** meaning that if you want Synch to transfer the personal data to another personal data controller, Synch must accommodate this request if the personal data are based on the legal grounds of consent or fulfilment of a contract.

Also, you have the right to lodge a complaint at the supervisory authority, if you believe that Synch's processing of personal data infringes applicable data protection laws. The supervisory authority in Sweden is Datainspektionen. If you are not based in Sweden, you may contact the supervisory authority that is relevant to you.

7. CHANGES TO THE PRIVACY POLICY

We reserve the right to amend the Privacy Policy at any time. The latest updated Privacy Policy can always be found at www.synchlaw.se. If we make any material changes, we will send you a notice. If your consent is required due to the changes, we will ask you for it in accordance with applicable law. We urge you to check our site frequently to see the current Privacy Policy that is in effect and any changes that may have been made to it.

