# **NORMA LAW**

# PRIVACY POLICY

## **CONTENTS**

1	INTRODUCTION	2
2	DATA CONTROLLER AND CONTACT DETAILS	2
3	HOW YOUR PERSONAL DATA IS PROCESSED	2
3.1	Fulfilment of client assignments	2
3.2	Receivership (bankruptcy)	5
3.3	Suppliers, partners, authorities	3
3.4	Website and digital channels	)
3.5	Events, seminars and other contacts	l
3.6	Marketing and information about our business operations	2
3.7	Recruitment	3
4	WHO HAS ACCESS TO THE DATA?	5
5	WHAT RIGHTS DO YOU HAVE? 16	5
6	USE OF EMAIL	3
7	CHANCE OF THE DOLICY	)

#### 1 INTRODUCTION

NORMA Law (as defined below) cares about your privacy and makes sure that your personal data is processed in a safe, correct, and legal manner. NORMA Law has adopted this Privacy Policy to inform you about how we process your personal data. Should you in any way submit personal data to us at NORMA Law, we encourage you to read this Privacy Policy first.

#### 2 DATA CONTROLLER AND CONTACT DETAILS

NORMA Advokater Handelsbolag, corp.no. 969796-6019, ("NORMA Law", "we" or "us") is the data controller for the personal data processing covered under this Privacy Policy. You are welcome to contact us at any time if you have any questions regarding our processing of your personal data. You can contact us by email at privacy@normalaw.se or by post to NORMA Law, Box 2259, 403 14 Gothenburg, Sweden. Our office is located at Parkgatan 49 in Gothenburg.

#### 3 HOW YOUR PERSONAL DATA IS PROCESSED

## 3.1 Fulfilment of client assignments

#### Whose personal data do we process?

*Clients*: Natural person who is our client or who represents/is employed by our client. This includes partners and beneficial owners.

*Counterparties*: Natural person who is a counterparty or who represents/is employed by a counterparty. This includes partners and beneficial owners.

Other natural persons who have a connection to an assignment handled by NORMA Law, for example representatives of or employees of a partner, or a group company of the client or the counterparty. This can also be employees of companies that are to be sold or acquired, guarantors, experts, witnesses, employees of authorities, courts, banks, and auditors.

## What personal data do we process?

As a starting point, we save all the information that we receive within the scope of the assignment. We usually receive the information directly from you as a data subject or the client. We may also supplement and check the information against sources such as the civil status register, credit information companies and the companies register.

Clients

If the client is a natural person, we will process the name, social security number, address and contact details, information relating to a contract, financial situation (assets, income, expenses, liabilities), sex, nationality, civil status, information in communication (verbal, email, letter), bank details and account details, transactions, type of case (jurisdiction), and all information relevant to the case/assignment in question, i.e. the course of events.

If the client is a legal person, the following data are usually processed regarding the client's employees/representatives: name, role/title, employer/client, contact details, information in communication (verbal, email, letter), all information relevant to the case/assignment in question.

In some cases, information is also collected if the person is someone in a politically exposed position or is closely associated with such a person.

## **Counterparties**

If the counterparty is a natural person, the same categories of data are usually processed as for a client who is a natural person, see above.

If the counterparty is a legal person, the same categories of information are usually processed as for a client who is a legal person, see above.

## Other natural persons

Which categories of data are processed depends on the connection to the client case, e.g. name, role/title, employer/client, contact details, information in communication (verbal, email, letter). If you are employed by a company that is to be sold or acquired, social security number, information about the employment contract, including income, benefits and other remuneration will also be processed.

## How do we collect personal data?

From the client, from counterparties, from public information sources, from courts, from websites on Internet (e.g. the client's or the counterparty's website), from witnesses and from other relevant third parties in each case.

#### Why and on what legal basis do we process your personal data?

We process personal data for the main purpose of providing and conducting legal activities, carrying out client assignments in accordance with the client's instructions and with the laws and guidelines to which we as a law firm are subject. Your personal data will only be used to the extent necessary in each individual case to achieve this purpose.

Receiving, administering, and performing the client assignment

- Receive and administer assignment requests;
- Confirm the identity of the client and the counterparty;
- Check that there is no conflict of interest before we accept assignments (bias review);
- Carry out the assignment according to the client's instructions and act as legal representative for the client;
- Communicate with the client, administer meetings with relevant parties; and
- Manage and administer the assignment and the client relationship, including presenting results of the work, invoicing and handling payments/transactions.

In digital video conferences, video- and audio are processed if you have activated your webcam and microphone. All attendees of the video conference can see you and access your name. This processing is carried out in real time and is never recorded.

The processing is carried out on the basis of our legitimate interest (Article 6.1.f) to fulfil contractual obligations towards our client and to carry out the assignment according to the client's instructions. If our client is a natural person, his/her personal data will instead be processed on the basis of fulfilment of the agreement (Article 6.1.b). Processing is also carried out on the basis of our legitimate interest (Article 6.1.f) to fulfil obligations that we are subject to in accordance with the Swedish Bar Association's regulations.

Fulfilling obligations that we are subject to

- In some cases, in accordance with the money laundering regulations, we
  process data within the framework of preventing, detecting, investigating or
  reporting money laundering or terrorist financing.
- For accounting purposes, such as preparing and maintaining accounting records in accordance with the Accounting Law.

The processing is necessary in order to fulfil legal obligations that we are subject to (Article 6.1.c).

Handling and defending legal claims, as well as safeguarding our rights provided by law or agreement

Where applicable, your personal data will be processed in order that we can

- investigate and respond to a legal claim against NORMA Law, for example within the scope of a dispute with you or a third party;
- enforce and safeguard our legal and contractual rights, for example in connection with the recovery of claims; and
- investigate and ensure that we comply with obligations that we are subject to according to e.g. money laundering and data protection legislation, and the Bar Association's ethical regulations, etc. and defend ourselves against legal claims in this regard.

The processing is performed on the basis of our legitimate interest (Article 6.1.f) to handle and defend legal claims, as well as to safeguard our rights provided by law or agreement.

Evaluating our business activities and following up on the client relationship

Personal data is also processed to compile collected statistics on, for example, client type, sales, and to carry out surveys in order to analyze and evaluate the business activities. In the statistics and reports that are created, personal data is used in aggregate form, and does not identify you as a person.

The processing is carried out on the basis of our legitimate interest (Article 6.1.f) to evaluate, improve and develop our business.

## How long do we store your personal data?

According to the Swedish Bar Association's rules, we are obliged to retain information relevant to an assignment for ten (10) years after the case is closed, or for a longer period if necessary. If a situation arises where we need to assert, defend, or respond to a legal claim, the personal data may be used for this purpose during the aforementioned period.

Personal data processed for accounting purposes is stored for seven (7) years. According to current money laundering legislation, we store personal data for five (5) and up to ten (10) years.

## 3.2 **Receivership** (bankruptcy)

## Who is responsible for your personal data?

The law firm's NORMA Law operations

NORMA Law is responsible for your personal data that the bankruptcy administrator processes in its role as administrator.

The bankruptcy estate's operations

The bankruptcy estate is responsible for your personal data that the bankruptcy administrator processes within the framework of the bankruptcy estate's activities and in its capacity as its representative.

### Whose personal data do we process?

We process personal data about the following categories of people:

*Representatives*, i.e. the natural persons who are representatives of legal persons who have gone bankrupt.

Physical bankruptcy debtors, i.e. natural persons who have gone bankrupt.

*Creditors*, i.e. natural persons who are representatives of creditors or natural persons who are creditors.

*Debtors*, i.e. natural persons who are representatives of debtors or natural persons who are debtors and who have debts to the bankruptcy debtor.

*Shareholders*, i.e. natural persons who own shares in the bankrupt company or natural persons who are representatives of shareholders.

*Employees*, i.e. natural persons employed by the bankruptcy debtor.

Guarantors, i.e. natural persons who provide a guarantee.

*Customers*, i.e. natural persons who are customers or who are representatives of the customers of the bankruptcy debtor or the bankruptcy estate.

*Suppliers*, i.e. natural persons who are representatives of the bankruptcy debtor's or the bankruptcy estate's suppliers of various services.

Auditors or accounting consultants.

*The government*, i.e. natural persons who are representatives of the government, for example contact persons at the Swedish Enforcement Authority, the Swedish Tax Agency, or the supervisory authority.

Bank, i.e. natural persons representing banks.

*Third party*, i.e. natural persons who own property in the bankruptcy debtor's possession (not third-party property).

*Family members*, i.e. natural persons who may be, for example, parents, siblings, etc. to any party.

## What personal data do we process?

We may process the following personal data about you: name, social security number, contact information, land register number, vehicle registration number, IP number, bank details, salary information, union membership, health data, and other information relevant to the matter that appears in the individual case.

## How do we collect personal data?

From the bankruptcy estate, from counterparties, creditors, debtors, from public information sources, from courts, from websites on Internet (e.g. the client's or the counterparty's website), from witnesses and from other relevant third parties in each case.

## Why and on what legal basis do we process your personal data?

In order to be able to conclude, handle and perform agreements with you as a creditor, debtor, supplier, customer, auditor or accounting consultant, employee or bank, we collect and process personal data regarding you. The legal basis for our processing of your personal data is that it is necessary in order to fulfil an agreement with you or to take measures before such an agreement is concluded.

In the event that you are a representative or contact person for any of the abovementioned categories of data subjects, the legal basis for our processing of your personal data is a weighing up of interests, i.e. that the processing is necessary for a purpose that relates to our legitimate interest in maintaining and fulfilling commitments in contractual relations. If you do not provide the personal data that we request, we will not be able to fulfil commitments to you or the organization you represent.

Some personal data may also be processed because we have a legal obligation to fulfil, for example personal data resulting from the bankruptcy estate's accounting obligation, obligation to create a bankruptcy estate register, or other obligations that we are subject to by law.

In order to perform the duty as bankruptcy administrator to ensure that the bankruptcy estate is managed correctly and in accordance with the assignment given to the bankruptcy administrator, personal data may be collected and processed if the processing is necessary in order to perform a task of public interest. For example, it is the responsibility of the bankruptcy administrator, as a representative of the bankruptcy estate, to ensure that creditors of the bankruptcy debtor are not disadvantaged, and that the distribution of any assets is performed correctly.

NORMA Law also collects and processes personal data regarding you for the purpose of performing the assignment given to a bankruptcy administrator at NORMA Law. The processing is necessary in order to perform a task of public interest or as a part of the exercise of authority that the handling of bankruptcy cases may involve, for example wage payment guarantee decisions regarding employees of the bankruptcy debtor.

In digital video conferences, video- and audio are processed if you have activated your webcam and microphone. All attendees of the video conference can see you and access your name. This processing is carried out in real time and is never recorded.

## How long do we store your personal data?

We never store personal data longer than necessary with regard to the purposes of the processing. We therefore regularly sort through stored personal data and delete the data that is no longer needed.

We may need to store personal data for a longer period, among other things to administer any guarantees, limitation periods, to comply with legal requirements, administrative decisions and handle legal claims that may be directed against NORMA Law, the bankruptcy debtor, and the bankruptcy estate. We need to store personal data for up to ten (10) years in accordance with the Swedish Bar Association's guidelines.

## 3.3 Suppliers, partners, authorities

#### Whose personal data do we process?

Natural person who represents or is employed by a supplier or partner of NORMA Law, or an authority NORMA Law is in contact with.

## What personal data do we process?

We usually process name, role/title, employer/client/authority, contact details, information in communication (verbal, email, letter) and in agreements.

#### How do we collect personal data?

From you or the organization you represent.

## Why and on what legal basis do we process your personal data?

In connection with the business relationship between NORMA Law and the organization you represent, we will process your personal data in order to:

- Enter into agreements with you or the company/organization you represent.
   This includes confirming your identity and your right to represent the company/organization;
- Administer the relationship including communicate with you as a contact person, administer meetings and follow up on the matter/delivery;
- Make use of the services or goods purchased in the intended manner, e.g. for the purpose of receiving delivery of the products, use customer support including complaints; and
- Handle invoices and payments.

In digital video conferences, video- and audio are processed if you have activated your webcam and microphone. All attendees of the video conference can see you and access your name. This processing is carried out in real time and is never recorded.

The processing is carried out on the basis of our legitimate interest (Article 6.1.f) to be able to administer the agreement, the contractual relationship, fulfil our contractual obligations and safeguard our contractual rights.

As for employees of authorities, your information is processed in order to (i) communicate with the authority e.g. in specific cases/matters, and (ii) report correctly and otherwise fulfil obligations/take measures necessary to comply with law or safeguard legal rights or for the case in question.

Where applicable, your personal data may be present on such documentation that we need to store for accounting purposes. The processing is then carried out on the basis that it is necessary in order to fulfil a legal obligation (Article 6.1.c) that we are subject to.

Where applicable, your personal data may need to be processed in order for us to assert, investigate, respond to or defend ourselves against a legal claim. For example, in the context of a dispute with your employer. The processing is carried out on the basis of our legitimate interest (Article 6.1.f) to handle and defend legal claims, as well as to safeguard our rights provided by law or agreement.

## How long do we store your personal data?

The personal data is stored as long as the contractual relationship between NORMA Law and your employer/client lasts and for a period of three (3) years thereafter. If a situation arises where we need to assert, defend, or respond to a legal claim, the personal data may be used for that purpose and for an extended period, but not longer than ten (10) years. Personal data processed for accounting purposes will be stored for seven plus one (7+1) years.

## 3.4 Website and digital channels

## Whose personal data do we process?

Visitors of NORMA Law's website "www.normalaw.se", and our social media pages.

## What personal data do we process?

Electronic identification data, cookies, but also the information that you actively provide such as name and email. The collection takes place in connection with your visit to the website. Your own browser and device settings influence what information we may collect from your visit.

On our social media channels, we process data that you provide to us, e.g. name email address, picture, video clip, username, and information in your comments and posts on our pages.

## Why and on what legal basis do we process your personal data?

NORMA Law's website and social digital channels are communication channels through which we can provide information about our business, our lawyers, events and seminars that we will arrange or participate in. The channels also make it possible for interested parties to contact us, sign up for newsletters and events/seminars.

NORMA Law is responsible for posts we publish ourselves and for posts other users publish on our social media pages/channels. Your public activity in our social channels (such as sharing or commenting on a post) can be seen by anyone who has access to the page in question and can be shared further by them. Other members and visitors of our pages can find and see your publicly posted content, including your name and picture.

We reserve the right to delete posts and comments that in our opinion are offensive, aimed at marketing other activities, involve copyright infringement, criminal activity, or cause NORMA Law to process personal data in violation of applicable data protection laws.

The legal basis is NORMA Law's legitimate interest to enable the use of the communication channels as intended, and in informing about our business and answering incoming questions, as well as maintaining relationships with clients and stakeholders, creating new ones, or regaining previous ones.

## How long do we store your personal data?

See our Cookie Policy. Public posts and activities in our social media channels are saved as long as we believe that it is relevant content for the channel in question.

We will always delete your personal data on our social media if you request it.

## 3.5 Events, seminars, and other contacts

## Whose personal data do we process?

The natural persons who register for and participate in events that NORMA Law arranges or participates in. Natural persons who in some other way come into contact with us, for example at conventions, through participation in investigations, via communication channels and via email.

## What personal data do we process?

Name, role/title, employer/client, contact details, food preferences, information in communication (letter, email, verbal), image and sound recording, history log regarding the event/seminar, and how you registered. We also process history logs about which mailings we sent you if you responded to the evaluation (not the answers you have given).

### How do we collect personal data?

From you.

#### Why and on what legal basis do we process your personal data?

### Events and seminars

If you register for an event or seminar organized by NORMA Law, we will process your personal data in order to administer your participation and arrange the event; and to evaluate and follow up on how it went. This includes drawing up lists of participants, sending out information regarding the event, ordering food, and conducting surveys. During the event, we may document via images and video for the purpose of providing information about our business operations via our communication channels. The processing is carried out on the basis of our legitimate interests (Article 6.1.f) to market and provide information about our business operations, to develop and improve business activities and to maintain the business relationship we have with you.

## Communication in connection with enquiries

If you contact us through our digital communication channels, letters, or emails, we must collect and store personal data. The purpose of the processing is to handle and answer enquiries related to our business operations. The processing is carried out on the basis of our legitimate interest (Article 6.1.f) in answering incoming questions and conducting our business. Certain enquiries may also be processed for our legitimate interest in following and demonstrating that we comply with the laws

and regulations to which we are subject, such as issues relating to the exercise of data subject rights under data protection laws.

#### How long do we store your personal data?

The data will be saved for one (1) year from your most recent participation. Food preferences are deleted immediately after the event. Images and videos that you appear in are deleted after a maximum of three (3) years (note that if the material has been published in digital channels, we no longer have control over the deletion). If you have given consent to the processing, the period of time you have agreed to apply instead, or until you withdraw your consent.

Communication in connection with enquiries to NORMA Law will be deleted six (6) months after the question has been answered. If we consider the communication necessary in order to defend legal claims, to demonstrate that we have complied with a legal obligation, or to protect our legal rights, the storage period will be extended to the time required, but to a maximum of ten (10) years.

## 3.6 Marketing and information about our business operations

## Whose personal data do we process?

Natural persons with whom we have or have had a business relationship, such as representatives or employees of existing, former, or potential clients, participants at events or seminars, or whose details we have received at conferences/events, and those who have signed up to our newsletter.

#### What personal data do we process?

Name, contact details, client type, role/title, employer/client, in some cases history logs about which newsletters/mailings we sent you.

## How do we collect personal data?

From you, and as generated during our use.

#### Why and on what legal basis do we process your personal data?

Your personal data is processed for the purpose of direct marketing and to inform you, in your professional role, about our business operations, such as which services we offer, our lawyers' experience, and to provide other information about the activities we organize or participate in. This includes, for example, sending out information such as newsletters and invitations via digital channels and email, as well as analyzing, measuring, and following up a marketing activity. The processing is carried out on the basis of our legitimate interests (Article 6.1.f) in marketing and providing information about our business operations, developing and

improving business activities and maintaining the business relationship we have. If you have signed up for newsletters the legal basis is Article 6.1.b. (contract). In some cases, consent is obtained for the above purposes and the use of electronic marketing.

## How long do we store your personal data?

For the above purposes, your personal data is processed for one (1) year from the time when (i) the business relationship or client relationship between your employer and NORMA Law ends; or (ii) your most recent participation in a seminar or event. If you have given consent to the processing, the period of time you have agreed to apply instead, or until you withdraw your consent. You always have the right to refuse further direct marketing; you can do this by following the instructions on unsubscribing in the message or by contacting us.

#### 3.7 **Recruitment**

#### Whose personal data do we process?

Natural person applying for a job or internship with NORMA Law.

## What personal data do we process?

The information you provide to us in connection with the application, usually: name, social security number, address and contact details, image, education, professional experience, grades, other skills and qualities and something about yourself, all information in communication such as email and dialogue in our recruitment system. If you apply using your Facebook or LinkedIn account, we also collect your profile picture, email address and a summary of your registered information in the account. We also keep internal notes in connection with interviews and make a judgment in relation to the position applied for. We may process information about health and ethnicity if you provide such information yourself. We do not use processes that involve automatic decision-making.

If you submit your application via our external recruitment system, we also collect electronic identification data such as IP address, data created by cookies e.g. time of your visits, navigations on the website, choices/actions you make and information about the source (website history), and type of device you use. This may be combined with information in your registered profile.

## How do we collect personal data?

From you, your references (if any), publicly available information on Internet e.g. LinkedIn, we may check your information against public information sources, the Swedish Bar Association, and the University you graduated from.

## Why and on what legal basis do we process your personal data?

Your personal data needs to be processed in order for us to be able to recruit employees to the business. Within the scope of the recruitment process, your information is processed for the following purposes:

- Managing the recruitment process, including administering application documents and booking interviews;
- Evaluating and assessing the candidate in relation to the position in question;
- Contact the references you provided and check your information against other sources (such as the University you graduated from and your references);
- Communicating with the candidate and providing information about employment; and
- If you have submitted a spontaneous application (i.e. not to a specific position), your application will be saved to provide information and consider your application the next time we are hiring.

We have assessed that it is in the interests of both NORMA Law and the jobseeker that the personal data is processed for recruitment purposes. The processing is carried out on the basis of our legitimate interest (Article 6.1.f) to recruit employees and to simplify/increase the efficiency of the recruitment process.

If you submit the application via our digital recruitment platform, we may also obtain your consent to process your data in order to create a candidate bank through which we can inform you about vacancies with us on an ongoing basis. We save information from previous recruitment processes that you have been involved in. The processing is carried out on the basis of your consent (Article 6.1.a).

If our digital platform is used, electronic identification data is also processed for analysis and statistical purposes by linking analytical tools from Google to the platform. The purpose is to understand how candidates find NORMA Law, and to analyze, measure and follow up a job advertisement. The processing is carried out on the basis of our legitimate interest (Article 6.1.f) to develop and improve our recruitment. The processing takes place at an aggregate level but can in some cases identify a candidate.

We also process your personal data for the purpose of defending and responding to a legal claim, but also to safeguard our legal rights, for example in the context of a discrimination case, or an employment law case such as in a case of pre-emption rights or re-employment. The information is stored for two (2) years for this purpose.

### How long do we store your personal data?

Your personal data is stored for six (6) months from the most recent job you applied for. Your data is thus stored until the job you applied for has become a permanent employment position. If you have given your consent to the processing, the data is instead stored for two (2) years from when you last gave your consent.

## Aggregated data (non-identifiable personal data)

We may share aggregated data with third parties. In such cases, the aggregated data has been compiled from information collected via the service and may, for example, include statistics on Internet traffic or the geographical location where the service is used. The aggregated data does not contain any information that can be used to identify natural persons and is therefore not considered personal information.

## 4 WHO HAS ACCESS TO THE DATA?

We do share your personal data with our employees and certain third parties in order to conduct our business. Namely:

- a) Authorities, courts, counterparties, debtors, creditors, other lawyers, advisors, consultants, and insurance companies. Examples of situations where your personal data may be shared to these categories of recipients are when such a measure is required in order to: comply with law; carry out our assignment; collect and control information and evidence; follow a request or a decision from an authority or a court; follow the client's request; comply with the rules of the Swedish Bar Association; or when this is required in order to serve an interest that we consider legitimate i.e. our clients.
- b) Service providers, especially server- and data storage/hosting provider; emailand communication (including video meetings) modules/software; other software providers; recruitment platform; and our provider for IT maintenance and support. Sharing personal data with this category of recipient is necessary for us to be able to: use digital tools in the business; receive and send information; hold and attend to digital meetings; and protect all information in the business including personal data (information security).
- c) Banks in order to make or receive transactions/payments.
- d) Auditors in connection with an audit.
- e) In some cases, our insurance company, legal advisor, and authorities if necessary to enforce and safeguard our legal and contractual rights.

f) We use social plugins on the website. This means that we have integrated content from a social network onto our website, which can in some cases relate your use of and visit to our website to your account in the network (provided you have an account). Content from the social network can be displayed on our website and it is possible for you to share content from our website on the social network. For information on the social network's personal data processing, visit their websites <a href="Instagram">Instagram</a>, <a href="Facebook">Facebook</a> and <a href="LinkedIn">LinkedIn</a>.

We only share your information with partners we trust and if we, when needed, have entered into the necessary data transfer agreement or personal data processing agreement.

In some cases, personal data will be disclosed to a party outside the EU or the EEA. It especially concerns cases where the client case requires us to do so e.g. where the counterparty is located outside EU/EEA. Also, we currently have software service providers based in the U.S. We only share your personal data with such parties if we have taken necessary safety precautions (e.g. entered into EU's standard contractual clauses) to assure an adequate level of protection.

#### 5 WHAT RIGHTS DO YOU HAVE?

Below is an overall description of the rights you as a data subject have under the General Data Protection Regulation. You exercise your rights by contacting NORMA Law.

Upon receipt of your request, NORMA Law will make an assessment of the request to determine if it is justified. All rights set forth below are not absolute and exceptions may be made.

## Access to personal data

You are entitled to request access to the personal data that we process about you along with information about how it is being processed and any recipients of the data. NORMA Law, as data controller, will provide you with a free copy of the personal data being processed.

#### Correction of incorrect personal data

You are entitled to request rectification of incorrect personal data. Furthermore, you are entitled to supplement incomplete personal data.

## Erasure of personal data

In some cases, you are entitled to request erasure of your personal data if it is no longer necessary for the purpose for which it was collected, if there is no legal basis for its processing, or if our processing is based on your consent. However, there

may be legal requirements, contractual relationships, or compelling legitimate interests that prevent us from deleting your personal data.

## **Restriction of processing**

You are in some cases entitled to request that the processing of your personal data shall be limited until (i) incorrect data is rectified; (ii) until an objection from you has been investigated; (iii) if the data is no longer necessary for the purpose for which it was collected but you object to erasure of it and request that the processing is instead restricted; or (iv) if NORMA Law is no longer in need of the personal data but you need it to establish, exercise or defend legal claims.

## Right to object

You have the right to object at any time to the processing of your personal data if the legal basis for the processing is our or a third party's legitimate interest. You also have the right to object at any time to the processing of your personal data if the data is processed for direct marketing purposes.

## Transfer your data/data portability

You are entitled to receive the personal data that you have provided to us in electronic form and, if technically feasible, have the data transferred to another data controller. This right applies if we are processing your personal data on the basis of your consent or for fulfilling a contract with you.

## Withdrawal of your consent

If we are processing your personal data on the basis of your consent, you may withdraw this consent at any time. Your withdrawal does not affect the legality of our processing up to the point of your withdrawal.

## **Complaints of the processing**

If you are not satisfied with how we are processing your personal data we ask that you contact us, see our contact information in Section 2. You also have the right to lodge a complaint with a supervisory authority, which in Sweden is the Swedish Authority for Privacy Protection (www.imy.se), Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm.

NORMA Law undertakes no personal data processing that involves automatic decision-making, including profiling.

### 6 USE OF EMAIL

Please note that email without encryption may involve security and confidentiality risks. An email can be compared to a postcard. Therefore, we ask that you do not provide any information that you do not want a third party to see. Never provide any sensitive information or information that may be used for undesirable purposes by a third party.

NORMA Law always has standard encryption activated for email communication, but this is not always sufficient. If we deem that the specific information cannot be sent with standard encryption and email, we will, if possible, add additional encryption, or use another method of communication. The same applies if you object to the use of email communication.

#### 7 CHANGE OF THE POLICY

NORMA Law reserves the right to change and update this policy. In the event of material changes to the policy or if existing information is to be processed in a manner other than that specified, you will be informed in an appropriate manner.