

## **Processing of personal data - Information in accordance with the General Data Protection Regulation (2016 /679 / EC)**

Kastell is the controller of the personal data of contact persons, suppliers, organisations, public authorities, and companies, which has been obtained by way of performing our business. This further applies to personal data we receive regarding visitors when we organise seminars and similar events. (We have developed a special information document relating to our processing of personal data regarding contact persons at clients which covers the main part of Kastell's personal data processing).

We process the data in order to fulfill and manage supplier contracts, provide seminars, and for billing and accounting purposes as well as for marketing. The data processed for the purpose of fulfilling agreements is handled on the premise that they are necessary to fulfill the obligations set forth in the agreements as well as duties arising from statutory law.

The data processed for marketing purposes is to be handled on the basis of our legitimate interest in developing the business and communicating with our contacts.

Personal data may be transferred between the law firm's group or sister companies for the purpose of performing conflict of interest and money laundering checks, as well as for the exchange of information and knowledge, and resource allocation. We will not disclose personal information to third parties other than in cases in which (i) it is specifically agreed upon between the law firm and yourself, (ii) it is necessary within the framework of a particular assignment to exercise your rights, (iii) it is necessary for Kastell to comply with statutory duties, or to comply with public authority decisions, or court judgments; or (iv) in the event that we hire third-party service providers who perform assignments on our behalf.

Kastell's basic position is to keep your personal information only for a period deemed necessary to fulfill our contractual obligations or as stipulated under statutory law, taking into account that a claim for negligence may arise with regard to performance of contractual obligations.

Tasks processed for the purpose of developing, analyzing and marketing the law firm's activities are stored for a period of up to two years after the last contact.

You have the right to request information cost-free from Kastell regarding the use of personal data relating to yourself. We will correct or delete information that is incorrect, or limit the processing of such information at your request or by our own initiative. You also have the right to request that your data is not processed for direct marketing purposes. You also have the right to receive part of your personal data in a machine-readable format or, if technically possible, to transfer the data to a third party that you have instructed. If you are dissatisfied with our data processing, you can lodge a complaint with a regulatory authority, which in Sweden is the Swedish Data Protection Authority ([www.datainspektionen.se](http://www.datainspektionen.se)). You can also contact the supervisory authority in the country where you live or work.

Kastell does not transfer personal data to third countries.

Contact us at [personuppgifter@kastelladvokatbyra.se](mailto:personuppgifter@kastelladvokatbyra.se) or at the address below, in the event that you have any questions regarding the processing of personal data.

The data controller is Kastell Advokatbyrå AB, 556811-6494, Stureplan 13, Box 7169, 103 88 Stockholm, telephone 08-459 12 40, [www.kastelladvokatbyra.se](http://www.kastelladvokatbyra.se), [info@kastelladvokatbyra.se](mailto:info@kastelladvokatbyra.se)

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### **Contact persons at clients**

Kastell is the controller of the personal data of contact persons at clients which has been obtained in conjunction with the assignment, or which has been processed in the course of the assignment being prepared or executed. You are not required to provide us with any personal information, however, this would signify that we cannot undertake the assignment, as we would not be able to carry out the necessary conflict of interest and money laundering checks.

We process the data to carry out mandatory conflict of interest and (if applicable) money laundering checks for the purpose of performing and managing the assignment, to safeguard your interests, and for accounting and billing purposes. The data is processed on the basis that it is necessary for fulfilling our obligations to the client (by way of our agreement) and / or balancing interests and / or fulfilling duties in accordance with statutory law.

The data may also be used for marketing purposes, business and methodological development, market analyses, statistics and risk management. The data processed for these purposes is to be handled on the basis of our legitimate interest in developing the business and communicating with our contacts.

Personal data may be transferred between the law firm's group or sister companies for the purpose of performing conflict of interest and money laundering checks, as well as for the exchange of information and knowledge, and resource allocation. We will not disclose personal information to third parties other than in cases in which (i) it is specifically agreed upon between the law firm and the client, (ii) it is necessary within the framework of a particular assignment to exercise the client's rights, (iii) it is necessary for Kastell to comply with statutory duties, or to comply with public authority decisions, or court judgments; or (iv) in the event that we hire third-party service providers who perform assignments on our behalf. The information may be disclosed to courts, authorities, counterparties and

counterparty agents if necessary for the purpose of safeguarding the client's rights.

Personal data is stored, in accordance with the Swedish Bar Association's Statutes and its Code of Conduct, for a period of ten years from the date of completion of the assignment, or for an extended period of time due to the nature of the assignment. Data processed for the purpose of developing, analyzing and marketing the law firm's activities is stored for a period of up to ten years after the last contact with the client. In the event that you wish to unsubscribe from newsletters or similar information channels, the data will be deleted immediately.

You have the right to request information cost-free from Kastell regarding the use of personal data relating to yourself. We will correct or delete information that is incorrect, or limit the processing of such information at your request or by our own initiative. You also have the right to request that your data is not processed for direct marketing purposes. You also have the right to receive part of your personal data in a machine-readable format or, if technically possible, to transfer the data to a third party that you have instructed. If you are dissatisfied with our data processing, you can lodge a complaint with a regulatory authority, which in Sweden is the Swedish Data Protection Authority ([www.datainspektionen.se](http://www.datainspektionen.se)). You can also contact the supervisory authority in the country where you live or work.

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