

Integrity and Personal Data Policy

Advokatfirman dNovo Integrity and personal Data Policy 2019:1

This Integrity Policy describes how Advokatfirman dNovo Göteborg AB, 559074–4818, and Advokatfirman dNovo Helsingborg Handelsbolag, 969771-7685, (hereinafter collectively referred to as "dNovo" and individually referred to as "Company"), processes your personal data. In this Policy, "we", "our" and "us" refer to dNovo.

We care for and protect your integrity. We are also responsible to ensure that we process your personal data in a lawful, fair and transparent manner. This means, among other things, that

- we collect personal data for the legitimate purposes stated in this Policy, and we do not process the personal data in any manner that is incompatible with these purposes,
- the personal data we process are adequate, relevant and necessary in relation to the purposes for which they are collected and used, and,
- the personal data we process are accurate and, when necessary, kept up to date.

When it comes to our processing of personal data in bankruptcy and company reconstruction matters, you should in particular read section 8 below.

1. CONTROLLER OF PROCESSING OF YOUR PERSONAL DATA

Advokatfirman dNovo Göteborg AB, 559074-4818, respectively Advokatfirman dNovo Helsingborg Handelsbolag, 969771-7685, are independent controllers of the processing of your personal data and are responsible to ensure that such processing is compliant with applicable data protection regulation.

2. WHOSE PERSONAL DATA DO WE PROCESS

We process personal data concerning the following categories:

Clients, meaning a natural person who either is a client of dNovo or who is a representative or a contact person of a client of dNovo. This also includes client-related data, ie. personal data concerning a natural person which is being processed within the framework of matters in the legal practice.

Other business contacts, meaning a natural person who has contact with dNovo. It may be a representative or a contact person of a potential future client or supplier, a representative or a contact person of a co-operating partner of a representative or contact person of a co-operating partner of dNovo, or who in any other way has contact with dNovo without being a client.

Visitors, meaning a natural person visiting our website or contacting us through a form on our website.

3. WHAT PERSONAL DATA CONCERNING YOU DO WE PROCESS

We process both data which you provide to us and data which we collect from you.

Personal data which you provide to us

Anytime you as a client or representative or contact person of the legal person use our services, contact us by phone or email, download material from our website or participate in our events, we process the personal data concerning you which you provide to us. Personal data which you provide to us and which we process may be, for instance, your name, address, mobile or phone number, your email address, copies of identity documents, information about bank account number and other invoicing data, and other data needed for carrying out our duties.

Personal data which we collect from you

Anytime you visit our website and download material or subscribe to our newsletter, we collect personal data concerning you. It may be your IP address and which subpages you have visited on our website. For more information about the data which we collect concerning you through our website, please see our Cookie Policy which is available on our website.

Personal data concerning you which we obtain from other parties

We may also receive information and material from other actors such as co-operation partners, authorities, our clients etc., both by email and other correspondence which includes personal data concerning third party, and therefore we also process such personal data. If the data are connected to a matter within the legal practice, the data are covered by our duty of confidentiality as lawyers, and we will in those cases not inform you about having possession of such data. To the extent that the data are not about a subject matter within the legal practice, we will, when required, inform you about our processing as a third party.

Specific projects

In certain specific client matters, the parties may need to agree on further personal data processing which may also include processing of sensitive data. This may occur in certain matters which, for instance, include matters related to labour law or due diligence investigations. Separate information about personal data processing in such matters will be given and formulated individually for each matter.

4. ON WHAT LEGAL BASIS AND WHY WE PROCESS YOUR PERSONAL DATA

Clients

In order for us to be able to accept a mandate for you or the legal person you represent, and to be able to carry out such mandate and to look after your or the legal person's interests, dNovo collects and processes personal data concerning you. We further process your data in order to carry through mandatory conflict of interest controls, anti-money laundering controls and invoicing of our work.

If you, as a private person (including one-person businesses), are a client of dNovo, the legal basis for our processing of personal data is that it is necessary in order for us to comply with our contractual obligations towards you, or to take measures prior to entering into our agreement. Should you not provide us with your data, we will not be able to carry out the mandate.



If you are a representative or a contact person of a legal person that is a client of dNovo, or of another natural person who is being processed within a mandate in dNovo's legal practice, the legal basis for our processing of personal data concerning you is a legitimate interest assessment, i.e. the processing is necessary for the purpose of our legitimate interest to maintain and fulfil the performance of our mandates in client relations. Should you not provide us with your personal data, we may not be able to carry out our mandate towards the legal person that we represent.

dNovo also processes your name and contact details such as your email address, as well as data concerning the legal person that you represent, in order to offer and promote our services to you and the legal person. The legal basis for our processing of your personal data is that it is necessary for the purpose of our legitimate interest to promote services that we think you and the legal person that you represent may be interested in. Our interest of processing your personal data in order to send offers to you overrides your potential interest to protect your personal integrity in the light of the potential advantages that these offers mean for the legal person. However, you are entitled to object at any time to processing of personal data for direct marketing purposes.

Certain personal data may also be processed due to a legal obligation that dNovo has to fulfil, e.g. based on dNovo's obligation to keep accounts or other obligations that lie upon dNovo according to law.

Other business contacts

dNovo also collects and processes personal data in order to be able to enter into and handle agreements with suppliers and other business contacts. The legal basis for our processing of personal data, when you have a one-person business that is a business partner of dNovo, is that it is necessary in order to fulfil our agreement with you or to take measures prior to entering into our agreement. The legal basis for our processing of personal data concerning you, when you are a representative of a legal person that is a business partner of dNovo, is a legitimate interest assessment, i.e. that the processing is necessary for the purpose of our legitimate interest to maintain and fulfil the performance of our mandate in the relationship.

dNovo also processes your name and contact details such as your email address, as well as data on the legal person that you represent, in order to offer and promote our services to you and the legal person that you represent. The legal basis for our processing of your personal data is that it is necessary for the purpose of our legitimate interest to promote services which we think the legal person may be interested in. Our interest of processing your personal data in order to send offers to you overrides your potential interest to protect your personal integrity in the light of the potential advantages that these offers mean for the legal person. However, you are entitled to object at any time to processing of personal data for direct marketing purposes.

Certain personal data may also be processed due to a legal obligation that dNovo has to fulfil, e.g. following dNovo's obligation to keep accounts or other obligations that lie upon dNovo according to law.

Visitors on our website

dNovo processes information obtained when you visit our website such as your name, your contact details and your email address as well as information about the legal person that you represent. The purpose is to ensure the quality of and develop our business. The legal basis for our processing of your personal data is that it is necessary for our legitimate interest to be able to develop our business and to meet your and the legal person's needs. Our interest of processing your personal data for

these purposes overrides your potential interest of protecting your personal integrity, among other things in the light of the potential advantages that the development of our business means for the legal person.

5. FOR HOW LONG DO WE STORE YOUR PERSONAL DATA

dNovo does not store data for longer than necessary considering the purpose of the processing. Therefore, we regularly screen the stored personal data and remove the data which is no longer needed.

dNovo stores data concerning you who belong to the 'Client' category (including bankruptcy and company reconstruction matters) for the period of time which is stated in the guidance of the Swedish Bar Association – currently meaning 10 years from the day the matter is completed – or a longer time, when called for by the nature of the matter. dNovo may, however, store data concerning a natural person who is a client or a counter-party in order to enable the required conflict of interest controls in accordance with the guidance of the Swedish Bar Association.

dNovo stores data concerning you who belong to the 'Other business contacts' category for as long as there is an active mandate or contract. After the mandate/the contractual relationship has ceased, dNovo stores the personal data for as long as a legal claim may be made in relation to the contract or insofar as it is necessary to store the data in order to follow legal requirements.

dNovo stores data concerning you who belong to the 'Visitors on our website' category till you have opposed to processing of your personal data, yet not longer than for three years. Should you oppose to processing, dNovo will remove your personal data as soon as possible.

6. WHO HAS ACCESS TO YOUR PERSONAL DATA

Your personal data may be shared with and processed by a third party. It may be companies within our group, service suppliers, other legal advisors, accountants, consultants, courts, authorities etc. Examples of situations where your personal data may be transferred to a third party are when such measures are required due to law, dispute, authority inquiries or decisions, by own request or when it is required in order to fulfil a legitimate interest of dNovo. dNovo remains the controller of the personal data which is transferred, whilst the third party, depending on the circumstances, either becomes an independent controller, joint controller with dNovo or a processor on behalf of dNovo.

7. WHERE DO WE STORE YOUR PERSONAL DATA

dNovo may process your personal data both within and outside the EU/EEA. dNovo will and must take necessary measures in order to ensure that transfers are made in a lawful manner and that the data remain secured by the receiving parties outside the EU/EEA.

dNovo takes appropriate organisational and technical measures in order to prevent any unauthorised or unlawful processing and access, loss, destruction or damage on personal data, and thereby ensure an appropriate level of security.

dNovo engages processors who process all personal data both by data storage and by operating our systems. The processor may in certain cases read the personal data, in the case that our IT system

needs maintaining or other technical support. Our processors are bound by a strict confidentiality agreement.

8. ADMINISTRATION OF BANKRUPTCY AND COMPANY RECONSTRUCTION

Preamble

dNovo has lawyers who undertake assignments as bankruptcy trustee and company reconstruction administrator, and who within those activities take account of the regulation on personal data processing.

The bankruptcy trustee differentiates between the processing within the framework of the activities of the bankruptcy estate and the processing within dNovo's ordinary business. The consequence of such a division is that there may be two different controllers in the bankruptcy matters.

The processing which takes place within a company reconstruction lays within dNovo's ordinary business, except for wage guarantee.

This part of the Personal Data Policy describes how the bankruptcy estate and dNovo process your personal data. The bankruptcy estate and dNovo will in all aspects ensure that personal data is processed in a lawful and accurate manner.

The ordinary business of the law firm in bankruptcy matters and company reconstructions

dNovo is the controller of your personal data which the bankruptcy trustee processes in his or her role as trustee, i.e. within the framework of dNovo's ordinary business. dNovo is responsible to ensure that such processing is compliant with the effective data protection regulations.

In a bankruptcy matter dNovo collects and processes personal data belonging to you for the purpose of carrying through the mandate assigned to a bankruptcy trustee. The processing is necessary for carrying through a public interest mandate or as a step in the exercise of public authority which may be included in the administration of bankruptcy matters and company reconstructions (such as decision on wage guarantee in relation to employees in a bankrupt company or in a company under company reconstruction).

Within the mandate as company reconstruction administrator, dNovo collects and processes personal data belonging to you for the purpose of the mandate assigned to an administrator. The processing is necessary for carrying through a public interest mandate or as a step in the exercise of public authority which may be included in the administration of company reconstructions (such as decision on wage guarantee in relation to employees in a company under company reconstruction).

In relation to other personal data processing in bankruptcy matters and company reconstructions, dNovo refers to the other parts of this Policy.

Activities of the bankruptcy estate

Controller of the processing of your personal data

The bankruptcy estate is the controller of your personal data which is processed by the bankruptcy trustee within the framework of the activities of the bankruptcy estate and as its representative. The

bankruptcy estate is responsible to ensure that such processing is made in accordance with the effective data protection regulations.

Whose personal data does the bankruptcy estate process?

The bankruptcy estate processes personal data concerning persons in the following categories:

- Deputy, i.e. a natural person who is a representative of the bankrupt company,
- Bankruptcy debtor, i.e. a natural person put into bankruptcy,
- Creditor, i.e. a natural person who, personally or as a representative of a legal person, has a claim in the bankruptcy,
- Debtor, i.e. a natural person who, personally or as a representative of a legal person, has a debt to the bankrupt company,
- Shareholder, i.e. a natural person who owns shares in the bankrupt company,
- Employee, i.e. a natural person who is employed by the bankrupt company,
- Guarantor, i.e. a natural person who has given a guarantee,
- Supplier, i.e. a natural person who is a representative of a supplier of the bankruptcy estate,
- Auditor or accountant, i.e. a natural person who is an auditor or an accountant,
- The state, i.e. a natural person who represents the state, such as a contact person of the Swedish Enforcement Authority, the Swedish Tax Agency or the supervisory authority,
- Bank, i.e. a natural person who is a representative of a bank,
- Third party, i.e. a natural person whose property is in the possession of the bankrupt company (excluding property separated from the bankruptcy estate), as well as,
- Family member, i.e. a natural person such as a parent, sibling etc. of a part.

What personal data may the bankruptcy estate process

The bankruptcy estate may process following personal data concerning you:

- Name,
- Personal identity number,
- Contact details, such as address, email address and phone number,
- Property designation,
- Registration number of a vehicle,
- IP number,
- Bank account details,
- Salary details,
- Trade union affiliation,
- Health data, as well as,
- Other information relevant for the matter which might emerge in the individual matter.

Why and on what legal basis does the bankruptcy estate process your personal data?

In order to be able to enter into, handle and fulfil contracts with you as a creditor, debtor, supplier, auditor or accountant, employee or bank, the bankruptcy estate collects and processes personal data belonging to you. The legal basis for our processing of your personal data is that it is necessary in order to carry out our contract with you or to take measures prior to entering into such contract. Should you not provide us with the above-mentioned personal data, we will not be able to fulfil our obligations towards you.

Personal data may be processed due to a legal obligation that the bankruptcy estate has to comply with, such as personal data following the bankruptcy estate's obligation to keep accounts or other obligations that we are subject to according to law.

For the purpose of carrying out the mandate as a bankruptcy trustee to ensure that the bankruptcy estate is being handled with in an accurate manner and according to the mandate assigned to the bankruptcy trustee, personal data may be processed on the basis that the processing is necessary for carrying out a mandate of public interest. For instance, the bankruptcy trustee as the deputy of the bankruptcy estate, is obliged to ensure that the debtors of the bankrupt company are not being disadvantaged, and that the allocation of the distributable proceeds is being done in a correct manner.

For how long does the bankruptcy estate store your personal data?

The bankruptcy estate never stores your data for longer than necessary for the purpose of the processing. We therefore screen the stored data regularly and remove the data which is no longer needed.

The bankruptcy estate needs to store personal data for a longer period of time for instance to administrate potential guarantees, claims deadlines, to comply with legal requirements, authority decisions as well as to handle any legal claims that may be done towards the bankrupt company and the bankruptcy estate. The bankruptcy estate may store personal data for up to 10 years in accordance with the guidance of the Swedish Bar Association.

Who has access to your data?

Your personal data may be shared with and processed by a third party. It may be companies within our group, service suppliers, other legal advisors, accountants, consultants, courts, authorities etc. Examples of situations where your personal data may be transferred to a third party are when such measures are required due to law, dispute, authority enquiries or decisions, by own request or when it is required in order to fulfil a legitimate interest of the bankruptcy estate. The bankruptcy estate remains the controller of the personal data which is transferred, whilst the third party, depending on the circumstances, either becomes an independent controller, joint controller with the bankruptcy estate or a processor on behalf of the bankruptcy estate.

Where does the bankruptcy estate store your personal data?

The bankruptcy estate may process your personal data both within and outside the EU/EEA. The bankruptcy estate will and must take necessary measures in order to ensure that the transfer is made in a lawful manner and the data remains secured by the receiving parties outside the EU/EEA.

What are your rights as the data subject?

What is stated in section 12 below also applies to situations where the bankruptcy estate is the controller.

Contact the bankruptcy estate

Should you have enquiries or other requests about personal data in bankruptcies, please contact dNovo's contact person for personal data processing, see contact details in section 14.

9. COOKIES

When you visit dNovolaw.com, we use cookies. More information about how we handle cookies can be found in our cookie policy.

Please note that if you choose not to accept cookies, you will not be able to use all functions on our website.

10. PROFILING

dNovo may process your personal data through profiling, such as analysing how you use our website. You can object at any time to processing of personal data through profiling. However, this does not apply if such processing is necessary to entering into or fulfilling a contract with you, or if such processing is allowed by applicable legislation.

11. USE OF EMAIL

dNovo will in their communication regarding a matter – both with the client and their representatives and contact persons as well as with courts, authorities and others with whom we, according to the clauses above, may need to share personal data – to use unencrypted email communication, unless there are special reasons against this or unless you object to using unencrypted email communication.

12. WHAT ARE YOUR RIGHTS AS THE DATA SUBJECT?

Right of access

You have the right to turn to dNovo in the capacity as the controller and request access to the personal data which we process, as well as to request information about, among other things, the purposes of the processing and the recipients to whom the personal data have been disclosed. dNovo will, in the capacity as the controller, provide you with a free of charge copy of the personal data which are being processed. For any further copies, dNovo may charge an administrative fee.

Right to rectification

You have the right to obtain without undue delay the rectification of your personal data, or under certain conditions, restriction of processing. If you think that dNovo processes personal data concerning you which are inaccurate or incomplete, you can request that such data are rectified or completed.

Right to erasure

You also have the right to obtain the erasure of your personal data, if they are no longer necessary in relation to the purposes, or if the processing of the personal data is based on consent and the consent has been withdrawn. However, there might be requirements by legislation or a contractual relationship due to which we will not be able to erase your personal data.

Right to object

As the data subject, you have the right to object at any time to processing of personal data concerning you, if the legal basis of the processing is a legitimate interests assessment. You, as the data subject, also have the right to object at any time to processing of personal data concerning you, if they are processed for direct marketing purposes.

Right to data portability

As the data subject, you have the right to receive the personal data which you have provided to dNovo as the controller, and have the right to transmit those data to another controller (data portability). However, this applies with the condition that it is technically feasible and that the processing has been necessary to fulfil a contract.

Right to lodge a complaint

If you are dissatisfied with our processing of your personal data, we ask you to contact us, see our contact details in section 14 below. You also have the right to lodge a complaint about our processing to:

The Swedish Data Protection Authority, Box 8114 104 20 Stockholm
datainspektionen@datainspektionen.se

13. CHANGES TO THE POLICY

dNovo reserves the right to make changes and updates to this Policy. In case of substantive changes to the Policy, or if the existing information is to be processed differently than stated in the Policy, dNovo will give information about this in an appropriate manner.

14. CONTACT dNOVO

Should you have any enquiries or other requests regarding personal data, please contact dNovo's contact person at respective office regarding personal data processing:

Contact details:

Advokatfirman dNovo Göteborg AB, advokat Per Hendar, Box 2115, 403 12 Göteborg, +46 10 788 18 60, per.hendar@dnovolaw.com

Advokatfirman dNovo Helsingborg HB, advokat Natalie Svensson, Box 1108, 251 11 Helsingborg, +46 70 458 65 44, natalie.svensson@dnovolaw.com