



## **ADVOKATFIRMAN GLIMSTEDT'S PRIVACY POLICY**

Glimstedt Law firm cares about your privacy and makes sure that your personal information is processed in a safe, correct and legal manner. Glimstedt has adopted this Privacy Policy to inform you about how we as individual legal entities and data controllers treat and process your personal information. The policy thus covers all law firms operating under the Glimstedt name that from time to time are owners of Glimstedt Sverige HB. Should you in any way submit personal information to us at Glimstedt, we encourage you to read this Privacy Policy first. This Privacy Policy covers all our processing of personal data, no matter how the data has been collected.

### **Personal data that we collect**

Glimstedt processes different categories of personal data in a number of different contexts. Regarding Administration of bankruptcy cases, please see headline below. For example, depending on your relationship with the law firm Glimstedt, one of the following categories of personal data may be collected and processed:

- identification information: name and social security number,
- contact information: telephone number, address and e-mail
- CV with completed education, grades, references (in recruitment processes)
- insurance details,
- such information obtained at the commencement of a client assignment and in the on-going assignment, including the assignments purpose, payment information including payment history, billing and payment reminders, information about where the economic funds that will be used to finance the assignment come from, information regarding the clients family relations to people in politically exposed position,
- IP address, cookies and other traffic data, as well as
- pictures.

In most cases, personal data is collected with you as the provider. Personal data may additionally be supplemented, collected and controlled by the use of public and other registers, such as a population registration register, registers from credit reporting companies, company registers etc.

### **The use of personal data**

Glimstedt only processes personal data that we are lawfully entitled to process. The purpose of the processing is to fulfil obligations in our business towards clients and job or intern applicants. Personal data may also be used for marketing purposes based on our legitimate interest of

communicating with our clients and business contacts, to send invitations to events, for educational purposes, for statistical purposes, and to develop our business. All processing occurs within the framework of the Swedish Bar Association's (*Sw: Advokatsamfundet*) ethical code. When personal data is used for aggregated statistics and for internal development work, the data is anonymized to the largest extent possible. Personal data may also be processed to fulfil the obligations under Swedish law, including but not limited to giving notifications to governmental authorities on suspicion of money laundering or terrorist financing.

If you submit a request for an assignment to us, your personal data will be processed when we evaluate whether we can accept the assignment, and in order to conduct control of conflicts of interest. Your personal information is also processed in the performance of the assignment and in the administration of the assignment. The legal basis for our treatment is the intended contractual relationship and later (if applicable) the contractual relationship.

If you are seeking employment or other similar position at Glimstedt, we will handle your personal information in connection with the recruitment. If we have the intention of saving your application documents for later recruitments, we will ask for your consent.

If you visit our website, your IP-address and cookies will be used for statistical purposes. A cookie is a small text file sent from our web server and saved by your browser. We use as few cookies as possible on our website to maintain a good service on the website. There are two kinds of cookies, "regular" cookies and session cookies. Session cookies disappear when you close your browser and are not saved, while regular cookies are stored on your computer. We use cookies to calculate the number of users and to monitor traffic on our website. By understanding how the site is used, we can develop and improve it. As a user, you can turn off the web-browsers ability to save cookies on your computer via your browser settings. For more information, visit the National Post and Telecom Agency's website ([www.pts.se](http://www.pts.se)).

### *Consent*

The processing of personal data may in some cases be based on consent given by you for a specific purpose. If you have given consent for processing of your personal data for a specific purpose, you are free to withdraw the consent by contacting us. Even though the consent is revoked, Glimstedt may have the right to continue the processing on the basis of other lawful grounds, such as fulfilling an ongoing agreement or arraignment between you and Glimstedt.

### **Recipients of personal data**

Glimstedt may disclose personal data to the data subjects themselves and to third parties such as governmental authorities, counterparties, counterparty agents, courts, auditors, insurance companies and credit companies. Your personal data may be disclosed to the law firms operating under the Glimstedt name for the purpose of performing conflict checks and in relation to transfer of information and knowledge. Most of the above recipients are to be considered as independent personal data controllers. The fact that the company is an independent personal data controller means that we are not controlling how the information submitted to the company will be processed. When your personal information is shared with a

company or a governmental agency that is an independent personal data controller, the company or government agency's privacy policy and personal data management will apply.

In some cases, personal data may be disclosed to a party outside the European Economic Area (EEA), and personal data may therefore be processed outside the EEA. Glimstedt only shares personal data with companies in third countries that has an adequate level of protection or companies that, by approved methods, are considered to achieve an adequate level of protection.

Glimstedt may also share information with our personal data processors where it is necessary for us to carry out our processing, for example the law firm's suppliers of IT services. A personal data processor is a company that processes personal data on our behalf and according to our instructions. When your personal data is shared with a personal data processor, it is shared only for purposes that are consistent with the purposes for which we have collected the personal data. Glimstedt has written agreements with our personal data processors and conducts ongoing checks to ensure that they provide adequate guarantees regarding the security and confidentiality of personal data, as well as compliance with our restrictions and requirements regarding the transfer of personal data to third parties inside and outside the EEA.

### **Safety measures**

Glimstedt has taken appropriate technical, administrative and organizational security measures to ensure that personal data is only processed by authorized personnel and to prevent personal data incidents.

### **Your rights**

If your personal information is processed or will be processed by Glimstedt, you are entitled to request information from the relevant office with a notification of the personal information we process.

You also have the right to request that your personal data is deleted, corrected or restricted. You also have the right to request that your data shall not be used for direct marketing purposes. You furthermore have the right to share your information in a machine-readable format (or, if technically possible, to transfer the data to a third party of your instruction).

If you are dissatisfied with the processing of your personal data, you can file a complaint to the supervisory authority, which in Sweden is Datainspektionen ([www.datainspektionen.se](http://www.datainspektionen.se)).

You may also contact the supervisory authority in your country of residence.

### **The storage period**

Your personal information will be saved as long as necessary to fulfil the purpose of the processing. Personal data attributable to client assignments are normally saved for a period of ten years from the date of completion of the case. Processing of personal data for purposes other

than fulfilment of assignments is retained in accordance with established routines for deletion of personal data. Glimstedt is also continuously working on retaining personal data when it has become out of date and / or when the purpose of the processing has ceased.

### **Contact information**

Each law firm operating under the Glimstedt name is the personal data controller responsible for their respective processing of personal data. Regarding Administration of bankruptcy cases, please see headline below. If you have questions about personal data processing in Advokatfirman Glimstedt's overall national operations, or need assistance in who to contact, please contact [personuppgift@glimstedt.se](mailto:personuppgift@glimstedt.se). Below are the contact details of the respective Glimstedt law firms. Contact the office with which you have a relation by the following email address:

**Falun/Ludvika:** [falun@glimstedt.se](mailto:falun@glimstedt.se)

**Göteborg/Alingsås:** [viarmedochbyggergoteborg@glimstedt.se](mailto:viarmedochbyggergoteborg@glimstedt.se)

**Helsingborg:** [helsingborg@glimstedt.se](mailto:helsingborg@glimstedt.se)

**Jönköping/Nässjö:** [anna.locsei@glimstedt.se](mailto:anna.locsei@glimstedt.se)

**Kalmar:** [kalmar@glimstedt.se](mailto:kalmar@glimstedt.se)

**Karlstad:** [orebro@glimstedt.se](mailto:orebro@glimstedt.se)

**Linköping:** [norrkoping@glimstedt.se](mailto:norrkoping@glimstedt.se)

**Norrköping:** [norrkoping@glimstedt.se](mailto:norrkoping@glimstedt.se)

**Stockholm:** [stockholm@glimstedt.se](mailto:stockholm@glimstedt.se)

**Växjö:** [johan.wanersjo@glimstedt.se](mailto:johan.wanersjo@glimstedt.se)

**Örebro:** [orebro@glimstedt.se](mailto:orebro@glimstedt.se)

### **Administration of bankruptcy cases**

An insolvency estate is an independent legal entity that is represented by one or several receivers appointed by a court. Solicitors at the offices of Glimstedt Law Firm, as listed above, are available to act as receivers.

Depending on the purposes and means as determined by Glimstedt, a certain amount of personal data processing will be effected, while other types of processing will be carried out depending on the purposes and means as determined by the insolvency estate via its receiver. Therefore, there will be two separate personal data controllers acting in bankruptcy cases: the

insolvency estate in question on the one hand and the respective Glimstedt Law Firm office on the other.

*Data control within the framework of Glimstedt Law Firm operations*

The Glimstedt office concerned – see list above – shall act as personal data controller for any personal data processed as part of carrying out the receiver’s mandate. As part of their task, the receiver shall draw up an inventory of the insolvency estate as well as produce a receiver’s report and, if applicable, decide on a wage guarantee for the employees of an insolvent company. The processing of personal data is necessary in this context in order to carry out a task that is deemed to be in the public interest or as part of the receiver’s exercise of the authority conferred to him/her. Personal data will be processed in accordance with the present policy.

*Data control within the framework of the insolvency estate’s operations*

The insolvency estate shall act as personal data controller regarding personal data processed by the receiver as part of the insolvency estate’s operations, including the liquidation of the insolvency estate or possible continuation of operations. Personal data will be processed in accordance with the present policy.