

## PRIVACY POLICY

### 1. General

The law firm Carlsson Wingert safeguards privacy and protection of personal data. It is important to us that personal data is processed in a legal, correct and transparent manner. We process personal data in accordance with applicable legislation, including the General Data Protection Regulation (2016/679, the “GDPR”) This personal data policy describes our processing of personal data and your rights as a data subject.

### 2. Controller of personal data

Advokatbyrå Carlsson Wingert Ab, FO-number 0712287-9  
Nygatan 7B, 22 100 Mariehamn  
Åland, Finland  
Phone: +358 18-13366  
E-mail: [info@cwlaw.fi](mailto:info@cwlaw.fi)

### 3. What personal data do we process and where does it come from?

In our assignments, we regularly receive and process various categories of personal data. Personal data is all data relating to an identified or identifiable natural person.

The personal data we collect is needed to provide our services and to fulfil our legal obligations. The personal data is mainly collected directly from the data subject, but we also receive personal data from authorities and other publicly available sources where personal data has been published by, for example, an employer or an authority.

We mainly process the following personal data:

- basic information, such as name, date of birth and social security number
- contact details, such as postal address, telephone number and e-mail address
- work-related information, such as title, contact details and employer,
- information about the customer relationship, such as information about assignments and payment information
- information about companies, such as contact persons and their contact details, and
- other information required to fulfil our assignments or other obligations.

### 4. Purposes of processing of personal data

We process personal data in order to be able to fulfil our commitments and safeguard our clients' interests, handle administrative tasks in connection with the assignments we have undertaken, and to fulfil our statutory obligations as well as regulations and recommendations established by the Finnish Bar Association, etc.

We also process personal data in supplier relationships, when we buy goods and services, and for the purpose of developing and marketing our services.

Before we accept an assignment, we must also process personal data to check that there is no conflict of interest.

#### **5. Legal grounds for processing personal data**

The legal grounds for our processing of personal data are the following:

- fulfilment of the agreement which is the basis for the assignment we have undertaken to perform,
- balancing of interests, where we have made the assessment that the processing of personal data is necessary for the purposes relating to our client or our legitimate interests and these outweigh any conflicting interests or fundamental rights and freedoms, and
- the processing is necessary for us to fulfil our legal obligations.

The processing may also in some cases be based on consent or another legal basis.

#### **6. Who has access to the personal data?**

We have implemented appropriate technical and organisational measures to protect the personal data that we process against e.g. loss or unauthorized access.

The personal data is processed mainly within our own organization and is only disclosed to others when we have a legal basis to do so. We only disclose personal data in the following circumstances:

- when this has been agreed upon between you and us,
- when this is necessary within an assignment to safeguard the interests and rights of our clients,
- when this is necessary in order for us to fulfil a statutory obligation, a court or official decision, or the regulations of the Finnish Bar Association
- when we use outside service providers who perform services on our behalf, however only so that the processing takes place in accordance with our instructions, or
- when this is otherwise permitted by law.

As a rule, we do not transfer personal data outside the EU / EEA area. If personal data is transferred outside the EU/EEA area, we ensure that the personal data is adequately protected and, as a rule, we use the European Commission's Standard Contractual Clauses (SCC) in such cases.

We do not sell personal data or disclose personal data for marketing purposes.

#### **7. How long is the personal data stored?**

Personal data is kept only for as long as is necessary for the purposes of the processing, but in some cases the personal data must be stored for a longer time in accordance with special regulations.

The information processed in connection with our execution of an assignment is stored in accordance with the Finnish Bar Association's recommendation for the preservation of documents, which means that the information is stored for at least ten years from the completion of the assignment.

#### **8. Your rights as a data subject**

If we process your personal data, you have the right to:

- request a copy of the personal data that we hold about you,
- get inaccurate personal data corrected,
- ask that we erase your personal data, e.g. if this is no longer necessary for the purposes for which it was collected, or
- object to our processing of your personal data and ask us to block, restrict or erase your personal data,
- where applicable, receive the personal data that you have provided to us and that concerns you in a commonly used machine-readable format and have the right to transfer this data to another personal data controller, and
- withdraw the consent that may form the basis for our processing of personal data.

Please note that the above-mentioned rights may be limited with reference to our duty of confidentiality as well as the archiving obligation we have based on laws or regulations issued by the Finnish Bar Association.

#### **9. Complaints and relevant data protection authority**

Should you have any complaints regarding our processing of personal data or any queries regarding the above, please contact us in writing at [info@cwlaw.fi](mailto:info@cwlaw.fi) or by letter to the address provided in this policy.

If you wish to file a complaint about our processing of personal data, you may do so by contacting the Finnish Office of the Data Protection ([www.tietosuoja.fi](http://www.tietosuoja.fi)).