

## Privacy Policy

Advokatfirman Titov & Partners KB, organisation number: 969784-0099

Last updated: 22 January 2026

### 1. Introduction

Advokatfirman Titov & Partners KB, organisation number 969784-0099 (hereinafter referred to as "Titov & Partners", "we" or "us"), is committed to protecting your personal privacy and private life. We therefore strive to ensure that all collection, processing and storage of personal data takes place in a secure manner and in accordance with applicable legislation and regulations. This includes all personal data processing that takes place within the framework of our activities as a law firm - both regarding our clients and others whose personal data may be processed by us.

This privacy policy describes the personal data that Titov & Partners collects, the purposes for which the personal data is processed, how it is protected and how you as a "data subject" can exercise your rights. The policy has been prepared with support from the Swedish Bar Association's guidance for the application of the Data Protection Regulation within legal practice.

### 2. Data Controller

Titov & Partners is the "data controller" for the processing of personal data within the framework of our activities as a law firm. This means that we are responsible for how your personal data is collected and how it is processed and used. All processing takes place in accordance with this privacy policy and in accordance with applicable data protection legislation, the General Data Protection Regulation (GDPR, EU 2016/679) and other applicable legislation for the protection of personal data and privacy.

Contact details:

- Advokatfirman Titov & Partners KB
- Attn: Data Protection Officer
- Humlegårdsgatan 20
- 114 46 Stockholm

- Email: [info@titovlaw.se](mailto:info@titovlaw.se)
- Telephone: +46 8 684 518 50
- Website: [www.titovlaw.se](http://www.titovlaw.se)

Titov & Partners does not use cookies within the framework of our activities as a law firm.

### 3. What are personal data and personal data processing?

#### 3.1 Personal data

Personal data is all information relating to an identified or identifiable living natural person who can be identified directly or indirectly. This includes, for example, name, telephone number, email address and IP address. Personal data also includes factors that are specific to a person's physical, economic, cultural or social identity (e.g. age, ability, ethnicity, race, gender, sexual orientation, socio-economic status and religion). Individual data that does not in itself constitute personal data but which together makes it possible to identify an individual is also considered personal data.

#### 3.2 Processing of personal data

All processing of personal data carried out wholly or partly by automated means constitutes processing within the meaning of the Data Protection Regulation. This means that every action, or combination of actions, relating to personal data is covered by the concept of processing, for example transfer of personal data via email or registration and organisation of personal data.

### 4. What personal data do we collect?

#### 4.1 Ordinary personal data

Titov & Partners only collects the personal data that is necessary for the defined purposes for which it is collected and provided that the personal data is relevant for the defined purpose.

The personal data we usually collect is name, telephone number, email address, personal identity number, title, contact details for relatives or close colleagues, information about employer, billing details, relevant personal data about counterparties, the counterparty's legal representatives or other representatives,

arbitrators, judges, consultants, witnesses and experts as well as other information that is relevant for the law firm's activities.

#### 4.2 Sensitive personal data

In connection with our assignments, we may also collect special categories of personal data such as information about crimes, race or ethnic origin, political opinions, religious beliefs, trade union membership or personal data concerning health or sex life.

#### 4.3 Sources of personal data

The collection of personal data takes place either through the data subject providing the information themselves or through it being provided to us by other parties such as clients, counterparties, the counterparty's legal representatives or other representatives, authorities, courts or other legal bodies. In addition, we may obtain the personal data from private or public registers or other sources.

### 5. Purpose and legal basis for processing of personal data

All processing of personal data within the framework of Titov & Partners' provision of legal services and other activities as a law firm is based on one of the legal bases stated in the EU General Data Protection Regulation. The purposes of the processing and the legal bases for the processing are as follows:

#### 5.1 Fulfil agreements and protect clients' interests

To enable us to perform, manage and administer assignments from clients and protect our clients' interests: to fulfil the agreement to perform assignments that we have undertaken.

#### 5.2 Balancing of interests and regulatory compliance

To carry out an assessment of potential conflicts of interest, verifications related to money laundering rules: our legitimate interest and to comply with applicable legislation and regulations.

#### 5.3 Handle contacts before assignment

To handle contacts made with us before we agree to undertake an assignment: our legitimate interest.

#### 5.4 Accounting and invoicing

For accounting and invoicing purposes: to comply with applicable legislation and regulations.

#### 5.5 Recruitment

To process job applications: our legitimate interest during the recruitment process and thereafter based on consent.

#### 5.6 Events and marketing

Events and marketing: our legitimate interest and consent.

### 6. How long is personal data stored?

#### 6.1 General storage period for client assignments

Titov & Partners stores and retains personal data collected in accordance with law and the Swedish Bar Association's rules. This entails an obligation to retain the data for ten years after completed assignment. Taking into account the nature of the current matter, the data may need to be retained for longer than ten years. The storage period may also be determined with regard to what is prescribed by law, such as the Bookkeeping Act and money laundering rules.

#### 6.2 Development and analysis

For the data that Titov & Partners collects to support the further development and analysis of the provision of legal services and other activities as a law firm, a storage period of one year after the last contact with us applies.

#### 6.3 Marketing

Data that has been collected for marketing purposes is stored until the recipient of the marketing opts out of receiving information for marketing purposes, but not longer than two years from the last contact with Titov & Partners. Data that has been collected with your consent is not stored after you withdraw your consent (with certain exceptions according to law). If you no longer wish to receive marketing

communications or wish to withdraw your consent as described above, please notify us by sending an email to the following email address: [info@titovlaw.se](mailto:info@titovlaw.se).

## 7. Technical and organisational security measures

Titov & Partners takes the technical and organisational security measures that are necessary to ensure a high level of protection. This includes proactive measures to prevent collected data from being misused, lost, ending up with unauthorised parties, destroyed or otherwise not handled in accordance with this privacy policy. To ensure a high level of protection, we regularly review our internal security policies and routines and update and/or modify them as necessary.

When Titov & Partners engages a third-party supplier to support its activities as a law firm, we have a responsibility to ensure that the supplier complies with our requirements regarding the protection of personal data processed by the supplier on our behalf.

## 8. Your rights as a data subject

The following is a summary of the rights that you as a data subject are entitled to if your personal data is registered with Titov & Partners, and how you exercise them.

### 8.1 Right of access to personal data (register extract)

As a data subject, you have the right to request information about what data Titov & Partners has collected about you, why it has been collected and how it is processed. You can do this by requesting a copy of a register extract. (This is provided free of charge to you, but if requests for such information are made repeatedly, Titov & Partners reserves the right to charge a reasonable fee for handling such matters). We reserve the right to take appropriate measures to verify the identity of the person requesting a register extract.

### 8.2 Right to rectification, withdrawal of consent and restriction of processing

You have the right to request that incorrect data be corrected or that incomplete data be completed without undue delay. You also have the right to withdraw all or part of your consent at any time which forms the basis for personal data processing carried out by Titov & Partners. Regarding restriction of processing, you also have the right to request that the processing of your personal data be restricted.

### 8.3 Right to erasure and right to object to processing

You have the right to request erasure of your personal data (sometimes called "the right to be forgotten"), for example if the processing is no longer relevant for the purpose for which the data was originally collected or if it is processed in violation of applicable law. You also have the right to object to our processing of your personal data for all or any of the purposes stated above.

However, Titov & Partners reserves the right to refuse requests for erasure or objections to processing as described above if there are legal obligations that prevent such actions. We may continue to process your data despite your request for erasure in order to establish the legitimacy of, assert or defend legal claims.

### 8.4 Right to data portability

Where technically possible, you have the right to receive your registered personal data in a structured, commonly used machine-readable format or to have the data transferred to a third party ("data portability").

### 8.5 Limitations on the data subject's rights

Requests made in accordance with any of the above rights can only be fulfilled to the extent that they are permitted under the laws and regulations that Titov & Partners is obliged to comply with in its capacity as a law firm. This means that out of consideration for confidentiality, as stated in the Code of Judicial Procedure and the Swedish Bar Association's rules, it is not possible to disclose certain information.

### 8.6 How to exercise your rights

Please feel free to contact Titov & Partners by email at [info@titovlaw.se](mailto:info@titovlaw.se) or at the address below if you have any questions or comments regarding our processing of personal data, or if you wish to exercise any of the data subject rights described above.

## 9. Sharing of personal data with third parties

### 9.1 Internal access

Titov & Partners ensures that only those employees who have a legitimate need for access to the personal data for an explicitly stated purpose are granted access to it.

## 9.2 External sharing

Titov & Partners reserves the right to disclose data to third parties in certain cases, for example after agreement with you, if it is necessary to protect your rights within the framework of an assignment, or if it concerns a legal obligation. Transfer may nevertheless be relevant when using an external service provider or if the data must be disclosed to a court or other legal body, authority, counterparty or similar party to protect your rights, or if Titov & Partners is obliged by law to do so.

## 10. Transfer of personal data to third countries

Titov & Partners strives to process your personal data within the EU/EEA, which also includes suppliers who provide services to us and contractors or other third parties who process data on our behalf. However, Titov & Partners reserves the right to transfer personal data outside the EU/EEA in certain situations. Such transfer then takes place provided that the country in question has an adequate level of protection or that there is another equivalent protective measure which means that the transfer is lawful and in accordance with applicable data protection legislation and regulations.

## 11. Processing of personal data in recruitment

If you apply for employment with us, your personal data will only be processed for as long as necessary for the recruitment and employment process. If we wish to continue to retain your personal data after the end of the recruitment process for possible future employment, we will ask for your consent for this.

## 12. Processing of personal data in bankruptcy cases

### 12.1 Background

The lawyers at Titov & Partners undertake assignments as external bankruptcy trustees, administrators or guardians. Therefore, Titov & Partners will need to process certain personal data within the framework of appropriate administration of the bankruptcy.

### 12.2 Two different data controllers

In a bankruptcy, a separate legal entity is established which is represented by a bankruptcy trustee or administrator, a bankruptcy estate. The bankruptcy estate is the

data controller, i.e. responsible for the processing of personal data in accordance with applicable provisions of the Data Protection Regulation. Titov & Partners is the data controller for the continued processing of personal data within the framework of the law firm's provision of legal services and other activities.

#### 12.3 What personal data is processed

Within the framework of a bankruptcy, the bankruptcy estate will process the personal data required such as name and personal identity number, contact details, property designation, vehicle registration number, IP number, bank information and work-related personal data such as salary, trade union membership and health.

#### 12.4 Purpose and legal basis

The specific purposes of processing personal data in a bankruptcy are to establish the bankruptcy estate's inventory and the bankruptcy trustee's accounts or other reports; decide on wage guarantee in the event of insolvency; enter into, manage and fulfil contracts; fulfil accounting and bookkeeping obligations as well as related matters with the aim of ensuring that creditors are not disadvantaged; together with complying with the other obligations incumbent on a bankruptcy trustee according to law.

Titov & Partners and the bankruptcy estate process personal data in the bankruptcy with legal basis in the performance of contracts, balancing of interests for the management of relevant business documents, legal obligation regarding the bankruptcy trustee's obligations according to law, and as necessary to perform a task carried out in the public interest or in the exercise of official authority, for example in connection with a decision on wage guarantee. The sensitive personal data processed by Titov & Partners and/or the bankruptcy estate through the bankruptcy proceedings is done on the basis of employment law obligations or to establish, exercise or defend legal claims.

#### 12.5 Categories of persons

The bankruptcy estate and Titov & Partners process personal data about, for example, representatives of the bankrupt company, representatives of creditors, debtors, bankruptcy debtors, shareholders, customers, suppliers, guarantors, auditors and accounting consultants, employees, the Swedish state, banks, third parties and family members.

## 12.6 Confidentiality and storage

The bankruptcy estate and Titov & Partners handle the personal data involved in the bankruptcy with appropriate confidentiality. During the bankruptcy proceedings, personal data relating to the bankruptcy may be disclosed to other parties, such as group companies, suppliers, consultants or public authorities. In certain situations, third parties may become independent data controllers, joint data controllers with the bankruptcy estate or the bankruptcy estate's data processor.

The personal data in question is processed for as long as necessary for the bankruptcy administration and is normally stored for 10 years in accordance with the Swedish Bar Association's guidance.

## 13. Complaints and supervision

If any problem arises with our collection, processing or storage of personal data, please contact us, preferably our data protection officer. If we cannot resolve the situation with you, you have the option to submit a complaint regarding our processing of personal data by submitting it to the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten, formerly the Data Inspection Board).

## 14. Changes to this Privacy Policy

Titov & Partners reserves the right to make changes to this privacy policy at its own discretion. The latest version will always be available on our website.

## 15. Contact details

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Attn: Data Protection Officer  
Humlegårdsgatan 20, 114 46 Stockholm

Telephone: +46 8 684 518 50

Email: [info@titovlaw.se](mailto:info@titovlaw.se)

We welcome you to visit us at [www.titovlaw.se](http://www.titovlaw.se).