

PRIVACY POLICY

Law firm Titov & Partners KB, company registration number 969784-0099 (“Titov & Partners”, “we” or “us”) safeguards your privacy and therefore endeavours to ensure that all collection and processing of personal data takes place in a secure manner and in accordance with applicable legislation. This includes all processing of personal data that takes place within the context of our business – in relation both to our clients and to others whose personal data may be processed by us.

This privacy policy provides an account of which personal data 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 drawn up on the basis of the guidelines of the Swedish Bar Association in relation to the application of the General Data Protection Regulation (EU 2016/679, “GDPR”).

1 RESPONSIBILITY FOR PERSONAL DATA

Titov & Partners is the data controller for the processing of personal data that takes place within the context of our business. This means that we are responsible for how your personal data is collected and how it is used. All processing takes place in accordance with this privacy policy and in compliance with the applicable General Data Protection Regulation (EU 2016/679) as well as other applicable legislation for the protection of privacy.

Titov & Partners does not use cookies within the context of its business.

2 WHAT IS PERSONAL DATA AND WHAT DOES THE PROCESSING OF PERSONAL DATA MEAN?

Personal data is any information relating to an identified or identifiable living natural person that can identify a person, directly or indirectly. This includes, for example, their name, telephone number, email address and IP address. Personal data also includes factors specific to the physical, economic, cultural or social identity of the person. Personal data also includes individual pieces of information that do not constitute personal data but which together enable a person to be identified.

All processing of personal data that is fully or partly automated constitutes *processing* in the sense of the General Data Protection Regulation. This means that any operation or set of operations which is performed on personal data constitutes processing – for example the transfer of personal data by email or the registration or organisation of personal data.

3 THE PERSONAL DATA THAT IS COLLECTED

Titov & Partners only collects the personal data that is necessary for the purposes for which collection takes place and provided that the personal data is relevant for the purpose.

The personal data we usually collect is name, telephone number, email address, personal identity number, title, contact details of next of kin, information about employer, billing details, relevant personal data concerning the counterparty, counterparty representative, arbitrators, judges, consultants, witnesses and experts, as well as other business information.

Within the context of our assignment, we may also collect special categories of personal data, such as details of criminal offences, racial or ethnic origin, political opinions, religious beliefs, trade union membership or personal data relating to health or sex life.

Personal data is collected either by the person to which the processing relates providing the information themselves or it being provided to us by a third party such as a client, counterparty, counterparty representative, authorities or courts or by us retrieving the personal data from private or public registers or other sources.

4 PURPOSE AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

All processing of personal data within the context of the business of Titov & Partners takes place on the grounds of one of the legal bases specified in the General Data Protection Regulation. The purposes of the processing and the legal bases for the processing are as follows:

- To enable us to perform, manage and administrate our assignments from clients and to safeguard the interests of our clients; in order to fulfil the contract to perform assignments we have undertaken,
- To carry out checks relating to conflict of interest and money laundering; our legitimate interest and in order to comply with applicable legislation,
- To handle conflicts we had before we undertook an assignment; our legitimate interest,
- For reporting and invoicing purposes; in order to comply with applicable legislation,
- To process job applications; our legitimate interest during the recruitment period, thereafter based on consent, and
- Events and marketing; our legitimate interest and consent.

5 HOW LONG IS THE DATA STORED?

Personal data collected by Titov & Partners is stored in accordance with the law and the Guidelines on good legal practice of the Swedish Bar Association. This includes an obligation to store the data for a period of ten years after the conclusion of an assignment. Depending on the case in question, the data may need to be stored for more than ten years. The storage period may also be determined on the basis of legal stipulations, for example those of the Swedish Bookkeeping Act and money-laundering regulations.

The data which Titov & Partners collects in order to develop and analyse the company's business is subject to a storage period of one year after the most recent contact with us.

Data that has been collected for marketing purposes is stored until the recipient of the marketing chooses not to receive information for marketing purposes, but for no more than two years from the most recent contact with Titov & Partners. Data that has been collected with your consent is stored

only until you withdraw your consent. If you no longer wish to receive marketing communications or you wish to withdraw your consent as above, please notify us of this by email at the following email address: info@titovlaw.se.

6 TECHNICAL AND ORGANISATIONAL SECURITY MEASURES

Titov & Partners implements appropriate technical and organisational security measures to ensure a good level of security. These include active measures to prevent the data collected being misused, lost, falling into the wrong hands, being destroyed or otherwise processed other than in accordance with this privacy policy. In order to ensure a good level of protection, we regularly audit our internal security policies and procedures and update and/or amend them as necessary.

In those cases where Titov & Partners engages an external supplier to assist the business, we have a duty to ensure that the supplier complies with our requirements regarding the protection of the personal data that the supplier processes on our behalf.

7 RIGHTS OF THE DATA SUBJECT

Below is a summary of the rights you have if your personal data is registered at Titov & Partners, as well as how to exercise these rights.

7.1 Right of access (register extract)

As a data subject, you have the right to request information be provided free of charge concerning the data that Titov & Partners has collected about you, why it has been collected and how it is processed. In the event of repeated requests, Titov & Partners reserves the right to charge a reasonable fee to administer such cases. We also reserve the right to take the necessary steps to confirm the identity of the person requesting a register extract.

7.2 Right to rectification, withdrawal of consent and restriction of processing

You have the right to request the rectification of inaccurate data or the completion of incomplete data without undue delay. You also have the right at any time to withdraw, in whole or in part, your consent that forms the basis for any of the processing of personal data carried out by Titov & Partners. You also have the right to request that the processing of your personal data be restricted.

7.3 Right to have personal data erased and to object to processing

You have the right to request the erasure of your personal data, for example if the processing is no longer relevant for the purpose for which the data was originally collected or if it is being processed in contravention of applicable legislation. You also have the right to object to our processing of your personal data for any or all of the purposes stated above.

Titov & Partners nevertheless reserves the right to refuse a request for erasure or objections as above where there are legal obligations preventing such measures. Your data may continue to be processed, despite your request for erasure, to enable us to establish, assert or defend legal claims.

7.4 Right to data portability

Where technically possible, you have the right to receive the personal data recorded about you in a structured, commonly used and machine-readable format or to have the data transmitted to a third party ('data portability').

7.5 Limitations to the rights of the data subject resulting from the operation of a law business

Requests in accordance with any of the rights above can only be granted where they are permitted by the regulations under which Titov & Partners must operate in its capacity as a law firm. This means that it is not possible to disclose certain information for reasons of client confidentiality, as stipulated in the Swedish Code of Judicial Procedure and the Guidelines on good legal practice of the Swedish Bar Association.

8 TRANSFER OF PERSONAL DATA TO A THIRD PARTY

Titov & Partners ensures that only those employees who need access to the personal data for an expressly stated purpose are given access to it.

Titov & Partners reserves the right to disclose information to third parties in certain cases, such as with your agreement, where this is necessary in order to exercise your rights within the context of an assignment or where there is a legal obligation. Transfer may also take place where an external service provider is engaged or if the data is required to be disclosed to a court, authority, counterparty or similar in order to exercise your rights or if Titov & Partners has a legal obligation to do so.

9 TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

Titov & Partners endeavours to process your personal data within the EU/EEA. This also includes our suppliers and business partners who process data on our behalf. Titov & Partners nevertheless reserves the right to transfer personal data outside the EU/EEA in certain cases. Such transfer shall then take place in accordance with applicable data protection legislation, provided that the country in question has an adequate level of protection or that there are other equivalent protection measures that mean the transfer is lawful.

10 PROCESSING OF PERSONAL DATA IN CONNECTION WITH AN APPLICATION FOR EMPLOYMENT

If you apply for employment with us, your personal data is processed only for the period necessary for the recruitment process. If we wish to continue to store your personal data after the recruitment process has ended, for the purpose of any potential future recruitment, we will obtain your consent for this.

11 AMENDMENTS TO THIS PRIVACY POLICY

Titov & Partners reserves the right to amend this privacy policy. The most recent version will always be available on our website.

12 CONTACT DETAILS

You can contact Titov & Partners at info@titovlaw.se or the address below if you have any questions or comments regarding our processing of personal data or if you want to exercise any of the rights referred to above.

Complaints relating to our processing of personal data should be submitted to [the Swedish Data Protection Authority](#).

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114 46, Stockholm
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Please visit our website: www.titovlaw.se.
