

## PRIVACY POLICY

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The law firm Advokatfirman Titov & Partners KB, company registration number 969784-0099 (hereinafter referred to as “Titov & Partners,” “we,” or “us”) is committed to protecting your personal integrity and privacy, and therefore we endeavor to ensure that all collection, processing and retention of personal data is conducted in a safe and 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 the support of the Swedish Bar Association’s Guidance for the application of the General Data Protection Regulation in the legal profession.

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### 1 PARTY RESPONSIBLE FOR PERSONAL DATA - THE 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 utilized. All processing is conducted in accordance with this Privacy Policy and in accordance with the applicable data protection regulation, the General Data Protection Regulation, GDPR (EU 2016/679) and other applicable legislation for the protection of personal data and privacy.

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

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### 2 WHAT AN ELEMENT OF PERSONAL DATA IS AND WHAT PROCESSING OF PERSONAL DATA MEANS/ENTAILS

Personal data is any information relating to an identified or identifiable living natural person that may directly or indirectly identify an individual. This includes for instance name, telephone number, e-mail address and IP address with contact. Personal data also includes factors specific to a person’s physical, financial, cultural or social identity (e.g. age, ability, ethnicity, race, gender, sexual orientation, socioeconomic status, and religion). Individual pieces of information that do not constitute personal data but which together make it possible to identify an individual, are also regarded as personal data.

Any processing of personal data to be performed wholly or partly by automated means constitutes *processing* within the meaning of the General Data Protection Regulation. This means that any action, or combination of actions, concerning personal data is encompassed within the meaning of processing, for example the transmission of personal data by e-mail, or the registration and organization of personal data.

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### 3 PERSONAL DATA COLLECTED

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

The personal data we ordinarily collect is name, telephone number, e-mail address, civil registration number, title, contact details of relatives or close associates, information about

employers billing details, relevant personal data about counterparties, counterparty legal counsel or other representatives, arbitrators, judges, consultants, witnesses and experts, and other law firm business-related information.

In the context of our assignments, we may also collect special categories of personal data such as information about criminal offenses, racial or ethnic origin, political opinions, religious beliefs, trade union membership, or personal data concerning health or private sexual life.

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

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#### 4 PURPOSE AND LEGAL BASIS FOR THE PROCESSING 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 specified in the EU General Data Protection Regulation. The purposes of the processing and the legal bases for the processing are as follows:

- To enable us to perform, deal with and manage assignments from clients and to safeguard our clients' interests: to fulfill the agreement to perform assignments we have undertaken.
- To conduct an assessment of potential conflicts of interest, verifications related to money laundering regulations: our legitimate interest and to comply with applicable legislation and regulations.
- To manage contacts made with us prior to us agreeing to undertake an assignment: our legitimate interest.
- For accounting and billing purposes: to comply with applicable legislation and regulations.
- To process job applications: our legitimate interest during the time of the hiring process, and thereafter based on consent.
- Events and marketing: our legitimate interest and consent.

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#### 5 HOW LONG THE DATA IS RETAINED

Titov & Partners retains and stores personal data collected in accordance with the law and the Swedish Bar Association's Code of Conduct. This entails an obligation to retain the data for ten years after completion of the assignment. In view of the case in question, the data may need to be retained for more than ten years. The retention period can also be determined with regard to what is prescribed by law, such as the Swedish Accounting and Bookkeeping Act and money laundering regulations.

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, activities a retention period of 1 year applies after the last contact with us.

Data that has been collected for marketing purposes is retained until the recipient of the marketing opts out of receiving information for marketing purposes, however for no longer than two years from the latest contact with Titov & Partners. Data that has been collected with your consent is not retained after you withdraw your consent (with certain exceptions according to law). If you no longer desire to receive marketing mailings or would like to revoke your consent as described above, please notify us by sending an e-mail to the following e-mail address: [info@titovlaw.se](mailto:info@titovlaw.se).

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## 6 TECHNICAL AND ORGANIZATIONAL SECURITY MEASURES

Titov & Partners takes the requisite technical and organizational security measures necessary so as to ensure a high level of protection. This includes proactive measures to prevent data collected from being misused, being lost, ending up with unauthorized parties, being destroyed or otherwise not being handled in accordance with this Privacy Policy. So as to ensure a high level of protection, we regularly review our internal security policies and procedures, and update and/or modify them as necessary.

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

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## 7 RIGHTS OF DATA SUBJECTS

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

### *7.1 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 being processed. You can do this by making a request for a copy of a register extract. (This is provided at no cost to you, however if the request for such information is made repeatedly, Titov & Partners reserves the right to charge a reasonable fee for the handling of such matters}. We reserve the right to take the appropriate requisite measures to verify 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, without undue delay, the rectification of inaccurate data or the supplementation of incomplete data. You also have the at any time right to withdraw all or part of your consent that forms the basis for any personal data processing performed by Titov & Partners. Regarding the restriction of processing you also have the right to request that the processing of your personal data be restricted.

### *7.3 Right to have your personal data deleted and to object to processing.*

You have the right to request the deletion of your personal data (sometimes referred to as the “right to be forgotten,” for example if the processing is no longer relevant to the purpose for which the data was originally collected or if it is processed in breach of applicable law. You also have the right to object to our processing of your personal data for all or any of the purposes set out above.

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

### *7.4 Right to data portability*

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

### *7.5 Limitations on the data subject's rights resulting from the provision of legal services and other activities as a law firm*

Requests made in accordance with any of the above rights can only be fulfilled to the extent that they are permitted by the laws and regulations that Titov & Partners is obligated to comply with in its capacity as a law firm. This means that for reasons of attorney-client privilege, as set out in the Swedish Code of Judicial Procedure and the Swedish Bar Association's Code of Conduct, it is not possible to disclose certain information,

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## 8 THIRD-PARTY TRANSFER OF PERSONAL DATA

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

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 relates to 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 judicial entity, governmental authority, counterparty, or a similar party in order to protect your rights, or if Titov & Partners is obligated by law to do so.

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## 9 PERSONAL DATA TRANSFERS TO THIRD COUNTRIES

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

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## 10 PROCESSING OF PERSONAL DATA IN THE CONTEXT OF AN APPLICATION FOR EMPLOYMENT

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

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## 11 SUBCONTRACTING THE PROCESSING OF PERSONAL DATA IN THE CONTEXT OF A BANKRUPTCY

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

### *11.1 Two different data controllers*

In the event of a bankruptcy, a separate legal entity is established which is represented by a bankruptcy trustee or receiver, 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 data protection regulations. Titov & Partners is the data controller for the further processing of personal data within the framework of the law firm's provision of legal services

and other activities.

### *11.2 What personal data is processed*

Within the framework of a bankruptcy, the bankruptcy estate will process the required personal data such as name and civil registration number, contact information, property designation (lot and block designation), vehicle registration number, IP number, banking information, and work-related personal data such as salary, trade union membership, and health.

### *11.3 Purpose and Legal Basis*

The specific purposes of the processing of personal data in a bankruptcy are to prepare the bankruptcy estate inventory and bankruptcy trustee/receiver's accounting or other reports; decide on wage guarantees in the event of insolvency; enter into, manage and fulfill agreements; fulfill accounting and bookkeeping obligations plus related matters with the goal of ensuring that creditors are not disadvantaged; along with complying with the other obligations imposed on a bankruptcy trustee by law.

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

### *11.4 Categories of persons*

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

### *11.5 Confidentiality and retention*

The bankruptcy estate and Titov & Partners handle the personal data involved in the bankruptcy with appropriate confidentiality. In the course of 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 some 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 it is necessary for the bankruptcy administration and normally is retained for 10 years in accordance with the Swedish Bar Association's Guidance.

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## **12 CHANGES TO THIS PRIVACY POLICY**

Titov & Partners reserves the right to make changes to this Privacy Policy at its discretion. The most recent version will always be available on our website.

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### 13 CONTACT INFORMATION

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

In the event any issue arises with our collection, processing or retention of personal data, please make contact with us, preferably with our Data Protection Officer. If we are unable to resolve the situation with you, you have recourse to file a complaint regarding our processing of personal data by submitting it to the [Swedish Authority for Privacy Protection / Integritetsskyddsmyndigheten](#).

Advokatfirman Titov & Partners KB

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

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