

## **Processing of personal data – information pursuant to the General Data Protection Regulation (EU) 2016/679**

Fredersen Advokatbyrå AB (“Fredersen,” “we,” or “us”) is the data controller for the personal data of contact persons that we receive in connection with an engagement to provide legal advice or other services, or that are otherwise processed in connection with the preparation or administration of such an engagement. You are not obliged to provide us with personal data, but without it we may not be able to accept an engagement, as we cannot perform necessary conflict of interest and anti-money laundering controls. Fredersen is furthermore the data controller for the personal data received in connection with a recruitment process or job applications sent to Fredersen at the applicant’s own initiative.

The purpose of our processing of personal data is to conduct mandatory controls for the purposes of conflict of interest and (if applicable) anti-money laundering, to perform and administer the engagement, to safeguard your interests, for accounting and invoicing purposes, and/or for recruitment purposes.

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

As regards clients who are private individuals, the legal ground for the processing of personal data is to fulfil the contract with the client regarding the engagement. In relation to other private individuals whose personal data we process when performing an engagement, such as, inter alia, representatives of corporate clients, counterparties who are private individuals, representatives and legal counsel of counterparties and witnesses, we process personal data based on our legitimate interest in performing the engagement.

When you apply for a position with us, either in connection with the announcement of a position or at your own initiative, we process your personal data based on our legitimate interest in managing Fredersen’s recruitment and staffing.

The processing of personal data made for conflict of interest and anti-money laundering controls, and the archiving of documents after the completion of an engagement, is based on our legal obligations, such as accounting and anti-money laundering legislation and the Code of Conduct of the Swedish Bar Association.

Personal data may also be processed for the purposes of business and methodology development, market analysis, statistics and risk management. Data processed in order to develop and analyze our business is based on our legitimate interest in developing our business and communicating with our contacts.

Fredersen will not disclose your personal data to any third party unless (i) there is an agreement of such disclosure between Fredersen and you, (ii) disclosure is necessary to safeguard your rights within the scope of the engagement, (iii) disclosure is necessary for us to comply with a legal obligation, a



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decision of a public authority or court, or (iv) we have engaged an external service provider to perform services on our behalf. We may furthermore disclose personal data to courts, public authorities, counterparties and legal counsel of counterparties if it is necessary to safeguard your rights.

The personal data is stored for a period of ten years from the completion of an engagement, or for the longer period required by the nature of the engagement, in accordance with Fredersen's obligations under the Code of Conduct of the Swedish Bar Association. Personal data used to develop and analyze the business of Fredersen or for marketing purposes are stored for a period of two years since the latest contact with the individual whom the personal data concern. Personal data processed for recruitment purposes are normally stored during the time of the recruitment process. The personal data may, however, be stored for a longer period of time to be used if an appointment is appealed according to applicable discrimination legislation. Personal data processed for recruitment purposes will be deleted at the latest two years after a recruitment has been concluded or an application sent at your own initiative has been received. If you end a subscription for a newsletter, your personal data processed for the purpose of sending newsletters will be deleted immediately.

You have the right to request information from Fredersen regarding the processing of your personal data, free of charge. We will, at your request or at our own initiative, correct or delete inaccurate information or restrict the processing of such information. You also have the right to request that your personal data is not processed for direct marketing purposes. You also have the right to receive your personal data in a machine-readable format. If you have any objections to our processing of your personal data, you may lodge a complaint with a supervisory authority, which in Sweden is the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*, IMY) ([www.imy.se](http://www.imy.se)). You may also contact the supervisory authority in the country where you live or work.

If you have any questions regarding our processing of your personal data, please contact us at [info@fredersen.se](mailto:info@fredersen.se) or the address set out below.

Fredersen Advokatbyrå AB, reg. no. 556688-7138, with address Neptunigatan 82, 211 18 Malmö, Sweden is the data controller for the personal data described above.



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