

ADVOKATFIRMAN DELPHI'S PRIVACY POLICY

We process your personal data as part of our work. Your integrity is important to us and we are committed to being transparent with the information we process about you and why. We have therefore prepared this privacy policy which describes our processing of your personal data.

This Privacy Policy contains the following information:

1. Personal data connected to our marketing activities and offers (seminars, events, newsletters or other mailings)	2
2. Personal data processed in connection with registration and participation at events and seminars	3
3. Personal data processed within the framework of our client assignments	4
4. Personal data processed in connection with application for employment.....	7
5. Personal data relating to employees and contractors of our suppliers	8
6. Personal data processed about a non-anonymous whistleblower in the context of whistleblowing	10
7. Our processing through cookies	10
8. Transfer of personal data to third countries	12
9. Your rights.....	12
10. Our contact details	13

1. Personal data connected to our marketing activities and offers (seminars, events, newsletters or other mailings)

1.1 Who is responsible for the processing of your personal data

Each local office is the controller of the personal data we process about you.

1.2 What personal data we process about you

We process your name, e-mail, place of work and other contact information. This personal data has been collected from you in connection to (i) you becoming our client (if you are a client), (ii) you coming into contact with us in another way, or (iii) you expressing a wish to receive invitations/newsletters from us.

1.3 Why we process your personal data

We process your personal data to communicate with you and to send marketing to you. This communication comprises of newsletters, information about Delphi and invitations to events and seminars.

We send this information on the basis of a balance of interests and Delphi's legitimate interest to maintain a business relation with you and to communicate with you in your professional capacity regarding information and events that we believe is in your interest. Please contact us if you would like to know more about how we have conducted this balance of interests.

If you have given your consent to our processing, we will instead process your personal data for the above purposes and to send electronic marketing communication based on your consent.

1.4 Who has access to your personal data

Your personal data will be processed by the Delphi companies which appear from section 10. The information will be shared with IT-providers that process personal data on our behalf, so called processors. For example, cloud service providers may get access to your personal data. We have entered into data processing agreements with our processors inferring, for instance, they are required to process the information in a safe, accurate and confidential manner.

1.5 How long we process and store your personal data

If you have given your consent, we process your personal data until you have withdrawn your consent. You can easily withdraw your consent by pressing the link "unsubscribe" which is included in all electronic communication you receive from us. If you have not given your consent, we process your information for as long as you have or your employer or contractor has a business relationship with us and for fifteen (15) months thereafter. You always have the option to, at any time, unsubscribe from receiving mailings from us. If you choose to unsubscribe, we will immediately terminate our processing of your personal data for marketing purposes.

2. Personal data processed in connection with registration and participation at events and seminars

2.1 Who is responsible for the processing of your personal data

Each local office is the controller of the personal data we process about you.

2.2 What personal data we process about you

We process your name, e-mail, place of work and other contact information. We have collected this information from you in accordance with what is stated in section 1.2 above.

We process information on allergies and food preferences. We have collected this information from you when you signed up for our event or seminar.

In cases where we photograph and/or film at our events and seminars, we also process information about you in the form of images and recorded material.

2.3 Why we process your personal data

Name, e-mail, place of work and other contact information is processed by us in accordance with what is stated in section 1.3 above and to provide, administer and follow-up on our events and seminars, e.g. to calculate the number of participants. In cases where we charge a fee in connection with registration or no-show to events and seminars, we also process the information for invoicing. We process the personal data on the basis of a balance of interests and Delphi's legitimate interest to provide events and seminars to inform about and market its business. Please contact us if you would like to know more about how we have conducted this balance of interest.

Information on allergies and/or food preferences is processed by us to pre order food and beverages and on the basis of your consent.

Images and recorded material is processed by us to inform about and market our business on our website, on printed material and on social media. We process the personal data on the basis of a balance of interest and Delphi's legitimate interest to market its business. Please contact us if you would like to know more about how we have conducted this balance of interest.

2.4 Who has access to your personal data

Your personal data will be processed by the Delphi companies which appear from section 10. The information will be shared with IT-providers that process personal data on our behalf, so called processors. For example, cloud service providers may get access to your personal data. We have entered into data processing agreements with our processors inferring, for instance, they are required to process the information in a safe, accurate and confidential manner.

2.5 How long we process and store your personal data

We process your name, e-mail, place of work and other contact information in accordance with what is stated in section 1.5 above.

We process information on allergies and food preferences until after finished event or seminar.

We process images and or/recorded material for a period of three (3) years after the event and seminar.

3. Personal data processed within the framework of our client assignments

3.1 Who is responsible for the processing of your personal data

The local office responsible for the client assignment is the controller of the processing of your personal data within the framework of the assignment.

3.2 How we collect your personal data

We process personal data which has been submitted to us by (i) client, (ii) counterparty, (ii) legal representative of counterparty, (iv) other parties that has a connection to the matter, or (v) which has been collected from public records or other sources.

3.3 What personal data we process about you

We process the following categories of personal data about you who are a client of Delphi or in any other way are connected to an assignment performed by us or our lawyers:

3.3.1 *Clients*

We process personal data relating to employees or contractors at legal entities and clients who are individuals. The data comprise of name, title, employer, personal identification number, contact information, matter designation, matter description, financial information, information regarding if the client or relatives of the client is a person in a politically exposed situation as well as name and profession/position of such a politically exposed individual and billing- and payment information.

3.3.2 *Counterparties*

We process personal data relating to employees or contractors at legal entities and counterparties which are individuals. The personal data we process in this regard is name, title, employer, personal identification number and matter designation.

3.3.3 *Other individuals*

We process personal data about other individuals who are of relevance within the framework of our assignments. These individuals may be legal representatives of the counterparty, arbitrators, judges, consultants, witnesses, experts, employees of companies which are sold or acquired, parties of a contract or similar.

3.3.4 *Special categories of personal data*

Within the scope of our assignments, we may process personal data relating to criminal convictions or other special categories of personal data, which are necessary and relevant for the execution of the assignment. Personal data relating to criminal convictions consist of information regarding trade prohibition, money laundering or other criminal offences. On occasional basis we process special categories of personal data which include racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information relating to health or sex life if relevant

for the assignment. In such cases, we apply the legal basis that the processing is necessary for the establishment, exercise or defence of legal claims.

3.4 **Why we process your personal data**

We process your personal data to carry out our assignment and to communicate with counterparties and other individuals connected to the assignment.

3.4.1 *We process your personal data for the following purposes to comply with a legal obligation:*

- To establish that there is no conflict of interests.
- In order to be able to observe the special rules concerning money laundering and terrorism.

3.4.2 *We process your personal data for the following purposes for the performance of a contract:*

- In order to manage and administrate billing- and payment services connected to either of the Delphi companies.
- In order to manage and administrate our accounting.
- In order to manage and administrate clients' receivable arising within the scope of an assignment.

3.4.3 *We process your personal data for the following purposes on the basis of a balance of interest:*

- In order to defend ourselves against legal claims regarding money laundering, terrorism and the EU Market Abuse Regulation.
- In order to comply with the Swedish Bar Association's framework and defend ourselves against legal claims.
- To exercise our rights in other legal claims directed to us.
- To make administration of our fee accounting possible.
- In order to communicate with you via mail, e-mail and phone.
- In order to administrate and book meetings.
- In order to provide effective and accurate documentation, administration and handling of the assignment.

Our legitimate interest is to exercise and protect our rights in case of legal claims, administrate the relationship with you as our client/counterparty/other party within the scope of the assignment and to comply with the ethical requirements put on us as a law firm.

Providing your personal data is not a legal requirement, however it is required in order to enter into an agreement with us as a client. We will not be able to fulfill our agreement or carry out our commitments towards you if you do not provide us with your personal data.

3.5 **Who has access to your personal data**

As law firms are subject to statutory requirements for professional secrecy and confidentiality, we only share your personal data in certain specific cases.

3.5.1 *We share your personal data with:*

- If necessary, other companies within Delphi. This may be necessary when conducting conflict of interest controls.
- Counterparties within the assignment.

Your personal data will also be shared with parties that process personal data on our behalf, so called processors:

- Suppliers of IT and systems that provide development and support for our systems and cloud services.

Your personal data will also, when applicable, be shared with the following parties which themselves are controllers of the processing of personal data:

- The client's insurance provider, accountant or others according to the client's instructions.
- Providers of liability insurance to safeguard legal interests.
- Representatives of counterparties within the scope of the assignment.
- If applicable, arbitration tribunal and court.
- Authorities, if such a disclosure is prescribed by law, for example the Enforcement Authority.
- Banks and debt collectors, for example regarding client funds and to safeguard legal interests.
- The police or the financial police, if such disclosure is prescribed by law.
- The Swedish Bar Association if such an obligation exists.

3.6 **How long we process and store your personal data**

Data that we process in order to fulfill our agreement with you/the client you are employee or contractor of is as a principle rule processed during the period of time it is necessary for us to administrate the contractual relationship, exercise our rights and fulfill our commitments to you/the client you are employee or contractor of. We may however process your personal data for a longer period in order to comply with legal requirements, or because we have a right to do so according to our legitimate interests. According to the Swedish Bar Association's framework, we are required to process information relating to an assignment for a period of ten (10) years after the assignment is closed or for a longer period if necessary.

We will also process a limited amount of personal data to comply with obligations in connection with conducting conflict of interest controls and at the defense against legal claims for ten (10) year due to the period of limitation according to the Swedish statute of limitation.

Any information relating to payment and where processing is required according to the Swedish Accounting Act is processed for seven (7) years in accordance with the Swedish Accounting Act. We also process certain information regarding your purchase in accordance with applicable sales legislation and consumer sales legislation.

4. Personal data processed in connection with application for employment

4.1 Who is responsible for processing your personal data

Each local office is controller of the recruitment process and the processing of personal data related to you as a job applicant.

4.2 What personal data we process about you

We process the personal data you provide to us in your application. Such data includes name, personal identification number, address, phone number, e-mail address, image (if any), education, education grades, work testimonial, professional experience and other information that you provide about yourself in your application. For some candidate categories, we perform tests. In these situations, we provide information about the processing of such personal data before initiating the test and ask for your consent to the processing.

4.3 Why we process your personal data

Our base our processing on three legal grounds, namely (i) carrying out our obligations and exercising our rights in the field of employment, (ii) a balance of interests (we have balanced our interest of using the information against your interest of privacy), and (iii) consent.

4.3.1 *For the following purposes, we process personal data to carry out our obligations and exercising our/ your rights in the field of employment:*

- If we were to become subject to claim according to the Swedish Discrimination Act, we process your personal data to exercise and protect our legal rights.

4.3.2 *For the following purposes, we process personal data on the basis of a balance of interests:*

- To assess and consider different candidates based on experience, qualifications and academic performance.
- To administrate invitations and bookings to interviews.
- To collect and review your resume, personal letter and degree certification.

We assess that we have a legitimate interest to process your personal data in order for Delphi to be able to recruit new members of the staff to our company.

4.3.3 *For the following purposes, we process your personal data on the basis of consent:*

- To perform recruitment tests that are a part of the recruitment process.
- To save your information in a database for candidates for future employments that could suit you.

The provision of your personal data is not a statutory or contractual requirement. You are not obligated to provide the personal data. If you do not provide your personal data to us, we will not have the possibility to carry out our commitments towards you and perform the recruitment process.

4.4 **Who has access to your personal data**

Your personal data will be shared with parties that process personal data on our behalf, so called processors. We share your personal data with:

If necessary, other companies within Delphi.

- Teamtailor AB to process application information and documents and regarding Friends of Delphi and Delphi Scholarship.
- Cubiks Group Limited regarding tests during the recruitment process.

4.5 **How long we process and store your personal data**

To the extent that our processing is based on a balance of interests, we in general do not process your personal data after the recruitment process is over.

We need to process your personal data after you have participated in a recruitment process to protect our rights under the Swedish Discrimination Act. We therefore save the information in the application documents for two (2) years after the application process is over.

If you consent to the continued processing of your personal data for future recruitment opportunities, we will process your information for this purpose until you revoke your consent or until such time as future recruitment is no longer relevant.

5. **Personal data relating to employees and contractors of our suppliers**

5.1 **Who is responsible for the processing of your personal data**

Advokatfirman Delphi Kommanditbolag and each respective local office is the controller with regard to the processing of your personal data.

5.2 **What personal data we process about you**

We collect personal data about you such as, name, phone number and e-mail from your employer, or when applicable, your contractor, in connection with the business relationship between us and your employer or contractor or which you have provided us with within the context of the business relationship.

5.3 **Why we process your personal data**

5.3.1 *For you who is an employee or contractor of supplier*

Your personal data as an employee or contractor of a supplier to us is processed in accordance with the agreement with the supplier for the purposes of invoice- and payment administration, deliveries, to enable communication between the parties as well as other administration needed within the contractual relationship. We process your personal data on the basis of a balance of interests. Our legitimate interest is to be

able to administrate the contract and to fulfill our obligations towards our suppliers (your employer or contractor).

If applicable, we process personal data about you who are an employee or contractor of supplier for accounting purposes such as billing or payment of your services or products. This processing is based on a legal obligation according to the Swedish Accounting Act.

5.3.2 *If you are a sole trader*

If you provide us with your personal data as a sole trader we process your personal data as necessary to fulfill our agreement or to take measures that you have requested before entering into an agreement. We also process your personal data to administrate the agreement, to communicate with you as well as to order and use your company's services.

Providing your personal data is not a legal or contractual requirement. You are not obligated to provide your personal data. If you do not provide us with your personal data, we will not be able to enter an agreement and thereafter fulfill our agreement and administrate the contractual relationship with you.

5.4 **Who has access to your personal data**

5.4.1 *We share your personal data with:*

- If necessary, other companies within Delphi.

5.4.2 *Your personal data is shared with parties that process personal data on our behalf, so called processors. We share your personal data with:*

- Suppliers of IT and systems that provide development and support for our systems and cloud services.

5.4.3 *Your personal data is also shared with the following parties which themselves are controllers for the processing of your personal data:*

- Authorities, if such a disclosure is prescribed by law, for example the Enforcement Authority.
- Banks and debt collectors.

5.5 **How long we process and store your personal data**

Personal data that we process for the purpose of fulfilling our agreement with you/the supplier to whom you are employee or contractor of is as a principle rule processed during the period of time it is necessary for us to administrate the contractual relationship, exercise our rights and fulfill our commitments towards you/the supplier to whom you are an employee or contractor of. If your employment or contract is terminated with the supplier or in relation to us, we will cease to process your personal data as soon as we have received such information from the supplier.

Any information relating to payment where processing is required according to the Swedish Accounting Act is processed for seven (7) years in accordance with the Swedish Accounting Act.

Inactive agreements containing your personal data are stored for a ten (10) year due to the period of limitation according to the Swedish statute of limitation.

6. Personal data processed about a non-anonymous whistleblower in the context of whistleblowing

6.1 Who is responsible for the processing of your personal data

The local office to which the report was submitted is the data controller for the processing of your personal data.

6.2 How we collect your personal data

The personal data we process has been provided to us by you.

6.3 What personal data we process

We process the personal data about you that you have provided in your whistleblowing report. If we launch an internal investigation, we will also process any personal data that emerges during the investigation.

6.4 Why we process your personal data

Personal data is processed to investigate and take action in response to a whistleblowing report.

The legal basis for Advokatfirman Delphi i Stockholm AB's processing is that the processing is necessary to fulfil the legal obligation that applies to us through the "Whistleblower Act", i.e. the Act (2021:890) on the protection of persons who report misconduct.

The legal basis for each other Delphi company's processing is that the processing is necessary for our legitimate interest in investigating the complaint. If you want to know more about how this balance of interests has been made, you are welcome to contact the relevant Delphi company you have reported to.

6.5 Who has access to your personal data

Your personal data is shared with organisations that process personal data on our behalf, known as data processors. We disclose your personal data to:

- The Whistle Compliance Solutions AB which provides our internal whistleblowing system.

6.6 How long we process and store your data

Personal data about you in a report or a follow-up case is kept for as long as necessary. Personal data in a follow-up case is processed for a maximum of two years after the case was closed. However, we may process your personal data for longer if it is necessary to establish and enforce legal claims.

7. Our processing through cookies

7.1 Who is responsible for the processing of your personal data

Advokatfirman Delphi i Stockholm AB is the controller of the processing of your personal data that is collected through cookies when you visit delphi.se.

7.2 **What personal data we process about you**

We process the information created by the cookies which are used when you visit delphi.se (including your IP-address).

If you agree to our use of Google's analytics service Google Analytics, we process an encrypted version of your IP address that we at Delphi cannot link to you as an individual, information about your device/browser, such as your screen resolution, information about how many times you have visited the website, which gives us a basis for counting the number of visitors to the website in total, and other information that Google has about you, such as information about the website from which you found us.

You can read more about the cookies on our website in our [cookie policy](#).

7.3 **Why we process your personal data**

We process your personal data for the purpose of remembering your last language setting and whether you have consented to the placement of cookies that require your consent, so that you are not disturbed by the message in the future. The processing is necessary for purposes related to our legitimate interest in remembering the choices you have made on our website. If you want to know more about how we have made this balance of interests, you are welcome to contact us.

In order to optimise the website, we also analyse how our visitors use our website through Google's analysis service Google Analytics. We do this to obtain information about which target groups visit our website. The analysis service from Google Analytics means that a random ID is used to distinguish your device from other visitors and to understand patterns in how our website is used. The legal basis for the processing is your consent.

7.4 **How long we process and store your personal data**

Personal data processed to memorise your language settings is processed for 1 year, while personal data processed to remember whether you have consented to the placement of cookies that require your consent is processed for 30 days.

Personal data processed to optimise our website is processed until you withdraw your consent. Google will continue to process your personal data as an independent data controller. You can read about how long Google stores your personal data in their [data protection policy](#).

7.5 **Who has access to your personal data**

Your personal data will be shared with the following parties that are controllers of personal data:

- Google LLC and its subsidiaries. Read more about Google Analytics and Google's processing of your personal data [here](#).

8. Transfer of personal data to third countries

As a principle rule, we, our suppliers and our partners only process your personal data within the EU/EEA. In cases where personal data is processed outside the EU/EEA, such processing is either based on a decision from the Commission establishing that the country in question ensures an adequate level of protection or appropriate safeguards that ensure that your rights are protected.

9. Your rights

Below follows a description of the rights you have regarding our processing of your personal data. You are welcome to contact us to exercise your rights (see contact information below).

9.1 Right to withdraw your consent and object to the processing

You may at any time withdraw the consent you have given us, either as a whole or partly, with effect from the day of the withdrawal.

You may object to our processing of your personal data for marketing purposes. We will then cease to process your personal data. You also have the right to object to the processing of your personal data on the basis of a balance of interests.

9.2 Right to access

You are entitled to request information about which personal data we process about you and how the personal data is being processed. You also have the right to request a copy of the personal data we process about you.

9.3 Right to rectification

You have the right to without unnecessary delay get inaccurate information corrected and to get incomplete information completed by providing us with correct information.

9.4 Right to erasure (right to be forgotten) and limitation

You have the right to at any time request that your data is erased, for example if the processing is no longer relevant in relation to the purpose the information was collected for, or if you object to processing which is based on our legitimate interests (marketing).

You may also request to have certain processing of your personal data restricted, for example if you object to the accuracy of the data.

9.5 Right to data portability

If you have given your consent to the processing or if the legal basis for processing is to fulfil an agreement with you, you have the right to obtain the personal data you have provided us with in a structured, commonly used and machine-readable format and have the right to transmit such to another controller, or get our assistance to transmit the data to another controller when technically feasible.

9.6 Right to object

If you have any complaints regarding our processing of your personal data, you have the right to send a complaint to the Swedish Authority for Privacy Protection's (IMY) (www.imy.se).

10. Our contact details

If you would like to contact us with regards to our processing of your personal data you, you are welcome to contact respective controller according to below:

Advokatfirman Delphi i Göteborg Kommanditbolag

Corporate identity number: 969693-6815

Post address: Östra Hamngatan 29, 411 10 Göteborg, Sweden

Phone: +46 31 10 72 00

Fax: +46 31 13 94 69

E-mail: privacy@delphi.se

Advokatfirman Delphi i Malmö AB

Corporate identity number: 556326-2913

Post address: Nordenskiöldsgatan 11 A, 211 19 Malmö, Sweden

Phone: +46 40 660 79 00

Fax: +46 40 660 79 09

E-mail: privacy@delphi.se

Advokatfirman Delphi i Stockholm AB

Corporate identity number: 556662-3293

Post address: Box 1432, 111 84 Stockholm, Sweden

Phone: +46 8 677 54 00

Fax: +46 8 20 18 84

E-mail: privacy@delphi.se

Advokatfirman Delphi i Östergötland AB

Corporate identity number: 556668-1978

Post address: Box 465, 581 05 Linköping, Sweden

Phone: +46 13 35 62 00

Fax: +46 13 35 62 01

E-mail: privacy@delphi.se

Advokatfirman Delphi Kommanditbolag

Corporate identity number: 969649-9988

Post address: Box 1432, 111 84 Stockholm, Sweden

Phone: +46 8 677 54 00

Fax: +46 8 20 18 84

E-mail: privacy@delphi.se