



## DATA PROTECTION NOTICE

### 1 GENERAL

The purpose of this notice is to provide privacy information required by the EU General Data Protection Regulation (hereinafter "GDPR") to both the data subject i.e. the data controller's client and to the supervisory authority.

### 2 DATA CONTROLLER AND CONTACT DETAILS

Krogerus Attorneys Ltd acts as the controller in accordance with this data protection notice.

The contact person of the data controller is Johan Weckström.

Address: Unioninkatu 22, 00130 Helsinki

Email: johan.weckstrom@krogerus.com

Telephone: +358 (0)29 000 6200

### 3 NAME OF THE REGISTER

The name of the register is Krogerus' client and marketing register.

The register covers Krogerus' clients, prospective clients, and other parties, who receive marketing material.

### 4 PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

The following table provides a summary of the purposes and the applicable legal basis for the use of personal data. A detailed description of the contents of the stored categories of personal data is available in section 5.

Purpose of Use	Legal Basis	Categories of Personal Data
Providing and developing legal services	The legitimate interest of the data controller, fulfilment of a contract.	Basic information, Client information, Consents and prohibitions.
Maintaining a client relationship, including providing information about trainings, current topics and events	The legitimate interest of the data controller, fulfilment of a contract	Basic information, Client information, Consents and prohibitions, Client event details, Interests, Analytics and modelled information, Data from websites and electronic notices
Client satisfaction and market surveys	The legitimate interest of the data controller	Basic information, Client information, Consents and prohibitions, Analytics and modelled information, Data from websites and electronic notices
Client acquisition and direct marketing	The legitimate interest of the data controller	Basic information, Client information, Consents and prohibitions, Client event details, Interests, Analytics and modelled information, Data from websites and electronic notices
Carrying out the obligations based on the statutory regulations and guidelines of the authorities and the Finnish Bar Association, such as the identification of the client and the prevention of money laundering and terrorist financing	Legal obligation	Client identification information

## 5 CATEGORIES OF PERSONAL DATA

The table below defines the categories of personal data.

Category of personal data	Information content of the group
Basic information	Name and contact details (email, telephone number, addresses) of the natural person (data subject), age, title, employment and other connections in business life.
Client identification information	The client identification information required by legislation, such as the necessary information to identify the client and to determine the client's financial status and political influence.
Client information	The information regarding the contractual relation between the party and Krogerus and the information regarding the communication between the parties as well as the information enabling the automatic archiving of the communication.
Consents and prohibitions	The consents and prohibitions given by the data subject for different purposes of processing of personal data.
Client event information	The tasks related to the managing of a client relationship and client events as well as the information needed to organise them, such as special diet, allergies and other restrictions.
Interests	The interests and hobbies of the client.
Analytics and modelled information	The information refined or acquired by Krogerus, which are used to improve, execute and govern the business operations.
Data from websites and electronic notices	<p>Monitoring the online behaviour of a person in the website of Krogerus and monitoring the use of services e.g. by means of cookies. The information collected may include, for example, the browsed page and visited pages of the user, network provider, IP address, location of the user, session ID, time and duration of the session, device model, unique device and/or cookie identifier, device operating system, screen resolution, channel (such as an application, a mobile browser or an internet browser) and the version of the web browser.</p> <p>The information collected from email notices include the reading of the notices, amount of openings, the time of the openings, opened links and the user IP address.</p>

## **6 RECIPIENTS AND GROUPS OF RECIPIENTS OF PERSONAL DATA**

Personal data may be disclosed, inter alia, to authorities in statutory situations.

## **7 TRANSFERRING PERSONAL DATA**

The data controller uses subcontractors in the processing of personal data. Personal data processed by subcontractors is not transferred outside of the EU or the EEA.

Personal data may be transferred to subcontractors for the purposes of e.g. updating contact information.

## **8 DATA RETENTION**

The necessity of retaining client's and prospective client's personal data for sales and marketing purposes, as well as the data's correctness, is reviewed annually. Unnecessary and outdated data will be erased in accordance with the reviewing of the data's correctness, and also at other times when deemed necessary.

## **9 SOURCES OF PERSONAL DATA AND UPDATING**

Personal data is collected from the data subject itself and also when the data subject uses the services of the data controller.

Based on its own clearance made by Krogerus, individuals may be added to the register, when the individual belongs to a group of people to which marketing actions will be allocated.

Personal data may also be collected and updated based on emails sent by the data subject to the personnel of Krogerus.

Personal data may also be collected and updated from third party registers, such as

- Suomen Asiakastieto Oy, Talouselämä and Bisnode Finland Oy
- Other partners, service providers and networks providing contact information for user groups

## **10 RIGHTS OF THE DATA SUBJECT**

The data subject has the right to receive confirmation from the data controller as to whether or not personal data concerning the data subject are being processed, or whether personal data has been processed.

The data subject is entitled to receive a copy of the processed personal data and the personal data undergoing processing.

Whether the data subject makes the request by electronic means and he or she has not requested it by any other means, the information shall be provided by electronic means.

The data subject has also the right to obtain from the controller the rectification or erasure of personal data concerning him or her and the data subject has the right to prohibit the processing of personal data for direct marketing purposes.

In certain cases, the data subject has also the right to request from the controller restriction of processing of personal data or otherwise object to processing. Furthermore, the data subject may require the transmission of the personal data, which he or she has provided to the controller in a machine-readable format based on the GDPR.

All requests mentioned here shall be provided to the above-mentioned contact person of the controller.

Whether the data subject finds the processing of his or her personal data unlawful, he or she has the right to lodge a complaint with a supervisory authority.

## **11 RIGHT TO WITHDRAW CONSENT**

Where processing of personal data of the data subject is based on consent, the data subject shall have the right to withdraw his or her consent. However, the withdrawal of consent may affect the usability and functionality of the service in question.

The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

## **12 THE PROTECTION OF THE REGISTER**

The location and protection of the equipment for storing documents has been carefully maintained and the documents are stored in a secured space. The access control at the premises has been appropriately arranged.

The right to access to the documentation is within the personnel of Krogerus, who have the obligation of confidentiality.