

PRIVACY POLICY FOR KROGERUS' EVENTS AND MARKETING

1 GENERAL

In this privacy policy we provide information required by the General Data Protection Regulation 2016/679 of the European Union ("**GDPR**") to persons attending or registered for Krogerus' company events and persons receiving marketing material.

In particular, we explain how we collect, retain and otherwise process personal data of our clients and potential clients when we organise various client events, when we market our services, events and trainings and when we conduct client acquisition. This privacy policy also explains how we collect, store and otherwise process personal data of our employees, former employees and alumni, and other individuals, such as students, when we organise various student and alumni events, when we market our services and when we provide information about, for example, Krogerus' trainings and other events.

2 CONTROLLER AND CONTACT DETAILS OF THE CONTROLLER

Krogerus Attorneys Ltd ("**Krogerus**" or "**we**") acts as the data controller in accordance with this privacy policy.

The contact person of the controller is Piia Järvinen.

Address: Fabianinkatu 9, 00130 Helsinki

E-mail: piia.jarvinen@krogerus.com

3 PURPOSES AND LEGAL BASES FOR THE PROCESSING OF PERSONAL DATA

The main purpose of processing personal data is to provide and market Krogerus' events, employment opportunities and services. We can only process personal data on legal bases derived from data protection legislation.

The main legal bases for processing personal data are the legitimate interest of the data controller, the consent of the data subject and the protection of the vital interests of the data subject.

In order to ensure that we provide desirable and safe food at our events, we may ask for information relating to special diets and allergies, which the data subject may provide with their explicit consent.

At events, we may take photographs by explicitly informing you, in which case the consent of the data subject will always be requested for the taking and publication of the photographs. The participant has always the possibility to refuse to be photographed and to refuse the photos to be published, as well as the right to withdraw their consent.

Krogerus processes personal data on the basis of legitimate interests when processing personal data is in connection with the organisation and marketing of client events, direct

marketing to clients and potential clients, client satisfaction surveys and market research. Krogerus has carefully considered the interests and rights of data subjects on the basis of legitimate interest and assessed the use of the legal basis by conducting a so-called balancing test.

The table below lists, by category, the purpose of the processing, the legal basis and the categories of personal data processed. For a more detailed description of the categories of personal data to be stored, see section 4.

Purpose of processing	Legal basis	Categories of personal data
Events and trainings organised for marketing purposes	Consent of the data subject	Identity data, event data
Catering for events	Explicit consent of the data subject Protection of the vital interests of the data subject	Health data about diets and allergies
Client satisfaction and market research	Legitimate interest of the data controller	Identity data, consents and refusals, analytics and modelled data, website and e-newsletter usage data
Direct marketing by email and other marketing and outreach to individuals, such as students and former employees or alumni of Krogerus	Consent of the data subject	Identity data, including current position/title/employer for former employees and alumni
Direct marketing by email and other marketing to business clients, potential business clients and other businesses that have not expressly prohibited direct marketing In addition, direct marketing to potential employees via social	Legitimate interest of the data controller	Identity data

media services may be targeted		
Information on trainings, current news and events in the form of a newsletter	Consent of the data subject	Identity data
Organisation and marketing of client events	Legitimate interest of the data controller	Identity data for participation, event data

4 CATEGORIES OF PERSONAL DATA

This table specifies in more detail the categories of personal data referred to in section 3 insofar as they are not otherwise unambiguously specified in the previous section.

Category of personal data	Content of the category
Identity data	The natural person's (data subject's) name, email address, telephone number, addresses (if necessary), age, company, title, possible place of study, place of employment and other business contacts, information on whether the company represented by the data subject is our client
Consents and refusals	Consents and refusals given by the individual for the different purposes of processing personal data and for direct marketing
Event data	Client events and events and the data needed to organise them, photos taken at these events
Health data	Data about special diets, allergies and other dietary restrictions when participating in an event organised by Krogerus
Interests	Client interests, hobbies etc.

Analytics and modelled data	Data processed or acquired by Krogerus and used for the development, implementation and management of the business
Data on the use of electronic bulletins	Data is collected from email messages about how they are read, the number of times they are opened, when they are opened, the links opened and the IP address of the user

5

SOURCES AND UPDATING OF PERSONAL DATA

The personal data we process is mainly obtained from the data subjects themselves in connection with the use of our services, the sending of newsletters or other communications, and in connection with client events and activities.

Client and potential client data is collected mainly from the data subjects themselves, but also from generally available public sources. Personal data may also be collected and updated on the basis of emails that Krogerus' staff directly receive from the data subject.

The data required to organise events is collected from the data subjects when they register for such event. As regards the former employees and alumni of Krogerus, data is collected from the data subjects themselves at the employee's exit interview.

The data subject's personal data is stored on Krogerus' marketing lists if the data subject fills in the form on our website or requests to be added to the list. For example, former employees of Krogerus may be added to an alumni or client list if they request access to those lists. Individuals may also be added on the basis of Krogerus' own research where the individual belongs to a group of persons to whom marketing activities are to be targeted, in which case the data is collected on the basis of Krogerus' legitimate interest.

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

- Suomen Asiakastieto Oy and Dun & Bradstreet Finland Oy (former Bisnode Finland Oy)
- Alma Talent Oy and similar information services
- Other cooperation partners, service providers and networks that provide contact details of user groups

Krogerus may process personal data through social media services when carrying out targeted marketing or promoting its events on social media, for example to students or former employees. In addition, Krogerus may process data from a data subject's social media account if the data subject interacts with us through a social media channel or otherwise interacts with Krogerus' social media channels, for example, by liking our site or commenting on our posts. In such cases, Krogerus will be a joint controller, where

applicable, with the relevant social media operators, such as LinkedIn and Facebook, for Krogerus' company pages and messaging services. Each social media provider processes personal data in accordance with its own privacy policy. For more information on the privacy policies of the service providers, please visit the respective service provider's website.

Providing data for marketing purposes is voluntary and you can always opt out of direct marketing. However, if you wish to participate in events offered by Krogerus, we will need some of your personal data in order to organise the event and for security reasons. Without this data, it may not be possible to attend the event or the details of the event, such as catering, may not be suitable for you.

6 RECIPIENTS AND RECIPIENT GROUPS OF PERSONAL DATA

In principle, we process personal data in the internal operations of Krogerus. In addition, Krogerus discloses personal data to third parties who act as service providers and processors for Krogerus.

- **Customer Relationship Management (CRM):** Through CRM, we collect sales and marketing contact data related to the client relationship. The data collected includes identity and contact data, contact activity and the source of the data. CRM also maintains marketing lists and marketing preferences of contacts.
- **E-mail marketing tool:** Krogerus uses an e-mail marketing application through which we manage the sending of newsletters and client feedback surveys, as well as invitations to events. We also use the app to send feedback surveys after events. The app collects, among other things, data related to the sending and opening of messages and other data provided by the data subject through the registration forms for the event or occasion, such as identity and contact data, data related to allergies and diet, and possibly other data depending on the content of the event, such as the level of competence relevant to safety at sport and recreational events.
- **Social media management tool:** Krogerus uses a social media tool that provides analytics on the development of the company's social media accounts and enables the automation of update management. The tool is linked to Krogerus' social media accounts, including LinkedIn, Facebook, Instagram and Twitter.

Krogerus may disclose data about special diets, allergies and other similar restrictions to external caterers. However, this data cannot be linked to data subjects. Personal data may be transferred to subcontractors for purposes such as updating address information and company responsibilities.

Krogerus also uses a media tracking tool, which allows us to monitor mentions of Krogerus in communication services and social media. However, Krogerus does not process any personal data through this tool. Krogerus does not share invitation and attendance lists for client events and events with third parties.

Service providers process personal data only to the extent necessary to provide the service in question or in connection with system maintenance and troubleshooting.

Krogerus concludes a contract to process personal data with all of its subcontractors who process personal data on behalf of Krogerus. In addition, contracts concerning the use of personal data are also concluded with service providers other than those acting as processors. Further information on the processing of data by such service providers can best be found on their own websites. Each service provider processes personal data only to the extent necessary for the provision of the service.

We may also transfer or disclose personal data to other authorities if required by applicable laws.

7 **TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES**

Krogerus does not as a rule transfer data outside the European Union or the European Economic Area ("**EU/EEA**"). However, data may be transferred outside the EU/EEA in situations where our service providers or their parent companies are located in such third countries. Where data is transferred outside the EU/EEA, such transfers will be subject to the conditions set out in data protection legislation, such as the European Commission's Standard Contractual Clauses or other transfer mechanism designated in the GDPR.

8 **DATA RETENTION PERIOD OR CRITERIA FOR DETERMINING THE RETENTION PERIOD**

The accuracy, relevance and adequacy of personal data used for marketing and event purposes is reviewed regularly, at least once a year. Unnecessary and outdated data will be deleted at the time of the review and at other times as necessary, for example when an individual withdraws their consent. In addition, data may be retained for the time necessary for the preparation, presentation or defence of a legal claim.

The table below describes Krogerus' main retention periods for personal data processed for events and marketing purposes.

Personal data to be retained	Retention period
Identity data	Identity data is retained for 3 years after collection.
Data on existing clients and potential clients	Data is retained for 5 years after collection.
Event data	<p>Event data is retained for 2 years after collection.</p> <p>Specific personal data, such as allergy and special dietary needs data, is deleted immediately after the event.</p> <p>Any photographs taken at events will be retained for 5 years.</p>

Data on client satisfaction surveys and market research

Data from identifiable client feedback surveys and market research will be retained for 3 years.

9 SECURITY OF THE PROESSING

Krogerus implements and maintains the following technical and organisational measures to ensure the protection of personal data:

- designated personnel responsible for developing, implementing and maintaining data security;
- internal guidelines and regulations on data security and data protection;
- non-disclosure agreements and undertakings;
- regular audit and risk assessment processes;
- processes for managing updates;
- control of access rights and use;
- data encryption;
- organised and regular staff training;
- business continuity and recovery plans; and
- physical and perimeter security of production facilities and other areas containing confidential client information

The adequacy of the measures is scaled on the basis of a risk assessment, taking into account, among other things, the nature, scope, context and purposes of the processing, as well as the risks to the rights and freedoms of data subjects. The measures are regularly assessed and reviewed and updated, as necessary.

Krogerus is committed to comply with the guidelines of the Finnish Bar Association.

The data will not be used for profiling. The processing does not include automated decision-making.

10 RIGHTS OF THE DATA SUBJECT

As a data subject, you shall have the following rights:

Rights of the data subject	
Right of access to your data	You have the right to know whether Krogerus is processing your personal data and what personal data Krogerus is processing. You can also request a copy of your personal data. You have the right to inspect the personal data concerning you. Krogerus cannot, however, in order to protect the confidentiality of its clients, agree to requests for data that could

	<p>jeopardise the processing of confidential client data.</p> <p>If you make your request electronically and have not requested another form of delivery, the data will be provided in the commonly used electronic format.</p>
Right to rectify your data	<p>You have the right to request that inaccurate or incorrect personal data concerning you be corrected or completed. However, due to the nature of the legal profession, Krogerus cannot always correct data, especially in the case of large requests.</p>
Right to have your data erased	<p>You have the right to have your data deleted in certain cases. However, a request to delete personal data cannot be implemented if the personal data is stored, for example, to comply with a legal obligation.</p>
Right to restrict the processing of your data	<p>In certain cases, you have the right to request restriction of the processing of your data.</p>
Right to object to the processing of your data	<p>You have the right to object to the processing of your data in certain cases. Krogerus may refuse a request if the processing is necessary for the legitimate interests of Krogerus or a third party.</p>
Right to transfer data from one system to another	<p>To the extent that we process your data on a contractual basis and the processing is carried out automatically, you have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format and the right to transfer that data to another controller.</p>
Right to lodge a complaint with a supervisory authority	<p>You have the right to lodge a complaint with the competent supervisory authority if you consider that data protection legislation has not been respected in the processing of your personal data. In</p>

Finland, the supervisory authority is the Data Protection Ombudsman.

All requests mentioned here should be sent to the contact person of Krogerus mentioned in section 2. You can make a free-form request. We may ask you specific questions if necessary to fulfil your request.

More detailed information on the exercise of data subjects' rights is available on the website of the Data Protection Ombudsman (<https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations>).