

# Information regarding Sandart's processing of personal data - Clients

## **Data Controller**

Sandart & Partners Advokatbyrå KB, reg. no. 916610-3524, P.O. Box 7131, 103 87 Stockholm,  
Visiting address: Kungsgatan 28A, 115 35 Stockholm, 08-440 68 00, [info@sandart.se](mailto:info@sandart.se).

## **Processed personal data and Sandart use of such data**

Sandart & Partners Advokatbyrå KB ("Sandart") is the data controller for personal data pertaining to clients which we receive in connection with assignments or which is otherwise processed when an assignment is prepared or administrated. Such personal data includes for example name, address and other contact information.

Sandart has, in accordance with the Code of Conduct of the Swedish Bar Association, a confidentiality obligation to everyone except for the client regarding any information processed within the scope of an assignment. This means that we do not have any obligation to provide information about the processing of personal data to anyone except for the client. The client may however in certain cases be obligated to inform a third party, should the client submit personal data relating to said third party to Sandart.

The information below is relevant only for personal data pertaining to a client or to a contact person for the client (the "Personal Data").

## **The purpose of the processed personal data**

Sandart processes the Personal Data in order to be able to carry out a conflict of interest check, anti-money laundering check, to carry out and administer the assignment, in order to safeguard the client's interest and for the purpose of book keeping and invoicing.

The Personal Data may also be used for business and method development, market analysis, statistics and risk management. Personal Data processed with the purpose of developing and analyzing the organization is processed in accordance with our interest in developing our organization and communicating with our contacts.

## **Transferring personal data**

Personal data may be transferred on behalf of Sandart to a so-called data processor. In such case, a written agreement will regulate the data processor's processing of the personal data. The data processor will not be authorized to use the personal data for any other purpose than in order to carry out a specified assignment on behalf of Sandart.

Sandart will not disclose any Personal Data to a third party other than when (i) it has been agreed between the firm and the client, (ii) it is required in order to safeguard the client's interest in a certain assignment, (iii) it is required in order for us to comply with a statutory duty, decisions by an

authority or a court order, or (iv) in the event we hire an external service supplier which carries out assignments on our behalf. The information may be disclosed to courts, authorities, counterparties and counterparties' representatives if necessary to safeguard the client's rights.

### **Legal grounds for processing personal data**

Sandart processes the Personal Data on the basis that it is required in order to fulfill the parties' agreement. Other personal data obtained and/or processed for an assignment, such as for example information pertaining to counterparties, is processed on the basis of Sandart's interest of safeguarding the client's rights and interests.

### **Storage periods**

Sandart stores the Personal Data for a period of ten (10) years from the day on which the assignment was completed (or for a longer period of time, should the nature of the assignment so require), in accordance with Sandart's obligation according to the Code of Conduct of the Swedish Bar Association.

Should Sandart be required, according to law or regulation, to store the Personal Data for a longer period of time than stated above, the Personal Data is stored in accordance with such law or regulation.

### **Access to personal data and requests for restriction of processing, correction etc.**

Anyone whose personal data is processed by Sandart has the right to contact Sandart in order to receive information about the processed personal data. Such requests can be made by contacting Sandart at the address above, by e-mail or by phone. Such person does also have the right to get his or her personal data corrected or deleted as well as getting the processing of personal data restricted or completely ceased (in case the process is carried out after a balancing of interests). Such person does also have the right to request porting of personal data, such personal data provided by the person itself, and which Sandart processes with the consent of such person or in order to fulfill a contractual obligation.

The client is however aware that a request for deletion or restriction of the processing of Personal Data may result in that Sandart may no longer be able to carry out the assignment on behalf of the client.

### **Complaints to the Swedish Authority for Privacy Protection**

Any complaints concerning Sandart's processing of personal data can be directed to the Swedish Authority for Private Protection. Visit [www.imy.se](http://www.imy.se) for more information or contact the Swedish Authority for Private Protection by e-mail [imy@imy.se](mailto:imy@imy.se) or by phone +46 8 657 61 00.