

PRIVACY POLICY of CMS Wistrand

1. Introduction

1.1 What information does this privacy policy contain?

This privacy policy contains information on how CMS Wistrand Advokatbyrå Stockholm KB ("CMS Wistrand Stockholm") and CMS Wistrand Advokatbyrå Göteborg KB ("CMS Wistrand Göteborg") process personal data. CMS Wistrand Stockholm and CMS Wistrand Gothenburg are hereafter jointly referred to as ("CMS Wistrand").

The information in this privacy policy is aimed towards all persons located outside of CMS Wistrand's own organisation. This includes, among others, our clients and recipients of our newsletter and other marketing material.

For information on the processing of personal data by CMS in general, please see our [website](#). This policy includes information on the processing of your personal data when you visit our website, for which CMS is the data controller. CMS also uses cookies on the website. For information regarding the use of cookies on the website and the data collected about you in connection with the use of cookies, please see our [website](#).

This privacy policy fulfils the requirements on provision of information to data subjects in accordance with Regulation 2016/670 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR").

1.2 Who is the data controller for the processing of personal data under this policy?

CMS Wistrand Stockholm and CMS Wistrand Göteborg are jointly responsible for the processing of personal data in accordance with this privacy policy.

In some cases, CMS Wistrand may be a joint controller with other CMS offices for the processing of your personal data. Please see further information on this under "[Sharing of your personal data](#)".

1.3 Definitions

Term	Definition
Personal data	Any information that can be directly or indirectly linked to a living person. Examples include name, address and social security number.
Data subject	An identified or identifiable natural person to whom the personal data relates.
Processing	Any operation or set of operations concerning personal data or sets of personal data, whether or not by automated means, such as collection, recording and storage.
GDPR	Regulation 2016/670 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

1.4 Security

CMS Wistrand has taken appropriate technical and organisational measures to protect personal data against loss, misuse, unauthorised access, disclosure, alteration and destruction. CMS Wistrand's employees, contractors and its suppliers are bound by confidentiality agreements and are required to comply with CMS Wistrand's information and IT security rules, this privacy policy and other internal regulations that further regulate the processing of personal data.

2. What personal data do we process about you?

To administrate and provide our services

Purpose and goal	Processing carried out	Categories of personal data
To carry out and administrate our services and to defend the interests of	<ul style="list-style-type: none">Communication with you, for example by e-mail or telephone	<ul style="list-style-type: none">NameContact details

our clients.	<ul style="list-style-type: none"> • Storage of communications with you • Documentation of our services • Other measures necessary to provide our services and to defend the interests of our clients 	<ul style="list-style-type: none"> • Address • Job title • Content of e-mails and other communications • Other information necessary to provide our services and to defend the interests of our clients
<p>Legal basis: The processing is necessary for our clients' legitimate interest in being able to hire us and our legitimate interest to provide our services and to defend the interests of our clients. If you are a client in the capacity of a private individual, or a sole trader, our legal basis is performance of a contract.</p>		
<p>Period of storage: The data is processed for a period of ten years from the date of completion of the engagement, or the longer period required by the nature of the engagement in accordance with the Swedish Bar Association's regulations.</p>		

Checking conflicts of interests

Purpose and goal	Processing carried out	Categories of personal data
To carry out mandatory conflicts of interests checks.	<ul style="list-style-type: none"> • Comparison of data with our internal client records • Storage of data in our internal client records 	<ul style="list-style-type: none"> • Name • Social security number • Other information relating to the relevant company that is necessary for the performance of mandatory conflicts of interests checks, such as information on ownership and board representation in relevant companies
<p>Legal basis: The processing is necessary to fulfil our legal obligations under The Swedish Code of Judicial Procedure (sw: <i>Rättegångsbalk</i> (1942:740)) and the Swedish Bar Association's regulations.</p>		
<p>Period of storage: The data is processed for a period of ten years from the date of completion of the engagement, or the longer period required by the nature of the engagement in accordance with the Swedish Bar Association's regulations.</p>		

Carrying out money laundering checks

Purpose and goal	Processing carried out	Categories of personal data
To carry out mandatory money laundering checks.	<ul style="list-style-type: none"> • Review of information collected in the context of money laundering checks • Storage of information collected in the context of money laundering checks 	<ul style="list-style-type: none"> • Name • Contact details • Social security number • Information available in identity documents • Information regarding board memberships • Information available in registration certificates • Information on ownership in

		<p>companies</p> <ul style="list-style-type: none"> • Information available in bank statements • Other information necessary for carrying out money laundering checks
<p>Legal basis: The processing is necessary to fulfil our legal obligations under the Swedish Money Laundering and Terrorist Financing (Prevention) Act (sw: <i>Lag (2017:630) om åtgärder mot penningtvätt och finansiering av terrorism</i>).</p>		
<p>Period of storage: The data is processed for a period of ten years from the date of completion of the engagement, or the longer period required by the nature of the engagement in accordance with the Swedish Bar Association's regulations.</p>		

Accounting and billing purposes

Purpose and goal	Processing carried out	Categories of personal data
To invoice for our services and to report our financial data.	<ul style="list-style-type: none"> • Preparation of invoices • Sending out invoices • Activities related to the establishment of our bookkeeping • Storage of invoices and other information related to our bookkeeping 	<ul style="list-style-type: none"> • Name • Address • Social security number • Account details • Contact details • Other information included in the bookkeeping records and invoices
<p>Legal basis: The processing carried out for the purpose of invoicing is necessary for our legitimate interest in being able to charge for our services. The processing carried out for the purpose of accounting and reporting of our financial data is necessary to fulfil our legal obligation under the Swedish Accounting Act (sw: <i>Bokföringslag (1999:1078)</i>).</p>		
<p>Period of storage: For the purpose of invoicing, the data is processed until the invoice is paid. For accounting purposes, the data is processed for a period of seven years after the calendar year in which the financial year ended in accordance with the Swedish Accounting Act.</p>		

To administer job applications

Purpose and goal	Processing carried out	Categories of personal data
To administer and manage job applications.	<ul style="list-style-type: none"> • Review of documents, such as CVs, cover letters, certificates, etc. • Communication with applicants • Storage of information related to the application 	<ul style="list-style-type: none"> • Name • Address • Contact details • Social security number • Grades and other qualifications • Contact details for reference persons • CV • Personal letter

		<ul style="list-style-type: none"> • Other information you provide to us when applying for a job
<p>Legal basis: The processing is necessary for our legitimate interest to be able to administer and manage your job application.</p>		
<p>Period of storage: For the purpose of administering your job application, personal data is processed for a period of six months after the relevant position has been filled. However, the personal data is saved for a total of two years after the position has been filled in order for us to be able to defend ourselves against legal claims under the Swedish Discrimination Act (sw: <i>Diskrimineringslag</i> (2008:567))</p>		

To save applications for the recruitment of future positions

Purpose and goal	Processing carried out	Categories of personal data
To save applications for the recruitment of future positions.	<ul style="list-style-type: none"> • Storage of information related to your application 	<ul style="list-style-type: none"> • Name • Address • Contact details • Social security number • Grades and other qualifications • Contact details of reference persons • CV • Personal letter • Other information you provide to us when applying for a job

Legal basis: The processing is based on your consent.

Period of storage: Personal data is stored for up to two years after you have given your consent to the processing or until you withdraw your consent.

Your right to withdraw consent: We value your integrity and you are able to withdraw your consent at any time by contacting us.

Administering mailouts of information about CMS Wistrand

Purpose and goal	Processing carried out	Categories of personal data
To administer mailouts of newsletters, invitations to seminars and events and other information about CMS Wistrand.	<ul style="list-style-type: none"> • Sending information by e-mail • Notes on what information you may be interested in receiving, based on your job title and previous participation in seminars and events • Storage of information necessary for the administration of mailouts 	<ul style="list-style-type: none"> • Name • Contact details • Address • Job title • Information on relevant company • Details of what information you may be interested in receiving via our mailouts. This includes, for example, information on your participation in previous seminars and events.

Legal basis: The processing is necessary for our legitimate interest to be able to market our services and sharing of news and your legitimate interest in receiving information about relevant services, news and events.
Period of storage: The data is stored for twelve months after you have subscribed to a newsletter, shown interest in CMS Wistrand, e.g. by participating in seminars and events organised by CMS Wistrand or been a client of CMS Wistrand. You will be asked annually if you wish to continue receiving our mailouts, whereupon you can easily decline such further processing.
Your right to object to the processing: We value your integrity and you may object to our processing at any time by clicking on "unsubscribe" in our mailouts.

Administering seminars and events

Purpose and goal	Processing carried out	Categories of personal data
To administer seminars and events.	<ul style="list-style-type: none"> Communication with you Storage of information necessary for the administration of seminars and events 	<ul style="list-style-type: none"> Name Contact details Job title Dietary preferences Information on relevant company
Legal basis: The processing is necessary for the performance of the contract we enter in order to provide you with seminars and events.		
Period of storage: The data is processed up to thirty days after the seminar or event has taken place.		

To establish and defend ourselves against legal claims.

Purpose and goal	Processing carried out	Categories of personal data
To establish and defend ourselves legal claims.	<ul style="list-style-type: none"> Storage of data necessary for the establishment and defence of legal claims. Other processing necessary for the establishment and defence of legal claims. 	<ul style="list-style-type: none"> All categories of personal data listed in this privacy policy.
Legal basis: The processing is necessary for our legitimate interest in establishing and defend ourselves against legal claims under, for example, the Swedish Discrimination Act.		
Period of storage: The data is processed for as long as it is necessary for the establishment and defence of legal claims.		

Providing uniform routines and effective administration

Purpose and goal	Processing carried out	Categories of personal data
To provide uniform routines and efficient and centralised administration, and to fulfil our legal obligations to carry out mandatory checks such as, for example, money laundering checks and KYC.	<ul style="list-style-type: none"> Sharing your personal data with other Wistrand offices, CMS offices, providers of IT systems that operate our IT environment and providers of marketing services. 	<ul style="list-style-type: none"> All categories listed in this privacy policy

Legal basis: The processing is necessary for our legitimate interest to provide uniform routines, to provide efficient and centralised administration and to share lessons learned within our wider organisation. The processing is also necessary for us to fulfil our legal obligations.
Period of storage: The data is processed for as long as any of the processing operations set out in this privacy policy are carried out.

Prevention and investigation of criminal offences

Purpose and goal	Processing carried out	Categories of personal data
To prevent and investigate criminal offences.	<ul style="list-style-type: none"> • Camera surveillance in our reception 	<ul style="list-style-type: none"> • Video recordings
Legal basis: The processing is necessary for our legitimate interest in preventing and investigating criminal offences.		
Period of storage: As a general rule, the data is processed for up to 3 days from the day the video material was recorded. However, the data may be stored for a longer period in the event of a suspected criminal offence. In the event of a suspected criminal offence, the data is stored for as long as necessary to investigate the suspected criminal offence.		

Communication with contacts persons at our suppliers and partners

Purpose and goal	Processing carried out	Categories of personal data
To communicate with contact persons at our suppliers and partners.	<ul style="list-style-type: none"> • Communication with you (e.g. drafting and sending emails) • Storage of contact details and communication with you 	<ul style="list-style-type: none"> • Contact details • Communication with you
Legal basis: The processing is necessary for our legitimate interest to communicate with our suppliers and partners.		
Period of storage: The data is processed until the contract with our suppliers or partners ends or until we receive information that the contact person has left their position within the organisation or changed their contact details.		

You are not obligated to disclose personal data to us. However, in those cases in which the processing is based on the performance of a contract, we require your information to be able to fulfil our obligations. If you do not provide your personal data, there is a risk that we will not be able to provide you with services

3. Sharing of your personal data

In some cases, we may disclose personal data to third parties. Examples of this are when such disclosure has been specifically agreed between us and you, when it is necessary within the framework of a specific engagement to defend the interests of our clients, if it is necessary for us to perform legal obligations or comply with the decisions of public authorities or courts of law, or in the event we retain external service providers who perform services on our behalf (for example, providers of IT-services).

We may also share your personal data with other firms within the CMS-organisation. When personal data is shared with other firms within the CMS-organisation, CMS Wistrand acts as a joint controller of this personal data alongside the other CMS firms. We may share data including, but not limited to, names, job titles, contact information and identity documentation for the purposes of centralised client administration and conducting legally required checks, such as anti-money laundering or KYC. Our legal bases for sharing this data as a joint controller are both the pursuit of our legitimate interests as a business to centralise client administration and share learnings within our wider organisation, and our compliance with relevant legal obligations.

4. Transfers of personal data outside the EU/EEA

We may disclose personal data to parties located outside of the EU/EEA which means that personal data may be

transferred to countries with a lower level of safeguards for personal data than that which applies within the EU/EEA. Such transfer may occur if:

- a) you have provided your explicit consent,
- b) it is necessary for the performance of a contract with you or to undertake measures prior to such a contract,
- c) it is necessary in order to enter into, or perform a contract between us and another physical or legal person in your interest; or
- d) it is necessary for the establishment, exercise or defence of legal claims.

Even when sharing personal data with other offices within the CMS-organisation, CMS Wistrand may transfer such personal data outside the EU/EEA. The CMS firms have put in place standard contractual clauses to ensure the protection of personal data when shared outside the EU/EEA.

Insofar as CMS Wistrand is acting as a joint controller of personal data, CMS Wistrand shall be the point of contact for data subjects whose personal data is gathered by CMS Wistrand. CMS Wistrand shall also continue to comply with all applicable data protection legislation working together with all other CMS firms. Should you have any questions about how CMS Wistrand uses personal data as a joint controller or your rights in relation to this processing, please contact your point of contact at CMS Wistrand.

5. Your rights as a data subject

You are entitled to:

- Request information about whether we process your personal data, what personal data we process and how the personal data is processed. You also have the right to request a copy of the personal data we process about you (a so-called register extract),
- Request the correction of inaccurate personal data, for example if you have changed your personal data or if your personal data is incomplete,
- Object to personal data processing based on the legal basis of legitimate interest, GDPR Article 6(1)(f). Please note that if we can demonstrate that our legitimate interest with regard to the processing outweighs your rights and freedoms, we can continue the processing despite your objection,
- Request that we erase your personal data in the event that:
 - the personal data is no longer necessary for the purposes for which it is processed,
 - you withdraw your consent (if the processing is based on consent),
 - you object to the processing and there are no legitimate reasons for us to continue the processing,
 - the processing is unlawful; or
 - the personal data must be erased to fulfil a legal obligation to which we are subject.
- Request that we restrict the processing of your personal data (meaning that we cease parts of the personal data processing) in the event that:
 - you contest the accuracy of the personal data (however, this restriction only applies while we are verifying the accuracy of the data),
 - the processing is unlawful and you ask for the processing to be restricted instead of erasing the data,
 - the personal data is longer necessary for the purposes for which they are processed but you need them to pursue a legal claim,
 - you have objected to the processing but we have not had time to assess whether our legitimate reasons outweigh your rights and freedoms.

- Withdraw your given consent to the processing. However, please note that withdrawal of consent does not affect the lawfulness of the processing carried out before the withdrawal of consent.
- Have your personal data transferred to another data controller.

Please see the contact information for exercising your rights under "[Contact information](#)". However, please note that such restriction or deletion of your personal data may mean that CMS Wistrand will not be able to provide the services described above.

6. Complaints

If you are dissatisfied with the way we process your personal data, you have the possibility to file a complaint with the Swedish Authority for Privacy Protection, which is the supervisory authority.

7. Contact information

If you have any questions about our privacy policy or have any other questions regarding our personal data processing or want to exercise your rights under applicable data protection legislation, please feel free to contact us at: dataprotection@cms-wistrand.com.

CMS Wistrand Advokatbyrå Stockholm KB

Visiting address: Jakobsbergsgatan 24

Tel: + 46 8 50 72 00 00

Fax: + 46 8 50 73 00 00

sthlm@cms-wistrand.com

Postal address: Box 7543, 103 93 Stockholm

CMS Wistrand Advokatbyrå Göteborg KB

Visiting address: Mårten Krakowgatan 2

Tel: + 46 31 771 21 00

Fax: + 46 31 771 21 50

gbg@cms-wistrand.com

Postal address: Box 11920, 404 39 Göteborg