PRIVACY NOTICE

Jurisprudentia processes personal data under this Privacy Notice and in accordance with applicable legislation, including the General Data Protection Regulation (2016/679; the "GDPR") and other applicable national data protection laws in Finland ("Data Protection Law").

This privacy notice applies to personal data that Jurisprudentia collects about its clients, webpage visitors or other persons that contact us, external third parties (such as suppliers) and for eventual recruitment purposes.

Controller

Asianajotoimisto Jurisprudentia Oy Kornetintie 4 A 00380 Helsinki Email: <u>privacy@jurisprudentia.fi</u>

Contact person Dario Alessi Kornetintie 4 A, 00380 Helsinki M: +358 40 578 3647 Dario.alessi@jurisprudentia.fi

Personal data is primarily collected directly from the Data Subject or it is obtained when using Jurisprudentia's services. In addition, personal data may sometimes be collected from third parties, such as the Data Subject's employer or public sources. Jurisprudentia occasionally needs additional information to keep the obtained information up to date and to validate the accuracy of the information.

Personal data

Personal data collected based on engagement

Personal data is processed to fulfill the agreement between Jurisprudentia and the Data Subject and based on the consent given by the Data Subject, if applicable.

Jurisprudentia processes personal data of the Data Subject for anti-money laundering purposes, clearing conflicts of interest, completion and administration of assignments, protection of the Data Subjects rights and communication, marketing, accounting and invoicing purposes as well as for any other reason required by applicable legislation. Legal grounds for processing are the guidelines of the Finnish Bar Association and Jurisprudentia's responsibilities towards the Data Subject to complete the assignment. Therefore, the personal data of the Data Subject is processed on following grounds:

(i) fulfilling obligations based on law or an agreement or other legal obligation;

(ii) fulfilling purposes based on the interests of Jurisprudentia; and

(iii) completing an agreement of which the Data Subject is a party.

Personal data collected based on your visit of Jurisprudentia's webpage and Cookies

When you visit Jurisprudentia web page, our server will record your IP address together with the date, time and duration of your visit if you have consented to this. Jurisprudentia may collect, process and analyze information related to the use of Jurisprudentia website.

Jurisprudentia may use cookies or other equivalent technology to provide services to its clients, provide a secure online environment, fulfill marketing measures, enable a better client experience online, track analytics of Jurisprudentia website and offer the best possible contents to the clients. The data is not used to identify individual persons. The Data Subject may choose from the browser settings whether to accept cookies or not. If the Data Subject does not accept the use of cookies, the Data Subject may use a part of Jurisprudentia website, but not accepting cookies may limit the use of the website and its services remarkably.

Personal data collected based on marketing or other promotional events

Jurisprudentia processes your personal data in connection with marketing events and trainings. Personal data that we may collect include your name, address, telephone number and title and event participation information.

Personal data collected based on third-parties engagement

Jurisprudentia processes personal data relating to external parties such as our advisors, service providers or their representatives based on our legitimate interest in administering the relationship and performing our legal or contractual obligations.

Recording personal data and period of storage

Any personal data received from you for networking and marketing and contact purposes will be retained for a period of 24 months from the last contact.

As regards personal data relating to an engagement, Jurisprudentia is legally obliged to retain any such personal data being a part of a case file for at least 10 years after relationship with you (client) has expired.

Sometimes mandatory laws (such as accounting and anti-money laundering laws) may, however, require Jurisprudentia to retain certain data for other time periods than those indicated above. Therefore, different data retention periods may apply to different data categories processed.

General sources of information

Mainly the recorded information is related to the Data Subject or the company the Data Subject represents. Personal data may also be collected from third parties. The sources of information in marketing events are the information provided by the Data Subject together with, i.a., the client information database and invoicing database.

Regular data transfer and transferring data outside of EU or EEA countries

Jurisprudentia will generally not disclose your personal data to any third parties unless legally compelled to do so or it is necessary in order to provide the requested services and information to the client. For example, in certain cases Jurisprudentia may need to share your personal data to

advisors and other third parties for the purposes of being able to carry out the assignment in question or in order to assert or defend against legal claims.

Further, Jurisprudentia may use third party service providers to whom Jurisprudentia may outsource the processing of your personal data. In these cases Jurisprudentia enter into a data processing agreement with the third party service provider (processor) as required under the GDPR.

Jurisprudentia primarily processes your personal data within the EU/EEA. However, it may be that in some cases the parties who we use to process personal data on Jurisprudentia's behalf are based outside the EEA. Whenever Jurisprudentia, or our third-party service providers, transfer your personal data out of the EEA, Jurisprudentia ensures a similar degree of protection is afforded to it by ensuring that your personal data is only transferred to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or the transfer takes place under standard contractual clauses approved by the European Commission. Where applicable, appropriate risk assessments will be carried out.

Security principles of the register

Information is stored in a way that is technically secured and Jurisprudentia ensures the security of the collected information by using sufficient technical and organizational measures. Physical access to information has been prevented by access control and other security measures. Access to information requires adequate rights and multiphase identification. Unauthorized access is prevented also by firewalls and technical security measures.

Only Jurisprudentia's representatives or its partners together with technical persons specifically appointed by Jurisprudentia have a right to process information from the register. Only appointed persons have the right to process and maintain information in the register. Users are bound by confidentiality and secrecy obligations.

A backup of the registered information is undertaken safely and the information can be restored if necessary.

Rights of the Data Subject

The Data Subject has the right, to

(i) request access to the personal data concerning the Data Subject and to request correction or erasure of personal data, restriction of processing or to object to processing as well as the right to data portability;

(ii) verify and correct, if necessary, information in register. The request shall be made to Jurisprudentia in writing. The Data Subject has a right to make changes to the information that have been incorrectly recorded to the register;

(iii) withdraw the consent whenever, to the extent the processing is based on the consent of the Data Subject, but this will not affect the lawfulness of the processing based on the consent before its withdrawal;

(iv) object such processing of personal data that is based on Jurisprudentia's interest. If Jurisprudentia, however, has compelling legitimate interests, which are more important than the benefits, rights or freedom of the Data Subject, Jurisprudentia may continue processing the data;

(v) object processing personal data in marketing purposes; and

(vi) lodge a complaint of processing personal data to the competent supervisory authority.

Amendments to the privacy policy

Jurisprudentia improves and develops services and the website continuously, which may occasionally require making amendments to the privacy policy. Jurisprudentia does not limit the rights of the Data Subject described in the privacy policy or rights based on data protection laws in the jurisdictions where Jurisprudentia operates. The Data Subject must read the privacy policy from time to time to receive updated information of possible amendments.

Contacting Jurisprudentia

The Data Subject may whenever be in contact with Jurisprudentia via the contact information provided on Jurisprudentia's website or on the first page on this privacy policy.