



## Advokatbyrå Gulliksson AB's Personal Data Policy (2025:1)

### General

This information concerns the processing of personal data that Advokatbyrå Gulliksson AB ("Gulliksson" or "we") collects in connection with the performance of our assignments for clients, from you/your organisation as a business partner, through your visits to our website [www.gulliksson.se](http://www.gulliksson.se), from third parties or otherwise as part of our business.

The information also relates to the processing of personal data carried out when we receive a report of wrongdoing in accordance with our whistleblowing policy.

We care about your privacy and this policy sets out how we collect, use and protect information about you and how you can exercise your rights. Please contact us if you have any questions or concerns about this Personal Data Policy.

By reference to law, we mean the General Data Protection Regulation (GDPR) and other applicable Swedish data protection legislation.

### 1. Personal data

Usually, the personal data we process about you comes from you or from someone within your organisation in connection with the conclusion of a contract or other agreement. You are not obliged to provide us with personal data, but without this we cannot undertake an assignment in cases where the personal data is necessary for us to be able to carry out the necessary disqualification and money laundering checks or we cannot otherwise fulfil our contractual obligations.

Personal data that we process may also have been provided to us by a counterparty, a counterparty agent, other parties related to the engagement, private/public records or other sources.

We may also use information about you that you have provided on our website or that we have obtained from other sources provided by third parties, such as marketing and sales activity companies.

In addition, such personal data may be used by us that appears in reports of misconduct under the Act (2021:890) on the Protection of Persons Reporting Misconduct ("VBL") in accordance with Gulliksson's Whistleblower Policy.

The personal data about you that may be affected are

**Personal and contact data** (e.g. name, address, e-mail address, telephone number and - when clearly justified by the purpose of the processing, the importance of secure identification or for the necessary checks on conflicts of interest and money laundering - also personal identification number)

**Images and recorded material** (for example at events or from CCTV)

**Billing and payment information** (such as account details)

**Mission-related information** (e.g. mission title and mission statement)

**Financial data** (e.g. register extract from UC)

**Information on whether the client or close relative is a politically exposed person and the name and occupation/position of this**

### Personal data in the Gulliksson system

(e.g. evaluative information such as behaviour, sensitive data such as information on racial or ethnic origin, political opinions, religious or philosophical beliefs or information on genetic data, biometric data to uniquely identify a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation, information on criminal convictions and offences)

**Special categories of personal data** (e.g. data on criminal offences, sensitive data relating to political opinions, trade union membership, etc. if relevant to the mission)

**Technical information about your device or internet connection** (e.g. IP address, cookies, electronic images and similar tracking technologies on website and in email communications, your geographical location and login details). For more information on how we use cookies, please see our cookie information on our website [www.gulliksson.se](http://www.gulliksson.se)

### 2. Purpose and legal basis

For our processing of your personal data to be lawful, there must be a legal basis for it, i.e. it is necessary for the performance of a contract with you or a legal obligation to which we are subject, or the processing is based on a balancing of interests, or you have given your consent to a specific processing. Below are the purposes for which we process your personal data and the legal basis on which this is done.



## *Client assignments*

One of our main purposes for collecting personal data is to perform and administer our tasks, namely to carry out mandatory conflict of interest checks, verify identity and ownership, comply with money laundering and terrorist financing regulations, inform us of the circumstances of a specific case, protect your or your organisation's interests, and for accounting and billing purposes.

Personal data that we process may have been provided by a client, counterparty, counterparty's agent, other parties related to the engagement or registers/other sources.

**Legal basis:** Performance of a contract or legal obligation, or if you are a representative, employee or otherwise represent an organisation that has entered into an agreement with us - legitimate interest. Gulliksson's legitimate interest in the aforementioned personal data processing is to fulfil contractual or legal. We also process personal data on the basis of our legitimate interest to be able to safeguard and protect our rights in the event of legal claims, to administer the assignment and to fulfil ethical requirements imposed on us.

Where we process special categories of personal data, we apply the legal basis that the processing is necessary for the establishment, exercise or defence of legal claims.

## *Marketing, newsletter mailings, etc.*

We may use your data to provide you with news and marketing information related to our services, both general and customer-specific, inform you about new relevant legislation, our activities or services. We may therefore use your data for direct marketing purposes, unless you/your organisation have instructed us not to do so. However, to the extent that you do not have an active customer relationship with us and are a consumer, we will only use your data for electronic direct marketing if you have given your consent.

**Legal basis:** Legitimate interest or consent where explicitly stated.

You can object to our use of your personal data for marketing purposes at any time by contacting us as described in point 9 below, or directly in our electronic mailings.

Gulliksson's legitimate interest in the above-mentioned personal data processing is to be able to offer you/your organisation better services (by developing, analysing the business and communicating with our contacts) and to provide you with personalised offers and other relevant information.

## *Registration and participation in events (e.g. seminars)*

We process your personal data, including your photos and recordings, to provide, administer and follow up our events and to market our activities.

**Legal basis:** Legitimate interest. Gulliksson's legitimate interest in the above-mentioned processing of personal data is to provide events and promote its business.

## *Supplier and other relationships*

We may collect your personal data from you or your employer in connection with a supplier contract or other business relationship between you or your employer and us. The purpose of the personal data processing is to administer and fulfil the contractual relationship and manage deliveries and communication.

**Legal basis:** Performance of a contract or actions you request prior to entering into a contract, or legitimate interest if the contract is entered into with your employer/client.

Gulliksson's legitimate interest in the above personal data processing is contract administration /performance.

If personal data is processed for accounting purposes, the legal basis is our legal obligation under the Accounting Act.

## *Camera surveillance*

We process personal data in the form of video recordings obtained through our CCTV. The camera surveillance is only activated when the alarm is triggered and is used to establish security and prevent, deter or detect criminal activities.

**Legal basis:** Legitimate interest in ensuring the security of Gulliksson's operations.

## *Reporting in the Gulliksson whistleblowing system*

We may process your personal data when you report an offence under the VBL in order to receive your report, liaise with you during the course of the case and to follow up on what has been reported to us and to provide you with feedback on this. Your personal data will also be used if you are mentioned in a report.

**Legal basis:** Legal obligation under the VBL.

## *Cookies and similar technologies*

Gulliksson processes the information created by the cookies set when you visit gulliksson.se, including



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your IP address.

If you consent to the use of the cookies that require your consent, unique identifiers, information about your device and how you use the website are also processed. For example, we use Google Analytics in order to collect data on how our website is used by website users.

**Legal basis:** The legal basis for saving technically necessary cookies is Chapter 9, Section 28, paragraph 2 of the Electronic Communications Act (LEK). The legal basis for processing personal data in connection with technically necessary cookies is our legitimate interest in providing you with a secure and functional website.

The legal basis for saving functional and statistical cookies is Chapter 9, Section 28, paragraph 1. LEK. The legal basis for processing personal data in connection with these cookies is your consent.

More information about the different categories of cookies, individual cookies, their purpose and storage period and the information they collect can be found by clicking on the cookie symbol at the bottom left of the website.

### 3. Data security

All personal data processed by Gulliksson is processed in accordance with the applicable laws on personal data processing. Personal data is stored in operating environments that use security measures to prevent unauthorised access. Reasonable standards for the protection of personal data are followed. Measures are taken to prevent unauthorised or unlawful processing of your data and accidental loss or destruction of, or damage to, that data.

Should a personal data breach be detected, it will be notified in the manner prescribed by law to the Privacy Protection Authority (IMY) and to you when and in the manner prescribed by law.

### 4. Disclosure of personal data

Gulliksson will not disclose personal data to third parties unless:

- (i) It was specifically agreed between you and Mr Gulliksson.
- (ii) This is necessary to protect your or Gulliksson's rights.
- (iii) It is necessary for Gulliksson to fulfil a legal obligation, comply with decisions of authorities or courts.
- (iv) Gulliksson has engaged an external service provider to perform our services on our behalf as a data processor. In this case, the service provider will be obliged to use the personal data only on Gulliksson's behalf and to protect it and process it under confidentiality in the same way as

Gulliksson.

- (v) The disclosure is necessary to follow up on reports under the VBL and in accordance with Gulliksson's Whistleblowing Policy or to address a reported issue.
- (vi) The disclosure to an alarm company or the police is necessary to ensure the security of Gulliksson's operations.

The personal data may be transferred to countries outside the EU on the basis of the above to the extent that this is permitted by law.

If and in the manner prescribed by law, you have the right to receive a list of any processors who process your personal data on behalf of Gulliksson.

### 5. Your rights

You have the right to request information about Gulliksson's processing of your personal data and to access the data in accordance with the law. Such a request must be in writing and personally signed. We will respond to your request as soon as possible and within one month. Where we are unable to fulfil your request, we will notify you and explain why.

Gulliksson will, at your request or voluntarily, correct any personal data about you that is inaccurate and, if necessary, supplement it and restrict our processing of your data. If you believe that the information about you is inaccurate or incomplete, you have the right to request rectification as provided by law. We will correct or update the information about you as soon as reasonably possible. You also have the right, as provided by law, to request the erasure of your data or to request that we restrict the processing of your personal data and to withdraw any consent, without prejudice to the lawfulness of processing on the basis of consent before its withdrawal. You also have the right, as provided by law, to have the personal data you have provided to us transferred (ported).

Please note that we may be required to retain necessary personal data in connection with deletion, withdrawal of consent or porting to fulfil our legal or contractual obligations. We may also be permitted by law to retain certain personal data to fulfil our business needs.

You have the right to object to the processing of your personal data that we carry out on the basis of a balance of interests. We must then, after you specify the processing to which you object, demonstrate that there are overriding interests. You also have the right to object at any time to the processing of your personal data carried out for direct marketing purposes

Please note that a prerequisite for the conclusion and fulfilment of a contract with us is that you provide the personal data requested by us and necessary in this regard.



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## 6. Storage time

Personal data is retained in accordance with Gulliksson's obligation under the Code of Conduct for Lawyers, for a period of ten years from the date of finalisation of a case, or such longer period as is required by the nature of the case.

Data relating to payment and where processing is required under the Accounting Act is retained until the seventh year after the end of the calendar year in which the financial year ended under the Accounting Act.

Data processed for the purpose of developing, analysing and marketing Gulliksson's business is never retained for longer than may be deemed necessary for the purpose in accordance with point 2 above and in accordance with applicable regulations and laws. Your personal data is deleted or anonymised when it is no longer relevant for the purposes for which it was collected or when processing is no longer required by law or contract. Personal data collected in connection with whistleblowing cases in accordance with our whistleblowing policy will only be processed for as long as necessary to fulfil the above-mentioned purposes in accordance with our whistleblowing policy and for as long as required by law, but no longer than two years after the whistleblowing case was closed unless otherwise required by law or the personal data is required to establish and enforce legal claims

Personal data collected on the basis of your consent is processed until you withdraw your consent.

## 7. Amendment of the privacy policy

This privacy policy may be updated by us. If there are material changes to this Privacy Policy, we will notify you by placing a prominent notice on the Website or by other required means. We encourage you to review this Privacy Policy to stay informed about how we process your personal data.

## 8. Complaints

If you believe that the processing of your personal data has been handled incorrectly, please notify us as soon as possible. You also have the possibility to lodge a complaint with the Data Protection Authority (IMY) regarding our processing of personal data.

If you believe that you have suffered damage because our processing of your personal data has been unlawful, you may be entitled to compensation. You can then claim damages from us or take legal action.

## 9. Contact us

Advokatbyrån Gulliksson AB, 556733-5319, is the data controller for the processing of your personal data as described above, unless otherwise expressly stated in connection with the collection of your data. If you have any questions about the policy or our personal data processing, please contact us as below.

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E-mail: [info@gulliksson.se](mailto:info@gulliksson.se)*