

## **Privacy Policy – Personal Data Act (523/1999) 10 § and 24 §**

### **1. Controller**

Nordic Law Ltd.  
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Website: [www.nordiclaw.fi](http://www.nordiclaw.fi)

### **2. Person in charge of data files**

Partner Jon Hautamäki  
Phone: +358 40 569 57 31  
E-mail: [jon.hautamaki@nordiclaw.fi](mailto:jon.hautamaki@nordiclaw.fi)

### **3. Purpose of the processing of personal data**

Nordic Law Ltd. processes personal data to:

- maintain, govern and enhance its client relationships and other such matters;
- plan and develop its business;
- maintain client communication and marketing (including direct marketing and opinion and market research);
- arrange, plan and carry out its client assignments; and
- to detect potential disqualifications.

### **4. Personal information in the data files**

The data file may contain the following information:

- i) Contact information, such as
  - name,
  - address,
  - phone numbers,
  - email addresses,
  - sex,
  - title and the positions in the organization,
  - language,
  - the personal identity number of private customers;
- ii) Information related to client relationship, such as
  - communication information,
  - information relating to invoicing and collecting payments,
  - information relating to the identification of the client required by law,
  - the interest information provided by the data subject,

- information relating to marketing measures and client events, and
- other such information relating to client relationships
- iii) Other information:
  - direct marketing information such as consent and prohibitions; and
  - any other such required information.

## **5. Regular sources of information**

Information regarding the data subject are regularly gathered:

- from data subjects themselves via phone, internet, e-mail, client meetings or in other similar fashion, and
- from various registers and other public sources such as VRK / Civil Registration System, Posti's address information system, telephone companies and other similar private and public registers.

Nordic Law Ltd. can also acquire the basic information of the register and update the related services from the companies and authorities offering them.

## **6. Regular disclosure of data**

Nordic Law Ltd. may disclose information within the limits of the applicable laws and what is acceptable for a law firm. Nordic Law Ltd. does not disclose information to third parties on a regular basis.

Upon expiry of the relevant assignment, Nordic Law Ltd may transfer the personal data, in accordance with the law, to Nordic Law Ltd.'s direct marketing register if it has not been prohibited by the data subject.

Nordic Law Ltd. may use subcontractors to process personal data, whereby the requirements of data protection legislation are contractually enforced.

## **7. Information transfer outside of EU or the European Economic Area**

Nordic Law Ltd. will not transfer data outside the European Union or the European Economic Area unless it is necessary for the performance of a service related to a customer relationship or any other relevant connection. In such cases, transfers will be made within the limits of the Personal Data Act.

## **8. Data subjects' rights**

### Right to inspect and rectify

The data subject has the right to verify the stored data in the data file that concern the data subject. Inquiries regarding the right of inspection must be in writing (including electronic form) and sent to the person in charge of data files in accordance with paragraph 2. In the situation that the information in the data file is incorrect, the data subject may submit a rectification request to the person in charge of the data file stated in paragraph 2.

### Right of refusal

The data subject has the right to prohibit the controller of processing personal data for purposes of direct advertising, distance selling and other direct marketing, market research and opinion polls, as well as registers or genealogical research. Prohibition and rectification must be in writing (including electronic form) and sent to the person in charge of data files in accordance with paragraph 2.

### **9. Data protection principles**

Nordic Law Ltd. maintains the security of its register in a generally accepted manner for a law firm, and pursues to prevent unauthorized access to its data systems by appropriate technical solutions.

Only the employees of Nordic Law Ltd. have access to the information contained in the register. Access to the register information, maintained by electronic information systems, requires the issuance of a personal user name and password.

Insofar as the information contained in the register is subject to the special secrecy and confidentiality requirements of a law firm, Nordic Law Ltd. handles such information in accordance with applicable legislation.