

NORDIC LAW OY'S PRIVACY POLICY AS A CONTROLLER

(updated on 24.5.2018)

This Nordic Law Oy's (hereinafter Nordic Law Oy may also be referred to as "we" or "us") privacy policy describes the personal data processing activities of Nordic Law Oy as the controller (hereinafter "Privacy Policy"). This Privacy Policy contains Nordic Law Oy's records of processing activities as the controller, and it also acts as a communication from us to our data subjects (hereinafter our data subjects may also be referred to as "you") through which we inform the data subjects of the ways Nordic Law Oy processes their personal data. Thus, this Privacy Policy contains at least the information that Articles 13, 14 and 30 of the EU's General Data Protection Regulation (679/2016) (hereinafter "GDPR") require of us.

Nordic Law Oy aims to ensure that this Privacy Policy is always publicly, transparently and easily applicable at Nordic Law Oy's websites.

1) CONTROLLER

Name: Nordic Law Oy

Business ID: 0947087-7

Address: Erottajankatu 5 A 6, 00130 Helsinki

2) PERSON IN CHARGE OF DATA FILES

Name: Jon Hautamäki, partner

Contact details: +358405695731, jon.hautamaki@nordiclaw.fi

3) CATEGORIES OF DATA SUBJECTS

Nordic Law Oy's Privacy Policy as the controller concerns the following categories of data subjects:

- 3.1) persons who act as contact persons of our clients or are otherwise our clients;
- 3.2) persons who act as our potential clients contact persons or otherwise could act as our clients;
- 3.3) persons who are the shareholders of Nordic Law Oy, employed by Nordic Law Oy or seek employment from Nordic Law Oy; and
- 3.4) persons who contact us through email or other similar means.

4) CATEGORIES OF PERSONAL DATA

The data files concerning the data subjects of Sections 3.1) – 3.2) may contain the following categories of personal data:

- contact information, such as full name, address, phone numbers, e-mail addresses, nationality, age, gender, title or profession, language skills and other skills;
- information relating to the client relationships, such as contact information, social security numbers, billing and payment information, product, service and order information, debt

collection information, customer feedback and contact information, cancellation information and other similar information;

- information relating to the implementation of communications and information relating to use of services; and
- possible other information, such as marketing information and other information we are required to process according to the law in force.

The data files concerning the data subjects of Sections 3.3) may contain the following categories of personal data:

- contact information, such as full name, address, phone numbers, e-mail addresses and personal identification numbers;
- videos and pictures;
- nationality, age, gender, title or profession and language skills;
- other information derived from the CVs, such as the work experience, educational background and other such skills;
- bank account data;
- possible registration information, such as username, pseudonym, password and other unique identification; and
- possible other information gathered with the data subject's consent.

The data files concerning the data subjects of Section 3.4) may contain the following categories of personal data:

- contact information, such as full name, address, phone numbers and e-mail addresses; and
- information relating to the implementation of communications and information relating to use of services; and
- possible other information gathered with the data subject's consent.

5) PURPOSE OF THE PROCESSING OF PERSONAL DATA

Personal data of the data subjects of Sections 3.1) – 3.2) can be processed for the following purposes:

- management and development of the client relationship;
- customer service;
- management and development of our business;
- to evaluate disqualifications;
- management and development of the client relationship;
- marketing;
- to enable us to comply with our legal and regulatory obligations; and
- analysis and statistics.

Personal data of the data subjects of Sections 3.3) can be processed for the following purposes:

- management and development of the employee and jobseeker relationships;
- management of employment contracts and other related matters; and

- to enable us to comply with our legal and regulatory obligations.

Personal data of the data subjects of Sections 3.4) can be processed for the following purposes:

- customer service;
- management and development of our website;
- to enable us to comply with our legal and regulatory obligations; and
- analysis and statistics.

6) LEGAL BASIS FOR PROCESSING

The controller has the right to process the personal data of the data subjects based on the:

- consent received from the data subject;
- performance of a contract to which the data subject is party or request of the data subject prior to entering into a contract;
- necessity of the processing for the purposes of the legitimate interests pursued by the controller or by a third party; or
- legal obligation to which the controller is subject.

7) REGULAR SOURCES OF INFORMATION

Information regarding the data subject are regularly gathered:

- from data subjects themselves through our service, via phone, internet, e-mail or in other similar fashion;
- with cookies and other similar tech;
- by Nordic Law Oy's other Finnish affiliate companies; and
- from the Population Register Center/Population Information System, Posti's address database, phone companies' databases and other similar private and public registries.

8) PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED

- 8.1) We shall retain only the necessary data of the data subjects of Section 3.1) for a period of five (5) years following the end of client relationships.
- 8.2) We shall retain only the necessary data of the data subjects of Section 3.2) for a period of three (3) years following the collection of data, if the data subjects have not turned into our actual customers.
- 8.3) We shall retain only the necessary data of our current and former shareholders of Section 3.3) for indefinitely, as we are required to do under the applicable law.
- 8.4) We shall retain only the necessary data of our employees of Section 3.3) for a period of ten (10) years following the end of their employment in our company, because we have a legal obligation to provide our former employees with references during that period.
- 8.5) We shall retain only the necessary data of the jobseekers of Section 3.3) provided that the data subjects explicitly give us their consent to do so. Having received such a consent, we may retain the data of the data subjects for a period of six (6) months following the explicit consent.

- 8.6) We shall retain only the necessary data of the data subjects of Section 3.5) for a period of three (3) year following the contact.
- 8.7) However, we may retain only the necessary data of the data subjects of Sections 3.1) – 3.5) for longer than is described above, where we are required to do so by law, it is necessary due to legal proceedings and it is necessary for any similar reason. We shall be careful not to apply this Section in vain.
- 8.8) We inspect the necessity of the personal data stored every six (6) months and keep records of the inspections.

9) CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The recipients of personal data may consist of the following categories:

- Nordic Law Oy's affiliate and customer companies;
- parties who offer cloud services;
- parties who offer accounting and auditing services;
- parties who help Nordic Law Oy to fulfill its legal obligations; and
- Nordic Law Oy's clients.

10) INFORMATION TRANSFER OUTSIDE OF EU OR THE EUROPEAN ECONOMIC AREA

We may transfer personal data outside the EU or the EEA. When doing so, we ensure appropriate data protection for the data being transferred.

11) DATA SUBJECTS' RIGHTS

The data subject has a right to use all of the below mentioned rights.

The contacts concerning the rights shall be submitted to the person in charge of the data file stated in Section 2. The rights of the data subject can be put into action only when the data subject has been satisfactorily identified.

Right to inspect

Having presented the adequate and necessary information, the data subject has the right to know what, if any, data the controller has stored of her/him. While providing the requested information to the data subject, the controller must also inform the data subject of the controller's regular sources of information, to what are the personal data used for and where is it regularly disclosed to.

Right to rectify and erasure

The data subject has a right to request the controller to rectify the inaccurate and incomplete personal data concerning the data subject.

The data subject can request the controller to erase the personal data concerning the data subject, if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

- the data subject withdraws consent on which the processing is based on;
- the personal data have been unlawfully processed; or
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

Let it be known that the data subjects' rights to rectify and erase data does not concern the data which the controller must retain due to its legal obligations.

If the controller does not accept the data subject's request to rectify or erase the personal data, it must give a decision of the matter to the data subject in a written form. The decision must include the reasons for which the request was not granted. The data subject may refer the matter to the relevant authorities (the Data Protection Ombudsman in Finland).

The controller must inform the party to whom the controller has disclosed the personal data to or has received the personal data from of the rectification or erasure of personal data. However, there is no such obligation where the fulfilment of the obligation would be practically impossible or otherwise unreasonable.

Right to restriction of processing

The data subject can request the controller to restrict the processing of the personal data concerning the data subject where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; or
- the data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If the controller has based the restriction of the processing of personal data on the abovementioned criteria, the controller shall give a notification for the data subject before removing the restriction.

Right to object

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning her/him for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Right to data portability

The data subject shall have the right to receive the personal data concerning her/him, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right

to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent or a contract.

Automated individual decision-making, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

However, the data subject shall not have the aforementioned right if the decision is:

- necessary for entering into, or performance of, a contract between the data subject and us;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- is based on the data subject's explicit consent.

Right to withdraw consent

Where the legal basis for the processing of personal data is the consent of the data subject, the data subject shall have the right to withdraw her/his consent.

12) RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

Data subject shall have the right to lodge a complaint with a supervisory authority, if the data subject considers that the processing of personal data relating to him or her infringes the GDPR. The complaint can be lodged in the Member State of her/his habitual residence, place of work or place of the alleged infringement.

13) COOKIES

Our website uses cookies through Google Analytics to improve our website and make it more user-friendly.

The data gathered by Google Analytics is anonymized, which means that we are not able identify the data to any person. Thus, we do not collect personal data through cookies. The data Google Analytics cookies store are for example data about the website from which you came to our website, the browser you use and how many users have visited our website.

Please see the following websites for more information about Google Analytics: <http://www.google.com/analytics/> and <https://support.google.com/analytics/answer/2763052?hl=fi>.

You can control and/or remove cookies freely at the individual browser level. Instructions can be found for example in here: aboutcookies.org.

14) SECURITY OF PROCESSING

Nordic Law Oy organizes the data security of its registers in a generally accepted manner to a law firm and seeks the most appropriate technical solutions to prevent unauthorized access to its electronic data systems as well as to manually maintained and stored data.

Only Nordic Law Oy personnel have access to the information contained in our registers. We restrict our personnel's access to certain data files by providing our personnel with different user rights. Access to our electronic registers requires the issuance of a personal username and a password.

To the extent that the information contained in the register is subject to special secrecy and confidentiality obligations of a law firm, Nordic Law Oy treats such information in a lawful manner.