

# PRIVACY POLICY

## for users of WeSynch

### 1. INTRODUCTION

Privacy and data protection is important to us, and in this Privacy Policy we will explain how we process personal data concerning users of WeSynch.

WeSynch is a digital platform used by Synch to provide services to its clients, and persons authorised by the clients to access WeSynch (henceforth collectively referred to as “Users”). The services include hosting data-rooms, interactive compliance checks, and contract management.

Users of WeSynch must provide personal data so that their identity can be verified, and they may optionally provide more personalised information on their user profiles.

When Synch processes personal data, Synch is a personal data controller. This means that Synch is determining the purposes and means for processing the personal data, and consequently bears the responsibility under applicable data protection laws.

### 2. CONTACT INFORMATION TO SYNCH

SYNCH ADVOKAT AB Org.no 556955-6656	<b>Phone</b>	<b>Email</b>
	+46 (0)8 761 35 35	privacy@synchlaw.se
	<b>Address</b>	<b>Visiting Address</b>
	P.O. Box 3631 SE-103 59 Stockholm Sweden	Birger Jarlsgatan 6 Stockholm Sweden

### 3. THE PERSONAL DATA WE PROCESS

In the table below, we set out what types of personal data we process, the purposes for doing so, and the legal grounds upon which we base the processing.

PERSONAL DATA	PURPOSE	LEGAL GROUND
User information: - Name* - Title or position - Email-address* - Telephone no. - Free text about the user	(i) administrate users of WeSynch; (ii) enable the provision of WeSynch; and (iii) authorise and monitor access of files and content WeSynch.	The personal data is processed based on Synch’s legitimate interests.

Synch cannot provide WeSynch unless the types of personal data indicated with an asterisk (\*) above is provided.

The legitimate interest of Synch is to provide WeSynch to Synch's clients as part of Synch's activities as a law firm, and the assignments for which the client has engaged Synch.

The Users of WeSynch are either representatives of Synch's client, or employed by either Synch's client or by a company with which Synch's client has dealings with. Synch therefore assumes that it is part of the User's employment description or reasonable expectations to be expected to use third party software and services.

#### **4. RECIPIENTS OF PERSONAL DATA, AND TRANSFERS OF PERSONAL DATA**

The personal data may be transferred to the following categories of recipients:

- Other Users of the WeSynch project, such as other parties in a data-room.
- Recipients whom Synch has been directed by the client to transfer information to.
- HighQ Solutions, Ltd., which provides the software and hardware upon which WeSynch is built.
- Other companies that provide services upon which Synch relies for its core activities (such as data management services, and digital infrastructure).

Synch does not transfer personal data to countries outside of the EU/EEA, unless this is necessary to carry out the assignment given by a client. If so is the case, and there is no decision from the European Commission that the country which the personal data will be transferred to provides adequate data protection legislation to ensure the safety of the personal data, Synch will use relevant safeguards to ensure the safety of the personal data. If you are a client and want to know more about the safeguard we use, please contact Synch for more information.

#### **5. STORAGE AND DELETION OF PERSONAL DATA**

In accordance with current guidelines from the Swedish Bar Association, Synch stores all client-related information, and personal data therein, for ten (10) years after completion of the relevant assignment.

Where the information relates to matters where statutes of limitation are longer than ten years, Synch will store the information, and personal data therein, for the duration of the relevant statute of limitation.

#### **6. YOUR RIGHTS**

Synch is a law firm and is as such subject to rules of professional secrecy. This means that Synch is not allowed to disclose information relating to the clients' matters to anyone but the client.

The rights that a person has in regards of their personal data are not absolute, meaning that certain criteria must be at hand for the right to be exercised. Also, there are exceptions to some of the rights. Synch will accommodate requests to the extent that Synch is obliged under data protection laws, and that doing so is compatible with the interests of Synch's clients.

A person has the following rights regarding personal data concerning them:



- **Access:** meaning that you have the right to information about the processing, access to the personal data in question, and the right to obtain a copy of it.
- **Rectification:** meaning that Synch must correct the personal data if it is incorrect.
- **Erasure:** meaning that Synch must erase the personal data in certain circumstances, such as if there is no purpose for processing it any longer.
- **Object to processing:** meaning that you have a right to object to Synch's processing of personal data.
- **Restriction of the processing:** meaning that you the right to have Synch restrict the processing of personal data, but not delete it.
- **Data portability:** meaning that if you want Synch to transfer the personal data to another personal data controller, Synch must accommodate this request.

Also, you have the right to lodge a complaint at the relevant supervisory authority, if you believe that Synch's processing of personal data infringes applicable data protection laws.

