



HAAGEN & MØLLER

Privacy Notice

1. INTRODUCTION

This Privacy Notice explains how Haagen & Møller Advokatpartnerselskab (the “firm”, “we”, “us” or “our”) may collect and use any personal data about you that is provided to us or collected by us during the course of our business and your rights in relation to that data. The firm is the data controller of any personal data collected by or provided to us in the circumstances described below in section 2.

2. SCOPE OF THIS PRIVACY NOTICE

This Privacy Notice applies when:

- we conduct open-source searches on you in connection with our business acceptance processes;
- we agree to provide legal services to you or the organization you work for;
- you or the organization you work for are a counterparty of one or more of our clients;
- you request information from us or provide information to us; and
- you apply for a job with us.

3. COLLECTION OF PERSONAL DATA

3.1 **Business Acceptance**

We collect personal data about prospective clients and their beneficial owners, controllers and/ or directors as part of our business acceptance process. The type of personal data we may collect includes name, address and nationality. We obtain this data from you or your employer directly and from publicly available open sources such as public registers, databases and other publicly available records (including electronic data sources to carry out checks to enable us to comply with applicable law), either directly or through a third party.

We may also collect personal data about other individuals who may be, or be working for, counterparties of our clients or our prospective clients or otherwise involved in matters we may be acting on.

3.2 Provision of Legal Services

We collect personal data as part of our provision of legal services. The type of personal data that we may collect includes current and historical information including your name and contact details (such as your address, email address and telephone numbers) and identifiers such as your organization, employment history, professional and business expertise and positions held.

We will also collect personal data you choose to provide to us directly, and information about your other dealings with us and our clients, including contact we have with you in person, by telephone, letter, email or online.

We collect personal data directly from you, from our clients or other parties to a matter and their authorized representatives. We may also collect personal data from third parties such as your employer, other organizations that you have dealings with, regulators, government agencies, information or service providers (some of whom may process your personal data on our behalf) and other law firms or professional advisers.

3.3 Recruitment

If you apply for a job at the firm we will collect personal data directly from you, or from recruitment agencies, recruitment websites and apps or other third parties involved in our recruitment and screening process. The type of personal data that we may collect includes current and historical information including your name and contact details (such as your address, email address and telephone numbers) and identifiers such as your organization, educational information, employment history, professional and business expertise and positions held.

4. PROCESSING OF PERSONAL DATA

4.1 General

We will only process your personal data if:

- it is necessary for the performance of a contract with you or the organization you work for;
- it is necessary in connection with a legal obligation;
- you have given your consent (where necessary) to such processing or the organization you work for has obtained your consent (where necessary) to share your data with us; or
- if we (or a third party) have a legitimate interest which is not overridden by your interests or your rights and freedoms. Such legitimate interests include the provision of legal services and running the firm's business.

4.2 Business Acceptance

As part of our business acceptance process, we may process your personal data to comply with our applicable legal and regulatory obligations to identify and verify the identity of our clients and their beneficial owners (i.e., to carry out Know Your Customer (or KYC) checks) and to identify and assess the risks of money laundering and terrorist financing which may apply to our business and to carry out conflict checks.

In addition, in the course of carrying out the KYC verification required by law, we may process a copy of an identity document (e.g. a passport, driver's licence, health insurance card or other ID card), including any personal data specified therein.

4.3 Provision of Legal Services

We may process your personal data in connection with our provision of legal services to you and/or the organization you work for, if you or that organization is a client.

We process personal data in relation to a matter in respect of which we agree to provide our advice or services to a you or the organization you work for (a "matter") for certain specific purposes, including to provide our advice and to handle the matter.

In connection with a matter, we may process personal data of various categories of data subjects, including clients and counterparties of our clients and their respective officers, agents and staff; other advisers, consultants and professional experts who are involved in the matter and their respective officers, agents and staff; our partners and staff; and third parties such as court officers, witnesses and other natural persons who are involved in the matter.

The data processed in connection with a matter may include various types of personal data, depending on the nature of the matter and the data that is provided to, or obtained by, us in the course of that matter. The types of personal data that we typically process in relation to a matter include client contact and communication data. Depending on the matter, we also process special categories of personal data (e.g. health data). We always limit the processing of personal data and in particular sensitive personal data to the necessary minimum.

Our processing of personal data in relation to a matter is ordinarily based on our legitimate interests to provide our services and advice to our clients. This processing is necessary for the pursuit of our client's legitimate interest to obtain legal advice and representation.

We process special categories of personal data (as necessary) for the establishment, exercise or defense of legal claims; based on your consent; for employment and social security law purposes; in relation to personal data which has been made public by a data subject; and/or for reasons of public interest in connection with a statutory provision.

with a delay in performing, or a failure to perform, our obligations as a result of events, circumstances or causes beyond our reasonable control.

- 6.4 We shall not be liable to any third parties for any services or advice that we provide to you unless we have agreed in writing that such third party can rely on our services or advice.
- 6.5 If we are liable to you in respect of our engagement for damage which you have suffered, and another person is liable to you in respect of the same damage, the compensation payable by us to you in respect of that damage will be reduced having regard to the extent of the responsibility of such other person for the damage. In determining the existence and extent of the responsibility of such other person for the damage in question, no account will be taken of any agreement limiting the amount of damages payable by such person or of any actual or possible shortfall in recovery of this amount (whether this is due to settling or limiting claims, or any other reason).
- 6.6 You agree that, in relation to the services provided to you by the Firm, (i) you will have a contractual relationship only with the Firm (and not any of its partners or employees) for the provision of the services, and (ii) to the fullest extent permitted by applicable laws, rules and regulations, no individual who is a partner or employee of the Firm accepts or assumes responsibility to you or to anyone else for the services provided to you.
- You agree (to the extent such agreement is enforceable under applicable laws, rules and regulations) that you will not bring any claim in connection with the services provided to you by the Firm, whether on the basis of contract, tort (including, without limitation, negligence), breach of statutory duty or otherwise, against any partner or employee of the Firm, but this will not limit or exclude the liability of the Firm itself for the acts or omissions of its partners or employees.
- 6.7 Nothing in these Terms of Business purport to exclude or limit any liability to the extent that it may not be excluded or limited by applicable laws, rules or regulations.

7. PROFESSIONAL LIABILITY INSURANCE

We carry professional liability insurance and have procured a guarantee in accordance with the rules provided by the Danish Bar and Law Society. The insurance extends to our legal practice wherever it is conducted. Our insurer and guarantor is Tryg Forsikring A/S, Klausdalsbrovej 601, 2750 Ballerup.

8. CONFLICTS OF INTEREST

- 8.1 We are bound by, and will observe, our professional conduct requirements in relation to conflicts of interest and we have procedures in place to identify and avoid potential conflicts of interests between

4.4 Running the Firm's Business

We may use your personal data to run the firm's business (e.g. carry out administrative or operational processes, including recruitment); maintain and develop our business relationship with you; improve our services to you, if you or the organization you work for are a client or prospective client; monitor and analyze our business; or process and respond to requests, enquiries or complaints received from you.

In connection with the running of our business, we may process personal data of various categories of data subjects, including clients and counterparties of our clients and their respective officers, agents and staff; our suppliers; our professional advisers, consultants and insurers and their respective officers, agents and staff; and our partners and staff.

We process personal data in relation to the running of our business for certain specific purposes, including for operational purposes (e.g. internal record keeping, accounting, billing and tax compliance), and to fulfil certain legal obligations (e.g. where applicable, disclosure obligations and compliance with court orders).

We have a legitimate interest to process personal data in order to comply with certain obligations related to the operation of our business such as maintaining our accounts, and for record keeping, billing and tax compliance purposes. We also process personal data to meet our legal and regulatory obligations under applicable laws, rules, orders, regulations, statutes, requirements, codes and executive orders of governmental or judicial authorities, each as amended, extended or re-enacted from time-to-time.

5. SHARING OF PERSONAL DATA

During the course of working with you or the organization you work for we may use certain third party technology services to assist with our work on the matter. Where these services are integral to our work for you (for example, the use of word processing software provided by Microsoft), we deploy them as a matter of course. We also use various ancillary services, for example, software that is capable of effecting bulk data transfers or facilitating e-signatures and virtual completions. In addition, we make use of third party technology services that are more integral to the work we do, i.e. running the firm's business. These services include, amongst other things, cloud security systems. The use of these integral and ancillary services may require your personal data to be held in the cloud on infrastructure managed by the relevant service provider.

We may share your personal data with other professional advisers, if required, on a case-by case basis, including those working with us on a matter; with other parties providing goods or services to us for the purpose of supporting our work on a matter (e.g. providers of legal technology) or in connection with the administration of the activities of the firm in the ordinary course of its business; or with our professional advisers and insurers where it is required for them to provide

their services to us.

We may also have to share your personal data with regulators, government and other public authorities, courts and other third parties.

We may share your personal data with third parties where:

- you have consented to us doing so (where necessary) or the organization that you work for has obtained your consent for us to do so (where necessary);
- we are under a legal, regulatory or professional obligation to do so (for example, to comply with anti-money laundering or sanctions requirements);
- it is necessary for the purpose of, or in connection with, legal proceedings or in order to exercise or defend legal rights; or
- it is in our or a third party's legitimate interest to share the data, and that legitimate interest is not overridden by your rights or freedoms.

6. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

We may transfer your personal data to countries outside the jurisdiction where you provided it or where we collected it. Therefore, if you are based outside Denmark (for example, in the European Economic Area (EEA)), your data may be transferred to Denmark and other third countries as set out below.

Your personal data may be accessed by third parties in countries whose laws provide varying levels of protection for personal data. Some of your personal data may be stored in a cloud located within or outside of Denmark or the EEA and managed by a third party service provider.

Where we transfer your personal data outside Denmark or the EEA we will take reasonable steps to ensure that your data is treated securely and the means of transfer provide adequate safeguards, including entering into the EU-Commission's standard contractual clauses with the recipient of the personal data (where necessary).

7. RETENTION PERIOD

We will only retain your personal data for as long as is necessary for the purpose for which it was collected, including for the purposes of complying with any legal, regulatory, accounting or reporting requirements, or there is otherwise a legitimate reason or other legal ground to do so. Personal data processed in connection with our business acceptance processes and/or providing legal services will be retained in accordance with the firm's retention and destruction procedures. If there is no longer a legal ground for the data to be retained, we will erase personal data securely, or in some cases anonymize it.

8. SECURITY

We use up to date data storage and security to hold your personal data securely in electronic form to protect your personal data from unauthorized access, improper use or disclosure, unauthorized modification or unlawful destruction or accidental loss.

All our partners, staff and third party service providers who have access to confidential information (including personal data) are subject to confidentiality obligations.

However, the transmission of information via the internet is not completely secure. Although we take appropriate and proportionate steps to manage the risks posed, we cannot guarantee the security of your data transmitted to our online services.

9. YOUR RIGHTS

You have certain rights that you can exercise under certain circumstances in relation to the personal data that we hold. These rights are to:

- request access to your personal data (known as a subject access request) and request certain information in relation to its processing (provided that we may refuse to provide access if the relevant data protection legislation allows us to do so, in which case we will provide reasons for our decision as required by the law);
- request rectification of your personal data;
- request the erasure of your personal data;
- request that we restrict the processing of your personal data; and
- object to the processing of your personal data.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once the firm has received notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you would like to exercise any of these rights, or have any questions about how this Privacy Notice applies to you or want to make a complaint to us about how we handle your personal data, please contact the firm in writing by emailing awh@haagemoller.com or by letter to:

Haagen & Møller Advokatpartnerselskab
Sankt Annæ Plads 11, st.
1250 Copenhagen K
Denmark

You also have the right to lodge a complaint with the Danish Data Protection Agency, which is the competent supervisory authority for data protection issues in Denmark.