

DATA PROTECTION POLICY

1. Registration and processing of personal data

Rosenfalck, Thorup & Russell ("Law Firm") operates as lawyers from the address Landemaerket 3, 3., 1119 Copenhagen K, Denmark and as result of this receives personal data about clients and other individuals.

The Law Firm is responsible (data controller) for the processing of this personal data, and the Law Firm's processing of the personal data is subject to the terms of this Data Protection Policy.

2. What personal data is stored and used?

The Law Firm processes the following categories of personal data about clients, the client's family members, counterparties and other individuals:

- Contact information, including name, address, telephone number, and email address.
- IP-address.
- Individual registration/tax Nos.
- Proof of identity; e.g. copy of passport or driver's license.
- Financial and legal information.
- Insurance details.
- Social and personal information.
- Health information.
- Criminal history.
- Employment information, including, where applicable, information about trade union affiliation.

The personal data is processed in digitised and, in some cases, physical form.

3. The purposes of processing

The Law Firm processes personal data(s) for the following purposes:

- providing legal assistance in disputes before the ordinary courts, arbitrations, tribunals etc.;
- assisting with the execution of business transactions concerning the Law Firm's clients, e.g. business transfers;
- provide legal and related advice to clients in various areas of law falling within the Law Firm's business areas; and
- providing assistance in connection with the completion of clients' legal relations, e.g. completing the purchase of real estate.

The processing of personal data(s) will be limited to what is necessary to fulfil the purpose(s) in question.

4. Collection of personal data

Personal data processed by the Law Firm will be:

- (i) provided by the data subject himself/herself;
- (ii) received from third parties, such as courts, public authorities, opposing parties and their lawyers, witnesses or other people involved in cases handled by the Law Firm;
- (iii) collected by the Law Firm from public registers, in particular the Land Registry, the Personal Register, the CVR Register and the CPR Register; or
- (iv) collected by the Law Firm from other public sources, including the Internet.

5. Basis for processing personal data

The legal basis for Law Firm's processing of personal data is one or more of the following:

- for the performance of an agreement with the client, including an agreement on representation by lawyers in legal proceedings or agreement on the provision of legal advice;
- in order for legal claims to be established, exercised or defended, including when the Law Firm participates in legal proceedings;
- in certain cases where it is necessary for the Law Firm to safeguard a legitimate interest, where the interests of the data subject do not prevail; and
- to comply with anti-money laundering rules applicable to lawyers.

6. Sharing personal data

To the extent it is relevant, the following natural and legal persons may have access to personal data as part of the Law Firm's case processing:

- Courts/tribunals, arbitration tribunals, complaints boards and public authorities that can rule on pending cases.
- Counterparties and their lawyers involved in legal proceedings or legal relationships to which the data subject is a party.
- Other parties and their lawyers in matters, which the Law Firm handles.
- Banks, estate agents and other companies/businesses that have a relevant role in the handling of the Law Firm's matters.
- Insurance companies that provide legal expenses cover, or that otherwise represent a party interest in a matter to which the Law Firm is a party.
- Experts and other individuals, including witnesses, involved in a matter.
- Employees at the Law Firm.
- Public authorities that are entitled by law to demand personal data be disclosed or to whom the Law Firm has a duty to report; e.g. in connection with anti-money laundering rules.
- Representatives of the Danish Law Society in connection with supervision under current regulation for lawyers.
- Public authorities, where required by law, including in specific cases for the purpose of combating online fraud and other criminal activities or attempts to do so.

Sharing/disclosure only takes place where it is necessary for the Law Firm's handling of a matter and associated administrative and financially linked tasks, such as invoicing.

Personal data may, when relevant for case handling, be transferred to other countries both within and outside the EU. The Law Firm carefully selects its business partners and attaches crucial importance to ensuring that information about matters is always treated confidentially.

7. Duration of storage

The law firm keeps the personal data for as long as they

- (i) are relevant for the Law Firm's performance of its duties;
- (ii) are necessary to meet any claims that may be raised against the client or the Law Firm; and additionally
- (iii) for as long as it is necessary to safeguard the client's interests and meet the client's needs.

As a general rule, the personal data will be deleted 5 years after the matter has been finalised, but this depends on a specific assessment in each case.

In this assessment, emphasis is placed on the nature of the assistance provided, documentation considerations and the relevant legislation, including in particular bookkeeping rules, the rules on conflict of interest and general rules on limitation of claims, as well as the client's need to be able to access the information in the future.

A client may terminate the Law Firm's services at any time. However, even in this situation, the Law Firm is subject to a number of rules and obligations that make it necessary to store the personal data for a longer period.

8. Safeguards

The law firm secures the personal data through both technical and organisational security measures in order to protect the data subject's information against unauthorized access, manipulation, destruction/deletion or loss of information.

The law firm uses Legis 365 and e-conomic as system suppliers for the processing, and storage of personal data is in the Cloud.

Data processing agreements have been entered into that guarantee the relevant, recommended and statutory security measures, and the related protection of the personal data processed by the Law Firm.

The Law Firm has determined that other lawyers and employees at the Law Firm may only access personal data to the extent that this is relevant to handling a matter. The individuals in the Law Firm who gain access to personal data are subject to professional secrecy.

9. Rights of the data subject

The individual about whom the Law Firm stores information, typically the client, has the following rights in relation to the Law Firm:

- Access to information about which personal data about the person in question is registered by the Law Firm.
- Right to have incorrect information about the person concerned rectified by the Law Firm.
- Right to have information about the person concerned deleted when the registration is no longer necessary for the fulfilment of the purposes in clauses 3 and 7 above,

and is not hindered by a task/duty incumbent on the Law Firm pursuant to Danish or EU law.

- Right to restrict processing of personal data concerning him/her where the accuracy or inaccuracy of the personal data in question cannot be ascertained, or the personal data is to be used as evidence.
- Access to have the information provided by the person concerned to the Law Firm in a structured, common and machine-readable format, possibly by e-mail, or to a lawyer appointed by the person concerned or to another third party.

The Law Firm will not inform a person who is not a client of this data protection policy, including the person's rights under this clause 9, if the Law Firm's processing of the personal data is covered by the Law Firm's duty of confidentiality, and this would be compromised by the information.

10. Change of personal data policy

This data protection policy may be amended by the Law Firm on an ongoing basis to comply with the data protection rules in force from time to time.

11. Contact

If the data subject objects to the Law Firm's processing of his/her personal data, the data subject is encouraged to contact Advokat Steen Rosenfalck at: SRosenfalck@rtr-law.com.

The data subject also has the right to complain to the Danish Data Protection Agency in relation to his/her rights and about the Law Firm's processing of his/her personal data. For further information, please refer to the Danish Data Protection Agency's [website](#).

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