

VINGE'S PRIVACY POLICY (E 2018:1)

Information concerning Advokatfirman Vinge's processing of personal data in connection with client engagements and business contacts

Vinge safeguards personal privacy and is thus always careful to protect personal data in an appropriate manner and to comply with all applicable regulatory frameworks governing the processing of personal data. Set forth below is a description of how personal data are processed by us in connection with client engagements and other business contacts.

Collection of personal data

We collect and process personal data when we receive inquiries concerning client engagements and when we obtain, perform and administer such engagements, including bankruptcy engagements. The same applies in relation to our suppliers and other co operating partners. There is no obligation to disclose personal data to us although if such does not occur we may be prevented from accepting an engagement or entering into a supply or co operation agreement since, in such event, we cannot perform the requisite conflict of interest and background checks. In certain cases, we have an obligation to verify the information which is disclosed and in such cases we may procure information from private or public registers as well as from other external sources. In addition, we collect and process personal data in conjunction with registration for our newsletters or seminars, if you are a part of our alumni network, and in connection with other business contacts.

Processing of personal data

The personal data are processed by us in order to be able to perform conflict of interest and background checks, to perform and administer engagements and other contractual obligations, and to safeguard our clients' interests as well as for accounting and invoicing purposes. The personal data are also processed in order to maintain contacts with our clients, suppliers and co operating partners, for business and method development, client and marketing analyses, statistical purposes, risk management, sending newsletters, invitations to seminars and for marketing purposes.

We process the personal data in order to perform contracts, legal obligations and tasks in the public interest. Since we have a legitimate interest in being able to maintain business contacts and develop and market our business, we also process the personal data by virtue of a balance in interests.

Personal data may be transferred between our various offices in order to perform conflict of interest and background checks, in order to exchange information and knowledge and to allocate resources. We will not disclose personal data to any third parties, with the exception of: (i) following a separate agreement with you; (ii) in the event it is necessary to protect our client's rights within the scope of a certain engagement; (iii) where it is

necessary in order for us to perform a statutory obligation or to comply with decisions of any public authority or decision of a court; or (iv) in the event we engage third party suppliers which provide IT or administrative services on our behalf. The personal data may be disclosed to courts, public authorities, counterparties and counterparty's counsel where such is necessary in order to perform an engagement.

Storage of personal data

We save personal data in accordance with the obligations which we have according to law and the Code of Conduct of the Swedish Bar Association (in the latter case for a period of ten years from the date on which the engagement was completed or such longer period as is required due to the nature of the engagement or the client relationship). Contact information is saved during such time as is necessary in order to maintain a business relationship with you or the company or the organization which you represent. You are entitled to deregister from newsletters or suchlike at any time and in such event your personal data will no longer be saved for such purposes.

Rights

Subject to certain statutory exceptions, you are entitled to request information concerning your personal data that we process and how this is used. You can also request that personal data concerning you is rectified if such is inaccurate. In accordance with applicable legislation, you are also entitled to request that your personal data is erased, that the processing of your personal data is limited or to object to the processing of your personal data. Under certain preconditions, you can also request to have your personal data transferred in electronic form.

Contact information

If you have any questions, complaints or wish to exercise your rights, you can contact us at gdpr@vinge.se or at the office address below. If you are dissatisfied with our processing, you can also turn to the Swedish Data Inspection Board.

The controller is Advokatfirman Vinge KB, Swedish Companies Registration Office's registration number 916618-4714, www.vinge.se

Offices:

Stureplan 8, Box 1703, 111 87 Stockholm
 Nordstadstorget 6, Box 11025, 404 21 Göteborg
 Östergatan 30, Box 4255, 203 13 Malmö
 Kajpromenaden 21, Box 1064, 251 10 Helsingborg
 Rue de la Loi 23, BE-1040 Brussels

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Information concerning Advokatfirman Vinge's processing of personal data in connection with recruitment

Vinge safeguards personal privacy and is thus careful to always protect personal data in an appropriate manner and to comply with all applicable regulatory frameworks governing the processing of personal data. Set forth below is a description of how personal data is processed by us in connection with employment applications, applications for participation in student activities such as Vinge Week, the summer intern programme, practical job experience and the Talent Pool or following an application for membership of Vinge Talent.

Collection of personal data

We collect and process personal data in connection with you completing application forms concerning employment positions, student activities or membership of Vinge Talent on our website and/or if you choose to submit your application and communicate with us via e mail. The personal data which we collect depends upon the position which you apply for, whether you are called for interview or whether you wish to become a member of Vinge Talent and may, among other things, include your name, contact information, education, work experience, letters of recommendation, results and evaluation of interviews, tests and other recruitment items as well as other background information.

Processing of personal data

The personal data are processed by us in order to evaluate your application as well as your knowledge and skills in order to assess whether you are an appropriate candidate and should thus be considered as suitable for employment, participation in student activities or membership of Vinge Talent. Our processing of personal data is necessary in order to take measures prior to the entry into of an employment agreement or similar. Since we have a legitimate interest in being able to fill positions and market our business, we also process personal data by virtue of a balance of interests. If you have applied for a specific position, but have not been chosen for it, we can, by virtue of your consent, continue to save your application documents and other personal data in the event you would be considered as a candidate for future positions.

Personal data may be transferred between our various offices in order to nominate relevant services, exchange information and knowledge and to allocate resources. We will not disclose your personal data to any third parties, with the exception of: (i) following a separate agreement with you; (ii) where it is necessary in order for us to perform a statutory obligation or in accordance with a decision by a public authority or decision of a court; or (iii) in the event we engage third party suppliers which provide recruitment, testing or background check services on our behalf.

Storage of personal data

We normally save personal data until such time as the recruitment procedure is concluded as well as up to a period of two years thereafter. However, the results of any tests and suchlike are deleted directly following the completion of the recruitment procedure. In conjunction with an application for participation in student activities such as Vinge Week, the summer intern programme, practical work experience and the Talent Pool, your personal data may be saved for a period of up to five years in order to maintain our contacts with you both during and following your studies. We can also save your personal data for a longer period if you have provided your consent to us saving your data in order to fill any future positions. You are entitled to withdraw your consent at any time by contacting us, see the contact information below.

Rights

You are entitled to request information concerning your personal data that we process and how this is used. You can also request that your personal data is rectified if such is inaccurate. In accordance with applicable legislation, you are also entitled to request the deletion of your personal data, that the processing of your personal data is limited or to object to your personal data being processed. Under certain preconditions, you can also request to have your personal data transferred in electronic form.

Contact information

If you have any questions, complaints or wish to exercise any of your rights, you can contact us at gdpr@vinge.se or at the office address below. If you are dissatisfied with our processing, you can also turn to the Swedish Data Inspection Board.

The joint controllers are Advokatfirman Vinge Stockholm AB, Reg. No. 556690-7100, Advokatfirman Vinge Göteborg Aktiebolag, Reg. No. 556688-6551, Advokatfirman Vinge Skåne AB, Reg. No. 556686-6108 and Advokatfirman Vinge KB, Reg. No. 916618-4714.

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