

Personal data policy for BFA LAW

Responsibility

At BFA Law we assign high priority to protecting your personal data, whatever context they are being used in.

This personal data policy has been agreed by BFA Law and describes how BFA Law treats your personal data.

Company

BFA Law is a co-working community shared by BFA Law Advokatanpartsselskab, CVR (Central Business Register) no. 39130661, LB Law, CVR no. 26626994, and the lawyer Johan Hartmann Stæger, CVR no. 39536056, who operate the business jointly from the address on the second floor of Jernbanepladsen 6, 1. mf. DK-2800 Kongens Lyngby. This office community is jointly referred to as BFA Law below.

Personal data and the purpose of collection

It is important to us that your personal data are stored safely, securely and confidentially. In accordance with the rules in this field, we have procedures for collecting, storing, deleting, updating and disclosing personal data in order to prevent unauthorised access to your personal data and comply with current legislation.

Initially, and as our relationship progresses, whenever we collect data we will advise you about what your personal data will be used for. The following personal data are the ones we typically collect:

- General personal data (name, address, e-mail and date of birth)

In certain cases we also collect the following information with a view to complying with the regulations in the Danish Act on Measures to Prevent Money Laundering and Financing of Terrorism (the Money Laundering Act):

- CPR (Danish social security and personal ID) number
- Copy of driving licence
- Copy of passport

Personal data obtained under the Money Laundering Act or regulations issued in pursuance thereof may only be processed with a view to preventing money laundering and financing of terrorism. These personal data must not be processed for other purposes, including commercial purposes. In accordance with section 26 of the Money Laundering Act, BFA Law can transfer personal data to the State Prosecutor for Serious Economic and International Crime and the Danish Bar and Law Society. And in some cases BFA

Law may need to transfer your personal data obtained under the Money Laundering Act to a financial institute in order to set up a separate client account or for some other matter.

To whatever extent relevant to the case, we record and process the following personal data in addition to the aforementioned:

- Children
- Parents
- Marital status
- Membership of the Danish National Church
- Nationality (citizenship)
- Existing wills and marriage settlements
- Debt
- Workplace
- Investments
- Tax particulars
- Working income
- CVR business registration
- Pension details
- Securities portfolio

The regulations governing personal data processing

We only process personal data about you that are relevant and sufficient in terms of the purposes defined above. The purpose is crucial to the type of personal data about you that is relevant to us. The same goes for the scope of the personal data we use. We use only the data that need to be used for the specific purpose in question.

We check that the personal data we process about you are not incorrect or misleading. We also make sure your personal data are regularly updated. We ask that you inform us of relevant changes to your personal data.

Your personal data will always be treated in accordance with good data processing practice and with current legislation on the subject.

BFA Law must store the following information about you (cf. also item **3.3**):

- 1) Information obtained for the purpose of complying with the requirements in Part 3 of the Money Laundering Act, including identity and monitoring information and copies of ID documents presented.
- 2) Documentation and records of transactions conducted as part of a business connection or an isolated transaction.

- 3) Documents and records relating to investigations carried out pursuant to section 25 (1) and (2) of the Money Laundering Act.

BFA Law's personal data processing

We process personal data electronically, and we store personal data physically and electronically.

Electronic processing and storage of personal data are done in the Legis365 case management system, data from which are saved at data centres in the EU. The data centres are located in North and West Europe. Legis365 also uses the cloud-based data storage system Sharepoint, provided by Microsoft.

Physical storage of personal data is done in case files, kept in locked filing cabinets in a specially locked room.

Your rights

You have the right to object to our treatment of your personal data. If objecting, please contact BFA Law, Lyngby Torv 1, 2. tv., DK-2800 Kongens Lyngby, louise@bfalaw.dk. If your objection is justified, we will make arrangements to stop your personal data being processed.

You can contact BFA Law at any time whatsoever to find out what information BFA Law, as data controller, is processing about you, the purpose of such processing, who is receiving the information, and the source of the information. We will answer your enquiry as soon as possible and, if it has not been answered within four weeks of receipt, tell you when a decision is expected to be announced. Enquiries concerning the above will only be answered if more than six months have elapsed since your last enquiry, unless you can prove that you have a special interest in getting the information earlier. If you think the personal data we are processing about you are inaccurate, you are entitled to have them changed. You must contact us and inform us as to the nature of the inaccuracies, and how they can be rectified.

If you discover that the information which BFA Law, as data controller, is processing about you is flawed or misleading, BFA Law will arrange to have this information rectified. Wherever possible, you yourself are encouraged to make corrections to such errors. You yourself can at any time correct or delete content and information at BFA Law given by yourself. If your personal information changes, or if you no longer wish to be registered with BFA Law, please get in touch with BFA Law by e-mail at louise@bfalaw.dk

If requested by you in writing, we will notify you as to whether we are processing personal data about you within four weeks of receiving your request. We will also inform you about 1) what personal data are being processed, 2) the purposes, 3) the categories and recipients of personal data, and 4) available information about the source of personal data. If we cannot provide you with this information within the stated four weeks of the date of receiving your request, we will advise you of the reason for this and tell you when the information will probably be available.

As mentioned above in items **3.3 and 4.4**, information, documents and records must be stored for at least five years after the business connection has been discontinued or the isolated transaction has been completed. Personal data must be deleted five years after the business connection has been discontinued or an isolated transaction has been completed unless otherwise stipulated in current legislation.

If you detect a breach of security at BFA Law, you must contact BFA Law, louise@bfalaw.dk, immediately.

Data processor

BFA Law uses external companies to manage its technical operations. These companies act as data processor in relation to the personal data for which BFA Law is data controller. The data processor acts solely on the instructions of BFA Law, and data processing is effected within the European Union.

BFA Law's data processors have taken the requisite technical and organisational precautions against information being accidentally or illegally destroyed, lost, impaired or degraded, and against it coming to the knowledge of unauthorised parties, being misused or otherwise handled contrary to the Danish Act on Processing of Personal Data. At your request - and against payment of the data processor's hourly rates for such work applicable from time to time - the data processor will give you sufficient information to enable the data processor to show that the technical and organisational precautions mentioned have been taken.

Security precautions

BFA Law protects your personal data and has in-house rules regarding information security. These rules are constantly being updated, and contain instructions and measures to protect your personal data from getting destroyed, lost or altered, from unauthorised publication, and from unauthorised parties gaining access to or knowledge of them.

BFA Law will ensure that the information collected, including personal data, is treated carefully and protected in accordance with security standards in force.

We have strict security procedures for collecting, storing and transferring personal data in order to prevent unauthorised access and to comply with current legislation. Our security is checked regularly. The information and personal details you give us are saved on our own or one of our data processors' servers.

BFA Law has taken the requisite technical and organisational security precautions to protect your personal data from inadvertent or illegal destruction, loss or alteration, and from unauthorised publication, misuse or any other action contrary to current legislation.

We keep and process your personal data on IT systems with monitored and restricted access, cf. above.

We use industry standards as firewalls and authentication protection to safeguard your personal data.

If you send us personal data by e-mail, you must be aware that the transmission to us is not secure if your e-mails are not encrypted.

We have full access to all your personal data, which are stored in our database(s) and on our server(s). Personal data will be accessed on a need-to-know basis only.

Changes to personal data policy

From time to time and without warning, BFA Law may update and change this personal data policy with effect for the future. News of any such change will be posted on www.bfalaw.dk.

Enquiries

Enquiries concerning the personal data policy can be addressed to BFA Law, Lyngby Torv 1, 2. tv., DK-2800 Kongens Lyngby, att. Louise Bomholtz, lawyer, at louise@bfalaw.dk

The Danish Data Protection Agency

You have the option of complaining to the Danish Data Protection Agency about BFA Law's collection and processing of your personal data: Danish Data Protection Agency, Borgergade 28, 5., DK-1300 Copenhagen K, tel.: +45 3319 3200, e-mail: dt@datatilsynet.dk, www.datatilsynet.dk