

PRIVACY POLICY

1. Generally

- 1.1. "NOVI Attorneys" is an office sharing arrangement between independent and legally separated sole legal practitioners. As used in this Privacy Policy, the terms "Practice", "we" and "us" refer to any of those practitioners.
- 1.2. This Privacy Policy ("Policy") applies to all personal data we process about you. The current version of the Policy is always available at www.novi-attorneys.com.

2. Data Controller

- 2.1. The data controller responsible for the processing of your personal data is the individual Practice to which you provide your personal data before or in connection with the establishment of the client-attorney relationship. Specifically, this will be one of the following Practices:

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- 2.2. For personal data which are not related to a client-attorney relationship, the data controller is Strandgade 52 Administration I/S, Strandgade 52, 1401 Copenhagen K, info@novi-attorneys.com, business reg. (CVR) no.: 34831785.
- 2.3. The general legal processing framework is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the

processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, and the attendant rules (the "GDPR"). In addition, the Danish Act No. 502 of 23 May 2018 on supplementary provisions to the EU Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data will apply (the "Data Protection Act").

2.4. All questions concerning this Policy, the processing of your personal data and any suspected non-compliance should be directed to the Practice with which a client-attorney relationship has been established, and in other cases to Strandgade 52 Administration I/S.

3. The personal data we process about you

3.1. If you are a client of ours or an employee or other representative of a client of ours, we may process various general work-related personal data about you, including your name, title, telephone number, email address, name and address of your employer and any other personal data you provide. In addition, we collect the personal data which are necessary to comply with the Danish Anti-Money Laundering Act (*hvidvaskloven*), if applicable. Those data are a copy of your driver's licence/passport and national health insurance card, including data about your civil registration number.

3.2. If you yourself are or your employer is a supplier of ours, we process general work-related personal data about you in the form of the contact details you provide when an order is placed or executed.

4. Purpose of processing your personal data

<p>Clients or employees of or representatives of clients, including potential clients</p>	<ul style="list-style-type: none"> • Registering you and / or your employer as a client and contact in our systems • Sending a letter of engagement • Providing legal advice • Answering questions
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	<ul style="list-style-type: none"> • Complying with the Danish Bookkeeping Act (<i>bogføringsloven</i>), the Anti-Money Laundering Act and the Code of Conduct of the Danish Bar and Law Society
Suppliers or contacts at suppliers	<ul style="list-style-type: none"> • Registering you or your employer as a supplier and contact in our systems • Documentation of orders • Communication concerning our orders • Providing an audit or records trail

5. Basis for processing

5.1. Client-related data

5.1.1. We process your general personal data before you yourself or your employer or principal decides whether to enter into an agreement with us. The legal basis for processing is Article 6(1)(b) of the GDPR, as the processing of your personal data is necessary to allow us to deal with requests, questions, etc. prior to entering into an agreement with us.

5.1.2. When we establish a client-attorney relationship with you yourself or your employer or principal, we process your general personal data for the performance of our obligations under the client-attorney relationship. The legal basis for processing is either Article 6(1)(b) of the GDPR, as the processing of your data is necessary for the performance of our agreement with you, or our legitimate interests, see Article 6(1)(f) of the GDPR. We have a legitimate interest in processing the above-described personal data for purposes of our ongoing communication with you concerning the assignment in question, including concerning the establishment of the facts of the case and the need for further information, for purposes of our ongoing legal services, in connection with keeping time records and for invoicing purposes.

5.1.3. Furthermore, we are subject to a legal obligation to process personal data about you in accordance with the Anti-Money Laundering Act and for purposes of providing an audit trail etc. in accordance with the provisions of the Bookkeeping Act. Among other things, we are required to retain our accounting records for five years after the end of the

financial year which the records concern. This processing is authorised by Article 6(1)(c) of the GDPR and section 11(1)(a) of the Data Protection Act.

5.2. Supplier-related data

5.2.1. If you yourself are or your employer is a supplier of ours, the legal basis for processing your personal data is either Article 6(1)(b) of the GDPR, as the processing of your data is necessary for the performance of our agreement with you, or Article 6(1)(c) of the GDPR, as we are subject to a legal obligation to do so under the provisions of the Bookkeeping Act on accounting records, or our legitimate interest, see Article 6(1)(f) of the GDPR. We have a legitimate interest in processing the above-described personal data for purposes of our ongoing communication with you concerning our order and for documentation purposes in respect of the order.

6. Sharing your personal data

6.1. We may share your personal data with suppliers and business partners providing services to us with regard to system management, IT support, data hosting, archiving and bookkeeping, as well as other law firms assisting us with your assignment.

6.2. We may disclose your personal data to external third parties in the form of public authorities, opposing parties and other law firms to the extent that such disclosure takes place in the course of our legal services or is otherwise necessary in order to handle your assignment. We may also disclose your personal data to our auditors in connection with their preparation of financial statements and in connection with their audit work.

7. Retention and erasure of your personal data

7.1. We will retain your personal data in accordance with the following rules:

7.1.1. If you are a client of ours or an employee or other representative of a client of ours, we will retain your personal data until they are no longer necessary for the purposes for which they are processed. In this connection, we will base our considerations on whether the assignment(s) you have entrusted to us have been completed and whether there are any other special and objective reasons for continuing to process the personal data. As a

general rule, we will not process your personal data for more than ten years after the end of the client-attorney relationship.

- 7.1.2. If you yourself are or your employer is a supplier of ours, we will generally not process your personal data for more than six years after the execution of an order.

8. Your rights

Access	You have the right to access the personal data we process about you. You may request access to the personal data we hold about you, including the purposes for which the data were collected.
Rectification and erasure	You have the right to request rectification, supplementary processing, erasure or blocking of the personal data we process about you.
Restriction of processing	In certain circumstances, you have the right to restrict the processing of your personal data.
Data portability	You have the right to receive your personal data (only data about you which you yourself have provided to us) in a structured, commonly used and machine-readable format (data portability).
Right to object	You have the right to ask us not to process your personal data in cases where our processing is based on Article 6(1)(f) (legitimate interests). The extent to which we process your personal data for such purposes is described in this Policy.
Withdrawal of consent	If the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time.

8.1. If you wish to exercise any of your above rights, please send an email to the Practice with which a client-attorney relationship has been established, and in other cases to Strandgade 52 Administration I/S, using the email addresses set out in clause 2.1 above.

9. Any consequences of not providing your personal data

9.1. If you are under an obligation to provide the personal data in question, you will be so informed when we collect the data. If you do not wish to provide the personal data we request, it may have the consequence that we will not be able to provide the services or advice you have requested.

10. Cookies

10.1. Our website uses functional cookies only. You can change your browser settings to alert you when you receive a cookie to enable you to decide whether to accept it in each case. You can also change your settings to block cookies. If you do so, however, your English/Danish language choice on our website will not be remembered. We do not collect any personal data via cookies.

11. Complaints to supervisory authority

11.1. If you are unhappy with our processing of your personal data, you have the right to lodge a complaint with the Danish Data Protection Agency, Borgergade 28, 5th floor, 1300 Copenhagen K, Denmark, tel.: +45 3319 3200, email: dt@datatilsynet.dk

12. Updating this Policy

12.1. We will review this Policy on a regular basis to keep it up to date and ensure compliance with applicable principles and law. This Policy is subject to change without individual notice. Material changes will be announced on our website www.novi-attorneys.com and an updated version of the Policy will be made available.

Latest version: 25 May 2018