

## PERSONAL DATA STATEMENT

### 1. About this privacy statement

This privacy statement concerns personal data processed by Advokatfirmaet BAHR AS, BAHR Advokatbyrå AB and BAHR Advokatpartnerselskab (hereinafter referred that as "BAHR" or "we"). The companies act as joint controllers for the processing of personal data in our practice as described in this privacy policy. This privacy statement gives an overview of how BAHR processes your personal data and what are your rights.

This privacy statement applies to our legal services, relation to business partners, marketing , the use of our website and BAHR's processing of personal data in connection with recruitment for permanent or temporary employment with BAHR.

BAHR is committed to your privacy and processes personal data in accordance with the data protection legislation applicable at any given time, including the EU General Data Protection Regulation (GDPR). In this privacy statement, we use several terms taken from these regulations, for example "processing", "controller" and "data processor". The terms have the same meaning here as in the legislation.

### 2. Which personal data are processed and for which purposes?

#### 2.1 Legal services

In connection with BAHR's provision of legal services, including the establishment and administration of client relationships, BAHR will collect and process personal data on individuals affiliated with our clients or other individuals referred to in correspondence, case documents, etc., that we get access to or prepare in connection with our case handling.

We process personal data to the extent necessary for purposes relating to BAHR's legitimate interest. We have a legitimate interest in providing our services to our clients, which include:

- Clarifying any conflict of interest
- Establishing client relationships
- Conducting client due diligence
- Handling cases/providing legal services
- Managing client relationships
- Invoicing
- IT operations
- Information security
- Filing and retention
- Internal knowledge management

If you are a private client, the basis for processing may also be that processing is necessary to perform our obligations under an agreement with you.

BAHR will also process personal data as the result of legal obligations. Examples are obligations under the anti-money laundering legislation, the bookkeeping legislation, the Courts of Justice Act and the Legal Practitioner Regulations.

We may process special categories of personal data. This processing is based either on individual consent or the processing being necessary for the establishment, exercise or defense of legal claims. Examples are data on trade union membership, health and criminal offences. In addition, the processing of data on criminal convictions and criminal offences, etc., is governed by Section 11 of the Personal Data Act.

BAHR collects and processes all types of personal data in our practice, typically:

- **Contact details:** Name, e-mail address, telephone number, title, company affiliation.
- **Beneficial ownership details:** Name, ownership stake, copy of ID document.
- **Case details:** Any details of relevance to the provision of legal services. Such details may relate to the client's employees, owners, opponents, witnesses, opponents' lawyers and others who are related to the case or featured in the case documents.
- **Invoicing details:** Contact details of the person responsible for processing invoices.
- **Profile details:** These include contact details, user ID and information that the user him- or herself chooses to disclose upon creating a user profile for our digital interaction tools.

Additional information on BAHR's processing of personal data in connection with the provision of legal services is set out in our terms of business.

## **2.2 Suppliers and other business partners**

We will process personal data in connection with our agreements with suppliers and other business partners. The personal data that will be processed are contact details and other information that are considered necessary to respond to communications, or to conclude or comply with agreements.

For individuals, the basis for processing will be agreements. Where the supplier or other business partner is a company, personal data are processed on the basis of BAHR's legitimate interest. Said legitimate interest is the need for maintaining a dialogue in connection with a potential or existing agreement.

## **2.3 Job applicants**

When you apply for a position with us, we process the personal data you submit to us in the recruitment process. This is normally identifying information, contact details, qualifications, work experience and skills. Some applicants choose to send us their picture. In the later stages of the recruitment process we collect your country of residence/tax residence, working permit, compensation information, the references you provide us with and the information they share with us.

We may prepare internal notes during the recruitment process. We will only note information that we consider to be relevant to our assessment of whether you are suited for the position in question or another position with us. In an interview, we will focus both on your professional and personal competence.

The legal basis for processing of personal data of job applicants is your consent, which you provide by sending us a job application, resume and other documents or information.

You may also choose to join our talent pool. We use this when researching potential new hires. All candidates who send us open job applications will be added to the talent pool for a period of three years. Other candidates will only be added to this pool after collecting an explicit consent.

We also use your personal data for statistical purposes and analytics of our recruitment process. The legal basis for this processing is our legitimate interests of continuously improving this process and understanding our position in the job market, cf. the GDPR article 6 no. 1 (f).

If you applied for a position as Corporate Legal Intern or similar arrangements what we provide together with a partner, we may share your application documents with them. The disclosure will be based on your consent.

If you have submitted your application via one of our recruitment portals, you may change or delete your profile and personal data in the portal. Username and password to your profile will be sent by email when your application is registered in the system.

## **2.4 Newsletters and BAHR events**

We send newsletters and event invitations to persons who are subscribers to these services. When subscribing, you consent to our processing of your e-mail address, name and business details. If you are a student, we also collect which university you attend. Optionally, you can also specify which industries and fields of expertise you are interested in, and inform us about any food allergies.

The personal data will be used for distribution of newsletters and invitations to seminars, lectures, other updates and evaluations of our events. In addition, we use the personal data as a basis for understanding market developments relevant to our legal services and how our recipients interact with newsletters and content we send out.

We send newsletters and event invitations also to contact persons with those of our clients that we have provided legal services to in the last few years, persons we have natural connection to or to potential clients. We base this processing on our legitimate interest in marketing our services.

You may at any given time inform us that you do not wish to receive newsletters and event invitations. Use the link at the bottom of the newsletter/invitation to unsubscribe. You may also unsubscribe from a newsletter for a specific industry or field of expertise by using the same link at the bottom of the newsletter/invitation.

We publish photos or videos of BAHR events in our marketing and on social media. These are photos or videos where the activity at the BAHR event is the main focus, and the individuals shown are less important to the main content. We will ask for consent if we would like to publish a portrait picture.

## **2.5 Our website**

We use one technical cookie on our webpage: bahr\_splash, used for running a video when entering our page. Duration: 1 month.

## **3. Who do we share your personal data with?**

### **3.1 Data processors**

Your personal data will be accessible to those of our suppliers who process personal data on our behalf. To secure your rights, we have entered into data processing agreements with them which, among other things, mean that your personal data cannot be used for other purposes. Our suppliers have a corresponding duty to enter into data processing agreements with their subcontractors which ensure that these are subject to the same obligations that apply to our suppliers.

Some of our suppliers are located in countries outside the EU/EEA. This means that personal data can be transferred or is accessible from a country with a regulatory framework that does not provide the same level of protection of personal data compared to the rules in the EU/EEA. To ensure your privacy, such transfer will only take place in accordance with the privacy legislation currently in force, for example by us entering into the Standard Contractual Clauses for International Transfers which is approved by the EU Commission.

### 3.2 Other third parties

BAHR will not disclose your personal data to others unless we have a lawful basis for such disclosure. Examples of such a basis are that you have consented to it, that disclosure is necessary for the provision of legal services or that we are required by law to disclose information. If the recipient is located in a country outside the EU/EEA, disclosure will only take place on a lawful basis.

Examples of third parties with whom we may share your personal data are opponents, courts of law or other advisors if necessary, in connection with a specific case.

## 4. Your rights

You have data protection rights listed below. For some of the rights, certain conditions must be met for them to be enforced. Exceptions to the rights may also apply.

- **Access:** you have the right to request information about how we process your personal data and to obtain a copy of that personal data.
- **Rectification:** you have the right to request the rectification of inaccurate personal data about you and for any incomplete personal data about you to be completed.
- **Objection:** you have the right to object to the processing of your personal data, which is based on our legitimate interests.
- **Erasure:** you have the right to request the erasure of your personal data (subject to certain conditions).
- **Restriction:** you have the right to ask us to restrict our processing of your personal data, so that we no longer process that information until the restriction is lifted.
- **Portability:** you have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and to have that information transmitted to another organisation in certain circumstances.
- **Compliant:** You have the right to lodge a complaint with the applicable Data Protection Authority if you have reason to believe that processing of your personal data does not comply with the data protection legislation.

We would like to hear from you if you have questions or objections to how we process your personal data, or if you wish to make use of any of the rights described above. You contact us by sending an email to [it-support@bahr.no](mailto:it-support@bahr.no).

BAHR does not make use of automated decisions, including profiling.

If our basis for processing is your consent, you may revoke this at any given time by contacting BAHR on the following e-mail address: [it-support@bahr.no](mailto:it-support@bahr.no).

## 5. When do we delete your personal data?

Personal data will only be stored for as long as is necessary to attain the purpose of their processing.

This means, for example, that any personal data we process on the basis of your consent will be erased once such consent is withdrawn. If the basis for processing is our legitimate interest, the personal data will be erased as soon as there is no longer such legitimate interest. Any data stored pursuant to statutory obligations will be erased once such obligations no longer apply. Typical examples of this are the retention obligations under the anti-money laundering legislation and the bookkeeping legislation.

Case documents will be retained for as long as is deemed relevant by BAHR; normally 25 years. This storage period is considered necessary out of consideration for the client and BAHR's legitimate interest in being able to consult older case details that may be of relevance to dispute or case handling.

Job applicant data is retained for one year after the end of a recruitment process. The end of a recruitment process is the date where a job offer from us is accepted by a candidate for an advertised job opening. Personal data about candidates who are part of our talent pool will be retained for a period of three years. Personal data is deleted if you withdraw the application before the recruitment process is finished.

We will not delete personal data if this is necessary to retain for us to determine, assert or defend legal claims, or if we are legally bound to retain personal information.

## 6. BAHR's social media profiles

BAHR has registered user profiles in the following social media:

- **Facebook**, privacy statement:  
<https://www.facebook.com/business/gdpr>
- **Instagram**, privacy statement:  
[https://privacycenter.instagram.com/policy/?entry\\_point=ig\\_help\\_center\\_data\\_policy\\_redirect](https://privacycenter.instagram.com/policy/?entry_point=ig_help_center_data_policy_redirect)
- **LinkedIn**, privacy statement:  
<https://www.linkedin.com/legal/privacy-policy>
- **Vimeo**, privacy statement:  
<https://vimeo.com/privacy>

BAHR is also using the digital publishing platform ISSUU to publish flipbooks on our website.

- **ISSUU**, privacy statement:  
<https://issuu.com/legal/privacy>

BAHR's user profiles have been created in accordance with the terms of use of these social media/publishing platforms. BAHR processes personal data in accordance with the terms applicable to each platform at any given time and in compliance with all relevant data protection provisions.

The social media and publishing platforms use cookies when you are using their services. Information on what personal data are collected and how these are used by the respective social media can be found in their privacy statements.

BAHR may retrieve anonymized analyses of the activity on BAHR's social media platforms, as well as data related to views of the digital flipbooks published on our website. The analyses are conducted by the

social media platforms Facebook, Instagram, LinkedIn and Vimeo and the digital publishing platform ISSUU. It is the respective social media and publishing platform that is the controller of the personal data used to provide anonymized analyses to BAHR. Further information on how these analyses are conducted can be found in privacy statements of each social media and publishing platform.

#### **7. Measures to safeguard your personal data**

BAHR is committed to ensuring that no unauthorised parties get access to your personal data. BAHR is therefore using multiple forms of security technology to ensure a high level of protection against unauthorised access and misuse of your personal data. BAHR has also established internal procedures to safeguard your privacy.

#### **8. Disclaimer of liability, etc.**

The contents of this website are only intended as general information and shall neither replace, nor be considered, legal advice. You are welcome to contact one of our lawyers if you have any specific legal questions.

#### **9. Use of information from the website**

Any copying and dissemination of information from this website shall require the written consent of BAHR.

#### **10. Amendments to the privacy statement**

This privacy statement will be updated when needed. You will always find our updated privacy statement on our website.