

## Privacy Notice

### Hannes Snellman Attorneys Ltd

Your privacy is important to us, and we make it a priority to keep our clients and contacts informed on how we process their personal data. We, at Hannes Snellman, are committed to process your personal data and other data relating to you reliably, securely, and in a transparent manner. In this Privacy Notice, we describe how we collect and process personal data of our clients, potential clients, and other business contacts. For more information on how we process personal data of job applicants, please refer to our recruitment privacy notice on our Career pages.

#### 1 Who Is The Data Controller For The Personal Data

The controller of your personal data, as described herein, is Hannes Snellman Attorneys Ltd in Finland, business ID 9209363-7. If you have any questions regarding to the processing of your personal data, or if you wish to exercise your rights as a data subject, please contact us at [privacy@hannessnellman.com](mailto:privacy@hannessnellman.com).

Further contact details of our office can be found [here](#).

#### 2 How We Collect Data

As a law firm, we regularly receive and process various types of personal data in connection with our business operations, for example, in connection with our business intake process and when performing and managing assignments from our clients. “Personal data” refers to data that can be used to identify you or data that can otherwise be linked to you.

We mainly process personal data that we obtain from you directly, for example when you send emails to us or communicate with us through other channels, when you sign up for newsletters or other marketing materials, or when you sign up for an event organised by us. Where applicable, we also process your personal data obtained from publicly available sources, such as your employer’s website, and personal data that accumulates from your use of our website.

#### 3 Why Do We Process Your Personal Data

We process the personal data we collect for the following purposes:

- (a) To manage and administrate our business relationship with you and/or your organisation

When we engage in a business relationship with you, we need to process certain information to manage and complete the assignment. The processing relates to the management of the assignment and provision of services, as well as, for example processing of payments, accounting, auditing, billing and other support related services.

In addition to client assignments, we also engage in business relationships with other business partners, service providers and suppliers, and process the personal data of their contact persons and/or other representatives.

The processing is further specified in the table below.

Categories of personal data	Legal basis
	<i>Contract.</i> The processing is necessary to fulfil our contract with you, i.e., what we are obliged

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li>• Contact information, such as your name, your contact details (email, address, phone number(s)), your employer, your title or position;</li> <li>• Information you provide to us for the purposes of attending meetings and events as well as information about your participation to our meetings and events; and</li> <li>• Identification and background information provided by you or collected by us as part of our business acceptance processes in accordance with the applicable Finnish Bar Association rules and other applicable laws (such as anti-money laundering regulations).</li> </ul>	<p>to provide under the agreement between you and us.</p> <p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest of managing and administrating our relationship with client employees as well as contact persons and/or other representatives of other business partners, service providers and suppliers with whom we have any engagements or agreements with.</p> <p><i>Legal obligation.</i> The processing is necessary to fulfil our legal obligations as a law firm, such as anti-money laundering and sanctions checks.</p>
	<b>Exemption for special categories of data</b>
	N/A

#### Retention period

Your personal data will be stored for as long as we have a meaningful business contact or other contact or as may otherwise be required by law. Furthermore, under the Finnish Bar Association's Code of Conduct, we are obligated to archive personal data related to client assignments for at least ten years.

#### (b) To enable business development and marketing

We process personal data for business development and marketing purposes. This includes e.g., (i) communicating with you with respect to legal developments, announcements, newsletters, events, training, and our other services which may be of interest to you; (ii) maintaining our contact lists, and (iii) compiling statistics and improving our services and communications, for example by gathering information regarding your preferences through methods such as website analytics or the tracking of our client publications to improve the quality of our communications and interaction with you.

The processing is further specified in the table below.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li>• Log data (e.g., in connection with your use of our mobile application or when you visit our website) and IP address;</li> <li>• Personal data provided to us by or on behalf of our clients, partners, and employees or generated by us in the course of providing services; and</li> <li>• Any other information relating to you which you may provide to us.</li> </ul>	<p><i>Consent.</i> We collect information via the use of cookies based on your consent. For more information about our use of cookies, please read our <a href="#">Cookie Policy</a>.</p> <p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest of providing you with a better experience and maintaining a business relationship between us.</p>
	<b>Exemption for special categories of data</b>
	N/A

#### Retention period

Your personal data will be stored for as long as we have a meaningful business contact or other contact or as may otherwise be required by law.

(c) Invitations to and participation in meetings, events and seminars

We process your personal data in order to send you invitations to our meetings, events and seminars as well as for the purposes of arranging the meetings, events and seminars. We may also process personal data when maintaining certain information, such as recordings, after the meeting, event or seminar.

Categories of personal data	Legal basis
<ul style="list-style-type: none"><li>• Contact information, such as your name, your contact details (email, address, phone number(s)), your employer, your title or position;</li><li>• Information regarding dietary requirements and preferences when such information is necessary for serving food and refreshments;</li><li>• Photos as well as video and voice recordings for information purposes; and</li><li>• Any other information relating to you which you may provide to us.</li></ul>	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest of inviting you to and arranging and organizing our meetings, events and seminars. The processing is also necessary to fulfil our legitimate interest of maintaining certain information, such as recordings, after the meeting, event or seminar.</p> <p><b>Exemption for special categories of data</b></p> <p>N/A</p>

**Retention period**

Personal data is retained for as long as it is necessary to arrange the meeting, event or seminar or to maintain the information thereafter. Information which is not necessary after the meeting, event or seminar will be deleted or anonymised.

(d) Fulfillment of legal obligations

We will process your personal data for the fulfilling of legal obligations within the area of e.g., book-keeping, anti-money laundering, and the Finnish Bar Association's Code of Conduct.

Categories of personal data	Legal basis
<ul style="list-style-type: none"><li>• Personal data provided to us by or on behalf of our clients, partners, and employees or generated by us in the course or providing services; and</li><li>• Any other information relating to you which you may provide to us.</li></ul>	<p><i>Legal obligation.</i> The processing is necessary to fulfil our legal obligations.</p> <p><b>Exemption for special categories of data</b></p> <p>Special categories of personal data, including criminal data, are only processed to fulfil our legal obligations.</p>

**Retention period**

Personal data is retained for as long as necessary to fulfil the legal obligations that we are subject to. Under the Finnish Bar Association's Code of Conduct, we are obligated to archive personal data related to client assignments for at least ten years. Personal data processed for book-keeping purposes must also be retained for at least ten years.

- (e) Establish, exercise and defend legal claims

For the purpose of establishing, exercising and defending legal claims, (for example in connection with a dispute or legal process) we may process your personal data.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> <li>Contact information for example your name, your contact details (email, address, phone number(s)), your employer, your title or position;</li> <li>Personal data provided to us by or on behalf of our clients, partners, and employees or generated by us in the course of providing services; and</li> <li>Any other information relating to you which you may provide to us.</li> </ul>	<p><i>Legitimate interest.</i> The processing is necessary to fulfil our legitimate interest to establish, exercise or defend the legal claim, for example in connection with a dispute or legal process.</p>
	<p><b>Exemption for special categories of data</b></p> <p>Special categories of personal data, including criminal data, are only processed to fulfil our legitimate interest of establishing, exercising or defending legal claims.</p>
<p><b>Retention period</b></p> <p>Personal data is retained during the period necessary to establish, exercise and defend the legal claim. Personal data for this purpose is not stored for longer than ten years from the end of the legal process in question.</p>	

#### 4 How We May Share and Transfer Your Data

We do not sell, rent, distribute, or otherwise make your personal data available to any third party for marketing purposes. However, we may share information with our suppliers when they perform services on our behalf, mainly to maintain and support our IT systems. Such suppliers are obliged to process the data on our behalf and for the aforementioned purposes, only.

We may also need to transfer personal data to third parties, such as other counsels, advisors, and third parties involved in your matters, including third parties based outside the European Union (the “EU”) and the European Economic Area (the “EEA”). The personal data we process are not regularly transferred outside the EU or the EEA. However, if we transfer your personal data outside the EU or the EEA, such transfer will be performed only when necessary for the services we provide you. Such transfer are subject to appropriate safeguards required by applicable data protection laws and regulations, such as the European Commission’s Standard Contractual Clauses combined with supplementary technological and organisational protection measures including encryption and anonymization/pseudonymization.

We take appropriate technical and organisational measures against unauthorised or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data in accordance with our internal security procedures covering the storage and destruction of personal data as well as access to personal data. We regularly check our security policies and procedures to ensure our systems are secure and protected. Only the personnel who need to process your personal data for the purposes mentioned above have access to your personal data.

#### 5 How Long We Will Store Your Data

Your personal data will be stored for the purposes mentioned above for as long as we have a meaningful business contact or other contact or as may otherwise be required by law. When the processing of your personal data is no longer necessary for the purposes they were collected, we will securely destroy the personal data relating to you in accordance with applicable laws and regulations. Under the Finnish Bar Association’s Code of Conduct, we are obligated to archive personal data related to client assignments for at least ten years.

If you want to learn more about our specific retention periods for your personal data, you may contact us at [privacy@hannessnelman.com](mailto:privacy@hannessnelman.com).

## 6 Your Rights and How to Exercise Them

You, as a data subject, have certain rights in relation to the processing of your personal data. To exercise the rights, described herein, please submit requests to the [privacy@hannessnelman.com](mailto:privacy@hannessnelman.com).

<b>Access</b>	You may request confirmation whether personal data about you is processed by us and, if that is the case, access your personal data and additional information regarding the operation, such as the purposes of the processing. You are also entitled to receive a copy of the personal data undergoing processing.
<b>Object to certain processing</b>	You have the right to object to the processing of your personal data based on a legitimate interest for reasons which concern your particular situation. In such a situation, we will stop using your personal data where the processing is based on a legitimate interest, unless we can show that the interest overrides your privacy interest or that the use of your personal data is necessary to manage or defend legal claims.
<b>Rectification</b>	You have the right to obtain from us the rectification of inaccurate personal data concerning you.
<b>Erasure</b>	You may have your personal data erased under certain circumstances, such as when your personal data is no longer needed for the purposes for which it was collected.
<b>Restriction of processing</b>	You may ask us to restrict the processing of your personal data to only comprise storage of your personal data under certain circumstances, such as when the processing is unlawful, but you do not want your personal data erased.
<b>Withdrawal of consent</b>	You have the right to at any time withdraw your consent to the processing of personal data to the extent the processing is based on your consent.
<b>Data Portability</b>	You have the right to receive the personal data concerning you which you have provided to us, in a structured, commonly used, and machine-readable format and ask for the information to be transferred to another data controller (where possible).

[Click here](#) to read more about the rights that you have in relation to the processing of your personal data.

Please note that if we restrict or delete your personal data, this may result in us not being able to provide you with the communications and invitations described above. We might also be obliged to prevent you from exercising your rights if the personal data relates to our client work or when confidentiality and other obligations under applicable law and the Bar Rules apply.

If you consider that your rights under the applicable data protection laws have been infringed, you may lodge a complaint with the competent supervisory authority (*Tietosuojavaltuutetun toimisto*).

## 7 Updates And Contact Information

We reserve the right to amend this Privacy Notice from time to time to reflect changing legal requirements or our processing practices. We will keep you informed of such updates where appropriate.

If you have any questions or concerns regarding the processing of your personal data, please contact us at [privacy@hannessnelman.com](mailto:privacy@hannessnelman.com).

Further contact details of our office can be found [here](#).