



CONSEGNO LEGAL PRIVACY POLICY

1. General Scope and Purpose

Consegno Legal AB (Consegno Legal), with org. no 559514-8114, values your privacy and is committed to process your personal data in a transparent, correct and adequate manner. In this Privacy Policy, Consegno Legal describes how your personal data is processed to ensure compliance with data protection legislation and the EU General Data Protection Regulation (EU) 2016/679 (GDPR). In case you have any questions regarding how we process your personal data, feel free to contact Consegno Legal via the following email address: victoria@consegnolegal.com

2. Personal Data

“Personal data” is any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, contact information and location data. Consegno Legal needs to process various types of personal data in order to fulfil the company’s missions and assignments.

3. Application

This Privacy Policy shall apply when Consegno Legal, as data controller, process personal data belonging to clients and their representatives as well as suppliers, business partners, and others who are in contact with Consegno Legal. It describes how your personal data is processed when collaborating with us or participating in our education sessions and workshops. Further on, it describes how your personal data is processed when you contact us via our website or social media. Consegno Legal may also have reasons to process personal data to comply with legal obligations prescribed by law or authority decisions. This Privacy Policy applies both to data processed internally to fulfil our daily working tasks as well as data processed in our external communication and assignments.

4. Processing of Personal Data

4.1 General Guidelines for Processing and Deleting Personal Data

Consegno Legal process personal data to the extent necessary to fulfil the purpose of the processing. The term “Processing” refers to any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means. Some examples of such actions are collection, registration, storage, processing, disclosure, or transfer of personal data. We never process more personal data than we deem necessary. Consegno Legal retains personal data as long as needed to fulfil the purposes specified in this Privacy Policy. Personal data is continuously deleted when Consegno Legal assesses that they are no longer necessary to retain.

4.2 Utilization of the Client Interest

Consegno Legal process personal data to utilize your interest as a client. We process the



personal data that we deem necessary to complete agreed missions according to the description of the assignment. The personal data is also used for ongoing contact with you as a client and for the administration of the assignment, such as invoicing and other services. We process your personal data to ensure necessary controls are conducted for the execution of the assignments, ensuring that they are performed in accordance with applicable laws and regulations, such as anti-money laundering, sanctions, tax, or accounting legislation. Therefore, we may have reason to request information such as extracts from authorities, the client's counterparty or counterparty representative, or other publicly available sources.

Consegno Legal hereby process the following information about you as a client:

- (a) Contact information, such as name, title, employer, postal address, phone number and email address;
- (b) Case data, such as information about ongoing and completed assignments;
- (c) Identification information, such as ID documents like passport and ID card, as well as photograph and date of birth or personal identification number;
- (d) Billing information, such as contact person, account number, and tax information, as well as other necessary information for issuing an invoice;
- (e) Other information and personal data except from those mentioned above, such as correspondence, sequences and other circumstances or information relevant to the assignment.

The lawful ground which Consegno Legal relies on to process personal data to utilize the client interest is primarily the Contract with the registered or Weighing of Interests to fulfil ongoing assignments or projects according to the description of the mission. Personal data may also be processed due to Legal Obligation according to the law of judicial procedure, anti-money laundering, sanctions, tax, or accounting legislation.

Considering that Consegno Legal is part of a corporate structure and thus a shareholder in Keynote Law, org. no. 559252-7450, Consegno Legal may, in some cases, transfer personal data between these organizations. This processing of personal data in relevant cases is based on Weighing of Interests, which due to the circumstances in the specific case justifies such actions.

4.3 Suppliers and Partners

Consegno Legal process personal data belonging to suppliers and business partners to the extent necessary to fulfil commitments and obligations. We collect personal data about you or your employer due to the business relationship. In some cases, we may supplement personal data by obtaining information from other sources, such as search results from available public or private search engines and registers. We process your personal data to ensure necessary controls are conducted of you as a supplier or partner and other external parties involved in the business relationship. This to fulfil our obligations in accordance with applicable laws and regulations such as anti-money laundering, sanctions, tax, or accounting legislation.



Consegno Legal hereby process the following information about you as a supplier or business partner:

- (a) Contact information, such as name, title, employer, postal address, phone number and email address;
- (b) Identification information, such as ID documents like passport and ID card, as well as photograph and date of birth or personal identification number;
- (c) Billing information, such as contact person, account number, and tax information, as well as other necessary information for issuing an invoice;
- (d) Other information and personal data except from those mentioned above, such as correspondence, sequences and other circumstances or information relevant to the assignment.

The lawful ground which Consegno Legal relies on to process personal data related to Suppliers and Partners is primarily the Contract with the registered or Weighing of Interests to fulfil the current business relationship. Personal data may also be processed due to Legal Obligation according to the law of judicial procedure, anti-money laundering, sanctions, tax, or accounting legislation.

Considering that Consegno Legal is part of a corporate structure and thus a shareholder in Keynote Law, org. no. 559252-7450, Consegno Legal may, in some cases, transfer personal data between these organizations. This processing of personal data in relevant cases is based on Weighing of Interests, which due to the circumstances in the specific case justifies such actions.

4.4 Collaboration and Gatherings

Consegno Legal process personal data for collaborations as well as educations, workshops, seminars, webinars, events, and other types of gatherings to fulfil the mission or commitment that Consegno Legal has undertaken to perform. We collect personal data about you or your employer. We may supplement the personal data by obtaining information from other sources, such as public search engines and registers, news channels and social media.

Consegno Legal hereby processes the following information about you who collaborate with us or participate in any of our gatherings, both digital and physical:

- (a) Contact information, such as name, title, employer, postal address, phone number and email address;
- (b) Identification information, such as ID documents like passport and ID card, as well as photograph and date of birth or personal identification number;
- (c) Billing information, such as contact person, account number, and tax information, as well as other necessary information for issuing an invoice;
- (d) In applicable cases, other information provided in connection with registration for a gathering or other event;



- (e) Other information and personal data except from those mentioned above, such as correspondence, sequences and other circumstances or information relevant to the assignment.

The lawful ground which Consegno Legal relies on to process personal data related to Collaboration and Gatherings is primarily the Contract with the registered or Consent to process the data. In some cases, the processing of data is based on Weighing of Interests regarding information needed to fulfil the obligations according to the collaboration or marketing and realization of gatherings such as educations, workshops, seminars, webinars, events, and other types of gatherings. Personal data may also be processed due to Legal Obligation according to the law of judicial procedure, anti-money laundering, sanctions, tax, or accounting legislation.

4.5 Communication and Correspondence

Consegno Legal process personal data when you communicate with us through our communication channels, such as our website, social media, email, letter, phone calls or digital meetings. We collect and process personal data from you or your employer to the extent we deem proportionate depending on the subject for the current correspondence.

Consegno Legal hereby processes the following information about those who communicate with us through any of our communication channels:

- (a) Contact information, such as name, title, employer, postal address, phone number and email address
- (b) Information connected to you who communicate with us through any of our communication channels mentioned above, which relates to the subject matter of the current correspondence.

The lawful ground which Consegno Legal relies on to process personal data related to Communication and Correspondence is Weighing of Interests, based on a proportionate balancing of interests in each individual case, in order to provide answers to the questions of the registered and proceed the dialogue with the registered in the current matter or project.

5. Your rights

You have the right to refrain from providing personal data in contact with us, which may result in Consegno Legal being restrained from communicating with you or fulfilling our commitments towards you, your employer or the organization you represent.

Furthermore, you have the right to:

- (a) Access your personal data and information about how we process your personal data;
- (b) Request erasure of your personal data;
- (c) Request rectification of personal data that you consider incorrect or incomplete and provide additional personal data;
- (d) Request limitation of the processing of your personal data, e.g., in connection with rectification according to point (c);



- (e) Object to our processing of your personal data for the purposes specified in this Privacy Policy;
- (f) Submit a complaint to the Swedish Authority for Privacy Protection (IMY) (www.imy.se) regarding our processing of your personal data according to this Privacy Policy.