

## PROCOPÉ & HORBORG PRIVACY NOTICE

**You have the right to object to the processing of your personal data at any time, on grounds relating to your particular situation, when we process your data based on our legitimate interests. You also have the right to object to the processing of your personal data for direct marketing purposes at any time. Please see sections 3 and 8.6 of this document for further information.**

### 1. INTRODUCTION

The privacy and security of your personal data is of paramount importance to us at Procopé & Hornborg Attorneys Ltd. We are committed to protecting the data we hold about you. This privacy notice (“Privacy Notice”) explains how we collect, use, store, and otherwise process data that can be used to directly or indirectly identify you (“Personal Data”).

The Privacy Notice applies to Personal Data we process in connection with our client matters, recruitment processes, use of our website [www.procope.fi](http://www.procope.fi), and marketing activities (including events and newsletter subscriptions), and when we acquire services from outside service providers. Please note that this Privacy Notice does not form part of any contract nor does it establish any obligation to provide services to you.

It is important that you read this Privacy Notice, together with any other privacy notice we may provide you with on specific occasions when we are collecting or processing Personal Data about you, so that you are aware of how and why we are using such data.

We may update this Privacy Notice at any time and will make an updated version available to you. We will inform you separately in case any material changes are made to this Privacy Notice.

We have divided this Privacy Notice into different sections, so that you may easily find the information that interests you the most:

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## 2. CONTROLLER INFORMATION

This Privacy Notice concerns Personal Data that Procopé & Hornborg Attorneys Ltd (2117197-6) processes about you as a controller. Please find below our contact information.

<b>Name</b>	Procopé & Hornborg Attorneys Ltd
<b>Address</b>	P.O. Box 1077 / Eteläesplanadi 18, 00101, Helsinki, Finland
<b>Email</b>	<a href="mailto:privacy@procope.fi">privacy@procope.fi</a>

We take data protection seriously and have therefore dedicated personnel to address your questions and concerns and handle your requests in relation to your rights stated below in section 8. You can always reach us at the email address indicated above.

We may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## 3. PURPOSES AND LEGAL BASES OF DATA PROCESSING

We collect and use Personal Data for the following purposes and on the following legal bases:

Purpose	Legal basis
<ul style="list-style-type: none"> <li>• Providing and enhancing our legal services;</li> <li>• Creating and managing our relationship with you;</li> <li>• Complying with our contractual obligations; and</li> <li>• Managing and planning our business</li> </ul>	<ul style="list-style-type: none"> <li>• We have a legitimate interest to process Personal Data for the following purposes: to market, create and enhance our business, personalise our services and communications, update your details, handle claims and solve disputes, as well as strategic planning and resource analysis and allocation; and/or</li> <li>• Processing is necessary for compliance with our legal obligations; and/or</li> <li>• Your consent; and/or</li> <li>• Processing is necessary for the performance of our contract with you or in order to take steps at your request prior to entering into a contract</li> </ul>
<ul style="list-style-type: none"> <li>• Complying with statutory obligations and regulations as well as guidelines of the Finnish</li> </ul>	<ul style="list-style-type: none"> <li>• Processing is necessary for compliance with our legal obligations (for example to comply with anti-money laundering and knowing your customer procedures, identification purposes)</li> </ul>

Bar Association and authorities	
• Recruitment and selection of employees	<ul style="list-style-type: none"> <li>• We have a legitimate interest to process Personal Data for the following purposes: to recruit new employees and to establish recruitment candidates' reliability; and/or</li> <li>• Your consent; and/or</li> <li>• Processing is necessary in order to take steps at your request prior to entering into a contract</li> </ul>
• Customer communication, newsletters and surveys; • Crisis communication; • Organizing and informing of events; and • Direct marketing of our services	<ul style="list-style-type: none"> <li>• We have a legitimate interest to process Personal Data for the following purposes: to create, enhance, and market our business, communicate with you and personalise our services and communications; and/or</li> <li>• Processing is necessary for compliance with our legal obligations (for example to inform you of any data breaches); and/or</li> <li>• Your consent</li> </ul>
• Supporting network and system security	<ul style="list-style-type: none"> <li>• Processing is necessary for compliance with our legal obligations; and/or</li> <li>• We have a legitimate interest to process Personal Data for the following purposes: to monitor data traffic and network security</li> </ul>
• Legal processes; • Compliance with court orders; and • Protection of our rights	<ul style="list-style-type: none"> <li>• Processing is necessary for compliance with our legal obligations</li> </ul>
• Website and newsletter analytics	<ul style="list-style-type: none"> <li>• We have a legitimate interest to process Personal Data for the following purposes: to market, create and enhance our business and personalise our services and communication, statistical purposes and system administration purposes</li> </ul>
• Historical research	<ul style="list-style-type: none"> <li>• Public interest; and/or</li> <li>• We have a legitimate interest to process Personal Data for the following purposes: to draft historical reviews and chronicles concerning our development over the years and as such satisfy a general interest of knowledge; and /or</li> <li>• Your consent</li> </ul>

#### 4. CATEGORIES OF PERSONAL DATA AND THEIR RETENTION PERIODS

We will store your Personal Data for as long as necessary to fulfil the purposes we collected it for or to satisfy any requirements stemming from the Rules of the Finnish Bar Association or other legal requirements. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure of Personal Data, the purposes for which we process Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your Personal Data are available below.

In case we have anonymized your Personal Data so that it can no longer be associated with you in any reasonable way, we may use such data without further notice to you. We may also be

required to retain Personal Data longer than described below, if it is necessary to handle an ongoing legal process, to comply with a decision from a court or authority, or to prove our compliance with applicable laws. Please note that if you have opted-out of or withdrawn your consent to receive marketing messages from us, we may need to save certain data longer than indicated below to make sure we respect your wishes.

Category of data	Context	Retention period
<ul style="list-style-type: none"> <li>• Name and title, company information (including trade register data), address, telephone number, email address;</li> <li>• Contractual details;</li> <li>• Permissions and consents;</li> <li>• Photographs;</li> <li>• Emails and contact requests sent by you;</li> <li>• Payment information and payment history;</li> <li>• Claims and requests concerning us;</li> <li>• Other information received, generated or collected by us in connection with handling your assignments and requests;</li> <li>• Passport and ID card information;</li> <li>• Social security number, date of birth; and/or</li> <li>• Financial and business activity details</li> </ul>	Assignment data collected or received about or from client, client's representative, counterparty, or counterparty's representative	Documents and material are retained for 11 years following the archiving of the assignment, while other data (name and title, contact details, company, assignment title, payment history, and payment details) may be retained longer, if necessary, for example due to conflictcheck obligations
<ul style="list-style-type: none"> <li>• Name and title, company information, address, telephone number, email address;</li> <li>• Contractual details;</li> <li>• Permissions and consents;</li> <li>• Emails and contact requests sent by you;</li> <li>• Payment information and payment history; and/or</li> <li>• Claims and requests concerning us</li> </ul>	Our service providers	Service provider agreements are retained for 2 years following the termination of the service agreement or provision of services, other data may be retained longer, if necessary, for example due to partner relations management
<ul style="list-style-type: none"> <li>• Name and title, company information, address, telephone number, email address;</li> <li>• Permissions and consents;</li> <li>• Emails and contact requests sent by you;</li> <li>• Claims and requests concerning us; and/or</li> <li>• Interests and preferences</li> </ul>	Potential customers and customer data not related to assignments	Retained data is reviewed every 5 years and deleted if contact is no longer relevant
<ul style="list-style-type: none"> <li>• Passport or other ID card information</li> </ul>	Identification for other purposes than client assignments, usually in connection with carrying out your	If related to an assignment, the information is retained for 11 years following the archiving of the assignment. Otherwise, the information is retained for 6 months from acquiring the information

	requests concerning your data	
• Health data (such as allergies) collected in connection with events organized by us	Events organized by us	Deleted after the event
• Newsletters • Direct marketing analytics (e.g. about how many times you have opened a marketing email – please note that such analytics include your email address) • Surveys	Newsletter subscriptions and direct marketing activities as well as client surveys	Deleted within a year from collection
• Electronic identification data including IP address and information collected through cookies (such as device ID, website analytics, user browser history, user activity details and preferences)	Use of our website	Deleted within a year from collection
• Job application and CV, including photos; • Name and title, company information, address, telephone number, email address; • Permissions and consents; • Emails and contact requests sent by you; and/or • Other information received, generated or collected by us in connection with the recruitment process	Recruitment of new employees	If you are not recruited, your information will be retained and stored in a separate folder with limited access rights for 2 years from the end of the recruitment process. The information will not be processed, unless necessary to defend our rights. However, with your separate consent, we may also consider your application in future recruitment processes. Retention periods for employee data is described further in our employee privacy notice
• Photographs	Historical research (such as historical reviews or chronicles)	Retained until no longer necessary for such purposes

## 5. SOURCES OF PERSONAL DATA

While we mainly process Personal Data that you personally have shared with us or that we have received, generated or collected (for example from your employer, colleague, or public registers such as the traderegister) in connection with assignments, we may also collect information about you from the following sources:

- Cookies and other similar technologies. For more information, please see our cookie policy [here](http://www.procope.fi/en/#legal-notice) (<http://www.procope.fi/en/#legal-notice>); and/or
- Publicly available sources: LinkedIn and your company's website

You are not obligated to provide information to us. However, Personal Data enables us to provide our services to you, enter into a contract with you, communicate with you, and personalize our marketing, communications, and services to match your personal preferences. Once we have entered into an agreement, the provision of your personal information may be required for us to perform our contractual

obligations. In case you do not provide us with the data we request, we might not be able to provide services to you, do business with you, or contact you.

## 6. RECIPIENTS OF PERSONAL DATA

We may share your Personal Data with the following recipients in accordance with applicable data protection laws and attorney-client privilege regulations:

- Authorities and supervisory bodies;
- Third parties in connection with client assignments;
- Service providers, such as payroll providers;
- Auditors;
- IT system management and information security service providers;
- Event organizers; and/or
- Our customers and companies performing law firm ranking surveys (such as Chambers and Partners or The Legal500) in case you have permitted us to use you as reference

Most recipients of your Personal Data are located in Finland or elsewhere in the EU or EEA. However, some recipients may be located or process Personal Data in third countries, depending on the person whose Personal Data is being processed and the situation at hand. If we and/or our service providers processing Personal Data on our behalf transfer Personal Data to countries outside the EU or the EEA, the transfer is subject to standard data protection clauses adopted by the EU Commission or other appropriate safeguards, unless the EU Commission has found that the level of data protection is adequate in the country in question. You can obtain a copy of said safeguards by contacting us as advised in section 2 above.

## 7. PROFILING

We use cookies and similar technologies when we send our newsletters and marketing messages to you. We use these technologies to collect and analyze user activity details and preferences in order to, for example, develop our services and marketing strategies. For more information about these technologies, see our cookie policy [here](https://procope.fi/legal-notice/) (<https://procope.fi/legal-notice/>)

## 8. YOUR RIGHTS

You have several rights regarding the processing of your Personal Data. If you wish to use your rights mentioned below in sections 8.1-8.8, please contact us as advised in section 2 above.

### 8.1 Right of access

You have the right to receive a confirmation from us as to whether or not we process your Personal Data. When we do process such data, you have the right to obtain access to it and the following information:

- Purposes of processing;
- Categories of Personal Data concerned;
- Recipients or categories of recipients to whom Personal Data have been or will be disclosed, in particular recipients in countries outside the EU and EEA or international organizations;

Where possible, the envisaged period for which Personal Data will be stored or, if not possible the criteria used to determine that period;

- Existence of the right to request from us the rectification or erasure of Personal Data or restriction of processing of Personal Data concerning you or to object such processing;
- Right to lodge a complaint with a supervisory authority;
- Where Personal Data are not collected from you, any available information as to their source;
- Existence of automated decision-making and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you; and
- Appropriate safeguards applied to transfers of Personal Data to countries outside the EU and EEA

You have the right to receive a copy of your Personal Data undergoing processing as long as the copy does not adversely affect the rights and freedoms of others. For any further copies requested by you, we may charge a reasonable fee based on administrative costs.

## 8.2 Right to rectification

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

You have the right to have your inaccurate Personal Data rectified by us without undue delay. You also have the right to have incomplete Personal Data completed.

We will communicate any rectification of Personal Data to each recipient to whom we have disclosed your Personal Data, unless this proves impossible or involves disproportionate effort. We will inform you about those recipients upon your request.

## 8.3 Right to erasure (right to be forgotten)

You have the right to have your Personal Data erased by us without undue delay where one of the following grounds applies:

- Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- You withdraw your consent on which the processing is based and there is no other legal ground for the processing;
- You object to the processing and there are no overriding legitimate grounds for the processing;
- You object to the processing of your Personal Data for the purposes of direct marketing;
- Personal Data have been unlawfully processed; or
- Personal Data have to be erased for compliance with a legal obligation to which we are subject.

Please note that the GDPR recognizes situations where processing may be necessary regardless of the applicability of the abovementioned grounds. We will always inform you separately of such circumstances and our grounds for processing.

We will communicate any erasure of Personal Data to each recipient to whom we have disclosed your Personal Data, unless this proves impossible or involves disproportionate effort. We will inform you about those recipients upon your request.

#### 8.4 Right to restriction of processing

You have the right to restrict the processing of your Personal Data in the following situations:

- You contest the accuracy of the Personal Data we process and as a result processing is restricted while the accuracy is verified;
- Processing is unlawful, but you oppose to the erasure of Personal Data and instead request us to restrict their use;
- We no longer need Personal Data for the purposes of the processing presented in this document, but the data are required by you for the establishment, exercise, or defence of legal claims; or
- You have objected to processing on grounds relating to your particular situation and such processing is legally based on our legitimate interests as presented in this document, and as a result processing is restricted while it is verified whether our legitimate grounds override those of yours.

If the processing of your Personal Data has been restricted, we will inform you before the restriction is lifted.

We will communicate any restriction of processing to each recipient to whom we have disclosed your Personal Data, unless this proves impossible or involves disproportionate effort. We will inform you about those recipients upon your request.

#### 8.5 Right to data portability

You have the right to receive your Personal Data that you have provided to us, in a structured, commonly used and machine-readable format (such as XML-format with relevant meta data), and you have the right to transmit such data to another controller, when:

- we process Personal Data based on your consent; or
- we process Personal Data because it is necessary for the performance of our contract with you; and
- we process such Personal Data by automated means; and
- this right does not adversely affect the rights and freedoms of others.

In the abovementioned situation, you also have the right to have your Personal Data transmitted directly from us to another controller, where that is technically feasible.

#### 8.6 Right to object

You have the right to object to processing of your Personal Data at any time on grounds relating to your particular situation, if we process Personal Data based on our legitimate interests as presented in this document. After such objection, we will no longer process your Personal Data unless we demonstrate compelling legitimate grounds for the processing and these grounds override your interests, rights and freedoms, or unless we need them for the establishment, exercise or defense of legal claims.

However, if your Personal Data are processed for direct marketing purposes, you have the right to object to such processing at any time. If you object to direct marketing, Personal Data will no longer be used for such purposes.

In case you are a consumer, we will only send you electronic direct marketing, if you have given us your consent to do so (i.e. you have opted in to such marketing). You may withdraw your consent at any time as explained below, after which we will no longer process your Personal Data for electronic direct marketing purposes.

#### 8.7 Right to withdraw your consent

If we process your Personal Data based on your consent, you have the right to withdraw such consent at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

#### 8.8 Right to lodge a complaint

In case you find that we do not comply with applicable data protection legislation, we ask you to contact us at the address indicated above in section 2. You also have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State where you live or work or where the alleged infringement has taken place. The Finnish supervisory authority is the Data Protection Ombudsman (Fin: tietosuojavaltuutettu).

#### Document revision history

Version	Date	Description
1.0	25.5.2018	Initial Document
2.0	16.8.2021	Updated Document