

Foyen's Privacy Policy

We care about your privacy. Our Privacy Policy informs you about how we use personal information that we collect, or that is submitted to us. We strive to be clear about what data we collect about you and the purpose of our processing. The policy is available on www.foyen.se. In the privacy policy, you will find the following information.

1. Foyen's processing of personal data
2. Personal data linked to Foyen's marketing (such as seminars, webinars, events and newsletters)
3. Personal data processed for registration and participation in Foyen's seminars and events
4. Personal data processed to perform client assignments
5. Personal data about people who apply for employment with Foyen
6. Personal data about employees of Foyen's suppliers
7. Personal data processed in the event of whistleblowing
8. Collection of cookies

1. Foyen's processing of personal data

Processing of personal data

We want you to feel confident about how we handle your personal data. We take steps to ensure that your data is protected and complies with applicable data protection regulations as well as our own internal policies and procedures.

This text has been created jointly by the companies within the Foyen Group ("we", "our", "us") and it describes how each company within Foyen as an independent data controller handles personal data. The following companies within the Foyen Group are covered by this information:

- Foyen Advokatfirma KB, org. no. 916941-2740
- Foyen Advokatfirma i Sverige AB, org. no. 556583-7134

Here we describe how both companies collect, process and share personal data. By personal data, we mean any information that can be used to identify an individual.

We may update this information

Foyen reserves the right to amend this Privacy Policy as necessary, for example to comply with changes in laws and regulations or, for example, if we change the way we process data. In that case, we will notify you in an appropriate manner. The latest version is always available on this page.

Your rights

Data protection legislation gives you several rights related to your personal data. Here are the rights you have in relation to our processing:

You have the right to:

- **Request access:** You can request confirmation as to whether we are processing your data and access to the data.
- **Request rectification:** If you believe that information about you is inaccurate or incomplete, you can request that it be corrected.
- **Withdraw consent:** If we process your data with your consent, you can withdraw it at any time for future processing. This means that if you withdraw your consent, we may have the right to continue processing already collected data about you, if there is legal basis for this.
- **Object to processing based on legitimate interest:** You can object to processing based on our legitimate interest if you have personal reasons. However, we may continue to process your data if we have compelling legitimate reasons that outweigh your privacy interest.
- **Request to erasure:** In certain circumstances, you can request that your data be deleted, unless we are required by law to keep it.

- **Request restriction of processing:** You can request that the processing of your data be restricted under certain circumstances.
- **Moving your data (data portability):** You have the right to receive a copy of your data in a structured format. This only applies to data you have provided to us and which we process on the basis of certain lawful grounds, such as your consent.

To exercise your rights, please contact Foyen via the contact details below.

Where we process your data

We always strive to process personal data within the EU. However, some of our service providers are located outside the EU and in these cases personal data is processed outside the EU/EEA area. In cases where personal data is processed outside the EU/EEA, there is either a decision from the European Commission that the third country in question ensures an adequate level of protection or there are appropriate safeguards in place to ensure that your rights are protected (for example, standard contractual clauses). You have the right, upon request, to receive information about which countries outside the EU/EEA your personal data is transferred and what safeguards we have taken.

When we share data with, for example, IT or service providers who process personal data on our behalf, so-called data processors, we have always signed a data processing agreement with them. This means that they are obliged to treat the information securely, correctly and with confidentiality.

Security measures

Foyen takes appropriate technical and organizational measures to prevent unauthorized or unlawful processing and access, loss, destruction or damage to personal data, thereby ensuring an appropriate level of security.

Disclaimer & cookies

Here you can read about how we handle cookies: [Disclaimer & cookies](#). We work with Hubspot and here you can read about how HubSpot cookies are used: [HubSpot-cookies](#)

Contact

If you have questions about how we process your personal data, you can contact Foyen, regardless of which company your question concerns. Please contact one of our offices listed below, or the lawyer responsible for the case listed below:

Foyen Advokatfirma KB

Stockholm

Regeringsgatan 38

103 89 Stockholm, Sweden

Tel: 08-506 184 00

E-mail: info@foyen.se

Malmö
Södergatan 22
211 34 Malmö, Sweden
Phone: 040-661 56 50
E-mail: info@foyen.se

Gothenburg
Stora Nygatan 33
411 08 Gothenburg, Sweden
Tel: 031-743 20 60
E-mail: info@foyen.se

Internally appointed person responsible for Foyen's personal data processing:

Partner Andreas Lindström
Tel: 040-661 56 50
E-mail: andreas.lindstrom@foyen.se

If you are not satisfied with our response, you can file a complaint with the Swedish authority for privacy protection, Integritetsskyddsmyndigheten (IMY) (<https://www.imy.se/>). Please note that, in order to ensure that the right person is submitting the request for action as described above, we will carry out an identity check.

Foyen Advokatfirma KB, org. No. 916941-2740

Postadress: Box 7229, 103 89 Stockholm

Phone: +46 (0)8-506 184 00

2. Personal data linked to Foyen's marketing (such as seminars, webinars, events and newsletters)

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Name • E-mail address • Telephone number • Workplace • Title • Other contact information 	<p>Legitimate interest: The processing is carried out in order to satisfy our legitimate interest in maintaining a business relationship with you and communicating with you in your professional capacity regarding information and events that we offer that we believe may be of interest to you.</p> <p>Consent: Processing of data can also take place on the basis of consent for sending electronic marketing.</p>
Why we process your personal data	Who gets access to your personal data
<p>To communicate with you and send marketing to you. Communication such as sending out newsletters, information about Foyen and invitations to events, webinars and lectures.</p>	<ul style="list-style-type: none"> • Foyen Advokatfirma KB • IT and service providers who process data on our behalf, so-called data processors.
Retention period	
<p>If consent has been given, we process your data until you withdraw your consent.</p> <p>You can easily withdraw your consent at any time by clicking on the "unsubscribe" link in our mailings.</p> <p>If you have not given consent, we will process your data for as long as you or your employer or client have a business relationship with us and for twenty-four (24) months thereafter.</p>	

3. Personal data processed for registration and participation in Foyen's seminars and events

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Name • E-mail address • Telephone number • Workplace • Title • Other contact information <p>We may also process data about you in the form of images and recorded material, if we photograph or film at seminars and events.</p>	<p>Legitimate interest: The processing is carried out in order to satisfy our legitimate interest in providing and administering seminars and events, as well as to market and inform about Foyen's services.</p>
Why we process your personal data	Who gets access to your personal data
<p>To provide and administer seminars and events, as well as to market and inform about Foyen's services.</p>	<ul style="list-style-type: none"> • Foyen Advokatfirma KB • IT and service providers who process data on our behalf, so-called data processors.
Retention period	
<p>We process your name, contact details and workplace data for as long as you or your employer or client have a business relationship with us and for twenty-four (24) months thereafter.</p> <p>Images and videos will be processed for a period of three (3) years after the date of the seminar or event.</p>	

4. Personal data processed to perform client assignments

Categories of personal data	Legal basis
<p>Clients and counterparties</p> <ul style="list-style-type: none"> • Name • Title • Contact • Workplace • Social security number • Mission statement • Financial information, such as billing and payment information (clients) <p>Other people</p> <ul style="list-style-type: none"> • Name • Title • Contact <p>Special categories of personal data</p> <ul style="list-style-type: none"> • Information about violations of the law (e.g. money laundering) • Sensitive personal data (e.g. health data) <p>The personal data that we process has been provided to us by (i) a client, (ii) a counterparty, (iii) a counterparty representative, (iv) other parties connected to the assignment, or (v) from private or public registers or other sources.</p> <p>Special categories of personal data are only processed if it is relevant for execution of the assignment</p>	<p>Legal obligation: To carry out conflict of interest checks (so that we as a law firm can fulfil our obligation to exclude conflicts of interest) and to comply with rules on money laundering.</p> <p>Contractual obligation: To manage and administer invoicing, reminders and payments, manage accounts receivable and administer the Foyen companies' accounting.</p> <p>Legitimate interest: To defend the companies against legal claims, to comply with the Bar Association's guiding rules on good legal practice, for fee accounting, for documentation and archiving purposes, to communicate and book meetings with clients and counterparties as well as other persons (e.g. employees of courts and authorities).</p>
Why we process your personal data	Who gets access to your personal data
<p>It is necessary for Foyen to process personal data in order to enter into and fulfil agreements with our clients. Without the processing of personal data, we cannot fulfil our agreements or fulfil our obligations in relation to our clients.</p>	<ul style="list-style-type: none"> • Foyen Advokatfirma KB • Counterparty, in the context of an assignment • Client's insurance company • Counterparty's counsel • Court/arbitration tribunal • Authorities • Banking operators • IT and service providers who process data on our behalf, so-called data processors. <p>Foyen Advokatfirma KB is subject to statutory requirements for legal confidentiality and</p>

	professional secrecy, and therefore we only share personal data in certain special cases
Retention period	
<p>In order to fulfil an assignment agreement, we process the data for the time necessary for us to be able to administer the contractual relationship, fulfil our obligations under the agreement and exercise Foyen's rights.</p> <p>On the basis of legal requirements or a balancing of interests, we may store the personal data for a longer period of time.</p> <p>Foyen is obliged to retain information pertaining to an assignment for ten (10) years after the conclusion of the case or, if necessary, for a longer period of time, in accordance with the Swedish Bar Association's guiding rules on good legal practice.</p> <p>For the defence of legal claims, we retain data for ten (10) years in light of the limitation period in the Limitation Act.</p> <p>We store data related to payment and similar data as required by the Swedish Accounting Act for seven (7) years.</p>	

5. Personal data about people who apply for employment with Foyen

Categories of personal data	Legal basis
<p>Personal data that you provide to us in your application, such as:</p> <ul style="list-style-type: none"> • Name • Social security number • Address • Telephone number • E-mail address • Education • Grades (Education) • Work certificate • Professional experience • Other information • Photo 	<p>Legal obligation: To fulfil Foyen's obligations under labour law and to defend Foyen against legal claims under discrimination legislation.</p> <p>Legitimate interest: To administer appointment booking for interview To assess candidates and review CVs, cover letters, grades and diplomas, etc.</p> <p>Consent: To store personal data in a candidate bank to inform about future vacancies.</p>
Why we process your personal data	Who gets access to your personal data
<p>It is necessary for Foyen to process personal data in order to be able to recruit employees to Foyen's operations.</p>	<ul style="list-style-type: none"> • Foyen Advokatfirma KB • Foyen Advokatfirma i Sverige AB • IT and service providers who process data on our behalf, so-called data processors.
Retention period	
<p>On the basis of a balancing of interests, Foyen does not process your personal data after the recruitment procedure has been completed.</p> <p>In order to safeguard Foyen's rights under the Swedish Non-Discrimination Act, we store the data in applications for two (2) years after the end of the recruitment procedure.</p> <p>If consent has been given for continued processing, the personal data will be stored until you withdraw your consent.</p>	

6. Personal data about employees of Foyen's suppliers

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Name • Telephone number • E-mail address 	<p>Legitimate interest: To administer supplier agreements and maintain business relationships with suppliers.</p> <p>Legal obligation: The processing is necessary to comply with requirements under applicable legislation, such as accounting legislation.</p>
Why we process your personal data	Who gets access to your personal data
<p>It is necessary for Foyen to process personal data in accordance with the agreement with the supplier in order for Foyen to be able to handle invoices, carry out payment and administer the contractual relationship with the supplier, handle deliveries of goods and services and communicate with the supplier.</p>	<ul style="list-style-type: none"> • Foyen Advokatfirma KB • IT and service providers who process data on our behalf, so-called data processors.
Retention period	
<p>On the basis of a balancing of interests, Foyen processes personal data for the time necessary for us to be able to administer the contractual relationship.</p>	
<p>We store data related to payment and such data as required by the Accounting Act for seven (7) years.</p>	

7. Personal data processed in whistleblowing

Categories of personal data	Legal basis
<ul style="list-style-type: none"> Personal data that you provide to us in your report <p>In the event that Foyen initiates an investigation, other personal data may also be processed.</p>	<p>Legal obligation: To fulfil Foyen's obligations under the Swedish Act (2021:890) on the Protection of Persons Who Report Misconduct (the Whistleblower Act).</p>
Why we process your personal data	Who gets access to your personal data
<p>It is necessary for Foyen to process personal data in order to be able to investigate whistleblower cases and take action.</p>	<ul style="list-style-type: none"> Foyen Advokatfirma KB (if necessary) Foyen Advokatfirma i Sverige AB (if necessary) IT and service providers who process data on our behalf, so-called data processors.
Retention period	
<p>Personal data is retained for as long as necessary.</p> <p>After the case is closed, personal data is processed two (2) years after the case was closed. If it is necessary for Foyen to be able to establish and assert legal claims, the personal data may be processed for longer than that.</p>	

8. Foyen's processing of cookies

When you navigate Foyen's website, certain information may be placed on your computer in the form of "cookies". These are pieces of information that are stored on your computer's hard drive or in your browser. Cookies may be used to facilitate your personal use of the website. Cookies may also be used to provide Foyen with information about your use of the website, to help Foyen improve the website's performance and appearance, and to enable Foyen to offer customised content and a good experience for website visitors.

In most cases, you can set your browser to block cookies if you do not want them to be placed on your computer. However, blocking cookies may mean that certain parts/pages of this website will not function as intended. The procedure for blocking cookies is different depending on the browser you use. Please refer to your browser's documentation for information and instructions.

If you consent to our use of cookies, we process the information created by the cookies that are set when you visit foyen.se, as set out in the table below.

Categories of personal data	Legal basis
<ul style="list-style-type: none"> • Your IP-adress • Information about your device, browser, operating system • Behavior on the homepage and landing pages (page visits, clicks, downloads, form filling, time on page) • How you found Foyen (ad, organic search) • Email interactions (emails opened, link clicks) • Geographic location • Data about which ads you click 	<p>Legitimate interest: The processing is carried out in order to satisfy our legitimate interest in updating and improving Foyen's website and to adjust settings on our website based on your preferences.</p> <p>Consent: Data processing is based on consent for cookies that are not necessary for the functioning of the website.</p>
Why we process your personal data	Who gets access to your personal data
<p>It is necessary for Foyen to process the personal data for purposes relating to Foyen's legitimate interest in being able to remember the choices you have made on the website and for Foyen to be able to improve the website.</p>	<ul style="list-style-type: none"> • Foyen Advokatfirma KB • IT and service providers who process data on our behalf, so-called data processors.
Retention period	
<p>For cookies used for the functioning of our website, the maximum storage period is one year.</p> <p>If consent has been given for the processing of cookies, the personal data is retained until you withdraw your consent.</p>	
<p>The Swedish Post and Telecom Authority (Post- och Telestyrelsen) is the supervisory authority in Sweden for the processing of cookies. If you would like more information about cookies, permitted</p>	

cookie use or would like to complain about our use of cookies, you can contact the supervisory authority here: <https://pts.se/>