

PRIVACY POLICY FOR WEBSITE AND COOKIES

1 GENERAL

This Privacy Policy for Website and Cookies provides information on how Krogerus Attorneys Ltd processes the personal data of its website visitors ("**you**") through cookies and other similar technologies ("**cookies**") as required by the European Union General Data Protection Regulation 2016/679 ("**GDPR**") and other applicable data protection legislation.

2 DATA CONTROLLER AND CONTACT DETAILS

Krogerus Attorneys Ltd ("**Krogerus**" or "**we**") acts as the data controller in accordance with this privacy policy.

The contact person of the controller is Oskar Palva.

Address: Fabianinkatu 9, 00130 Helsinki

E-mail: oskar.palva@krogerus.com / privacy@krogerus.com

3 WHAT ARE COOKIES

Cookies are small text files that will be placed on your device when you visit our website.

Cookies can be generally categorised according to their duration, origin and purpose. We have categorised our cookies further below in section "Cookies used ON our website" and on the cookie banner.

- **Duration:** Cookies can be either session cookies or persistent cookies. Session cookies are stored on the device only for the duration of the use of a website and are deleted when the browser is closed. Persistent cookies are stored on the device for a specified time or until the user deletes them.
- **Provider:** First-party cookies are directly stored by the website that a user is visiting. Third-party cookies are created and set by domains that differ from the website a user is currently visiting. Third-party cookies are often used for advertising purposes.
- **Purpose:** Cookies can be categorised by their purposes into several sub-categories, inter alia, necessary, functional, analytics, personalisation, social media and advertising cookies.

4 PURPOSE OF AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

The information collected and generated by cookies will be used for the purposes of providing our website, evaluating the use of our website and compiling reports of the user's website activity. As a general rule, we only place cookies that are strictly necessary and essential for the proper functioning of the website automatically. We place other

cookies only by your consent. We process the personal data collected through the cookies based on our legitimate interests of practicing our business and analysing the website traffic to calculate, for example, page visits.

The table below lists, by category, the purpose of the processing, the legal basis and the categories of personal data processed. For a more detailed description of the categories of personal data to be stored, see section 5.

The purpose of processing	Legal basis	Categories of personal data
Using strictly necessary cookies to provide a safe access to our website and to further develop it	Legitimate interests of the controller when <i>retrieving the personal data through the cookie and further processing.</i>	<ul style="list-style-type: none"> Data collected by cookies Consents and prohibitions

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CATEGORIES AND SOURCES OF PERSONAL DATA

This table specifies in more detail the categories of personal data referred to in section 4 insofar as they are not otherwise unambiguously specified in the previous section.

Categories of personal data	Description of personal data	Sources of personal data
Data collected by cookies	<p>Data may include the following: IP address; site pages visited; links clicked; browser type; operating system of the device; source website; date, time, number and duration of visits; geographical location of visits.</p> <p>Please see section "Cookies used ON our website" for up-to-date information.</p>	Data is collected by cookies placed on a user's device
Consents and prohibitions	The consents and prohibitions provided by the user for accepting or declining other than strictly necessary cookies.	Data is collected from the user's active action (accepting or declining other than strictly necessary cookies) by a consent cookie.

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COOKIES USED ON OUR WEBSITE

Below are the cookies that are currently used at our website and categorised by their function. In addition, you will find information on their purposes, expiration periods,

providers, the personal data that may be collected, and if the personal data is transferred outside the EU/EEA.

Strictly necessary cookies (always on)

Strictly necessary cookies refer to cookies without which the website cannot function properly.

Name	Provider	Description and purpose	Expiry	Transfers to third parties
CRAFT_CSRF_TOKEN	www.krogerus.com	This cookie will be created to facilitate protection against cross-site request forgeries. This helps to safeguard data as it is submitted through forms on the website.	Session	No
critical-css	www.krogerus.com	Stores cached critical CSS for faster page rendering and improved site performance.	7 days	No
cookiehub	CookieHub	Used by CookieHub to store information about whether visitors have given or declined the use of cookie categories used on the site.	365 days	CookieHub

Social media features

We use embedded pictures and features, such as so-called share buttons on our website. These are linked to third-party services. We do not currently use social media cookies such as cookies placed by third-party social media providers. For certain instances, we may be acting as joint controllers with social media platform providers. When you click on social media links on our website, you will be redirected to third-party social media platforms. Please note that these platforms are operated by external service providers and are governed by their own privacy policies and terms of service. We recommend reviewing their privacy practices before engaging with their content. For further information on how these third-party social medias process your data when visiting their pages, please see their corresponding privacy policies.

7 MANAGE YOUR CONSENT AND COOKIES

When you visit our website, you can give or decline your consent to setting other than strictly necessary cookies through a pop-up cookie banner. If you continue browsing our website without any action to the banner, other than strictly necessary cookies will not be set. In addition, you can always manage your consent by clicking the cookie banner on the bottom left of the web page.

8 RECIPIENTS OF PERSONAL DATA

In principle, we process personal data in the internal operations of Krogerus. In addition, Krogerus discloses personal data to third parties who act as service providers and processors for Krogerus.

- CookieHub

CookieHub provides Krogerus with consent management tool (or Cookie banner) implemented on our website. You may consent or withdraw your consent via the Cookie Banner at any time. You can always manage your consent by clicking the cookie banner on the bottom left of the web page.

Krogerus utilizes third party service providers that enable us to collect and analyze website usage statistics and also service providers that assist in handling data subject's consent.

Service providers process personal data only to the extent necessary to provide the service in question or in connection with system maintenance and troubleshooting. Krogerus concludes a contract to process personal data with all of its subcontractors who process personal data on behalf of Krogerus. In addition, contracts concerning the use of personal data are also concluded with service providers who are acting as processors. Further information on the processing of data by such service providers can best be found on their own websites. Each service provider processes personal data only to the extent necessary for the provision of the service.

9 TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

Krogerus does not as a rule transfer data outside the European Union or the European Economic Area ("EU/EEA"). However, data may be transferred outside the EU/EEA in situations where our service providers or their parent companies are located in such third countries. Where data is transferred outside the EU/EEA, such transfers will be subject to

the conditions set out in data protection legislation, such as the adequacy decision made by the European Commission, European Commission's Standard Contractual Clauses or other transfer mechanism designated in the GDPR.

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SECURITY OF THE PROCESSING

Krogerus implements and maintains the following technical and organisational measures to ensure the protection of personal data:

- designated personnel responsible for developing, implementing and maintaining data security;
- internal guidelines and regulations on data security and data protection;
- non-disclosure agreements and undertakings;
- regular audit and risk assessment processes;
- processes for managing updates;
- control of access rights and use;
- data encryption;
- organised and regular staff training;
- business continuity and recovery plans; and
- physical and perimeter security of production facilities and other areas containing confidential client information

The adequacy of the measures is scaled on the basis of a risk assessment, taking into account, among other things, the nature, scope, context and purposes of the processing, as well as the risks to the rights and freedoms of data subjects. The measures are regularly assessed, reviewed and updated, as necessary.

Krogerus is committed to comply with the guidelines of the Finnish Bar Association.

The data will not be used for profiling. The processing does not include automated decision-making.

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DATA SUBJECT RIGHTS

As a data subject, you shall have the following rights:

Rights of the data subject	
Right of access to your data	You have the right to know whether Krogerus is processing your personal data and if yes, what personal data Krogerus is processing. You can also request a copy of your personal data. You have the right to inspect the personal data concerning you. Krogerus cannot, however, in order to protect the confidentiality of its clients, agree to requests for data that could

	<p>jeopardise the processing of confidential client data.</p> <p>If you make your request electronically and have not requested another form of delivery, the data will be provided in the commonly used electronic format.</p>
Right to rectify your data	<p>You have the right to request that inaccurate or incorrect personal data concerning you be corrected or completed. However, due to the nature of the legal profession, Krogerus cannot always correct data, especially in the case of large requests.</p>
Right to have your data erased	<p>You have the right to have your data deleted in certain cases. However, a request to delete personal data cannot be implemented if the personal data is stored, for example, to comply with a legal obligation.</p>
Right to restrict the processing of your data	<p>In certain cases, you have the right to request restriction of the processing of your data. For example, if you exercise the right to restrict the processing of your data based on inaccuracy of the personal data, we may restrict the processing of your data for the duration of investigating the data accuracy or correcting the data.</p>
Right to object to the processing of your data	<p>You have the right to object to the processing of your data in certain cases. Krogerus may refuse a request if the processing is necessary for the legitimate interests of Krogerus or a third party.</p>
Right to transfer data from one system to another	<p>To the extent that we process your data on a contractual basis and the processing is carried out automatically, you have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format, and the right to transfer that data to another controller.</p>

Right to lodge a complaint with a supervisory authority	You have the right to lodge a complaint with the competent supervisory authority, if you consider that data protection legislation has not been respected in the processing of your personal data. In Finland, the supervisory authority is the Data Protection Ombudsman.
The right to withdraw consent	Please see section 7.

11.1 **Right to object to the processing of your data**

You have the right to object to the processing of your data in certain cases. For example, you may exercise this right when Krogerus is processing your personal data based on legitimate interests. Krogerus may refuse a request if the processing is necessary for the legitimate interests of Krogerus or a third party.

11.2 **Contact and data protection authority**

All requests mentioned here should be sent to the contact person of Krogerus mentioned in Section **Error! Reference source not found.** You can make a free-form request. We may ask you specific questions if necessary to fulfil your request.

In Finland, the data protection authority is the Office of the Data Protection Ombudsman, visiting address: Lintulahdenkuja 4, 00530 Helsinki, postal address: PL 800, 00531 Helsinki, email: tietosuoja(at)om.fi, phone number: +358 29 566 6700. You can also find the contact details as well as more detailed information on the exercise of data subjects' rights at (<https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations>).