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# DATA PROTECTION AND PRIVACY STATEMENT

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This Data Protection and Privacy Statement aims to give you information about how W & W Legal Attorneys Ltd (hereinafter “**W & W Legal**”, “**we**” or “**us**”) collects, processes, protects and stores your personal data. Our Cookie Notice is accessible on our Website. We are committed to keeping your personal data secure and processing it appropriately to protect your privacy.

## Data Controller

W & W Legal Asianajotoimisto Oy  
(Business ID 3100351-1)  
Address: Erottajankatu 2, 00120 Helsinki  
Telephone: +358 29 123 2222  
Email: office@wwlegal.fi

Data Protection Contact Person:

Attorney-at-Law, Doctor of Laws, Sonya Walkila  
Address: Erottajankatu 2, 00120 Helsinki  
Telephone: +358 400 377 095  
Email: sonya.walkila@wwlegal.fi

## What personal data we collect about you

Personal data includes any information relating to an identified or identifiable natural person. It does not include data that cannot be linked in an individual (anonymous data).

Special categories of personal data include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation,

political opinions, trade union membership, information about your health and genetic and biometric data. In limited circumstances, we collect special categories of personal data about you.

We collect, use, store and transfer the following types of personal data about you:

- Basic information such as name, address, telephone number and email address.
- Client-related information, such as information about services, billing, payment and credit information, information related to client contacts (including emails and contacts made via email).
- Information generated in connection with the services, such as in emails and in other contact information.
- Other information collected with the consent of the individual, to be determined at the time of the request for consent.

## How we use your personal data

Personal data is processed in accordance with Finnish legislation in force, the EU's General Data Protection Regulation (2016/679) and other instructions and regulations issued by the authorities.

Personal data is processed lawfully, fairly and in a transparent manner for the data subject, while

respecting the specificities of the legal profession, in particular confidentiality and professional secrecy. The personal data contained in the personal file are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

The personal data retained is accurate and updated as necessary. With regard to personal data, every reasonable effort will be made to delete or rectify personal data that are inaccurate or incorrect for the purposes of processing. Personal data shall be kept for as long as necessary for the purposes for which they are processed.

Personal data is processed in a manner that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, using appropriate technical and organizational measures.

Personal data will only be processed by appropriate persons within W & W Legal and its subcontractors and partners. The staff, subcontractors and partners are bound by a confidentiality agreement or obligation of secrecy in relation to personal data. Access rights to information systems relating to personal data are maintained and monitored on an ongoing basis.

## How we collect your personal data

We use different methods to collect personal data from and about you, including through the channels set out below.

**Direct interactions:** You give us your personal data in your direct interactions with us by corresponding with us by email or post, by speaking to us in person or over the telephone, or whilst visiting our offices.

**Third-party sources:** We receive some personal data about you from third parties, when we:

- provide our client services or other parties send us your personal data to enable the provision of those services;
- we conduct our “know your client” and other background checks;
- you provide your personal data to a third party for the purpose of sharing it with us; and
- we interact with governmental or regulatory bodies or other authorities in relation to you or on your behalf.

In relation to the use our Website, we may also receive Technical Data from analytics providers such as Google based outside the EU.

**Publicly available sources:** We collect some personal data from publicly available sources, including from:

- public registers of individuals (for instance, Digital and Population Data Services Agency);
- public registers of companies, charities, law firms, chartered accountants, stock or commodities exchange participants, mutual and other entities (for instance, the Finnish Patent and Registration Office);
- public registers of sanctioned persons and entities; and
- other public sources including any services accessible on the Internet which you are using for professional networking purposes for example Linked-In.

## For which purposes we use personal data

We collect personal data on a purpose-specific basis only for a specific, explicit and legitimate purpose and we do not subsequently process it in a way incompatible with those purposes. We use your personal data for the following purposes:

- Provision of services and client relationship management: Service and cooperation require that personal data of clients, suppliers, partners and other parties necessary for

the provision of services are processed for identification, purchase and performance of services, billing, collection, client service, troubleshooting and complaint handling. In addition, personal data is used for client communications, service-related notifications and business-related contacts with clients, suppliers and other parties necessary for the provision of services.

- Development and analysis: Personal data is processed internally to develop services, processes, client relationships and business.
- Security and misuse of services: Personal data may also be processed to ensure the security of services and, where necessary, to detect or prevent misuse and crime.
- Legal proceedings and requests from public authorities: Personal data may also be processed on the basis of applicable law or by court order in the context of legal proceedings or official proceedings. For example, by court order, personal data may be disclosed to the copyright holder or his/her representative. It may also be disclosed to a competent authority, to the extent required by law, in accordance with a predetermined procedure. The legal profession is subject to a strong legal obligation of confidentiality, secrecy and prohibitions to disclose information even to public authorities.
- Business arrangement: Processing of personal data may be necessary in connection with business arrangements, such as mergers and various business acquisitions or transfers.
- Other purposes for which consent has been obtained: Personal data may also be processed for other purposes for which the individual has given consent.

In all of the above situations, personal data will be processed only to the extent necessary for the

purposes for which they are processed and with respect for the privacy of the individual.

We process your personal data only for the specified purpose. Data collected for the same purpose may be combined where necessary in accordance with applicable data protection legislation. Personal data will never be processed in a way incompatible with the specified purpose.

## On which legal bases we use your personal data

We will only process (i.e. use) your personal data when the law allows us to, that is, when we have a legal basis for processing. The processing of personal data is usually based on a contract with us, or on legal obligation. We may also process personal data on other grounds, such as consent or legitimate interest.

We use your personal data in the following circumstances:

- Performance of a contract: where we need to perform a contract which we are about to enter into or have entered into with you as a party or to take steps at your request before entering into such a contract;
- Legal or regulatory obligation: where we need to comply with a legal or regulatory obligation that we are subject to, such as in relation to anti-money laundering and knowing our clients' procedures, as well as to fulfill our obligations under the Rules of the Finnish Bar Association in relation to conflicts of interest procedures;
- Legitimate interests: where necessary for our interests (or those of a third party), provided that your fundamental rights do not override such interests. This can mean, for instance, that it is in our interest, to monitor how you are using our Website or access to systems to ensure that the security of our Website or systems is maintained. We make sure we

consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests; and

- Consent: where you have provided your consent to processing your personal data. Generally, we do not rely on consent as the legal basis for processing your personal data. When we do, you have the right to withdraw consent at any time.

We may process your personal data for more than one legal basis depending on the specific purpose for which we are using your personal data.

## Disclosures of personal data and International transfers

We will not disclose personal data to any third parties unless required to do so under applicable laws, to prepare for legal proceedings or defend a claim, or to perform services for our clients.

However, your personal information may be transferred to and processed by third party service providers who provide services to us (data processors) to enable these companies to perform the services we request. These companies will only be provided with personal data that is necessary for the purposes mentioned above. All third-party service providers must comply with our guidelines and applicable written data processing agreements and any other agreements in force between us and its third-party service providers and must implement appropriate technical and organizational measures to protect personal data.

We process personal data on servers in Finland (thus within the EU/EEA). However, we may need to transfer your data from a location within the EU/EEA. The level of data protection in countries outside the EU/EEA may be lower than that offered within the EU/EEA. Where this is the case, we will implement appropriate measures under

the GDPR to ensure that your personal information remains protected and secure.

## Cookies and Use of Website

This website uses only essential cookies. Cookies are pieces of information that describe the use of an internet service, such as information stored on a user's computer, which can be used to control communication between an internet browser and an internet server.

Our website wwlegal.fi has been created by using the WordPress publishing system.

## Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. This includes for example the purposes of satisfying any legal, regulatory, accounting, reporting requirements, to carry out legal work, for the establishment or defense of legal claims.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## Data security

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, we implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk of processing, including:

- the pseudonymization and encryption of personal data;

- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

We ensure that those who have permanent or regular access to personal data, or that are involved in the processing of personal data, or in the development of tools used to process personal data, are trained and informed of their rights and responsibilities in processing personal data.

## Third-party marketing

We do not share your personal data with any organizations outside of W & W Legal for marketing purposes.

## Your rights

We have a legal obligation to ensure that your information is kept accurate and up to date. We invite you to assist us to comply with this obligation by ensuring that you inform us of any changes to your information and/or updates to your preferences by contacting the Data Protection Contact Person.

You may, subject to the limitations set out in the GDPR and Data Protection Law, at any time exercise your rights in relation to your personal data that we process:

- Obtain confirmation from the controller that personal data concerning you is or is not being processed and, if so, the right of access to the personal data.
- Withdraw consent at any time, without prejudice to the lawfulness of the processing

carried out on the basis of consent before its withdrawal, provided that the processing of personal data is based on your consent.

- Require the controller to rectify, without undue delay, inaccurate or incomplete personal data concerning you, and the right to have incomplete personal data completed, including by providing further explanations to the controller.
- Obtain the erasure of personal data concerning you by the controller, provided that the conditions of data protection law are met in this respect.
- Obtain a restriction on the processing of personal data by the controller, provided that the conditions of data protection legislation are met in this respect.
- Receive personal data relating to a data subject which the data subject has provided to the controller in a structured, commonly used and machine-readable format and the right to transmit such data to another controller without hindrance from the controller to whom the personal data have been provided, provided that the processing of the personal data is based on the data subject's consent and is carried out automatically. W & W Legal does not carry out automated processing of data.

If you wish to exercise any of the rights described above, you should contact the Data Protection Contact Person. Please note that there may be situations where our confidentiality and other obligations under applicable legislation and the respective Rules of the Finnish Bar Association may prohibit us from disclosing or deleting your personal data or otherwise prevent you from exercising your rights, if the personal data relates to our client work.

If you believe that we have acted in breach of this Data Protection and Privacy Statement or

applicable law, you have the right to make a complaint. The complaint should be addressed to the Data Protection Contact Person mentioned above. You may also lodge a complaint with the Data Protection Ombudsman who supervises the lawfulness of the processing of personal data in Finland ([www.tietosuoja.fi](http://www.tietosuoja.fi)).

## **Changes to the Data Protection and Privacy Statement**

Any changes we make to this Data Protection and Privacy Statement in the future will be posted on our Website. Please check periodically to see any updates or changes to our Data Protection and Privacy Statement.