

PRIVACY POLICY LAW FIRMS

Regi Research & Strategi AB (org. nr. 556388-6653) ("Regi") work with research-based analyses and advisory for quality assurance and business development of our customer's business. We process personal data as a part of our business. Regi cares about the integrity of all we come into contact with. All processing takes part in accordance with this policy and the provisions in the General Data Protection Regulation (GDPR).

1. Data controller

Regi Research & Strategi AB (org. nr. 556388-6533, Regi Research & Strategi AB, c/o No 18, Centralplan 15, 111 20, Stockholm) can act as both controller and processor in our business. In simplified terms, in case we process data for our purposes, we act as controller, and on behalf of someone else, we act as a processor. For more information on this distinction, please see the descriptions of each type of processing we conduct in our business below.

2. Description of our data processing

Our processing differs to a certain extent between our different business areas. You can read about the processing we conduct specifically for each area in terms of its purposes and legal basis for the processing, the types of data concerned, and the duration of the processing.

2.1 Conducting industry analyses

2.1.1 What kind of processing do we conduct?

Regi conducts quality assurance and industry analysis concerning business law firms' view of their own industry, legal services market analysis, and analysis of the business law firms' clients' view of the relationship with their respective law firms.

In order to analyse the law firms' and the buyers view of their own industry, Regi establishes contact with persons holding leading positions at business law firms and persons procuring legal services. In terms of this processing, Regi acts as the controller of personal data and the purpose is to conduct industry analysis. The contact details of the persons concerned are collected from the websites of the business law firms. The personal data concerned may typically consist of name, position at a certain company, work email, work phone number, and individualised links used for questionnaires.

In order to analyse the clients' view of the relationship with their respective business law firm, Regi receives lists containing names and contact details of the clients from the participating business law firms. The processing in this regard is conducted by Regi on the behalf of the law firms. Consequently, Regi acts as a processor of personal data on behalf of the law firms that are the controllers of personal data. The purpose of the processing is to conduct client assessments of the law firms. In the processing, the respondents (i.e. the clients of the law firms) are contacted and asked to answer questions using questionnaires accessed through an individual link and by phone interview. The results are subsequently compiled to be used as a basis for Regi's analysis and can be further supplemented by phone interviews, SMS and a special questionnaire. The results attributable to each client are not shared with the law firms. The processed personal data may include name, position at a certain company, work email, work phone number, and individual links used for questionnaires.

In order to enable us to provide our services to law firms, the personal data of contact persons at the law firms are processed – both in relation to firms that already are our customers and also regarding prospective customers. As for the data concerning existing customers, the processing is done with the aim to uphold the customer relationship. Data concerning prospective customers is collected from public

sources and the purpose is to promote Regi's services. The data subject to processing may contain name, position at a certain company, work email, work phone number and references for invoices.

2.1.2 What legal basis do we have for the processing?

Concerning industry analysis, the legal basis for the processing is the legitimate interests of Regi. In this regard, Regi acknowledges that we have a legitimate interest of analysing trends in the business law industry in which our customers operate. Regi assesses that the interests or fundamental rights and freedoms of the registered persons does not outweigh our legitimate interest. Regi particularly acknowledges in this regard that all registered persons have their contact details published in public sources and that we operate in B2B-relations.

As to the analysis of the law firms' clients' view of the relationship with their law firms, the processing conducted by Regi is done on the behalf of the law firms. Consequently, Regi acts as a processor of personal data on behalf of the law firms that are the controllers of personal data. The law firms have obtained consent from the customers for the processing consisting of analysis of client relations and the subsequent storage of the answers for a duration of two years due to back-up reasons.

In relation to Regi's processing of personal data of contact persons at law firms that are our customers, such processing is necessary to enable contact with the customer company, for instance to enable invoicing. In this regard, our processing is based on the necessity of performing in accordance with the contracts established with our customers. Additionally, some data, in particular invoice related information, is stored in order to comply with the legal obligations of Regi.

As to the processing of the contact details concerning law firms that we deem to be prospective customers, such processing is based on our legitimate interests. In this regard, Regi acknowledges that we have a legitimate interest of promoting our services. Regi assesses that the interests or fundamental rights and freedoms of the registered persons does not outweigh our legitimate interest. Regi particularly acknowledges in this regard that all registered persons have their contact details published in public sources and that we operate in B2B-relations.

2.1.3 Who are the recipients of personal data?

Regi does not sell any personal data to third parties. Some data may however be stored by our IT-suppliers who provide us with platforms for questionnaires, CRM-software, email and backup systems. Furthermore, phone interviews are conducted with the help of our business partners based on information provided by Regi that is subsequently returned to us. All recipients of personal data have entered into data processing agreements to ensure that the processing of your personal data is done in a correct and secure manner.

2.1.4 Retention period

The contact details of the respondents are deleted when Regi has collected the answers needed for every survey. Contact details and other data that might be saved in questionnaires are stored for a duration of two years, i.e. both concerning answers from the clients of the law firms and the answers collected in the general industry analysis. The contact details of the respondents who are processed within the framework of the industry analysis are stored for as long as Regi has a legitimate interest in processing this data, however, the processing is terminated if the registered opposes further processing. There is a possibility to opt-out from further processing in the email sent out to the registered before each analysis.

Contact details concerning our customers are processed for as long as they remain our customers and are only deleted following the end of the customer relationship. As to contact details of our prospective customers, such data is stored until the point of first contact (which occurs within in a month) and the processing stops if there is no interest shown in Regi's services. The data might however continuously

be processed for marketing purposes in the form of newsletters and invitations to events. This processing is described in section 2.2 below.

Storage of personal data due to Regi's obligations continues as long as the legal obligations at hand require.

2.2 Events and newsletters to our existing and prospective customers

2.2.1 What kind of processing do we conduct?

Regi arranges different events such as seminars, workshops, awards etc. for our customers and prospective customers. The purpose of the processing is to arrange events with the aim to maintain a dialogue with the industry, to acknowledge happenings, promote our services, and similar. The events shall moreover be planned and photos are taken at the events may in some cases be used for marketing purposes.

Regi sends out email newsletters for marketing purposes covering various aspects of our business. The email addresses used partly originate from our customers, but also from lists containing prospective customers whose contact details have been retrieved from public sources, and, in some cases, email addresses saved following attendance at our events. There is always an opinion, which is stated in every newsletter, to opt-out from further processing. If done, your contact details will automatically be removed from our CRM-system, i.e. no longer processed for marketing purposes.

2.2.2 What legal basis do we have for the processing?

In order for us to arrange the different events of Regi, it is in the interest of us to have the names and contact details of the attendees in order to plan and manage the events. In this regard, Regi acknowledges that these actions fall within our legitimate interest. Regi assesses that the interests or fundamental rights and freedoms of the registered persons does not outweigh this legitimate interest. Regi particularly acknowledges in this regard that all registered persons have expressed their will to attend the events. Regarding the taking of photos at our events, it is only done to a limited extent and if individuals appear in photos, the persons concerned are always informed. The processing done by the taking and publishing of photos is based on our legitimate interests. In this regard, Regi acknowledges that we have a legitimate interest of conducting marketing. Regi assesses that the interests or fundamental rights and freedoms of the registered persons does not outweigh our legitimate interest. Regi particularly acknowledges in this regard that there always is a possibility to object to being photographed and that the contexts in which the photos may appear are not of sensitive nature, but solely of industry-related contexts. Additionally, this entails B2B-relations.

As to the processing conducted in order to distribute our newsletter, it is also based on our legitimate interests. In this regard, Regi acknowledges that we have a legitimate interest of promoting our services. Regi assesses that the interests or fundamental rights and freedoms of the registered persons does not outweigh our legitimate interest. Regi particularly acknowledges in this regard that all registered persons can easily opt-out from further processing and that the processing ceases for marketing purposes. Furthermore, this entails B2B-relations and registered persons operate within the business area.

2.2.3 Who are the recipients of personal data?

Regi does not sell any personal data to third parties. Some data may however be stored by our IT-suppliers who provide us with platforms for questionnaires, CRM-software, email and backup systems. All recipients of personal data have entered into data processing agreements to ensure that the processing of your personal data is done in a correct and secure manner.

2.2.4 Duration of the processing

Contact details are stored in our CRM-system as long as we have a legal basis for processing the data or until the point we receive an objection to further processing. There is a possibility to opt-out from further processing in all our email send outs.

3. Your rights as a registered person

If your personal data is processed by Regi, you are ensured the rights that we describe below.

3.1 Right to access

As a registered you have the right to request access to your stored personal data free of charge. However, if such request is filed repeatedly, Regi has the right to charge a reasonable fee in order to administrate your request. A request may preferably be done in writing and sent to us by mail to Regi Research & Strategi AB, c/o No 18, Centralplan 15, 111 20, Stockholm or by e-mail to info@regi.se. Regi has the right to conduct actions to verify the identity of the applicant.

3.2 Right to correction

As a registered you have the right to request rectification of any incorrect data about yourself. If you discover there is any incorrect information in the data Regi have registered about you may contact us by mail to Regi Research & Strategi AB, c/o No 18, Centralplan 15, 111 20, Stockholm or by e-mail to info@regi.se in order to correct the information about you.

3.3 Right to be forgotten

In some cases, you as a registered also have the right ask us to delete your personal data in whole or in part. This means that you can, for example, object to a balance of interest assessment we have made or claim that the information is no longer necessary to fulfil the purpose for which it was collected.

To the extent that it is necessary for us to continue the processing of your personal data, for example to fulfil our legal obligations, we are not obliged to delete the data. This means that certain data can be stored until we are no longer obliged to process them.

3.4 Right to restriction of processing

As a registered you have the right to ask us to limit our processing of your personal data. A restriction can be made for several reasons.

- In case you dispute that the personal data we process is correct, you can request a limited processing during the time we control whether the personal data is corrected.
- In case you demand that we delete your personal data, but we cannot meet the request, you may request restriction of processing. This could be because we need the data we have about you in order to establish, assert or defend legal claims. In these cases, you can request limited processing of the data from us.
- In case you have objected to a balance of interest assessment that Regi have made as a legal basis for processing, you may request limited processing during the time we work to control whether our legitimate interests outweigh your interests in having the data deleted.

If the processing has been restricted as described above, Regi may only store your personal data and process it to establish, assert or defend legal claims or to protect someone else's rights or because you have given your consent.

3.5 Right to object

At any time, you as a registered have the right to object to our processing of your personal data based on a balance of interests as a legal basis. A continued processing of your personal data requires that we can show that it has a justified reason for the processing. If we cannot prove a justified reason, it may only process the data to establish, exercise or defend legal claims.

3.6 Right to data portability

Under some circumstances, you as a registered have the right to transfer the data that concern you and that you have given Regi, to another controller (data portability). A prerequisite for data portability is that the transfer is technically feasible and can be done automatically.

4. Transfer of personal data

Regi does not sell any personal data. For more information on the recipients of personal data, please see the description above regarding the different types of processing we conduct.

5. Transfer to third countries

Processing of personal data is mainly conducted within the EU/EEA and Regi's ambition is to process all personal data within the EU/EEA. Nevertheless, some of the processing of personal data may involve transfers outside the EU/EES (so-called "third countries"). If any data leaves the EU/EEA following the appointment of any sub-processors, Regi will always secure the processing by using specific data protection agreements and/or data processing agreements with any appointed sub-processors. However, the personal data of clients submitted by Regis' customers within the framework of The Law Firm of the Year will only be processed within the EU/EEA.

Transfer is conducted according to data protection regulation to maintain adequate level of protection regarding processing of personal data. If personal data is transferred to third countries, it is foremost done so to countries subject to decision by the EU Commission stating that there is an adequate level of data protection for the country in question and within the framework of a data processing agreement in order to guarantee the level of protection of personal data. In third countries not subject to any decision regarding adequate level of data protection, the level of protection of personal data is not equivalent to the level existing in the EU/EEA. The consequence thereof is primarily that authorities in third countries may access the personal data and the possibility to exercise your privacy rights may be limited. In order to protect the personal data, we adapt appropriate safeguards by ensuring that the transfers are governed by so called standard contractual clauses adopted by the European Commission.

Additionally, as far as possible, Regi aspire to inform you as a registered person on how your personal data is transferred to third countries, what risks it entails and how your rights are secured. Questions regarding transfers are referred to info@regi.se.

6. Automated decision-making and profiling

Regi does not apply any form of automated decision-making or profiling in terms of analysing questionnaires.

7. Duration of the processing

Please see specific information regarding the duration of the processing in the description of our processing categories above.

8. Complaints

If you have any questions or concerns regarding our processing of personal data, please contact us at info@regi.se or by telephone +468-545 612 80, or by mail to c/o No 18, Centralplan 15, 111 20, Stockholm.

You may always lodge a complaint with the Swedish Authority for Privacy Protection (Swe: Integritetsskyddsmyndigheten) imy@imy.se, 08-657 61 00) regarding our processing of personal data.

This policy may be updated. This version was adopted by Regi 28-06-2021.