

Privacy Policy for CLX Legal (D-2026:2)

This Privacy Policy describes how CLX Legal AB ("CLX Legal", "we", "us", or "our") processes personal data in connection with client assignments and business contacts. By engaging us or otherwise contacting us, you acknowledge that you have read this information regarding our processing of your personal data.

1. Collection of Personal Data

We collect and process personal data when we receive inquiries regarding assignments and when we perform and administer our services. The same applies to contact persons at our suppliers and partners.

As a general rule, there is no statutory obligation for you to provide personal data to us. However, without the necessary information, we are often unable to accept an assignment or enter into an agreement, partly because we cannot perform mandatory conflict of interest and background checks.

We may also collect personal data from external sources, such as private or public registers, for the purpose of verifying provided information or fulfilling legal requirements.

2. Processing of Personal Data

2.1 We process personal data for several purposes, primarily to conduct necessary conflict of interest and background checks, perform and administer assignments, protect our clients' interests, and manage invoicing and accounting. Personal data is also processed to manage relationships with suppliers and partners, for internal risk management and statistics, and for marketing purposes.

2.2 The processing of personal data is carried out in accordance with applicable data protection legislation. The legal grounds on which the processing primarily rests are:

- (i) Performance of a contract: To be able to perform our assignment for you.
- (ii) Legal obligation: For example, requirements under the Swedish Accounting Act.
- (ii) Legitimate interest: Certain processing, such as documentation to establish, exercise, or defend legal claims, as well as marketing, is based on a balancing of interests where we have a legitimate interest in conducting and developing our business.
- (iii) Consent: In cases where it is required (for example, for certain types of marketing), in which case you have the right to withdraw it.

2.3. Personal data may be disclosed to third parties only in the following situations:

- (i) following a specific agreement with you;
- (ii) if it is necessary within the framework of an assignment to safeguard your rights or fulfill the assignment (for example, to courts, authorities, opposing parties, and opposing counsel);
- (iii) if required to fulfill a statutory obligation or comply with a decision from an authority or court; or

(iv) if we engage external providers who provide IT or administrative services on our behalf.

2.4 When we share personal data with IT providers, they act as personal data processors. Such processing takes place in accordance with data processing agreements and under our instructions. We strive for all storage to take place within the EU/EEA. In the event that data is transferred to a country outside the EU/EEA, we ensure an adequate level of protection, for example, through the European Commission's Standard Contractual Clauses (SCCs).

3. Retention of Personal Data

We do not store personal data longer than is necessary for the purposes for which the data is processed. Data linked to an assignment is normally stored for ten (10) years from the date the assignment was concluded. Retention is carried out to fulfill requirements under accounting legislation, industry practice for qualified legal practitioners, and to be able to establish, exercise, or defend legal claims.

4. Rights

You have the right, with certain statutory exceptions, to request information about what personal data we process about you and how it is used. You also have the right to request that incorrect data be rectified. In accordance with applicable legislation, you may further have the right to request the erasure of personal data, the restriction of processing, or to object to certain processing.

Under certain conditions, you also have the right to data portability. However, these rights do not apply to the extent that the processing is necessary to fulfill legal obligations (e.g., archiving requirements) or to establish, exercise, or defend legal claims.

5. Contact and Complaints

The data controller is CLX Legal AB (reg. no. 559568–8341). If you have questions about our processing of personal data or wish to exercise your rights, you are welcome to contact us via email at gdpr@clxlegal.se.

If you believe that we are processing your personal data in violation of applicable regulations, you also have the right to lodge a complaint with the supervisory authority, the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten – IMY).