Purpose of the policy

The purpose of this privacy policy is to make you aware of how Focus Advokater P/S ("we", "us") process your personal data. With this policy, we want to make you aware of what information is collected and processed and how long it is stored. The privacy policy covers the processing of personal data by Focus Advokater P/S when you enter into agreements, interact or otherwise exchange personal data with us.

Data processing

Focus Advokater P/S processes your data for one or more specific purposes and in accordance with the data protection rules. We process your data if you are our customer, business partner or supplier, if you visit our website or our social media, if you sign up for our newsletter, participate in a course, seminar or webinar or apply for a job with us. The data will generally come directly from you, and we will only process your data for as long as it is necessary for the purpose for which it was collected. The data may be processed and stored for a longer period in anonymised form.

PROCESSING	PURPOSE	CATEGORY OF PERSONAL DATA	LEGAL BASIS	RETENTION PERIOD
LEGAL ASSISTANCE	Delivery of legal services	Contact information for customers as well as ordinary, confidential and sensitive information relevant to the case	GDPR article 6(1)(b), article 6(1)(f), article 9(2)(a) and DDPA article 11(2)	Until the purpose if the processing expires.
MONEY LAUNDERING DOCUMENTATION	Comply with the requirements of the Money Laundering Act	Contact information and copy of passport or driving licence and health card (incl. Personal Registration (CPR) No.)	GDPR article 6(1)(c) and DDPA article 11(2)	5 years

In the table below, please find an overview of the different types of processing we do.

COURSES AND SEMINARS	Collect payment, send out calls and prepare participant list for all course participants at the relevant course / seminar	Contact information, including name, email address, telephone number and place of employment and payment details.	GDPR article 6(1)(b) and article 6(1)(f)	5 years after the conclusion of the course/seminar or conclusion of the evaluation
WEBSITE	Statistics, optimisation and marketing	IP-addresses and cookies	GDPR Article 6(1)(a)	IP-addresses are not stored. Cookies are stored for 2 years
NEWSLETTERS	News and marketing materials	Name, position and email	GDPR Article 6(1)(a)	Up until cancellation and 2 years afterwards
SoMe	Lead generating and facilitating contact	Name, e-mail and telephone number	GDPR Article 6(1)(a)	Immediately after initial contact, if a client relationship is not established.
Suppliers and collaborators	Negotiations, follow-up and service	Name, e-mail, telephone number and job title	GDPR Article 6(1)(f)	Until termination of collaboration. Financial information is stored for 5 additional years.

In the following paragraphs, you can read more about the specific processing scenarios.

Legal counselling

When we enter into a customer relationship with you for the purpose of providing specific legal assistance, we process your personal data. The data we collect is stored in our legal matter management system. We process contact information such as name, address and e-mail to be able to contact you about your case. Depending on the circumstances of your case and the services requested, we may also process other categories of personal data, including your personal identification number.

We process your personal data based on an agreement to provide you with legal services. The legal basis for this is GDPR art. 6(1)(b). We process information about your CPR number or other confidential or sensitive personal data, if it is necessary for a legal claim to be established, asserted or defended, cf. section 11(2)(4) of the DBL and Article 9(2)(f) of the GDPR. E.g. processing of CPR numbers in connection with decisions subject to registration with the Danish Business Authority.

If you are a counterparty in our case, we process your information based on our legitimate interest pursuant to GDPR Art. 6(1)(f). Our legitimate interest is to establish or defend a legal claim on behalf of our customers. The data will generally originate from you, but we may also obtain data from publicly available registers and public authorities as well as counterparties, parties or co-plaintiffs.

If we need to - or are obliged to - register your personal data in public registers, this can be done to a number of public authorities via their reporting portals. The authorities in question will depend on your specific case, but will for example be the Danish Courts Administration, the Danish Business Authority, and the Danish Land Registry.

In connection with a pending case, we retain your registered data until it is no longer necessary for the fulfilment of the purpose(s) for which the data was collected and processed. Focus Advokater has, across its systems and physical archives, prepared internal guidelines for deletion deadlines for personal data that comply with the obligations we are subject to in relation to applicable legislation.

Money laundering documentation

When providing legal advice in relation to transactions or money transfers, we are obliged under the Money Laundering Act to identify and obtain identification of our customers. This means that for our corporate customers, we are required to identify and legitimise the company's beneficial owner(s). Your personal data will therefore be processed by virtue of your direct customer relationship with us or by virtue of you being the beneficial owner of a company that is a customer of ours. The data collected and registered will be your identity data, including name, address, nationality and CPR number, if you have one. For this purpose, we need to obtain a copy of your passport or driving license and your health (insurance) card.

We process your personal data, including your social security number, in accordance with GDPR art. 6(1)(c) and DBL § 11(2)(1), as we are subject to a legal obligation under the Money Laundering Act. The information is generally obtained directly from you, but there may be cases where we are required to obtain additional information from international registers.

If we suspect or have reasonable grounds to suspect that a transaction, funds or activity is or has been related to money laundering or terrorist financing, we are obliged to inform the State Prosecutor for Serious Economic and International Crime (SØIK). Please note in particular that you do not have the right to know whether a notification has been made to the State Prosecutor or the right to know the content of the notification.

We store your personal data in relation to money laundering documentation for 5 years after the end of the customer relationship.

Courses, seminars and webinars

Registration and participation in courses, seminars, and webinars, require the processing of your personal data. For this purpose, we need to process data including contact information such as name, position and email. We will also process your payment information if you need to pay for the course, seminar or webinar.

We process your data based on an agreement between you and us to participate in our courses, seminars and webinars. The legal basis is in the GDPR art. 6(1)(b). The processing of your personal data may also take place based on our legitimate interest in evaluating the courses and sharing your contact details with the other participants by providing participant lists. The legal basis for this processing is GDPR Art. 6(1)(f). The personal data originates from you or the person who has registered for the course on your behalf, e.g. your employer.

When Focus Advokater P/S organises webinars, we use Microsoft Teams. In this connection, Microsoft is the data processor and processes information about the webinar participants on behalf of Focus Advokater P/S and according to our specific instructions.

We generally store your data until the end of the evaluation and 5 years thereafter.

Cookies and website

When visiting our website, we collect personal data about you via cookies to improve the website's display and user experience and to compile statistics. The information we collect via cookies includes your IP address, browser type, device (type, version, operating system, etc.) and user behaviour, including page views.

We only collect your data if you have given your consent. You can withdraw your consent at any time. Read more about this in our cookie policy <u>here.</u> (In Danish).

On our website, we also have integrated plugins from social media that can collect data about you if you have given your consent. In this regard, we have a joint data responsibility with each medium. We use integrated plugins from Facebook and LinkedIn.

Information collected via cookies is stored for a maximum of 2 years. IP address information is not stored.

Social media

We use certain social media such as Facebook and LinkedIn to get in touch with potential customers and promote our marketing. If you have "liked" our page on social media or have been in contact with us through this, we avoid processing your personal data. For this purpose, we only process information about your name and email.

If you contact us via social media, we process your personal data based on our interest in being able to contact you and respond to your enquiries, cf. GDPR art. 6(1)(f). The data will originate from you and the social media that you contact us through.

We have a so-called joint data responsibility with the social media we use, as we both process your personal data for our own purposes. You can read more about the social media's processing of your personal data below:

- Facebook's processing of your personal data <u>here</u> and about joint data responsibility
- You can read more about LinkedIn's processing of your personal data <u>here</u> and about joint data responsibility <u>here</u>.

Data processed in connection with social media, that relates to direct communication via social media, is deleted immediately. Posts on e.g. Facebook pages or in public groups are not deleted, as a post or comment on Facebook pages or in public groups is considered public areas. You can read more about public areas <u>here</u>.

Marketing and commercialisation

We only process your personal data for marketing purposes if you have given your consent in accordance with Art. 6(1)(a) GDPR, e.g. to receive newsletters about news that are important for your company's operations and practices and invitations to professional events. The scope of our processing is stated in the specific consent.

If you have consented to receive marketing from us, we will generally process information about your name, company name, email, job title and CVR number. It is also possible to write

in a free text field, but we do not recommend writing personal data in this field unless it is relevant to the enquiry.

You have the right to withdraw your consent at any time by using the "unsubscribe" link in the newsletters you receive and by sending an email <u>compliance@focus-advokater.dk</u>

We keep the documentation of your consent as long as you receive our marketing or participate in our marketing and for 2 years after the consent has been withdrawn, if it is necessary for legal claims to be established, asserted or defended.

Job applicants

If you apply for a job at Focus Advokater P/S, we also process your personal data. You can read more about how we process your data in our Privacy Policy for job applicants <u>here</u>. (In Danish).

Suppliers and partners

When we enter into agreements with suppliers and business partners, we process information about their contact persons. This includes information such as name, job title, telephone number, email and, if necessary, payment information.

The data is processed either because it is necessary for the fulfilment of the contract with the supplier or business partner concerned, cf. GDPR Art. 6(1)(b), or because we have a legitimate interest in processing their contact data as part of the contract, cf. GDPR Art. 6(1)(f).

We retain relevant contact information throughout our co-operation. Written correspondence is deleted on an ongoing basis.

Notification of statutory or required processing

In cases, where we process your personal data based on a legal obligation or contractual requirement or a requirement that must be fulfilled in order to enter into a contract, you are obliged to provide us with the information so that we can maintain the client relationship, fulfil the contract and invoice you for our services etc. If you do not wish to provide us with the informations, the consequence may be that we will not be able to establish or continue the client relationship or fulfil a contract with you.

Recipients of personal data

As a law firm, our employees are subject to a duty of confidentiality pursuant to Retsplejeloven and the Advokatetiske regler. We only disclose information about you to third parties when we have obtained your consent or when we are required by law. These third parties may, for example, be counterparties and their advisors, external advisors and public authorities, including the Danish tax authorities and the courts. We may transfer personal data to our system suppliers who process personal data on our behalf and on our specific instructions in accordance with the data processing agreement entered.

In some cases, we use data processors outside the EU/EEA, whereby personal data may be transferred to third countries, e.g. in connection with our use of cloud solutions. In this case, we use a valid transfer basis (possibly including Standard Contractual Clauses) before we transfer the personal data. The transfer only takes place in compliance with the necessary security guarantees as required by applicable data protection legislation and an individual assessment is always made regarding the need for additional measures.

Your rights

When we collect information about you, you have a number of basic rights under data protection laws that you can exercise. Your rights include the right to request access to and rectification or erasure of your personal data, restriction of and objection to our processing, and the right to receive your data in a structured, commonly used and machine-readable format (data portability).

The rights mentioned above may be subject to conditions and restrictions. Whether you as a data subject can request, for example, to have your personal data deleted will in all cases depend on a concrete assessment.

If you have given your consent to our processing of your data, you have the right to withdraw this consent at any time.

If you are dissatisfied with our processing of your personal data, you can file a complaint with the Danish Data Protection Agency via their website <u>datatilsynet.dk</u> or by calling +45 33 19 32 00.

Contact details

The company responsible for processing your personal data is

Focus Advokater P/S CVR no.: 34 04 56 66 Cortex Park Vest 3 5230 Odense M, Denmark mail@focus-advokater.dk +45 63 14 20 20 We have appointed an employee as our internal personal data coordinator. If you have any questions regarding our processing of your personal data, please contact Stefan Juvald Stade at <u>sta@focus-advokater.dk</u> or by phone +45 63 14 45 19.

Changes

We reserve the right to update and amend these guidelines for the processing of personal data. In the event of significant changes, we will contact you by email or visible notice on our website.

This privacy policy was last amended on 12 March 2025.