

Privacy Policy

1. General

This privacy policy (hereinafter "Privacy Policy") describes how personal data is processed and protected at Aver Legal Oy (hereinafter "Aver") in accordance with the applicable legislation and good data processing practices.

Aver processes personal data when we are contacted regarding an assignment, when preparing and making clearances for potential assignments, when a person takes part in our events, marketing campaigns or survey polls or is seeking for job or is employed by Aver, or when we receive contact information through a company, an organization, interest group or any other cooperation.

2. Data file controller and contact information

Aver Legal Oy
Hiiralantie 21, FI-02160 Espoo, Finland
Business ID: 2272652-3
www.aver.fi
tel.: +358 40 532 7763
email: timo.jaasalo(a)aver.fi

3. Personal data that Aver processes

Aver processes personal data when necessary for the purposes described below. The purpose of use determines what type of data Aver collects and processes. Also, the data that Aver processes may vary based on which of its services are used and how they are used. Thus, one can also himself affect the way we process one's data.

The data may consist, among others, of the following:

Name and contact details, such as first name and surname, address, phone number and email.

Information required for the prevention of money laundering and terrorist financing, such as nationality, political background, relationship with a political person, the name, number or other identifying information of the document used to verify identity (accepted authentication documents are a passport, an identity card, a driving license and a Kela photocard and, in the case of a foreign customer, a national passport or an identity card issued by an EEA authority).

Other demographic information, such as social security/identification number of private individuals.

Client relationship information, such as any information on assignments, invoicing and payment information, client feedback, communication and cancellation information.

Interest and profiling information, such as information received from the person themselves about their professional interests.

Job applications and other information received along with recruitment processes.

Other information collected based on consent.

Aver may also process the following data: name, title/profession, age/date of birth, contact details and other similar identifiers, such as object of interest after the termination of an assignment or data received through a company, an organization, interest group or any other cooperation.

4. Sources of information

Personal data is provided to us by or on behalf of our clients or from a third party related to an assignment when Aver is preparing for or handling an assignment of legal services or other eventual assignments. Data is collected, among others, during preparations and clearances for assignments and during discharging an assignment in the course of preparing or providing legal services, from feedback or contacts, or later during customer-relationship or cooperation.

Personal data may also be collected and updated from our partners' registers, companies' online services and applications, as well as from authorities and companies offering services related to personal data.

5. The purposes and legal foundation for processing personal data

Aver processes its clients' personal data to prepare for, manage, develop and administer client accounts. Aver processes personal data to prepare for and execute the contractual relationship with the client e.g. to handling assignments and for the customer service.

Aver may also process personal data based on consent when necessary and when there is a legal obligation for processing, such as prevention, revealing and detection of money laundering and terrorist financing.

6. Regular data disclosures and transfers

Aver may disclose and transfer personal data only when this is an obligatory requirement under applicable law (e.g. disclosures to the statutory authorities). In addition, in the case of a possible merger and acquisition transaction, Aver may disclose and transfer data to a third party related to the merger and acquisition transaction.

Aver may use subcontractors and service providers for the processing of personal data, as well as, for the technical maintenance of its IT-systems. The data Aver discloses or transfers to such partners is only to be used for purposes determined by Aver. In addition, Aver has taken care of that according to all applicable agreements that are in place, all of its contractual partners must implement

appropriate measures for the protection of the personal data and also otherwise comply with the valid data protection legislation.

Aver stores personal data in the European Economic Area (EEA) or in countries with the level of data protection required by the authorities. If the handling of the assignment requires us to disclose data outside EEA, we will only use such co-operation partners that process the personal data on the same basis that we do. In that case, we will ensure an adequate level of data protection and other necessary measures (such as contractual mechanisms) as required by legislation.

7. Retention time policies

Aver stores personal data for as long as it is necessary under the applicable legislation, regulations, regulatory provisions, and as far as legal assignments are concerned, the Rules of the Finnish Bar Association.

Among others, Aver may store information related to assignments for 10 years after the termination of the assignment. In accordance with the Finnish Bar Association's Guidelines for the Prevention of Money Laundering and Terrorist Financing, we store information necessary to prevent money laundering and terrorist financing for 5 years from the end of the client relationship, unless any other obligation requires us to retain the information longer.

8. The rights of a data subject

A data subject has different rights concerning his/her personal data.

A data subject has the right to access his/her personal data with certain restrictions, the right to get incorrect information in our registers rectified, a restricted right to have his/her personal data erased and the right to restrict or object the processing of his/her personal data.

A data subject also has the right to cancel the consent he/she has given, to opt-out from future marketing, and, in certain situations, the right to have his/her data transferred to himself/herself or to a third party. In addition, a data subject has the right to make a complaint regarding the processing of personal data to the supervising authority (www.tietosuoja.fi/en/home).

Questions and requests concerning the rights of a data subject shall be sent to Aver's email address: timo.jaasalo@aver.fi or by mail to the following address: Aver Legal Oy / Privacy Policy, Hiiralantie 21, FI-02160 Espoo, Finland.

9. Protecting personal data

Aver uses necessary technical and organisational measures to protect personal data from illegal access, releasing, destroying or any other unjust handling. These measures include, among others, firewalls, cryptography, using safe equipment bay, due access control, controlled admission of rights of use and controlling the

use of such rights, briefing staff that is involved in processing personal data and careful selecting of subcontractors, contracts and instructions.

10. Changing the privacy policy

Aver develops constantly its services and practices concerning data privacy, and it reserves the right to revise and update this Privacy Policy when necessary. Also, the changes in legislation and its interpretation may cause a need for changing the policy.

Updated Privacy Policy can be found on Aver's website.