

7WISE LAW FIRM'S PRIVACY POLICY

7WISE Law Firm KB (hereinafter "7WISE," "we," "our," or "us") is committed to protecting the privacy of our clients and other data subjects. This Privacy Policy contains information about how we process personal data and the rights of data subjects.

1. Data Controller and Contact Information

7WISE Law Firm KB, corporate registration number 969664-4211, Kungsgatan 56, 111 22 Stockholm, is the data controller for the processing of personal data described below. This means that we are responsible for ensuring that personal data is processed correctly and in accordance with applicable legislation (including Regulation (EU) 2016/679 of the European Parliament and of the Council [hereinafter "GDPR"]). If we process your personal data, you have several rights, which are described below. If you have questions regarding our processing of personal data or if you wish to exercise your rights, you may contact us via email at reception@7wise.se or by mail at the address above.

7WISE has attorneys who undertake assignments as bankruptcy trustees and who process personal data in that capacity. We distinguish between the processing of personal data that takes place within the scope of the law firm's normal operations and the processing that takes place within the scope of the bankruptcy estate's operations. The reason for this is that there may be two different data controllers in bankruptcy matters. For personal data processed by the bankruptcy trustee in their role as a bankruptcy trustee, 7WISE is the data controller. For personal data processed by the bankruptcy trustee within the scope of the bankruptcy estate's operations and in their capacity as its representative, the bankruptcy estate is the data controller.

2. Processing of personal data and legal basis for processing

2.1. Processing of personal data in connection with our assignments

We process personal data about our clients and counterparties to perform and administer our assignments and to safeguard our clients' interests. The processing carried out includes, for example, communication, documentation of the assignment, review and storage of information collected in connection with conflict of interest and anti-money laundering checks, as well as other measures necessary for the performance of the assignment.

The categories of personal data processed include, among other things, name, organization/personal identification number, contact information, address, identification documents, information regarding board assignments, communication, and other information necessary for the performance of the assignment (including conflict of interest and anti-money laundering checks) as well as to safeguard our clients' interests.

Our legal basis for the processing is the performance of a contract and our legitimate interest in being able to carry out the assignment and safeguard our clients' interests. In addition, the processing regarding conflict of interest and anti-money laundering checks is necessary to fulfill the legal obligation incumbent upon us under the Swedish Bar Act and the Swedish Bar Association's regulations. (See Article 6(1)(b), 6(1)(c), and 6(1)(f) of the GDPR.)

2.2. Processing of personal data in connection with bankruptcy cases

In bankruptcy matters, we process personal data of various categories of data subjects, including representatives, individual bankrupt debtors, debtors, shareholders, employees, guarantors, customers, suppliers, auditors, the government, banks, third parties, and family members. The categories of personal data that may be processed include names, organization/personal identification numbers, contact information, addresses, assets, liabilities, bank details, identification documents, information regarding

board assignments, information regarding shareholdings, property designations, vehicle registration numbers, IP numbers, salary information, union membership, health information, bookkeeping and accounting materials, as well as other information relevant to the matter that arises in the individual case. The processing is carried out for the purpose of performing the assignment given to a bankruptcy trustee at 7WISE. The processing is necessary to perform a task in the public interest. For example, it is incumbent upon the bankruptcy trustee, as the representative of the bankruptcy estate, to ensure that creditors are not disadvantaged and that the distribution of any assets is carried out correctly. The processing may also be necessary as part of the exercise of public authority that the handling of bankruptcy cases may entail when issuing wage guarantee decisions regarding employees of the bankrupt debtor. In addition to the above, certain personal data is processed because the bankruptcy trustee has a legal obligation to fulfill, including as a result of the bankruptcy estate's accounting obligations, the obligation to prepare a bankruptcy estate inventory, or other obligations incumbent upon us by law.

Our legal basis for the processing is to fulfill contracts, legal obligations incumbent upon us and the bankruptcy trustee, as well as a legitimate interest in being able to perform the assignment and safeguard the interests of the bankruptcy estate. In addition, processing in connection with wage guarantees is necessary to perform a task in the public interest or as part of the bankruptcy trustee's exercise of official authority. (See Article 6(1)(b), 6(1)(c), 6(1)(e), and 6(1)(f) of the GDPR.)

2.3. Personal data processing in connection with accounting and invoicing

We process personal data to invoice our assignments and to report our financial information. The processing carried out includes, for example, the preparation of invoices and their dispatch, as well as the preparation of accounting records. The categories of personal data processed include, among others, name, address, organization/personal identification number, contact information, and other data included in the accounting records.

Our legal basis for the processing is our legitimate interest in being able to charge for our services, as well as the legal obligation imposed on us under the Accounting Act (see Article 6(1)(b) and 6(1)(c) of the GDPR).

2.4. Processing of personal data in connection with recruitment

We process personal data to administer and handle job applications. The processing carried out includes, for example, reviewing resumes, grades, etc., as well as communicating and storing information related to the application process. The categories of personal data processed include name, social security number, contact information, address, grades and other qualifications, CV, cover letter, and other information you have provided to us in connection with the application and interview.

Our legal basis for the processing is our legitimate interest in being able to administer and process your job application (see Article 6(1)(f) of the GDPR). If you have given your consent for us to store your personal data for future job openings, our legal basis is your consent (see Article 6(1)(a) of the GDPR).

2.5. Personal Data Processing in Connection with Supplier Management

We process personal data to communicate with contact persons at our suppliers and partners. The processing carried out includes, for example, communication and the storage thereof. The categories of personal data processed are names, contact information, and communications.

Our legal basis for the processing is the performance of a contract and legitimate interest (see Article 6(1)(b) and 6(1)(f) of the GDPR).

2.6. *Personal Data Processing in Connection with Communication and Correspondence*

We process personal data to assist those who choose to contact us. The processing carried out includes, for example, communication and the storage thereof. The categories of personal data processed are name, contact information, and communication.

Our legal basis for the processing is legitimate interest (see Article 6(1)(f) of the GDPR).

3. Storage of personal data

We store personal data for as long as necessary based on the purposes of the processing.

Processing of personal data in connection with assignments (including conflict of interest and anti-money laundering checks): The data is processed for a period of ten years from the date of completion of the assignment, or for a longer period as required by the nature of the assignment in accordance with the Swedish Bar Association's regulations.

Personal data processing in connection with bankruptcy matters: The data is never processed for longer than necessary considering the purposes of the processing; at most, personal data may be stored for up to ten years in accordance with the Swedish Bar Association's regulations.

Accounting and billing purposes: For billing purposes, the data is processed until the invoice is paid. For accounting purposes, the data is processed for a period of seven years following the calendar year in which the fiscal year ended, in accordance with the Accounting Act.

Recruitment purposes: The data is processed during the period the position is advertised until the advertised position is filled and employment begins. If you have given your consent for us to save your application for future positions, your personal data will be stored for up to two years after you gave your consent to the processing or until you withdraw your consent.

When managing suppliers and business partners: The data is stored for as long as necessary for us to administer the contractual relationship or business relationship, exercise our rights, and fulfill our obligations, or for as long as required to fulfill a legitimate interest. Personal data processed to fulfill obligations under the Accounting Act is stored for seven years.

Third parties who contact 7WISE: The data is never processed for longer than necessary in light of the purposes of the processing, i.e., to assist the person contacting us.

4. Who do we share your personal data with?

Personal data may be transferred between the law firm's various partner firms for the purpose of conducting conflict of interest and anti-money laundering checks, for the exchange of information and knowledge, and for resource allocation. We will not disclose your personal data to third parties except in the following cases.

- i) When such disclosure has been specifically agreed upon between you and us,

- ii) When, within the scope of a specific engagement, it is necessary to protect your or our client's rights and interests or to act in accordance with clients' instructions (e.g., to a court, arbitration tribunal, government agency, opposing party, opposing party's representative, insurance company, or auditor),
- iii) If it is necessary for us to fulfill a legal obligation, comply with a government agency decision or a court order, or in the event that we engage third-party service providers who perform assignments on our behalf (e.g., IT service providers), or
- iv) If otherwise permitted or required by applicable law.

In certain cases when we share your personal data, the recipient of your personal data is an entity that is itself a data controller for the processing of the personal data (e.g., a court, government agency, auditing firm, or similar). In other cases, the recipients may be data processors who process the personal data in accordance with our instructions and are not permitted to use the personal data for their own purposes (e.g., service providers and partners who, under contract, may only process personal data to provide the relevant service or on another legal basis).

5. What rights do you have to influence the processing of your personal data?

Below is a description of the rights you have regarding our processing of your personal data. To exercise your rights, please feel free to contact us (see contact information in Section 1). Please note that the rights described below may be limited due to provisions regarding professional secrecy, attorney-client privilege, and archiving obligations under the Swedish Bar Association's regulations or other applicable laws and rules.

5.1. Right to Information and Access

You have the right to request information regarding whether we process personal data belonging to you and, if so, to receive a copy of such data (a data subject report) along with certain detailed information about how we process your personal data.

5.2. Right to rectification

You have the right to request that we correct and/or supplement inaccurate or incomplete information about you.

5.3. Right to object

You have the right to object to the processing of your personal data based on a balancing of interests. If we cannot demonstrate that there are compelling and legitimate grounds to continue processing the personal data, we must cease processing.

5.4. Right to erasure

In certain cases, you may have the right to request the erasure of your personal data ("right to be forgotten"). Erasure may be applicable, for example, to personal data that is no longer necessary to process or retain for the purpose for which it was collected, or to personal data processed based on your consent if you choose to withdraw that consent. However, there may be situations where we are unable to erase your personal data, such as when your personal data is needed for us to fulfill a legal obligation, or if our interest in continuing to process the data outweighs your interest in having it erased.

5.5. *Right to restriction*

In certain cases, you have the right to request that we restrict our processing of your personal data, which means that the data is marked so that in the future it may only be processed for certain limited purposes. This applies, for example, if you have objected to the processing, if you believe the data we have about you is incorrect, or if the processing violates the law. By requesting a restriction on processing, you have the ability, at least for a certain period of time, to prevent us from using the personal data for anything other than, for example, defending our legal claims.

5.6. *Right to data portability*

If we process your personal data to fulfill a contract or based on your consent, you have the right in certain cases to receive the personal data so you can use it elsewhere, e.g., transfer it to another data controller. The personal data must then be provided in a structured, commonly used, and machine-readable format (“right to data portability”). This right applies only to the personal data that the data subject has provided to 7WISE.

5.7. *Right to Withdraw Consent*

In cases where we process your personal data based on your consent, you have the right to withdraw your consent at any time. When you withdraw your consent, we will cease processing personal data based on your consent.

5.8. *Right to file a complaint*

If you have any objections or comments regarding how we process your personal data and wish to file a complaint, please feel free to contact us using the contact information provided above in Section 1. You also have the right to file a complaint with the Swedish Data Protection Authority, which is the Swedish supervisory authority for our processing of personal data. You may also file a complaint in the specific EU/EEA member state where you reside, where you work, or where an alleged violation of applicable data protection laws has occurred.

6. Security and geographical location of personal data processing

Your personal data will primarily be processed within the EU and the EEA. However, in certain cases, within the scope of a specific assignment, 7WISE may process personal data outside the EU and the EEA if necessary for the performance of the assignment. In such cases, we will take the necessary measures to ensure that the processing is carried out securely and in accordance with applicable legislation, including the GDPR. Examples of such measures include processing outside the EU and the EEA in a country that, according to a decision by the European Commission, ensures an “adequate level of protection,” or through agreements that ensure your rights are protected (standard contractual clauses). If you would like more information about our protective measures, you can always contact us. You can find our contact information in Section 1. You can find more information about which countries are considered to have an “adequate level of protection” on the European Commission’s website, and you can read more about standard contractual clauses in Swedish on the Swedish Data Protection Authority’s website.

7WISE continuously implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk. This includes measures to protect personal data against loss, misuse, unauthorized access, disclosure, alteration, and destruction.

7. Links to Third-Party Websites

In the event that our website contains links to third-party websites or material published by third parties, these links are provided for informational purposes only. Since 7WISE has no control over the content of these websites or their material, we are not responsible for their content. 7WISE is also not liable for any damages or losses that may arise from the use of these links.

8. Changes to the Policy

We may update and amend this policy. In the event of significant changes, we will notify you of the changes in an appropriate manner, for example by publishing the updated policy on our website.

This version was last updated in August 2026.