PRIVACY NOTICE

Oktober 2025

1. INTRODUCTION

Synch Law AB ("Synch", "we", or "us") is the data controller and responsible for the processing of your personal data as outlined in this privacy notice ("Notice"). We see this Notice not merely as a legal formality, but as part of our responsibility to treat your data with care and respect. For us, respecting your privacy is fundamental to building trust.

This Notice explains how Synch collects, uses, transfers, and otherwise processes your personal data (collectively referred to as "processing"). It is intended to provide transparency, helping you understand why and how we process your data and to inform you of your data protection rights.

We are committed to processing personal data in accordance with applicable data protection legislation, including the EU General Data Protection Regulation 2016/679 ("GDPR") and other applicable national laws. If you have any questions, you can reach us using the contact details provided in section 2 below.

You have the right to be informed about how we process your personal data. We therefore encourage you to read this Notice in its entirety. However, if you are looking for information on a specific topic, you may use the links below to navigate directly to the relevant section:

- 2. CONTACT DETAILS
- 3. SCOPE
- 4. Sources of Personal Data
- 5. HOW WE PROCESS YOUR PERSONAL DATA
- 6. SOCIAL MEDIA
- 7. RECIPIENTS OF YOUR PERSONAL DATA

8. TRANSFERS OF PERSONAL DATA OUTSIDE THE EU/EEA

9. COOKIES AND SIMILAR TECHNOLOGIES

10. YOUR DATA PROTECTION RIGHTS

11. CHANGES TO THIS PRIVACY NOTICE

2. CONTACT DETAILS

Our contact details are the following:

Name: Synch Law AB

Org.no: 556955-6656

Address: P.O. Box 3631, SE-103 59 Stockholm, Sweden

Visiting Address: Birger Jarlsgatan 6, 11434, Stockholm, Sweden

Email addres: privacy@synchlaw.se

Phone: +46 (0)8 761 35 35

3. SCOPE

This Notice covers how we collect and process personal data about the following categories of individuals:

- Clients, client representatives, prospective clients, -and counterparties;
- Agents or other employees of (potential) corporate clients, suppliers, or business partners;
- Participants at events, seminars, and other activities organised by us;
- Subscribers to our newsletters or other communications;
- Individuals who otherwise contact us or send us enquiries, for example through our contact forms, by email, or in person at meetings or events.

Please note that this Notice does not apply to individuals who apply for job roles, internships, or other career opportunities via our careers page. Such applications are subject to a separate privacy notice specifically addressing recruitment and applicant data.

4. SOURCES OF PERSONAL DATA

The personal data we process about you consists of information you have provided to us or that we have otherwise obtained during our relationship. We collect data, for example:

- From you or your representatives
- From our clients when establishing a business relationship or during the handling of a matter on behalf of our clients
- From our business contacts, such as suppliers and vendors
- When you share information with us in other ways, such as through meetings, conversations, social media, events, or online forms

We may also collect or receive information about you from other sources, such as:

- Public records
- Bisnode
- The Swedish Companies Registration Office (Bolagsverket) and other public authorities
- Swedish courts
- Other service providers

5. HOW WE PROCESS YOUR PERSONAL DATA

In the table below, you will find details about how we process your personal data, including the purpose of processing, the categories of personal data involved, the legal basis for processing, and the retention period for each specific purpose.

5.1 Client/ prospective client related processing

5.1.1 Registering clients and potential clients

We process personal data in order to carry out client onboarding and registration procedure, which are necessary steps to establish and manage our client relationships. This includes verifying the identity of our clients, performing conflict of interest checks, and fulfilling other legal and regulatory obligations. These activities are essential for us to be able to provide legal services in accordance with applicable laws, AGRD Partners' Code of Professional Conduct and professional standards.

Where applicable, and in accordance with Anti-Money Laundering legislation ("AML"), we are also required to carry out Know Your Customer checks ("KYC"). These activities are essential for us to provide legal services in compliance with applicable laws and professional duties.

For these purposes we will process the following personal data categories:

Contact details such as name, address, email address, and phone number.

Financial information, if the client/counterparty is, for example, a sole trader or a private individual.

Employment-related information such as employer, job title, qualifications, and skills.

Identification documents or background information that we have received from you or collected as part of our client registration process. This includes, for example, date of birth, personal identification number, and copies of official identification documents (e.g., passport, national ID)

Information for AML or international sanctions checks, which includes information on nationality, beneficial ownership, or whether someone is a politically exposed person ("PEP") or related to a PEP.

For representatives and contact persons of corporate clients, the processing of personal data is based on our legitimate interest in establishing and managing the client relationship and fulfilling our legal obligations as well as our obligation to comply with AGRD Partners' Code of Professional Conduct. This includes identity verification, communication, and conflict of interest checks.

The processing of personal data for client registration who are private clients is necessary to enter into and perform a contract with our clients.

In addition, certain processing activities—such as identity checks, conflict screening, and KYC procedures—are necessary for compliance with our legal obligations under applicable laws, including AML.

accordance with AGRD Partners' Code of Professional Conduct, we retain all clientrelated information. including any personal data, for ten (10) years following the of completion the relevant matter.

Where applicable, and in line with AML, we retain information for antimoney laundering or international sanctions checks for a minimum of five (5) years, but no longer than ten (10) years.

5.1.2 To provide our legal services

To effectively handle a client's matter in their best interest and in compliance with AGRD Partners' Code of Professional Conduct, we process the personal data necessary to deliver our legal services. This includes scheduling and conducting meetings, as well as communicating with clients. Additionally, we may need to collect or share information about our clients or other individuals involved in the legal matters—such as opposing parties, their legal representatives, witnesses, or others relevant to the case or to Synch's legal services more broadly.

The types of personal data processed can vary widely and may include contact details, case notes, references to individuals in documents we prepare, and any other information necessary for handling and managing the client's matter. Sensitive personal data may also be processed.

For clients that are legal entities, the In accordance processing of personal data relating to their contact persons or representatives is based on our legitimate interest in providing legal services. If we have a contract with you as a private client, the legal basis for the processing is contractual necessity related to managing your legal matter.

For the processing of personal data related to other individuals involved in the legal matters—such as opposing parties, their legal representatives, witnesses, or others relevant to the case or to Synch's legal services more broadly the processing of personal data relating to such individuals is based on our legitimate interest in providing legal services.

AGRD Partners' Code of Professional Conduct. we retain all clientrelated information, including personal data, for ten (10) years following the conclusion of the relevant matter.

5.1.3 To invoice our clients

The purpose of processing this data is to invoice our clients and receive payment for our services.

The personal data we collect consists of the information necessary to invoice you, primarily including contact and transaction details such as name, email, phone number, job role/title, address, personal identification number, invoice number, payment amount, and similar data. When the above information concerns a legal entity that is not a sole trader, this information does not constitute personal data under the GDPR.

We rely on our legitimate interests to carry out invoicing for our corporate clients. If we have a contract with you as a private client, the legal basis for the processing is contractual necessity.

In accordance with AGRD Partners' Code of **Professional Conduct** we are required to retain client records including invoices—for a longer period than stipulated by accounting laws. The recommended retention period is ten (10) years from the conclusion of the matter, unless specific reasons call for a longer or shorter duration.

5.1.4 Reporting

We process and anonymize personal data to create internal reports, such as analyses of overdue invoices. These reports may initially include personal data like names, time specifications, and timekeeper information, but are aggregated and anonymized to ensure that no personal data is present in the final reports. This enables us to monitor and improve our financial and operational performance while protecting individual privacy.

The personal data processed for this purpose will primarily relate to the client as such. When the information concerns a legal entity that is not a sole trader, this information does not constitute personal data under the GDPR. However, if the client is a private individual, we may process transaction details or other data relevant to the specific matter.

The legal basis for this processing is our legitimate interest in managing and optimizing our business operations efficiently.

The aggregated and anonymized reports do not contain personal data and are retained only as long as necessary for internal analysis and business purposes. Any underlying personal data used during report generation is handled in accordance with applicable data retention policies and promptly anonymized to protect individual identities.

5.2 When you communicate with us

To respond to your inquiries regarding our services when you fill in relevant forms on our website or when you contact us via other communication channels.

When you contact us—whether through the contact form on our website or by other means—we may process personal data such as your name, email address, phone number, title, address, and any other information you choose to provide related to your request.

We base the processing on our legitimate interest in responding to your inquiries about our business operations and communicating with you.

Personal information collected during your contacts with us is stored during the time we have an ongoing relationship with you. If we have not heard anything from you in the past twelve (12) months, we will delete your information.

5.3 When you participate to our events

The purposes of the processing are to:

- manage event registrations (including seminars, after-works, and webinars),
- send reminders and practical information related to the event,
- follow up with participants after the event, including sharing relevant materials and requesting feedback to help us improve future events,
- contact you if you have expressed interest in our services during the event, and
- anonymise participation data to generate internal reports on event engagement.

We process your name, email address, title/role, other contact details, and any additional information you provide—for example, dietary restrictions if food is offered at the event.

In some events, we may take photos, make sound and image recordings of the participants and publish them on our website and/or our social media platforms.

The processing is based on our legitimate interest in promoting its brand, maintaining relationships with existing clients and contacts, expanding its network, and sharing relevant updates and insights.

The legal basis for the processing of photos, sound and image recordings is our legitimate interests.

We have concluded that the processing of your personal data is necessary to provide information about and market our business through photos, sound and image recordings. We have also concluded that these interests override any competing interests and fundamental rights and freedoms. You always have the right to object to this conclusion and can read more about your rights below.

In some cases, the legal basis for the processing of photos, sound and image recordings is consent. In such cases, you will be informed separately when we ask for your consent. Consent is voluntary and you always have the right to withdraw any consent previously

Contact data is retained for one (1) month after the event unless we are engaged in ongoing communication with you.

Any dietary restriction information is deleted after the end of the event in question.

Photos, sound and image recordings processed on the basis of legitimate interest will be processed for as long as we deem we have a legitimate interest or until you object.

Photos, sound and image recordings processed based on your consent will be deleted once you withdraw your consent.

given. We will then be required to	
cease the processing.	

5.4 SynchZipped- Our newsletter	We only process your name and email address in order to deliver our newsletter to you.	If you are not a client and have subscribed to our newsletter, we	We will process your personal data for as
The purpose of the processing is to distribute the newsletter and promote our legal services and business activities.		rely on your consent to process your personal data. If you are an existing client and we send you our newsletter, we do so based on our legitimate interest in marketing our services and maintaining our client relationship.	long as we have your consent or until you object to receiving our newsletter, depending on the applicable legal basis. You can withdraw your consent or object to the processing at any time by clicking the "unsubscribe" link in any of our emails or by contacting us at privacy@synchlaw.se
5.5 To market our services We may contact you to promote our legal services if we have identified a relevant need or interest.	We process your business contact details.	The processing will be based on our legitimate interest in marketing our legal services and growing our business.	We will retain your personal data for as long as we maintain an active dialogue with you, and for up to 12 months following our last interaction.

5.6 To plan and execute day-to-day business operations

We process personal data to manage and administer our relationships and agreements with clients, partners, suppliers, and other external parties. This also includes maintaining and updating our contact lists related to these stakeholders.

The personal data we may process will vary but it will include data such as:

- Contact information such as name, address, email address, and phone number.
- Work-related information, including employer and job title.
- Case-related information, for example, data provided to us to manage client and supplier matters and agreements.

If we have a contract with you as a private client, the legal basis for the processing is contractual necessity.

If we have a contract with a legal entity that you represent, the processing is necessary for our legitimate interests in managing the relationship with you or the legal entity you represent.

We strive for data minimisation, but how long we keep the personal data depends on the purpose of the specific processing activity.

When personal data forms part of or is

forms part of, or is included in, documents that Synch is obligated to retain for accounting purposes, the data will be stored and preserved until the end of the seventh (7th) year following the end of the calendar year in which the financial year was closed. Agreements and other documents may be stored for ten (10) to be able to defend against legal claims in accordance with the Swedish Statute of Limitations.

WeSynch is Synch's subscription-based, web-aservice platform designed for offering on-demand legal tools delivered through a solution. This section is applicable to you whauthorised user of WeSynch in cases wher controller of the personal data and we need to the company you represent with access to a WeSynch services.	high-quality, private cloud (which may concern other individuals as well ten you are an e we are the provide you or	private client, the legal basis for the processing is contractual necessity.	
5.8 To publish quotes you have shared a services on our website and social mplatforms From time to time, and always subject to your approval, we may invite you to provide feedba services for the purpose of publishing your quowebsite, social media channels, or other commplatforms.	statement, and the company that you represent. prior ack on our ote on our	We will only publish your feed back upon your prior approval and consent.	We will process the personal data only for as long as we have your consent.

5.9 Compliance with legal obligations	The specific categories of personal data to be processed may vary and cannot be	The legal basis for such processing is our obligation to comply with	We will retain the data for as long as required
In addition to the purposes described above, we may also process your personal data when required by applicable law—for example, to comply with accounting regulations or to respond to binding requests from public authorities.	determined in advance, as they depend on the nature and scope of the legal obligation in question.	applicable legal requirements.	under the relevant legislation.
to respond to binding requests from public authorities.	However, the processing may include some or all of the following categories:		
	 Contact details such as name, address, email address, and phone number 		
	Financial information		
	Employment-related details such as employer and title		
	 Identity documents or background information obtained during our client registration process 		
	Case-related information, such as data provided to us in connection with legal		

matters

5.10	To establish, exercise, or defend legal claims
	against Synch

In the event of a dispute — or to prepare for the possibility of one — we may process your personal data for the purpose of establishing, exercising, or defending legal claims.

The specific categories of personal data to be processed may vary and cannot be determined in advance, as they depend on the nature and scope of the specific matter at hand. However, the processing may include some or all of the following categories:

- Contact details such as name, address, email address, and telephone number
- Financial information
- Employment-related information, such as employer and job title
- Identification documents or background information provided by you or collected as part of our client onboarding process
- Case-related information, such as data submitted to us for the purpose of handling legal matters
- Agreements that Synch has in place with relevant suppliers

Our legal basis for this processing is our legitimate interest in safeguarding our business interests in connection with potential or actual legal proceedings. Your personal data will be retained for as long as necessary to establish, exercise, or defend a legal claim in the event of a dispute.

6. SOCIAL MEDIA

Synch is present on the social media platforms Linkedin and Instagram. These platforms are responsible for the processing of your personal data, such as your personal account. We are also responsible for personal data for the processing of certain personal data in the form of so-called "insights" regarding visits and

activity on our pages. On LinkedIn, we have a joint controller responsibility for activities on our pages. Our joint controller responsibility with Linkedin is available here. For more information about each platform's processing of your personal data, see their respective privacy policies (LinkedIn; Instagram).

Our processing of data in the form of "insights" is based on our legitimate interest in being able to gain a better understanding of the type of communication and measures that yield results, and a better understanding of our activities and our presence on social media.

7. RECIPIENTS OF YOUR PERSONAL DATA

We may share your personal data with trusted third parties with whom we have agreements ensuring that your personal data is processed in accordance with this Notice. Such third parties may include, for example:

- Other professional advisors
- Auditors
- IT providers (e.g. NetDocuments, Legalsense, and HighQ from Thomson Reuters)
- Third-party service providers, such as those providing translation, document review, and other support functions
- Third parties involved in delivering legal services related to client matters, such as courts, authorities, opposing parties, opposing counsel, and providers of virtual data rooms
- Third parties involved in organizing events
- Social media providers, including Meta (Instagram & Facebook), Microsoft (LinkedIn)

By exception, we might transfer and make accessible personal data to the General Counsel of AGRD Partners Group AB (or other persons who may be employed or engaged in compliance roles) for the purpose of assisting in conducting conflict checks or fulfilling internal compliance obligations, provided that such disclosure is necessary, proportionate, and subject to appropriate safeguards as set out in section 2.2.2 of AGRD Partners' Code of Professional Conduct. In addition, where a client files a complaint under the procedures established for review of complaints, the individuals designated to assess or investigate such complaints (including any persons engaged to support the assessment or investigation) might be given access to personal data necessary for the purpose of reviewing the matter as further outlined in section 2.2.2 of AGRD Partners' Code of Professional Conduct.

In certain circumstances, we may also be required to disclose personal data upon request from authorities or to third parties in connection with legal proceedings, mergers and acquisitions, or similar processes.

8. TRANSFERS OF PERSONAL DATA OUTSIDE THE EU/EEA

In certain cases, our processing of personal data—whether carried out directly by us or through our service providers—may involve the transfer of personal data to countries outside the EU/EEA ("**Third Countries**"). When such transfers occur, we ensure that appropriate safeguards are in place to protect your personal data in accordance with this Notice and applicable data protection laws. These safeguards include:

- (i) Transfers to countries deemed adequate by the EU Commission, meaning the country ensures an adequate level of data protection; or
- (ii) Implementation of valid transfer mechanisms, such as the EU Commission's Standard Contractual Clauses ("SCCs") for controller-to-controller or controller-to-processor transfers, where the destination Third Country is not recognized as providing adequate protection under point (1).

If the applicable SCCs are rendered ineffective due to the laws of the recipient country, we will implement additional technical, organizational, or contractual measures to ensure an adequate level of data protection for transfers under point (2).

For more information about our international data transfers and the safeguards we apply, please contact us at privacy@synchlaw.se.

9. COOKIES AND SIMILAR TECHNOLOGIES

Cookies and similar technologies (such as pixels, tags, and local storage) are small data files stored on your device when you visit a website. They are commonly used to make websites function, remember your preferences, analyze usage, or track your behavior for advertising and analytics purposes.

At Synch, we believe in a privacy-first approach. That's why our website does **not** use cookies or any similar tracking technologies apart from cookies that are necessary for the functionality of our website. We do not collect or store information about your browsing behavior for analytics, advertising, or profiling.

Your visit here is private and free from unnecessary tracking—just the way we think the internet should be.

10. YOUR DATA PROTECTION RIGHTS

Under the GDPR, you have certain data protection rights which you can exercise by submitting a request at privacy@synchlaw.se. Once we receive your request we will respond as promptly as possible and, in any event, within one month. Please note that, before taking any action, we may ask you to verify your identity to ensure your request is handled securely.

The table below provides an overview of your rights, including any applicable conditions or limitations that may affect how each right can be exercised:

YOUR RIGHT	WHAT DOES IT MEAN IN PRACTISE	CONDITIONS AND LIMITATIONS
Right to access	You have the right to access and request a copy of the personal data we process about you, along with relevant supplementary information. To help us respond accurately and efficiently, we kindly ask that you clarify the nature of your request by indicating whether you are seeking: (a) confirmation of whether we process your personal data; (b) a copy of specific personal data; and/or (c) particular supplementary information not already included in this Notice that you would like us to provide.	We may restrict access where disclosure would adversely affect the rights and freedoms of others, reveal confidential business information, or where we are legally prevented from sharing specific data. In such cases, we will inform you of the reason for the restriction, unless we are legally prohibited from doing so.
Right to rectification	You have the right to challenge the accuracy of your personal data at any time and/or request that incomplete data is complete. We encourage you to inform us promptly of any inaccuracies or changes—such as updates to your contact details—so we can ensure your information remains accurate and up to date.	Depending on the purpose of the processing, we may ask you to provide a supplementary statement to verify the accuracy of your updated personal data.
Right to erasure	In certain circumstances, you have the right to have your personal data erased—commonly referred to as the "right to be forgotten." This may apply, for example, when the data is no longer necessary for the purpose for which it was collected or when we no longer have a legal basis for processing it.	Please note that this right is not absolute. There are several lawful reasons why we may not be able to fulfil a request for erasure, including: (i) compliance with a legal obligation; (ii) the establishment, exercise, or defence of legal claims; or (iii) the existence of another lawful basis for processing your personal data.

Right to objection	You have the right to object to the processing of your personal data at any time. When you exercise this right, we will stop processing your data unless we can demonstrate compelling legitimate grounds to continue the processing. However, you have an absolute right to object to the use of your personal data for direct marketing purposes. To help us respond appropriately, please specify the purpose(s) of processing to which you are objecting, where possible, so we can ensure our actions align with your expectations.	This right is only applicable where the processing is based on our legitimate interest which does not override your rights and freedoms.
Right to restriction	By exercising this right, you can limit the way we process your personal data for a certain period of time. This right may serve as an alternative to requesting erasure—particularly if you prefer that your data not be deleted. Where possible, please specify the duration for which you would like the processing to be restricted, so we can ensure our actions align with your expectations.	 You have the right to request the restriction of processing in certain circumstances, such as: When you contest the accuracy of your personal data; When you believe your personal data has been unlawfully processed and you oppose its erasure; When we no longer need the data for our purposes, but you require it to establish, exercise, or defend a legal claim.
Right to withdraw consent	You have the absolute right to withdraw your consent to any processing for which you have previously given consent at any given time.	This concerns processing activities performed based on your consent as a leagal basis. If you withdraw your consent, it will only take effect in regard to future processing.
Right to not be subject to automated decision making	You have the right not to be subject to decisions based solely on automated processing, including profiling, that produce legal effects or similarly significant consequences for you. We do not use automated decision-making or profiling and all decisions involving your personal data are reviewed and made by a human.	

In any case, if you have any comments, concerns, or complaints regarding our processing of your personal data, we encourage you to contact us directly using the contact details provided in Section 2 of this Notice.

You also have the right to lodge a complaint with the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten – IMY), which is the supervisory authority for personal data matters in Sweden. You can contact IMY using the details below:

Integritetsskyddsmyndigheten

Box 8114, 104 20 Stockholm

Email: imy@imy.se
Phone: 08-657 61 00
Website: www.imy.se

Please note that IMY generally requires you to first attempt to resolve your complaint with us before they will investigate the matter.

11. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update or amend this Privacy Notice at any time. The most recent version will always be available at www.synchlaw.se.

If we make material changes that affect how your personal data is processed, we will inform you in advance and explain what the changes mean for you. Where required by applicable law, we will also seek your consent.

We encourage you to review the Privacy Notice periodically to stay informed about how we protect your personal data. Changes that are purely editorial in nature—such as corrections of typographical errors, formatting, or other minor adjustments that do not affect your rights—may be made without prior notice.