

Privacy policy

Lindfors & Co Attorneys at Law Ltd (“**LCO**”) processes personal data in accordance with applicable data protection legislation, including the General Data Protection Regulation (2016/679; “**GDPR**”).

This privacy policy describes how and for what purposes LCO process personal data and what rights the data subjects have with respect to their personal data.

1. Purposes of processing

LCO process personal data for the following purposes:

- LCO processes personal data in order to open client assignments and to provide services to its clients. Personal data in LCO’s client register is collected and processed mainly in order to manage and perform client engagements as well as for invoicing purposes. Such data may contain e.g. names, contact details, information on counterparties and invoicing information of our clients’ or their representatives. Depending on the legal matter, this information may also contain sensitive personal data related to the matter assigned to LCO;
- LCO processes personal data in order to identify clients as required in the applicable anti-money laundering legislation;
- LCO processes personal data in order to maintain client relationships and conduct marketing activities. LCO may, for instance, send invites to events organized by the firm or provide information on news and updates relating to LCO; and
- LCO processes personal data of applicants in recruitment processes for the purposes of making recruiting decisions.

2. Data subject’s rights

In accordance with applicable privacy legislation the data subjects have the following rights concerning the collection and processing of their data:

- right to access their own personal data;
- right to request the controller to rectify incomplete or incorrect personal data;
- right to erasure (‘right to be forgotten’) unless there is a legitimate ground not to erase their data;
- right to restriction of processing their personal data in cases where e.g. erasure is pending;
- right to data portability in a commonly used format;
- right to object to the processing of their personal data under certain circumstances;
- right to withdraw their consent on data processing at any time without it affecting the lawfulness of processing based on consent prior to withdrawal; and
- right to lodge an appeal at the local supervisory authority if they consider the controller’s processing of personal data unlawful.

If a data subject wishes to exercise his/her rights, he/she should contact LCO at office@lindforsco.com.

3. Categories of personal data and the sources of it

LCO may process personal data of the following categories:

- basic identifying data, including name and contact details (such as email address, telephone number and address); title and association with the client entity, such as work tasks and title; personal identification number, where appropriate;
- identifying information about LCO’s private clients, company representatives and beneficial owners; identifying information as provided for in the Finnish Act on Preventing Money Laundering and Terrorist Financing (444/2017) (for example name, date of birth, personal identification number, citizenship, passport copy, and information to determine the client’s financial status and level of political influence);
- client information, including information regarding the contractual relation between the client and LCO; personal data that is received while we provide our services or that we need for invoicing (for example email messages and other communications, documents, name, email address, title, position, employer’s name)

- Information provided to LCO for the purposes of attending meetings and events (for example name, email address, dietary requirements);
- information on recruitment, which includes educational information and information concerning on-going and former work experience;
- automatically collected data, i.e. data collected by our website cookies as specified below and e.g. information about whether you have opened and read an email message we have sent you; and
- personal data is usually collected directly from the data subjects or from the client's representative but can also be collected from open sources.

4. Disclosure of personal data

Personal data is processed by LCO's employees and, as a general principle, not disclosed to third parties, unless required by applicable legislation, authorities or the performance of the client assignment. However, personal data may be disclosed to third parties in the event that LCO wishes to appoint external processors or sub-processors. In that case, LCO will enter into a data protection agreement with the service provider in order to secure a safe and appropriate processing of personal data.

Personal data subject to this Privacy Policy is located primarily in within the European Union.

It is not excluded that LCO's service providers transfer personal data to third countries. When personal data is located in servers located outside EU/EEA, transfer of personal data is protected by measures such as Standard Contractual Clauses adopted by the European Commission or equivalent appropriate legal safeguards adopted by the General Data Protection Regulation. Transfer of personal data may also be protected by selecting data recipients that are certified to the EU-U.S. and Swiss-U.S. Privacy Shield frameworks.

5. Storing of personal data

Personal data subject to this privacy policy is safeguarded from any and all parties outside of LCO by technical, organizational and physical safeguards.

The right to access personal data is limited to the necessary personnel of LCO who are obliged to process the collected personal data with confidentiality.

In the event of a breach on the measures taken to safeguard data subjects' personal data in a way that effects privacy any data subject, LCO will notify the affected data subjects and the necessary authorities timely as required by relevant legislation.

LCO does not store personal data for longer than is legal and necessary for the purposes of the processing of such data. The period of storing varies according to the nature of the data and the purpose for which it has been collected and processed.

6. Cookies

LCO's website uses cookies. Cookies are small text files that a website places on your computer or mobile device when you visit a website. Some of the cookies are essential for you to use some of the features of the website. Cookies collect information in an anonymous form, and LCO does not use this data to identify its website visitors even if the technologies used would make such identification possible.

You may refuse to accept cookies from the LCO website and delete existing cookies by selecting the appropriate settings on your browser. If you wish to do so, please refer to your browser's user guide to find out how to control cookies by adjusting your browser's preferences. Please note that if you refuse cookies, some features on LCO's website may not function optimally.

LCO's website may also include links to third party website. Such third parties use their own cookies and apply their own separate privacy policies.