

## DATA PROTECTION POLICY

This data protection policy ("Policy") describes how Lykke Schmidt Advokatfirma, as data controller, collects and processes your personal information in connection with your use of our website and our services and connection with the fulfilment of agreements for the delivery of services and products as well as solutions of tasks.

Lykke Schmidt is determined to fulfil its obligations regarding processing personal data in accordance with applicable Danish law and EU legislation around data protection (GDPR). The purpose of Policy is to provide you with information about our processing of your personal data and how we ensure compliance with the GDPR.

## **1 PROCESSING OF PERSONAL DATA**

Lykke Schmidt receives personally identifiable information when taking on assignments and/or delivering services and products.

Lykke Schmidt processes this information according to written internal instructions that ensure confidentiality and that the processing takes place in accordance with both the EU Data Protection Regulation and the Data Protection Act.

### 2 CONTACT INFORMATION

Happiness Schmidt Advokatfirma, Company No. 43772694, Jernbanegade 23, DK-4000 Roskilde, Telephone +45 4056 0602, is the data controller for the personal data received and processed.

Questions regarding the processing of personal data are directed to <u>info@LykkeSchmidt.com</u>.

### **3 PURPOSE**

Personal information is processed to carry out the assignments and deliver the services or products that Lykke Schmidt has undertaken or is required to do according to applicable law or to protect Lykke Schmidt's legitimate interests in asserting, clarifying or defending its legal claims. Social security numbers and sensitive personal data such as health information, trade union membership, religion, sexual orientation etc., are processed per the Data Protection Act requirements.

The Law on Money Laundering authorizes the processing of personal data in its area.

Lykke Schmidt only processes personally identifiable information to the extent necessary in relation to the execution of the assignment and delivery of the services that Lykke Schmidt has undertaken.

Information that is processed mainly comes from our clients but can also come from counterparties, other parties, courts, public authorities, open public registers, etc. Lykke Schmidt continuously ensures that only correct, updated information is processed.

### 4 FINANCE AND CASE MANAGEMENT

Lykke Schmidt uses the E-conomic accounting system and the Legis 365 attorney system, and a data processing agreement has been entered into with the suppliers. Personally identifiable information is passed on to use the systems.

All material, including inquiries regarding the individual cases, is archived electronically and, in some cases, physically on the cases.

### 5 TRANSFER OF PERSONALLY IDENTIFIABLE INFORMATION

When processing Lykke Schmidt's assignment, it may be necessary to transfer personally identifiable information to courts, public authorities, and other parties in the case. It may also be necessary to transfer information authorized by law, e.g. the Ant-Money Laundering Act and the Accounting Act. Finally, if any assignment includes services or deliverables from the consulting company Lykke Schmidt ApS (the Trade Compliance House), (Company no. 41144815), Lykke Schmidt may transfer personal information to the Trade Compliance House if relevant or required for the Lykke Schmidt and/or the Trade Compliance to fulfill its obligation under the assignment and/or applicable law.

By engaging Lykke Schmidt or placing an order, the client consents to Lykke Schmidt sharing and transferring personal data as described above.

Personally identifiable information is deleted no later than 10 years after completing the assignment. The period has been determined considering Lykke Schmidt's obligations under the Accounting Act and the Anti-Money Laundering Act and the possibility of dealing with legal liability cases.

Personal information is not passed on for marketing purposes and is not transferred to countries outside the EU/EEA unless a separate agreement has been entered into.

# 6 THE DATA SUBJECT'S RIGHTS

## 6.1 Right of access

Upon request, Lykke Schmidt grants a registered person the right to access the personal data it processes if Lykke Schmidt's duty of confidentiality does not cover the information.

## 6.2 Right of rectification

Incorrect, objective data processed about a data subject may require rectification by the data subject. The registered person has the right to have any illegally processed information deleted from Lykke Schmidt.

## 6.3 Data portability

A registered person has the right to data portability by receiving the information that the person himself has given Lykke Schmidt in a standard, machine-readable format.

## 6.4 Right to object

In some instances, the data subject can object to processing his personal data. If the data subject has the right to have the processing restricted, Lykke Schmidt will only process the information, apart from storage, with the consent of the data subject or to establish, assert or defend legal claims or to protect a person or vital community interests.

### 6.5 Right to be forgotten.

If the personal data is no longer necessary to fulfil the purpose of collection, e.g. if the legal basis ceases, or if the data subject's legitimate interest in the data being deleted is more critical than Lykke Schmidt's interest in the data being stored, the data subject can request that the datapoint be deleted. Regarding the data subject's rights, please refer to the Data Protection Authority's guidance on the data subject's rights, which can be found at <u>www.datatilsynet.dk</u>.

## 7 COMPLAINT TO THE DANISH DATA PROTECTION AUTHORITY

The registered person has the right to complain to the Danish Data Protection Authority about the way Lykke Schmidt processes the person's personal data. The Danish Data Protection Authority's contact information can be found at <u>www.datatilsynet.dk</u>.

June, 2023