

Privacy notice for legal advice and case work

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This privacy notice explains how Bruun & Hjejle Advokatpartnerselskab ("**Bruun & Hjejle**") processes personal data in connection with providing legal advice and performing case work in relation to

- i) General case work
- ii) Addendum for legal advice on employment law
- iii) Addendum for private clients
- iv) Addendum for transfers of businesses, transactions, real estate transactions and company registrations

Bruun & Hjejle has a duty of confidentiality about almost all information, including personal data, in our case work. This privacy notice therefore only provides selected general information on the processing of personal data.

Abbreviations used in this privacy notice:

- **GDPR:** The Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
- **DPA:** Act No. 502 of 23 May 2018 on supplementary provisions to the regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the Danish Data Protection Act)

This privacy notice will be updated on an ongoing basis.

1. Overview of the processing activities

We collect and process the following categories of personal data for the purposes and on the legal basis stated below:

i) General legal advice and case work			
Data subjects	Personal data	Purpose	Legal basis
<ul style="list-style-type: none"> • Contacts with clients which are companies or law firms 	<p><u>Personal data</u></p> <ul style="list-style-type: none"> • Contact details (name, e-mail, address, phone number) • Employer and position • Data related to case work such as negotiations or dispute resolutions • View on the cooperation • Activity logging if granted access to data room or other file sharing service 	<ul style="list-style-type: none"> • Contact with the data subject • Entry into an agreement with the client on legal services, ongoing advisory services and case work • Management of the client relationship • Evaluation of the cooperation • Submissions to ranking agencies by Bruun & Hjejle • Compliance with legislation as well as rules for lawyers and law firms • To document activity in relation to case handling 	<ul style="list-style-type: none"> • Bruun & Hjejle's legitimate interests in providing legal advice, performing case work and evaluating the cooperation, making submissions to ranking agencies as well as in establishing, exercising and defending legal claims, cf. article 6(1)(f) of the GDPR • Bruun & Hjejle's compliance with the rules on professional conduct of lawyers, cf. article 6(1)(c) and (f) of the GDPR • Bruun & Hjejle's legitimate interests in logging access to personal data, cf. article 6(1)(f) of the GDPR
<ul style="list-style-type: none"> • Clients' opposing parties (in person and opposing parties' contacts) • Clients' and opposing parties' customers, suppliers, advisers, business partners, etc. and contacts with these, including employees, executive 	<p><u>Personal data</u></p> <ul style="list-style-type: none"> • Contact details (name, e-mail, address, phone number) • Employer and position • Education, training, professional experience and other, including current, duties, experience and business connections • Contact from or to Bruun & Hjejle and our clients 	<ul style="list-style-type: none"> • Contact with the data subject • Providing legal advice to and case work for Bruun & Hjejle's clients • Compliance with legislation as well as rules for lawyers and law firms 	<ul style="list-style-type: none"> • Bruun & Hjejle's legitimate interests in providing legal advice, performing case work and in establishing, exercising and defending legal claims, cf. article 6(1)(f) and article 9(2)(f) of the GDPR, cf. sections 8 and 11 of the DPA • Personal data have clearly been made public by the data subject

<p>board, board of directors, etc.</p> <ul style="list-style-type: none"> Witnesses, experts and expert witnesses (whether appointed by a party or a court or other types of experts) in cases for or against Bruun & Hjejle's clients 	<ul style="list-style-type: none"> Depending on the case; for instance, contents of a negotiation or dispute, civil registration number, data on financial matters and contractual relationships <p><u>Special categories of personal data</u></p> <ul style="list-style-type: none"> Depending on the case; for instance, data on criminal offences, health data and other sensitive data 		<p>and the data controller has a legitimate interest in processing the data, cf. article 6(1)(f) and article 9(2)(e) of the GDPR</p> <ul style="list-style-type: none"> Bruun & Hjejle's compliance with the rules on professional conduct of lawyers, cf. article 6(1)(c) and (f) of the GDPR
<ul style="list-style-type: none"> Lawyers and other representatives or advisers to clients, other parties, opposing parties, witnesses, etc. 	<p><u>Personal data</u></p> <ul style="list-style-type: none"> Contact details (name, e-mail, address, phone number) Employer and position Contact from or to Bruun & Hjejle and our clients Data related to case work such as negotiations or disputes Disputes concerning the rules on professional conduct of lawyers 	<ul style="list-style-type: none"> Contact with the data subject in connection with advice and case work Compliance with legislation as well as rules for lawyers and law firms 	<ul style="list-style-type: none"> Bruun & Hjejle's legitimate interests in providing legal advice, performing case work and in establishing, exercising and defending legal claims, cf. article 6(1)(f) of the GDPR Compliance with the rules on professional conduct of lawyers, cf. article 6(1)(c) and (f) and article 9(2)(f) of the GDPR, cf. section 8 of the DPA
<ul style="list-style-type: none"> Employees at public authorities, courts and arbitration institutes and tribunals Contacts with for instance auction houses or insurance companies 	<p><u>Personal data</u></p> <ul style="list-style-type: none"> Contact details (name, e-mail, address, phone number) Employer and position Contact from or to Bruun & Hjejle and our clients 	<ul style="list-style-type: none"> Contact with the data subject Enquiries and requests for access to documents as well as permits Advice to and case work for Bruun & Hjejle's clients 	<ul style="list-style-type: none"> Bruun & Hjejle's legitimate interests in providing legal advice, performing case work and evaluating the cooperation as well as in establishing, exercising and defending legal claims, cf. article 6(1)(f) of the GDPR

used as advisers in connection with case resolution		<ul style="list-style-type: none"> • Compliance with legislation as well as rules for lawyers and law firms 	<ul style="list-style-type: none"> • Bruun & Hjejle's compliance with the rules on professional conduct of lawyers, cf. article 6(1)(c) and (f) of the GDPR
<ul style="list-style-type: none"> • Persons mentioned in company reports 	<p>Personal data</p> <ul style="list-style-type: none"> • Information from LinkedIn profiles • Information from the Danish Central Business Register • Information from BIQ • Contact from or to Bruun & Hjejle and our clients 	<ul style="list-style-type: none"> • Processed by the lawyers in connection with the case work for and advice to Bruun & Hjejle's clients 	<ul style="list-style-type: none"> • Bruun & Hjejle's legitimate interests in providing legal advice, performing case work and evaluating the cooperation as well as in establishing, exercising and defending legal claims, cf. article 6(1)(f) of the GDPR • Bruun & Hjejle's compliance with the rules on professional conduct of lawyers, cf. article 6(1)(c) and (f) of the GDPR
<ul style="list-style-type: none"> • Persons participating in meetings 	<p>Recordings of meeting participants at</p> <ul style="list-style-type: none"> • Physical meetings • Virtual meetings • Telephonic meetings 	<ul style="list-style-type: none"> • Recordings of meetings and/or conversations in relation to case work, such as drafting referrals etc. 	<ul style="list-style-type: none"> • Bruun & Hjejle's processing of recordings of meetings and/or conversations is based on consent, cf. article 6(1)(a) of the GDPR, cf. section 6(1) of the DPA
<ul style="list-style-type: none"> • Natural persons and ultimate owners of legal entities 	<p>personal data (incl. confidential personal data)</p> <ul style="list-style-type: none"> • Name • Birth date and place of birth • Contact details • Address • National identification number • Financial information and • Tax and asset information 	<ul style="list-style-type: none"> • Bruun & Hjejle's advice may be of such a nature that it must be reported to the Danish Tax Agency as a result of EU-based rules on reporting of certain arrangements (EU Directive no. 2018/822 ("DAC6")). We always assess 	<ul style="list-style-type: none"> • Compliance with legal obligations under tax legislation (DAC6), cf. Article 6(1)(c) and article 9(2)(f) of the GDPR, cf. sections 7, 8 and 11 of the DPA • Bruun & Hjejle's reporting to the Danish Tax Agency on your behalf is based on consent, cf. article

		<p>whether arrangements should be reported to the Danish Tax Agency under DAC6</p> <ul style="list-style-type: none"> • Reporting to the Tax Administration under DAC6 on behalf of an individual 	6(1)(a) of the GDPR, cf. section 6(1) of the DPA
ii) Addendum for legal advice on employment law			
Data subjects	Personal data	Purpose	Legal basis
<ul style="list-style-type: none"> • Clients and their existing and former employees, executive officers and board members • Opposing parties to clients (in person and their existing or former employees) • Witnesses in cases for or against Bruun & Hjejle's clients • Clients' and opposing parties' customers, suppliers, business partners, etc. and contacts with these, including employees, executive board, board of directors, etc. 	<p><u>Personal data</u></p> <ul style="list-style-type: none"> • Depending on the case; for instance, salary data, data on employment matters such as employment contracts, title, working hours, etc., residence and work permits, data on conflicts including violations of terms or legislation, relations to colleagues and customers, assessments as well as intended and imposed penalties etc. <p><u>Special categories of personal data</u></p> <ul style="list-style-type: none"> • Depending on the case; data on criminal offences, health data, including pregnancy/parental leave, as well as trade union membership and other sensitive data, religious or philosophical beliefs 	<ul style="list-style-type: none"> • Contact with the data subject • Providing legal advice and performing case work within employment law, including preparation of employment contracts, termination notices, severance agreements, etc. • Compliance with legislation as well as rules for lawyers and law firms 	<ul style="list-style-type: none"> • Bruun & Hjejle's legitimate interests in providing legal advice, performing case work and in establishing, exercising and defending legal claims, cf. article 6(1)(f) and article 9(2)(f) of the GDPR, cf. sections 7, 8 and 11 of the DPA • Personal data have clearly been made public by the data subject and the data controller has a legitimate interest in processing the data, cf. article 6(1)(f) and article 9(2)(e) of the GDPR • Bruun & Hjejle's compliance with the rules on professional conduct of lawyers, cf. article 6(1)(c) and (f) of the GDPR

iii) Addendum for private clients			
Data subjects	Personal data	Purpose	Legal basis
<ul style="list-style-type: none"> Parties/clients in the case such as the testator, heir, married couples, lessees, etc. Deceased Principals External parties of importance to for instance the estate of the deceased, the transaction or the litigation. 	<p><u>Personal data</u></p> <ul style="list-style-type: none"> Contact details (name, e-mail, address, phone number) Data on financial matters, including matrimonial property regime as well as information regarding ownership of companies Dispositions as testator Dispositions as principal Insurance data Data on employment law regarding employees National identification number Copy of passport Other data for the case work (the specific data of the case – depending on the individual case) <p><u>Special categories of personal data</u></p> <ul style="list-style-type: none"> In connection with administration of estates of deceased persons; Trade union membership and health data 	<ul style="list-style-type: none"> Providing legal advice, including in connection with matters concerning family and inheritance law, e.g. drawing up of wills, marital contracts and proxies Administration of estates of deceased persons, including in connection with litigations as well as transactions concerning e.g. securities, real estate and companies To make the necessary registration and reporting, including in relation to the Danish Tax Agency, financial institutions, mortgage credit institutes, insurance companies, the Danish Business Authority etc. Compliance with legislation as well as rules for lawyers and law firms 	<ul style="list-style-type: none"> Bruun & Hjejle's legitimate interests in providing legal advice, performing case work and in establishing, exercising and defending legal claims, cf. article 6(1)(b) and (f) and article 9(2)(f) of the GDPR, cf. sections 7, 8 and 11 of the DPA Compliance with legal obligations under the Danish Administration of the Estates of Deceased Persons Act, the Danish Inheritance Act, the Danish act on division of matrimonial property, tax legislation, etc., cf. article 6(1)(c) and article 9(2)(f) of the GDPR, cf. sections 7, 8 and 11 of the DPA Bruun & Hjejle's compliance with the rules on professional conduct of lawyers, cf. article 6(1)(c) and (f) of the GDPR

iv) Addendum for business transfers, transactions, real estate transactions and company registrations			
Data subjects	Personal data	Purpose	Legal basis
<ul style="list-style-type: none"> • Business owners, members of board of directors, executive board, employees, customers and suppliers as well as other parties involved in a business transfer/transaction • Real estate owners, tenants and other parties in a real estate transaction • Persons who are to be registered in a public register in connection with transactions • Persons who are to identify themselves towards a client or an opposing party 	<p><u>Personal data</u></p> <ul style="list-style-type: none"> • Contact details (name, e-mail, address, phone number) • All information in data rooms, for instance salary data, data on employment matters such as employment contracts, title, working hours etc., residence and work permits, data on conflicts including violations of terms or legislation, information on tenancy, deeds, relations to colleagues and customers, assessments as well as intended and imposed penalties etc. • Private addresses, passport copies, national identification numbers and other identity information, e.g. health insurance cards or driver's licenses, expenditures etc. • Transcripts from public registers • Information about decisions taken in minutes of board meetings • Insurance policies for employees and management members <p><u>Special categories of personal data</u></p> <ul style="list-style-type: none"> • Data on criminal offences, health data, including pregnancy/parental leave, as well 	<ul style="list-style-type: none"> • Providing legal advice, including in connection with the sale and purchase of businesses, purchase and sale of real estate and other transactions and company registrations • Compliance with legislation as well as rules for lawyers and law firms • To conduct registrations with public authorities • To make a positive identification of individuals 	<ul style="list-style-type: none"> • Bruun & Hjejle's legitimate interests in providing legal advice, performing casework, e.g. in connection with comparison of lists of tenancy with leases as well as collecting rent and handling disputes, and in establishing, exercising and defending legal claims, cf. article 6(1)(c) and (f) and article 9(2)(f) of the GDPR, cf. sections 7, 8 and 11 of the DPA • Compliance with legal obligations set out in the Danish Companies Act, the Danish Land Registration Act, the Danish Anti-Money Laundering Act as well as financial legislation in Denmark and abroad, including guidelines issued by public authorities etc., cf. article 6(1)(c) and article 9(2)(f) of the GDPR, cf. §§ 7, 8 and 11 of the DPA • Bruun & Hjejle's legitimate interests in complying with the rules

	as trade union membership and other sensitive data, religious or philosophical beliefs		on professional conduct of lawyers, cf. article 6(1)(c) and (f) of the GDPR
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2. Sources

The personal data are collected directly from you or from your employer, lawyer, other adviser or third parties, for instance public authorities such as the Danish Tax Agency, the Danish Civil Registration System, clients, opposing parties, auditors, the police, etc. The source depends on the specific circumstances of the case.

3. Voluntariness

When we collect personal data directly from you, in most cases you give us the personal data voluntarily, or to be able to enter into or perform a contract with us or a third party, or to be able to exercise a legal claim. In some cases, you are obligated to provide us with these data, for instance national identification number for reporting to the tax authorities in connection with the administration of the estates of deceased persons.

If you do not provide these personal data, the consequence - depending on the specific circumstances - may be that we cannot fulfil the purposes mentioned above, that we cannot manage the client relation and possibly not maintain it, that we cannot meet our obligations as a lawyer/trustee, etc. or that we cannot meet our obligations to public authorities.

4. Disclosure to third parties

Depending on the specific circumstances, the personal data may be disclosed to third parties, if necessary, to comply with legal obligations or if it takes place in connection with advice and case work. Disclosure may for instance be made to the following recipients:

- Public authorities, such as the Danish Business Authority, the Danish Tax Agency, the Danish Competition and Consumer Authority and the Danish Financial Supervisory Authority, the courts, arbitration institutes and boards, the police, external legal advisers, financial advisers, other lawyers, auditors, financial institutions, including mortgage credit institutes, insurance companies, or third parties such as businesses investigating some matters or providing advice on other matters, including taxation.

5. **Transfer of personal data to data processors**

We transfer personal data to our data processors, who, among other things, supply our IT systems, including hosting, backup, and support. Depending on the specific case, it may be necessary to use other data processors such as ad hoc translators or external IT investigators.

6. **Transfer of personal data to third countries**

We transfer personal data to third countries if this takes place in connection with the management of the client relationship or the case work. In such cases, we ensure a transfer basis for instance in the form of the European Commission's standard contractual clauses etc. for data transfers to third countries whose security level is not deemed adequate by the European Commission. Transfer may in other circumstances be necessary in order to establish, exercise or defend legal claims.

7. **Storage period**

We generally store personal data for 15 years after a case is closed. This retention period has been determined by taking into account the Danish Limitation Act and the rules on professional conduct of lawyers on the storage of case data. If specific circumstances dictate it, we will store data for a shorter or longer period of time, for instance when it comes to legislative documents. Any recordings of meeting participants will be deleted as soon as the purpose of the recording is no longer present.

Log information about activity in data rooms and file sharing solutions is stored in accordance with the other documentation related to the individual case, and the storage period depends on the type of case.

8. **Your rights**

You have the following rights - on the terms and subject to the exceptions provided by law, for instance in relation to the duty of confidentiality of lawyers:

- The right of access to the personal data processed about you
- The right to have incorrect and incomplete personal data rectified
- The right to have personal data erased

- The right to restrict the processing of personal data
- The right to data portability when electronic processing is based on a contract or a consent, i.e. the right to receive personal data given by you to Bruun & Hjejle in a structured, commonly used and machine-readable format as well as the right to transmit those data to another data controller
- The right to object to the processing of personal data when the processing is based on legitimate interests or public interests

You also have the right to file a complaint with the Danish Data Protection Agency. Further information is available at the agency's website: <https://www.datatilsynet.dk/english>

The right to object

You have the right - for reasons relating to your particular situation - to object to the processing of personal data where the legal basis is public or legitimate interests, as stated above. Bruun & Hjejle shall then no longer process the personal data unless Bruun & Hjejle demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims.

About consent

If you have given consent to one of the above processing purposes, you have the right to withdraw your consent at any time. It is always voluntary whether you give consent. If you withdraw your consent, the withdrawal will, however, not affect the processing based on the consent prior to the withdrawal. The consent can be withdrawn by contacting Bruun & Hjejle at gdpr@bruunhjejle.dk.

9. Contact information

If you have any questions about the processing of your personal data or about how you may exercise your rights, you are welcome to contact us at

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