

PRIVACY POLICY

SCHWARTZ & PARTNERS ADVOKATPARTNERSELSKAB

Date: 27 February 2026

This is an unofficial English translation of the firm's Danish privacy policy ("Persondatapolitik"). In the event of any discrepancy, the Danish original prevails.

Contents

1. Background.....	2
2. Data controller	2
3. Basis for processing personal data	2
4. Categories of personal data	3
5. Disclosure of personal data	3
6. Transfer to third countries	4
7. Sources for obtaining personal data.....	4
8. Storage of personal data.....	4
9. Automated decisions, profiling	4
10. Withdrawal of consent.....	4
11. Right of access.....	5
12. Data portability.....	5
13. Right to rectification.....	6
14. The right to be forgotten.....	6
15. Right to object and right not to be subject to automated decisions.....	6
16. Right to restriction of processing activities	6
17. Handling of requests.....	7
18. Changes to the privacy policy	7
19. The Danish Data Protection Agency.....	7

1. Background

- 1 This privacy policy describes how personal data is processed in connection with any contact with Schwartz & Partners, whether as a client, business partner, supplier, guest, party to a case, etc. It also sets out the rights that apply in connection with the processing of personal data.
- 2 All personal data is processed securely and confidentially. Internal procedures have been established for, among other things, the deletion, storage and disclosure of personal data in order to safeguard the integrity, confidentiality and security of the personal data. Personal data is processed solely for explicitly specified and legitimate purposes, and no processing takes place that is incompatible with those purposes.
- 3 Schwartz & Partners' data protection efforts are based on the risk assessments prepared by the firm.
- 4 All employees at Schwartz & Partners are subject to a duty of confidentiality.

2. Data controller

- 5 Schwartz & Partners is generally the data controller for the processing of personal data.

Contact details:

Schwartz & Partners Advokatpartnerselskab, CVR no. 46293924, Ny Carlsbergvej 80, 1799 Copenhagen V, tel. +45 33 170 370, info@sp-law.dk.

- 6 Should Schwartz & Partners exceptionally act as a data processor, this will be stated upon contact with Schwartz & Partners. The processing of personal data in that context follows the principles set out in this privacy policy.

3. Basis for processing personal data

- 7 Personal data is collected for the processing purposes set out below, the specific processing depending on the relationship with Schwartz & Partners.
 1. Legal practice.
 2. Improvement of advisory services and other services.
 3. Marketing and teaching activities.
 4. Statistics.
 5. Optimisation of the website.
 6. Compliance with legislation to which Schwartz & Partners is subject, including for example the Anti-Money Laundering Act, the Administration of Justice Act, the Bookkeeping Act and the Code of Conduct for the Danish Bar and Law Society.
 7. To enable Schwartz & Partners and the clients it represents to defend against or establish legal claims.
- 8 Personal data is processed by Schwartz & Partners on the legal basis of GDPR Article 6(1)(c) and GDPR Article 9(2)(b) (in order to comply with a legal obligation to which Schwartz & Partners is subject); GDPR Article 6(1)(b) (in order to perform a contract to which the person is a party, or in

order to take steps at the person's request prior to entering into a contract); GDPR Article 9(2)(f) (legal claims may be established, asserted or defended – both for clients and for Schwartz & Partners); GDPR Article 6(1)(f) (the pursuit of a legitimate interest, unless the person's interests or fundamental rights and freedoms override it); or GDPR Article 6(1)(a) and GDPR Article 9(2)(a) (consent to the processing of personal data for one or more specific purposes).

4. Categories of personal data

9 Schwartz & Partners processes only the personal data necessary to fulfil the specific purpose of the processing. The personal data processed depends on your relationship with Schwartz & Partners. Set out below are the categories of personal data most frequently processed.

Ordinary personal data such as: name, address, email, telephone number, CVR registration, land-registry registrations, employment circumstances, employment, gender, citizenship, marital status, family circumstances, IP address, etc.

Confidential personal data such as: passport number, civil registration (CPR) number, financial information (e.g. salary income, loans, investments, debt, assets, bank details, accounts, etc.), pension and insurance information, litigation, criminal record information, social problems, etc.

Sensitive personal data such as: information about trade-union and unemployment-fund membership, information about illness and health, etc.

5. Disclosure of personal data

10 In some situations, personal data is disclosed to a range of actors, including authorities and data processors, as necessary to carry out the tasks to be performed. Examples of authorities to which information is disclosed may be the courts, the Money Laundering Secretariat or the Danish Tax Agency. Examples of data processors to which information is disclosed may be IT providers.

11 When a contractual relationship is entered into with a supplier who becomes a data processor for Schwartz & Partners, a data processing agreement is concluded that meets the requirements for data processing agreements in GDPR Article 28(3). Ongoing checks are carried out on the data processor's compliance with the GDPR and the provisions of the data processing agreement. It is always possible to obtain information about which data processors Schwartz & Partners uses by using the contact details in section 2.

6. Transfer to third countries

12 Schwartz & Partners' processing of personal data generally takes place within the EU/EEA.

13 If it is necessary to transfer personal data to a third country or international organisation located outside the EU/EEA, it is ensured before the transfer that the transfer is made to a safe third country/organisation for which the EU Commission has decided that the level of protection is adequate, or that the transfer is made on another basis that provides sufficient guarantees that personal data is protected, for example through the use of the EU Commission's standard contractual clauses on data protection.

7. Sources for obtaining personal data

14 Personal data is obtained directly from clients, parties to cases, third parties, public authorities, banks, insurance companies, accountants, the courts, other advisers, former employers, colleagues, clients, the IT devices used (IP addresses), sanctions lists and from the transactions carried out at Schwartz & Partners. Data is obtained on an ongoing basis.

8. Storage of personal data

15 Schwartz & Partners stores personal data only for as long as is necessary to fulfil the purpose for which it was collected.

16 Personal data relating to cases is stored for 10 years from the date the case is archived. Specific types of cases may, due to special limitation rules or on the basis of a specific assessment, be stored for up to 30 years.

17 If a person (natural or legal) has been associated with a case as a party, the name and date of birth / CVR number is retained in order to be able to search for conflicts of interest, as required under the Code of Conduct for the Danish Bar and Law Society.

18 A copy of identification information obtained in connection with carrying out customer due diligence procedures under the Anti-Money Laundering Act, to which Schwartz & Partners is subject, is deleted 5 years after the client's last case covered by the Anti-Money Laundering Act has been archived, cf. section 30(2) of the Anti-Money Laundering Act.

9. Automated decisions, profiling

19 Schwartz & Partners does not use automated decisions or profiling in connection with personal data.

10. Withdrawal of consent

20 If the processing of personal data is based wholly or partly on consent, such consent may be withdrawn at any time. The contact details in section 2 may be used.

21 If consent is withdrawn, this does not affect the lawfulness of the processing of personal data carried out on the basis of the consent previously given and up to the time of withdrawal.

11. Right of access

22 Generally, under GDPR Article 15, there is a right to obtain confirmation as to whether personal data concerning a party is being processed, and to be provided with a transcript or a copy of the personal data.

23 In addition, the following information must be provided: (i) the purposes of the processing and information about the categories of personal data concerned, including where the personal data originates from if it is not collected from the party itself; (ii) the recipients or categories of recipients to whom the personal data has been or will be disclosed, in particular recipients in third countries or international organisations; (iii) where possible, the envisaged period for which the personal data will be stored, or, if this is not possible, the criteria used to determine that period; (iv) the right to request rectification or erasure of personal data or restriction of the processing of personal data, or to object to such processing; (v) the right to lodge a complaint with a supervisory authority, including the Danish

Data Protection Agency. There is also a right to obtain information about appropriate safeguards if personal data has been transferred to third countries.

24 The right of access does not apply if the interest in disclosing the information must yield to overriding considerations of private interests, including consideration for the party itself. This includes, among other things, information covered by the duty of confidentiality applicable to lawyers, for which reason access to such information cannot be granted.

12. Data portability

25 Under GDPR Article 20, a person has the right to receive, in a structured, commonly used and machine-readable format, personal data concerning that person which the person has provided to Schwartz & Partners.

26 There is also a right to transmit this data to another data controller without hindrance from Schwartz & Partners, where the processing is based on consent or a contract and the processing is carried out by automated means. If the right to data portability is exercised, there is also a right to have personal data transmitted directly from one data controller to another, where technically feasible.

27 The right to data portability, which may be particularly relevant in connection with a change of lawyer, covers only data that has itself been provided to Schwartz & Partners, and covers only processing that is carried out by automated means and that is based on contractual consent.

13. Right to rectification

28 Under GDPR Article 16, a person has the right to obtain, without undue delay, the rectification by Schwartz & Partners of inaccurate personal data. Taking into account the purposes of the processing, there is a right to have incomplete personal data completed.

29 The right to rectification, however, concerns only objective personal data and not subjective assessments.

14. The right to be forgotten

30 Under GDPR Article 17, there is in certain cases a right to have registered personal data erased.

31 Erasure may be required, among other things, if the personal data is no longer necessary to fulfil the purposes for which it was collected; if there are legitimate interests in objecting to the processing that override the legitimate interests in storing the personal data; or if the personal data has been processed unlawfully.

32 Under GDPR Article 17(3), erasure cannot be required where the processing is necessary to comply with a legal obligation, or in order for legal claims to be established, asserted or defended, cf. GDPR Article 17(3)(b) and (e).

33 If Schwartz & Partners is obliged to erase personal data under Article 17 that has been disclosed to other data controllers or data processors, Schwartz & Partners must notify those data controllers or data processors that erasure of the personal data has been requested, cf. GDPR Article 19.

15. Right to object and right not to be subject to automated decisions

34 It follows from GDPR Articles 21 and 22 that an objection may be made at any time to the processing of personal data where the processing is based on GDPR Article 6(1)(e) (performance of a task carried out in the public interest) or (f) (legitimate interests), or on automated processing, including profiling.

35 If an objection is made, Schwartz & Partners may no longer process the personal data concerned, unless compelling legitimate grounds for the processing can be demonstrated that override the person's interests, or where the processing is necessary in order for legal claims to be established, asserted or defended.

36 This right does not apply where the processing is necessary for entering into or performing a contract between a person and Schwartz & Partners, where the processing has a basis in law, or where the processing is based on explicit consent.

16. Right to restriction of processing activities

37 Under GDPR Article 18, the processing of personal data may be restricted on request where: (i) the accuracy of the personal data is contested, but only for the period until it is possible to establish whether the personal data is correct; (ii) the processing is unlawful and erasure is opposed and restriction of use is requested instead; (iii) Schwartz & Partners no longer needs the personal data for the processing, but it is necessary in order for a legal claim to be established, asserted or defended; and (iv) an objection to the processing has been made pursuant to GDPR Article 21(1), but only for the period during which it is being verified whether Schwartz & Partners' legitimate interests override those of the data subject.

38 It follows from GDPR Article 21(2) that, where processing has been restricted, such personal data may, apart from storage, still be processed by Schwartz & Partners, among other things where consent is given, or where the processing is necessary in order for a legal claim to be established, asserted or defended.

17. Handling of requests

39 If a right is invoked, a request is handled within a maximum of 30 days. If, contrary to expectations, the handling should exceed this period, notification will be given. If a request cannot be complied with, a reasoned explanation will be provided.

18. Changes to the privacy policy

40 Schwartz & Partners may at any time and without notice amend this privacy policy with effect for the future. The most recently applicable privacy policy is made available at www.schwartzpartners.dk.

19. The Danish Data Protection Agency

41 There is an option to complain to the Danish Data Protection Agency (Datatilsynet) about the processing of personal data:

Datatilsynet
Carl Jacobsens Vej 35
2500 Valby

Telephone: +45 33 19 32 00

dt@datatilsynet.dk

www.datatilsynet.dk