Poul Schmith 7 DECEMBER 2022

## ESTABLISHMENT OF CLIENT RELATIONSHIPS, CLIENT RELATIONS AND MARKETING

TASK	PERSONAL DATA	PURPOSE	LEGAL BASIS	PERIOD	RECIPIENTS
Money laundering	Clients: - Personal data (non-sensitive) - Confidential personal data	Personal data are processed for the purpose of complying with the rules of the Anti-Money Laundering Act regarding know-your-customer procedures according to which Poul Schmith/Kammeradvokaten must obtain the documentation for money laundering checks.	The legal basis is a legal obligation (section 30(2) of the Danish Anti-Money Laundering Act) to which Poul Schmith/Kammeradvokaten is subject under the Danish Anti-Money Laundering Act and the Danish Administration of Justice Act, cf. Article 6(1), point (c) of the General Data Protection Regulation.  The legal basis for processing CPR numbers (identification numbers) is a legal obligation following from section 11(1), para (a) of the Danish Anti-Money Laundering Act, cf. the Danish Data Protection Act.	Deletion takes place not later than 5 years + current month after last time recording on the last case covered by the Anti-Money Laundering Act for the client in question.	Poul Schmith/Kammeradvokaten only discloses your personal data to the extent necessary and if there is a legal basis for doing so. It may be to public authorities, private businesses or persons, foundations, associations etc. depending on the nature of the matter. Poul Schmith/Kammeradvokaten passes on personal data to our data processors (e.g. IT suppliers). Transfers of personal data to non-EU/EEA countries, which have not been deemed safe by the European Commission, may take place through the provision of various transfer tools that provide appropriate safeguards. As an example we can mention conclusion of the European Commission's standard contractual clauses regarding data protection with the recipient and additional measures. In special cases, transfers to non-EU/EEA countries may also take place pursuant to Article 49(1) of the General Data Protection Regulation, e.g., in cases where the transfer is necessary for the establishment, exercise or defence of legal claims.

	Conflict of interest check	Clients:  — Personal data (non-sensitive)  — Confidential personal data	Personal data processed as part of the checks for potential conflicts of interest serve the purpose of complying with the code of legal ethics in this respect.	The legal basis is a legal obligation (the code of legal ethics in 12) to which Poul Schmith/Kammeradvokaten is subject under the code of legal ethics and the Danish Administration of Justice Act, see Article 6(1), point (c) of the General Data Protection Regulation.	Personal data processed in connection with conflicts of interest checks are kept for 20 years after archiving of the file, unless the matter, as an exception, has an extended deadline for erasure.	Poul Schmith/Kammeradvokaten only discloses your personal data to the extent necessary and if there is a legal basis for doing so. It may be to public authorities, private businesses or persons, foundations, associations etc. depending on the nature of the matter. Poul Schmith/Kammeradvokaten passes on personal data to our data processors (e.g. IT suppliers). Transfers of personal data to non-EU/EEA countries, which have not been deemed safe by the European Commission, may take place through the provision of various transfer tools that provide appropriate safeguards. As an example we can mention conclusion of the European Commission's standard contractual clauses regarding data protection with the recipient and additional measures. In special cases, transfers to non-EU/EEA countries may also take place pursuant to Article 49(1) of the General Data Protection Regulation, e.g., in cases where the transfer is necessary for the establishment, exercise or defence of legal claims.	
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CRM		Existing/potential customers, clients, business partners, networks etc and competitors:  - Personal data (non-sensitive)	Personal data on business partners, networks etc, competitors and existing and potential customers/clients are processed to improve the customer experience and to prepare tenders.	The processing is necessary for Poul Schmith's/Kammeradvokaten's pursuit of a legitimate interest, see Article 6(1), point (f) of the General Data Protection Regulation. The legitimate interest justifying the processing is marketing, including improvement of the customer experience and preparation of tenders.	The personal data are erased when their processing is no longer relevant, such as when there has been no customer activity for 2 years. Personal data are examined on an annual basis for the purpose of ensuring updating, high data quality and data minimization.	Poul Schmith/Kammeradvokaten only discloses your personal data to the extent necessary and if there is a legal basis for doing so. It may be to public authorities, private businesses or persons, foundations, associations etc. depending on the nature of the matter.  Poul Schmith/Kammeradvokaten passes on personal data to our data processors (e.g. IT suppliers). Transfers of personal data to non-EU/EEA countries, which have not been deemed safe by the European Commission, may take place through the provision of various transfer tools that provide appropriate safeguards. As an example we can mention conclusion of the European Commission's standard contractual clauses regarding data protection with the recipient and additional measures. In special cases, transfers to non-EU/EEA countries may also take place pursuant to Article 49(1) of the General Data Protection Regulation, e.g., in cases where the transfer is necessary for the establishment, exercise or defence of legal claims.
(does	nts, webinars and network s not include <sup>-</sup> alent Network)	Members, clients and potential clients:  — Personal data (non-sensitive)	Personal data are processed for the following purposes:  — to set up a membership; — to draw up lists of members; — to prepare name badges; — to prepare course certificates; — Invoicing; — registration in the firm's client database — preparation of lists of participants — submission of lists of participants to event participants and speakers. — receipt of relevant marketing material, which comprises satisfaction surveys concerning the specific event,	The processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract, see Article 6(1), point (b) of the General Data Protection Regulation.  The data subject has consented to the processing of the personal data, see Article 6(1), point (a) of the General Data Protection Regulation. The consent concerns the processing of personal data for the purpose of submitting relevant marketing material, which	The personal data are erased when the data subject is no longer a member or when the network is closed down.  Personal data processed for the purpose of preparing lists of participants, sign-up for events, preparation of course certificates and name badges will be erased after 2 years.  Personal data processed for the purpose of registering participation in events and networks will be	Poul Schmith/Kammeradvokaten only discloses your personal data to the extent necessary and if there is a legal basis for doing so. It may be to public authorities, private businesses or persons, foundations, associations etc. depending on the nature of the matter. Poul Schmith/Kammeradvokaten passes on personal data to our data processors (e.g. IT suppliers). Transfers of personal data to non-EU/EEA countries, which have not been deemed safe by the European Commission, may take place through the provision of various transfer tools that provide appropriate

		follow-up on questions from the event, and sale of legal services	comprises satisfaction surveys concerning the specific event, follow-up on questions from the event, and marketing of legal services.	erased 5 years after receipt of the request for registration.  Invoices are erased not later than 5 years + current year after the invoice date.  Consent to submit relevant marketing material is automatically withdrawn not later than 3 years after the consent was given.	safeguards. As an example we can mention conclusion of the European Commission's standard contractual clauses regarding data protection with the recipient and additional measures. In special cases, transfers to non-EU/EEA countries may also take place pursuant to Article 49(1) of the General Data Protection Regulation, e.g., in cases where the transfer is necessary for the establishment, exercise or defence of legal claims.
Talent network	Applicants and network participants:  — Personal data (non-sensitive)	Personal data are processed for the following purposes:  - evaluation of the candidate - administration of the network - establishment of contact - ongoing registration of information that is relevant to registration in the firm's client database registration in the firm's client database.	The processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract, see Article 6(1), point (b) of the General Data Protection Regulation.	The personal data will be processed until the time when the network participant deregisters from the network. If the participant does not deregister from the Talent Network, the data will be processed for 6 months after graduation.  If the data subject has not participated actively in the Talent Network during a calendar year (from 1 January to 31 December), the data subject will be automatically deregistered from the network, unless the data subject confirms that the data subject wishes to remain in the network.  Personal data on applicants that are not included in the Talent Network will be erased not later than 6 months after receipt of the application.	Poul Schmith/Kammeradvokaten only discloses your personal data to the extent necessary and if there is a legal basis for doing so. It may be to public authorities, private businesses or persons, foundations, associations etc. depending on the nature of the matter.  Poul Schmith/Kammeradvokaten passes on personal data to our data processors (e.g. IT suppliers). Transfers of personal data to non-EU/EEA countries, which have not been deemed safe by the European Commission, may take place through the provision of various transfer tools that provide appropriate safeguards. As an example we can mention conclusion of the European Commission's standard contractual clauses regarding data protection with the recipient and additional measures. In special cases, transfers to non-EU/EEA countries may also take place pursuant to Article 49(1) of the General Data Protection Regulation, e.g., in cases where the transfer is necessary for the establishment, exercise or defence of legal claims.

Newsletters and requested marketing	Clients and other interested parties:  — Personal data (non-sensitive)	Personal data are processed for marketing purposes, ie sending out newsletters, requested marketing material and invitations to events. We use tracking tags in connection with sending out newsletters. Tracking tags are necesary in order to be able to register whether emails are opened and links in newsletters are clicked on so that we can improve user experience and optimise the planning of sending out newsletters.	The data subject has consented to the processing of personal data for one or more specific purposes, see Article 6(1), point (a) of the General Data Protection Regulation.	The personal data are erased when the data subject unsubscribes from the newsletter or when Poul Schmith/Kammeradvokaten ceases to send out newsletters in the area concerned.	Poul Schmith/Kammeradvokaten only discloses your personal data to the extent necessary and if there is a legal basis for doing so. It may be to public authorities, private businesses or persons, foundations, associations etc. depending on the nature of the matter.  Poul Schmith/Kammeradvokaten passes on personal data to our data processors (e.g. IT suppliers). Transfers of personal data to non-EU/EEA countries, which have not been deemed safe by the European Commission, may take place through the provision of various transfer tools that provide appropriate safeguards. As an example we can mention conclusion of the European Commission's standard contractual clauses regarding data protection with the recipient and additional measures. In special cases, transfers to non-EU/EEA countries may also take place pursuant to Article 49(1) of the General Data Protection Regulation, e.g., in cases where the transfer is necessary for the establishment, exercise or defence of legal claims.
Social media (Facebook, Lir Twitter, Instagram and YouT	itiative has made available on the names	Personal data are processed as part of Poul Schmith's/Kammeradvokaten's communication and marketing activities on social media. For example, the data subject may indicate his or her email address in a commentary track of a posting, and thereby obtain access to a trial period for a digital product.	Poul Schmith/Kammeradvokaten has a legitimate interest in making content available at social media for marketing purposes, see Article 6(1), point (f) of the General Data Protection Regulation.	Personal data related to any of Poul Schmith's/Kammeradvokaten's postings may be erased not later than 3 years after publication.  Comments not related to a posting by Poul Schmith/Kammeradvokaten are erased when the data subject removes its comment.	Poul Schmith/Kammeradvokaten only discloses your personal data to the extent necessary and if there is a legal basis for doing so. It may be to public authorities, private businesses or persons, foundations, associations etc. depending on the nature of the matter. Poul Schmith/Kammeradvokaten passes on personal data to our data processors (e.g. IT suppliers). Transfers of personal data to non-EU/EEA countries, which have not been deemed safe by the European Commission, may take place through the provision of various transfer tools that provide appropriate

	safeguards. As an example we can
	mention conclusion of the European Commission's standard contractual clauses regarding data protection with the recipient and additional measures.
	In special cases, transfers to non- EU/EEA countries may also take place pursuant to Article 49(1) of the General Data Protection Regulation, e.g., in cases where the transfer is necessary
	for the establishment, exercise or defence of legal claims.

ACTION	AUTHOR	APPROVED	BY DATE	VERSION
Clarification of processing in connection with newsletters and requested marketing	SDFR	JNO	28-03-2023	1.4
Information regarding personal data transfers to non-EU/EEA countries	LBEN	SDFR	07-12-2022	1.3
Updating of form regarding compliance with the duty to inform	SDFR	SDFR	11-08-2022	1.2
Updating of form regarding compliance with the duty to inform	LBEN/SDFR	SDFR	14-06-2022	1.1
Drafting of form regarding compliance with the duty to inform	MSKO	JNO	June 2019	1.0