# Privacy policy


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## Contact details of the data controller

Söderberg & Partners Wealth Services AB (556907-5582)

Söderberg & Partners
Box 7785
103 96 Stockholm

08-451 50 00
WealthServices@soderbergpartners.se

## Categories of personal data

**Contact information –** Information used to contact you, such as your email address and phone number.

**Cookies** – A small text file with information about your settings and preferences that is saved in your browser when you visit the website.

**Corporate involvement** – Information about your involvement in companies, e.g. board assignments, shareholding in companies and what degree of involvement you have in the company (i.e. passive or active involvement).

**Employment information** – Data related to your employment, such as position, employer and type of employment.

**Family relationships** – Information about your family relationships, e.g. about your marriage status, partner, number of children and other close relatives.

**Financial information** – Information about your financial status, such as details of your income, any liabilities or assets. The data may also include account details, custody details and property information.

**Identity data –** Data used to identify you, such as your name and date of birth.

**Insurance information** – Information about your insurance, e.g. occupational pension, other personal insurance, or any life insurance.

**Social security number** – Information such as social security number and coordination number (if applicable) used to securely identify you. In some cases, we use national ID number and passport number, when necessary.

**Tax-related data** – Data related to your tax, e.g. tax liability after calculation. In some cases, we also treat religious affiliation (i.e. if you are a member of the Church of Sweden) if it is required to calculate your final tax.

## Our processing of personal data

Our processing of personal data depends on the relationship you have with us. You can read more about how we process your personal data by clicking on the respective heading below.

### Family law

We enter into agreements with you to deliver legal and family law advice and to draw up legal documents, for example regarding wills, prenuptial agreements, cohabitation agreements, future power of attorney. In addition, other advice in Swedish private law. In order to provide you with correct advice and draw up legal documents, we need to process your personal data.

#### What personal data is processed?

The information we process about you is employment information, family relationships, financial information, identity data, contact information and social security number. In some cases, we also have information about company involvement and insurance information.

#### Is the data required or is it voluntary?

The information we have about you is required for us to be able to provide advice in family law and to draw up family law documents according to agreement.

#### From which sources do we collect your personal data?

We collect the information directly from you and from authorities or companies if you have given us a power of attorney to do so.

#### For what purposes do we process your personal data?

##### *Counselling*

We process data in the form of identity data, financial information, family relationships and employment information in order to be able to provide appropriate legal advice based on your situation.

##### *Preparation and archiving of documents*

We process data in the form of identity data, contact information, social security number, financial information, family relationships in order to be able to establish and, if you wish, archive relevant documents on your behalf.

##### *Documentation*

We process data in the form of identity data, contact information, financial information, family relationships, social security number and employment information in order to document our advice and other measures that we take at your request.

##### *Booking of meetings*

We process information in the form of identity data (name only), your social security number and your contact information for the purpose of administering the booking of consultation meetings with you. We then also process any notes you enter in the free text field.

##### *Secure identification*

For certain types of signatures, we process your identity data, contact information and your social security number in order to enable secure identification when signing with mobile Bank ID.

## On what legal basis do we process your personal data?

The legal basis for the processing is the performance of the contract we have with you.

## Who are the recipients of your personal data?

The information we process about you can be sent to the Swedish Tax Agency, the Swedish Financial Supervisory Authority, the Swedish Companies Registration Office, the National Land Survey and any consultants. The recipients are located in Sweden or within the EU/EEA. In addition, your personal data may be shared with other companies for marketing purposes if you have approved it.

## Transfer to third countries

Our processing primarily takes place in Sweden or within the EU/EEA. In isolated cases, we use suppliers or subcontractors where personal data may be transferred outside the EU/EEA (so-called "third countries"), for example to the UK or the USA. This could be in special situations where crisis management and support are necessary and the necessary expert personnel are not available within the EU/EEA. In these cases, we ensure that measures are taken to meet the protection requirements of Article 46 of the GDPR, for example by ensuring that the EU-commission has recognized that the recipient country offers an adequate level of data protection or through the EU Commission's Standard Contractual Clauses (SCC), supplemented by encryption and data minimisation. You can read more about which countries have been assessed as offering an adequate level of data protection and what this means here (https://www.imy.se/verksamhet/dataskydd/det-har-galler-enligt-gdpr/overforing-till-tredje-land/adekvat-skyddsniva/). You can read more about the European Commission's SCC here (https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).

## How long do we store your personal data?

We will retain your personal data for as long as is necessary with regard to our agreement and the period within which claims for damages can be made, which normally corresponds to 11 years after the termination of the agreement.

## Automated decision-making

We do not perform automated decision-making based on your personal data.

## Tax

We enter into agreements with you to deliver tax law advice and draw up tax law documents, for example regarding income tax returns, tax return attachments, review cases, claims to authorities, and other written statements. In order to provide you with correct advice and draw up tax documents, we need to process your personal data.

## What personal data do we process?

Employment information, family relationship information, financial information, identity data, contact information, social security number, and tax-related data. In some cases, we also process information about company involvement and insurance information.

## Is the data required or is it voluntary?

The information we collect from you is required for us to be able to provide advice.

## From which sources do we collect your personal data?

We collect the information directly from you as well as from employers, companies you represent and external financial companies if you have given us a power of attorney to obtain it.

## For what purposes and purposes do we process your personal data?

### *Counselling*

We process your identity data, your tax-related data, financial information, corporate involvement, family relationships and employment information. In some cases, we also process insurance information. The purpose of the processing is to provide you with proper advice regarding your taxation.

### *Represent you in relation to authorities*

When we have a power of attorney, we process identity data, your tax-related data, financial information, corporate involvement, family relationships and employment information for the purpose of representing you in relation to various authorities, such as a court or the Swedish Tax Agency.

### *Preparation and archiving of documents*

We process identity data, contact details, social security numbers, your tax-related data, financial information, corporate involvement, family relationships and employment information in order to be able to establish and, if you wish, archive relevant documents on your behalf.

### *Documentation*

We process identity data, contact details, social security numbers, your tax-related data, financial information, corporate involvement, family relationships and employment information for the purpose of documenting our advice and other actions that we take at your request.

### *Booking of meetings*

We process your identity data (name only), your social security number and your contact information for the purpose of administering the booking of consultation meetings with you. We then also process any notes you enter in the free text field.

### *Secure identification*

For certain types of signatures, we process your identity data, contact information and your social security number in order to enable secure identification when signing with mobile Bank ID.

## On what legal basis is the personal data processed?

The legal basis for the processing is the performance of the contract we have with you.

## Who are the recipients of the personal data?

The information we process about you can be sent to the Swedish Tax Agency, the Swedish Companies Registration Office, the National Land Survey, auditors lawyers or another person or authority that needs the information in order for us to be able to fulfill our agreement with you. We may also share your contact information with other companies for marketing purposes if you have approved it.

## Transfer to third countries

Our processing primarily takes place in Sweden or within the EU/EEA. In isolated cases, we use suppliers or subcontractors where personal data may be transferred outside the EU/EEA (so-called "third countries"), for example to the UK or the USA. This could be in special situations where crisis management and support are necessary and the necessary expert personnel are not available within the EU/EEA. In these cases, we ensure that measures are taken to meet the protection requirements of Article 46 of the GDPR, for example by ensuring that the EU-commission has recognized that the recipient country offers an adequate level of data protection or through the EU Commission's Standard Contractual Clauses (SCC), supplemented by encryption and data minimisation. You can read more about which countries have been assessed as offering an adequate level of data protection and what

this means here (https://www.imy.se/verksamhet/dataskydd/det-har-galler-enligt-gdpr/overforing-till-tredje-land/adekvat-skyddsniva/). You can read more about the European Commission's SCC here (https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).

### How long do we store your personal data?

We will retain your personal data for as long as is necessary with regard to our agreement and the period within which claims for damages can be made, which normally corresponds to 11 years after the termination of the agreement.

### Automated decision-making

We do not perform automated decision-making based on your personal data.

## Entrepreneurial service

We enter into an agreement with you to deliver advice, handle the administration and draw up documents related to both your companies and your personal finances. In order to provide you with correct advice and draw up relevant documents, we need to process your personal data.

### What personal data is processed?

Employment information, company involvement, family relationships, financial information, identity data, contact information and social security number. In some cases, we also process insuranceinformation.

### Is the data required or is it voluntary?

The information we have about you is required for us to be able to perform advice.

### From which sources do we collect your personal data?

We collect the information directly from you or the company you represent as well as financial information from external custodian banks if you have given us a power of attorney to obtain it.

### For what purposes do we process your personal data?

#### *Counselling*

We process your identity data, tax information, financial information, corporate involvement, family relationships and employment information. In some cases, we also process insurance information. The purpose of the processing is to provide you with correct advice regarding your and your companies' total finances as well as legal and tax law aspects.

#### *Represent you in relation to authorities*

When we have a power of attorney, we process identity data, contact information, social security number, tax information, financial information, company involvement, family relationships and employment information for the purpose of representing you in relation to various authorities, such as a court or the Swedish Companies Registration Office.

#### *Documentation*

We process identity data, contact details, social security numbers, tax information, financial information, corporate involvement, family relationships and employment information for the purpose of documenting our advice and other actions that we take at your request.

#### *Preparation and archiving of documents*

We process identity data, contact information, social security number, tax information, financial information, company involvement, family relationships and employment information in order to be able to establish and, if you wish, archive relevant documents on your behalf.

*Booking of meetings*

We process your identity data (name only), your social security number and your contact information for the purpose of administering the booking of consultation meetings with you. We then also process any notes you enter in the free text field.

*Secure identification*

For certain types of signatures, we process your identity data, contact information and your social security number in order to enable secure identification when signing with mobile Bank ID.

## On what legal basis do we process your personal data?

The legal basis for the processing is the execution of the agreement we have with you and in some cases our legal obligations under the Accounting Act.

## Who are the recipients of your personal data?

The information we process about you can be sent to the Swedish Tax Agency, the Swedish Financial Supervisory Authority, the Swedish Companies Registration Office and external auditors. The recipients are located in Sweden or within the EU/EEA. In addition, your personal data may be shared with other companies for marketing purposes if you have approved it.

## Transfer to third countries

Our processing primarily takes place in Sweden or within the EU/EEA. In isolated cases, we use suppliers or subcontractors where personal data may be transferred outside the EU/EEA (so-called "third countries"), for example to the UK or the USA. This could be in special situations where crisis management and support are necessary and the necessary expert personnel are not available within the EU/EEA. In these cases, we ensure that measures are taken to meet the protection requirements of Article 46 of the GDPR, for example by ensuring that the EU-commission has recognized that the recipient country offers an adequate level of data protection or through the EU Commission's Standard Contractual Clauses (SCC), supplemented by encryption and data minimisation. You can read more about which countries have been assessed as offering an adequate level of data protection and what this means here (https://www.imy.se/verksamhet/dataskydd/det-har-galler-enligt-gdpr/overforing-till-tredje-land/adekvat-skyddsniva/). You can read more about the European Commission's SCC here (https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).

## How long do we store your personal data?

We will retain your personal data for as long as is necessary with regard to our agreement and the period within which claims for damages can be made, which normally corresponds to 11 years after the termination of the agreement.

## Automated decision-making

We do not perform automated decision-making based on your personal data.

## Business services

We enter into agreements with you to deliver accounting-related services regarding your companies and / or business activities and to draw up relevant documents, for example regarding company declarations, applications to authorities (such as the Swedish Companies Registration Office and the Swedish Tax Agency, etc.), as well as other written documents that are necessary to be able to manage the companies' and business operations' operation in accordance with applicable legislation and customs at any given time. In order to provide you with correct advice and draw up relevant documents, we need to process your personal data.

## What personal data is processed?

Employment information, family relationships, financial information, identity data, contact information and social security number.  In some cases, we also process information about company involvement and insurance information.

## Is the data required or is it voluntary?

The information we hold about you is required for us to provide advice and/or accounting services.

## From which sources do we collect your personal data?

We collect the information directly from you or the company you represent as well as financial information from external custodian banks if you have given us a power of attorney to obtain it

## For what purposes do we process your personal data?

### *Counselling*

We process your identity data, financial information, company involvement, family relationships and employment information in order to be able to provide appropriate advice for your companies and / or business based on your situation.

### *Preparation of documents*

We process identity data, contact information, social security number, financial information, company involvement, family relationships and employment information in order to be able to draw up relevant documents on behalf of your company and / or business.

### *Documentation*

We process identity data, contact information, social security number, financial information, company involvement, family relationships and employment information for the purpose of documenting our advice and other measures that we take at your request.

### *Represent you in relation to authorities*

When we have a power of attorney, we process identity data, contact information, social security number, financial information, company involvement, family relationships and employment information for the purpose of representing you in relation to various authorities, such as a court or the Swedish Companies Registration Office.

### *Booking of meetings*

We process your identity data (name only), your social security number and your contact information for the purpose of administering the booking of consultation meetings with you. We then also process any notes you enter in the free text field.

### *Secure identification*

For certain types of signatures, we process your identity data, contact information and your social security number in order to enable secure identification when signing with mobile Bank ID.

## On what legal basis do we process your personal data?

The legal basis for the processing is the execution of the agreement we have with you and our legal obligations under the Accounting Act.

## Who are the recipients of your personal data?

The information we process about you can be sent to the Swedish Tax Agency, the Swedish Financial Supervisory Authority, the Swedish Companies Registration Office and external auditors. The recipients are located in Sweden or within the EU/EEA. In addition, your personal data may be shared with other companies for marketing purposes if you have approved it.

### Transfer to third countries

Our processing primarily takes place in Sweden or within the EU/EEA. In isolated cases, we use suppliers or subcontractors where personal data may be transferred outside the EU/EEA (so-called "third countries"), for example to the UK or the USA. This could be in special situations where crisis management and support are necessary and the necessary expert personnel are not available within the EU/EEA. In these cases, we ensure that measures are taken to meet the protection requirements of Article 46 of the GDPR, for example by ensuring that the EU-commission has recognized that the recipient country offers an adequate level of data protection or through the EU Commission's Standard Contractual Clauses (SCC), supplemented by encryption and data minimisation. You can read more about which countries have been assessed as offering an adequate level of data protection and what this means here (https://www.imy.se/verksamhet/dataskydd/det-har-galler-enligt-gdpr/overforing-till-tredje-land/adekvat-skyddsniva/). You can read more about the European Commission's SCC here (https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).

### How long do we store your personal data?

We will retain your personal data for as long as is necessary with regard to our agreement and the period within which claims for damages can be made, which normally corresponds to 11 years after the termination of the agreement.

### Automated decision-making

We do not perform automated decision-making based on your personal data.

## Relatives of our customer

If a relative of yours is a customer of ours, we may ask questions about family circumstances and financial situation, which may affect the advice to your relative.

### What personal data is processed?

Identity data (name), family relationships and financial information.

### Is the data required or is it voluntary?

It is voluntary for your relative to provide the information.

### From which sources do we collect your personal data?

We collect the information from your relative who is a customer of ours.

### For what purposes do we process your personal data?

The purpose of the processing is to provide advice to our customer and live up to the legal requirements for documentation that apply to our business.

### On what legal basis do we process your personal data?

The legal basis for the processing is the execution of the agreement we have with your relative.

### Who are the recipients of your personal data?

The information we have about you is not passed on to third parties.

### Transfer to third countries

Our processing primarily takes place in Sweden or within the EU/EEA. In isolated cases, we use suppliers or subcontractors where personal data may be transferred outside the EU/EEA (so-called "third countries"), for example to the UK or the USA. This could be in special situations where crisis management and support are necessary and the necessary expert personnel are not available within

the EU/EEA. In these cases, we ensure that measures are taken to meet the protection requirements of Article 46 of the GDPR, for example by ensuring that the EU-commission has recognized that the recipient country offers an adequate level of data protection or through the EU Commission's Standard Contractual Clauses (SCC), supplemented by encryption and data minimisation. You can read more about which countries have been assessed as offering an adequate level of data protection and what this means here (https://www.imy.se/verksamhet/dataskydd/det-har-galler-enligt-gdpr/overforing-till-tredje-land/adekvat-skyddsniva/). You can read more about the European Commission's SCC here (https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).

### How long do we store your personal data?

We will retain your personal data for as long as is necessary with regard to our agreement and the period within which claims for damages can be made, which normally corresponds to 11 years after the termination of the agreement.

### Automated decision-making

We do not perform automated decision-making based on your personal data.

## Marketing

We may market our services to you through, for example, telemarketing, newsletters and event invitations. Our website also uses cookies which is created when you log in to one of our websites. This processing is completely voluntary and can be objected to at any time.

### What personal data is processed?

Within the framework of our marketing, we may process your employment information , your identity data and your contact information. If you participate in an event we organize, we may also process information about allergies, if you provide it to us.

Of the above information, we only use those that are necessary for the type of marketing we carry out.

Our websites and applications use cookies. A cookie is a small text file with information about your settings and preferences that is saved in your browser when you visit the website. When we use cookies, we process information about your IP address, your browsing habits and your visit history. For more information about the cookies we use see (**link to cookie policy**).

If you want to be placed on our block list where you make it clear that you no longer want any direct marketing communication from us, we may process the types of contact information that you choose to put on the block list.

### Is the data required or is it voluntary?

It is up to you whether we may use your personal data to market our or our partners' services. You can find more information on how to object to us using your personal data for marketing purposes under the heading **Right to object**. In addition, you can always choose whether you want to allow our website to place cookies, which are not necessary for the website to work, in your browser or not.

Providing information about allergies or other food preferences is voluntary after consent has been obtained and your consent can be revoked at any time. However, a revoked consent means that we can no longer accommodate your possible wishes regarding allergies or food preferences.

## From which sources do we collect your personal data?

We collect information directly from you, other companies that your employer and/or the company that you represent is a customer of and with which we cooperate, as well as from external address providers.

## For what purposes do we process your personal data?

### *Telemarketing*

We process your identity data and contact information in order to market our services and enable contact with you.

### *Event*

We process your identity data and contact information for the purpose of producing guest lists and providing information to you about events that we are planning and/or that you have accepted. We also process information about any allergies, in cases where you provide them to us. We will then obtain your specific consent for this processing.

### *Newsletter*

We process identity data (name only) and contact details (e-mail address only) for the purpose of sending you newsletters. We send out newsletters to you who have chosen to subscribe via our website and to you who are a customer provided that you do not object to this. For more information about the newsletter, see here (Link to newsletter).

### *Contact form*

We process identity data (name only) and contact information for the purpose of contacting you in the case you want to be contacted. The purpose of the processing is for the appropriate person or department to be able to help and respond to what you want help or information about.

### *Block list*

We process the contact information or contact information that you choose to put on the block list in order to live up to our legal obligation to have an internal marketing block list.

### *Cookies*

The purpose of our processing of personal data derived from cookies is to improve your user experience on our website. This is done through follow-up of web statistics to improve the website's content, appearance and functionality. The purpose is also to ensure that our website works, to analyze visitor statistics and to be able to provide relevant marketing and relevant offers to you through web advertising. In order for us to be able to target marketing and offers that are relevant to you as a visitor, we sometimes make selections based on your browsing habits and visitor statistics on our website. It may then happen that some visitors receive offers that others do not receive, based on so-called profiling.

To read more about specific cookies and their use, please see our Cookie Policy (link).

## On what legal basis do we process your personal data?

We have a legitimate interest of marketing our services. In our balance of interests, we have taken great care that you who receive the marketing should not be surprised or unduly disturbed by our marketing. We also have a legitimate interest of analyzing data in order to improve your user experience on the website.

We carry out targeted marketing and profiling based on your consent when you have approved marketing cookies. If you have consented to marketing cookies, you can withdraw your consent to these at any time. Read more about how to change cookie settings under "Manage cookie settings" and in our Cookie Policy which can be found here https://www.soderbergpartners.se/om-oss/personuppgifter-cookies/cookies/.

If we process information about allergies or other food preferences before an event, we will, via each event's registration form, collect your consent first. If you have given your consent, you have the right to withdraw your consent at any time. However, a revoked consent means that we can no longer accommodate your possible wishes regarding allergies or food preferences.

For the block list, our legal basis is the fulfillment of our legal obligation to have a functioning block list.

### Who are the recipients of your personal data?

Information about you is disclosed to companies that help us with our marketing or our events.

Your contact information may also be shared with selected partners for marketing purposes, provided that you do not object.

### Transfer to third countries

Our processing primarily takes place in Sweden or within the EU/EEA. In isolated cases, we use suppliers or subcontractors where personal data may be transferred outside the EU/EEA (so-called "third countries"), for example to the UK or the USA. This could be in special situations where crisis management and support are necessary and the necessary expert personnel are not available within the EU/EEA. In these cases, we ensure that measures are taken to meet the protection requirements of Article 46 of the GDPR, for example by ensuring that the EU-commission has recognized that the recipient country offers an adequate level of data protection or through the EU Commission's Standard Contractual Clauses (SCC), supplemented by encryption and data minimisation. You can read more about which countries have been assessed as offering an adequate level of data protection and what this means here (https://www.imy.se/verksamhet/dataskydd/det-har-galler-enligt-gdpr/overforing-till-tredje-land/adekvat-skyddsniva/). You can read more about the European Commission's SCC here (https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).

### How long is your personal data stored?

We save your information for as long as necessary depending on the type of marketing we carry out. Regarding telemarketing, events and the contact form, we store your personal data for a maximum of six months, or until you decline further contact. Once you have chosen to subscribe to our newsletter, we will retain your data for as long as you have subscribed to the newsletter.

Please see our cookie policy for information on the storage period regarding cookies (link to cookie policy).

### Automated decision-making

We do not perform automated decision-making based on your personal data.

## Your rights

**What rights do I have and how do I use them?**

If we process personal data about you, you have a number of rights under the GDPR that you can use. If you are unsure whether we process information about you, you also have the right to receive information about whether we do or not. See the list below where we describe in more detail your rights and how you should go about using them.

## Right of access

You have the right to receive confirmation of whether we process personal data about you and in such cases to access your personal data (also called "register extract"). You also have the right to receive a copy of your personal data being processed. You have the right to receive a register extract free of charge showing what personal data is registered about you, the purposes of the processing and the categories of personal data to which the processing relates.

If you wish to receive a register extract, you can apply for this by submitting the application form that you find here.

## Right to rectification

You have the right to request that any incorrect information about you be corrected and also demand that we limit our processing of your personal data while we investigate your request. You also have the right to request a supplement to any incomplete information we hold about you.

If you wish to have information corrected, you can request this by submitting the application form that you will find here.

## Right to erasure ("Right to be forgotten")

Under certain conditions, you have the right to have the information we process about you deleted. You have the right to have your personal data deleted if:

- the personal data is no longer necessary for the purposes of the processing,
- you withdraw your consent on which the processing is based,
- if you have objected to the processing that is supported by a balance of interests and we are not considered to have a legitimate interest in continued processing that outweighs your interest,
- if the processing is for direct marketing purposes and you object to the processing of the data,
- the personal data have been unlawfully processed, or
- if deletion is required to comply with a legal obligation.

We are not always able to comply with a request for deletion. For example, there may be legal requirements that require us to retain the personal data or if we need the information to be able to fulfill an agreement with you.

In case you wish to have information deleted, you can request this by submitting the application form that you find here.

## Right to restriction

You have the right to request that our processing of your personal data be restricted. A restriction can be made for several reasons.

- If you dispute that the personal data we process about you is correct, you can request a restricted processing while we check whether the data is correct.

- If the document is unlawful and you object to the erasure of the personal data and instead request a restriction of use.

- If you have objected to a processing that is based on a balance of interests that we have used as a legal basis for a purpose, you can request a restricted personal data processing while we work to assess whether our legitimate interests outweigh your legitimate interest.

- If we as a controller no longer need the personal data for the purposes of the processing but you need them to be able to establish, exercise or defend legal claims.

If a restriction occurs, we may only, in addition to storing the data, process the data for the establishment, exercise or defense of legal claims, to protect someone else's rights or because you have given your consent. If you have had the processing of your personal data restricted, we will inform you before the restriction of processing ends.

In case you wish to have information restricted, you can request this by submitting the application form that you find here.

### Right to object

You have the right to object at any time to our processing of your personal data based on a balance of interests as a legal basis (legitimate interest) including profiling. Continued processing of your personal data requires us to show a legitimate interest that outweighs your interest in the processing in question. Otherwise, we may only process the data for the establishment, exercise or defense of legal claims.
You also have the right to object at any time to processing carried out for direct marketing purposes, including profiling to the extent that it is related to such direct marketing. If you have objected to processing for direct marketing purposes, we may no longer process your data for such purposes.
If you wish to object to our use of your personal data, you can request this by submitting the application form that you can find here.

### Right to Data Portability

In some cases, you have the right to have your personal data transferred in electronic format to another data controller (so-called "data portability"). This assumes that the transfer is technically possible and can be done in an automated way. The right to data portability applies to data that you have provided to us and that we process on the basis of performance of a contract or consent as legal bases.
If you wish to have data portability of your data, you can apply for this by submitting the application form available here.

## How is your data protected

We pursue a very ambitious information security programme. This means, among other things, that we have strong technical measures that protect all our information, such as firewalls and intrusion protection. In addition, we work with access control, which means that personal data is not accessible to more of our employees than is necessary for each employee to be able to perform their work. Finally, we impose at least as high security requirements on the suppliers who process personal data on our behalf.

## Questions & complaints

If you have questions or concerns regarding our personal data management that cannot be answered by this page, you are welcome to contact our switchboard (08-451 50 00), or email WealthServices@soderbergpartners.se.

We have appointed a Data Protection Officer who works to monitor compliance with the rules on the protection of personal data. Our Data Protection Officer can be reached via dataskyddsombudet@soderbergpartners.se.

If you think that we process information about you in a way that violates the Data Protection Regulation, you can primarily contact us through one of our communication channels above. If, after handling by us, you do not feel satisfied, you have the right to file a complaint with the Swedish Authority for Privacy Protection, which is responsible for the supervision of personal data processing in Sweden. The Swedish Authority for Privacy Protection can be reached via www.imy.se.