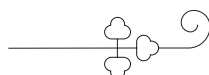




Groth & Co

Established 1869



Groth & Co KB Integrity Policy

Updated: August 2018

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VAT Reg No.
SE916642393001

1. Background

Groth & Co KB respect your privacy. This Integrity Policy (the "Integrity Policy") describes how we obtain and process your personal data. The Integrity Policy also describes your rights in relation to us and how you can assert these rights.

All our processing of your personal data is in accordance with our Integrity Policy and current data protection legislation, such as the General Data Protection Regulation (EU) 2016/679 ("GDPR"). We ask you to carefully read this Integrity Policy before you share any personal data with us.

2. Controller

Groth & Co KB, reg. No. 916642-3930, Box 6107, 102 32 Stockholm, gdpr@groth.eu. +46(0)8 729 9100, is the controller for the processing of your personal data as described in this Integrity Policy. That means that it is our obligation to make sure that all the processing is carried out in a safe manner and in accordance with applicable laws and regulations.

3. Scope

This Integrity Policy addresses the processing of all personal data of our existing and potential customers, suppliers, business partners ("parties") and its contact persons, representatives and any other physical person connected to such party ("contact persons"), job applicants, visitors to our website, subscribers to our marketing information and others who interact with us in any way.

4. How do we collect personal data?

4.1 Information from you

In general, we collect personal data directly or indirectly from you in a variety of ways, both online and offline, such as

- (a) when we are engaged or preparing, administering or performing assignments,
- (b) when we otherwise enter into, administer or perform agreements,
- (c) when you apply for a job or otherwise announce your interest in working with us,

- (d) when you log in to or use any of our systems,
- (e) when we meet at meetings, events, seminars, fairs, etc.,
- (f) when you sign up for our newsletter subscription service,
- (g) when you participate and sign up to participate in our events,
- (h) when you interact on our social medias,
- (i) when you visit our facilities,
- (j) when you participate in our surveys,
- (k) when you contact us through our website, by e-mail, letter or phone or face-to-face, or
- (l) when you in any other way interact with us.

4.2 Information from other sources

We may also collect personal information from the following sources:

- (a) party or person with connection to our assignment,
- (b) private or public records, such as intellectual property records, business registers and Infotorg as well as other records when our assignment, based on its nature, actualizes such needs,
- (c) other persons connected to the party for which you are a contact person,
- (d) our group companies,
- (e) websites owned by the party for which you are a contact person,
- (f) marketing and sales activity companies, as well as
- (g) your references and by recruitment consultants or other service providers employed in connection with recruitment.

4.3 What personal data do we process?

The categories of personal data that we process about you may be:

- (a) **Identity information**, such as national identification number, date of birth, name, initials, signature, nationality, copy of passport or other identity document, etc.
- (b) **Contact information**, both personal and professional, such as postal address, phone number, mobile phone number, e-mail address, fax number, employer, job title or role, work place, etc.
- (c) **Assignment information**, i.e. details regarding ongoing and former assignments, case name, case description, applicant, inventor, representative, information about what the assignment refers to and aims at, economic information regarding the customer, information about the location of the assets that will be used in the assignment, information whether the customer or a related person or employee thereof is a politically exposed person as well as name, occupation and position of such politically exposed person, information about beneficial ownership information of the customer, information in registration certificates or equivalent, intellectual property rights such as patents, trademarks and copyright, as well as rights holders, etc.
- (d) **Billing information**, such as billing address, reference person and other billing information, billing history, account information and other payment information, payment history, payment reminders, etc.
- (e) **Merit and recruitment information**, i.e. information about the applied appointment or appointment of interest, information in personal letter, resume and submitted credentials and other documents, information provided by references, test values, notes and summaries of interviews and conversations during the recruitment process, and summaries and analyses about you by recruitment consultant or other service provider in connection with recruitment, etc.
- (f) **Unique user information**, such as login ID, username, password, security question, etc.
- (g) **System and device information**, such as IP address, language

settings, browser type, browser settings, time zone, operating system, platform, screen resolution, response time, download error, your geographical location, etc.

- (h) **Traffic and usage information**, such as which links you click and when, which functions you use and when, how you reached and left the service, the address of the website from which you arrived, session time, session ID, delivery notifications when we contact you, etc.
- (i) **Marketing and event information**, such as which seminars and events you have attended, and which of our email newsletters you have read.

In addition, we may treat other categories of personal data that we collect or receive in connection with the performance of our assignments, depending on what the assignment, based on its nature, actualizes or provided by you or the party for which you are a contact person.

We will only process your national identification number if and to the extent that it is clearly motivated by the purpose of the treatment, the importance of a secure identification or other relevant reason or for necessary money laundering control.

We do not process sensitive personal data (i.e. special categories of personal data) about you, unless you choose to give us such information.

5. What do we do with your information?

5.1 The purposes of and legal basis for our processing of your personal data

Below we have compiled our various purposes with our processing of your personal data, the categories of personal data pertaining to the respective process, the legal basis for the processing and how long we store your personal data:

Purpose	Personal data	Legal basis	Storage period
Customers and assignments			
<p>Provide offers on our services</p> <p>E.g. to create, estimate and provide offers on our products and services.</p>	<p>Identity information</p> <p>Contact information</p> <p>Assignment information</p> <p>Billing information</p> <p>Other categories of personal data provided by you or the party for which you are a contact person</p>	<p><i>If to you personally</i></p> <p>Take steps at the request of you prior to entering into a contract</p> <p><i>If to a party for which you are a contact person</i></p> <p>Legitimate interest</p>	<p>Until the offer is denied or, if it is accepted, during our contractual relationship.</p> <p>Thereafter, only necessary information is stored up to ten years, as long as you can take legal action against us, deriving from our offer or our contractual relationship, with respect to the regulation concerning statute of limitation or the length of time invoked by the nature of the case.</p>
<p>Perform money laundering control as well as evaluate and decide whether we can undertake or need to resign from an assignment</p> <p>E.g. to fulfil our legal, regulatory and risk management obligations as well as for commercial reasons evaluate whether we can undertake an assignment, etc.</p>	<p>Identity information</p> <p>Contact information</p> <p>Assignment information</p> <p>Billing information</p> <p>Other categories of personal data regarding our services</p> <p>Other categories of personal data provided by you or the party for</p>	<p>Comply with legal obligations</p> <p><i>To the extent that there is no legal obligation (for example, when, we want to evaluate whether we can undertake an assignment due to commercial reasons):</i></p> <p>Legitimate interest</p>	<p>Until the offer is denied or, if it is accepted, during our contractual relationship.</p> <p>Necessary information is stored in compliance with the time limits in applicable regulation regarding measures against money laundering and terrorist financing.</p> <p>Necessary information is stored up to ten years, as long as you can take legal action against us, deriving or the length of time invoked by the nature of the case from our offer or our contractual relationship, with respect to the regulation</p>

Purpose	Personal data	Legal basis	Storage period
	which you are a contact person or which we collect in connection with the performance of our assignment		concerning statute of limitation.
<p>Manage and perform our assignments</p> <p>E.g. administer our services, design, develop and customise our services, perform, make available and maintain services, process orders, time keeping, to fulfil our obligations and exercise our rights arising from any assignment contract with you or a party for which you are a contact person, handling of customer issues, complaints, liability and warranty cases, etc.</p>	<p>Identity information</p> <p>Contact information</p> <p>Assignment information</p> <p>Billing information</p> <p>Other categories of personal data regarding our services or contract</p> <p>Other categories of personal data provided by you or the party for which you are a contact person or which we collect in connection with the performance of our assignment</p>	<p><i>If to you personally</i></p> <p>Perform our contract with you</p> <p><i>If to a party for which you are a contact person</i></p> <p>Legitimate interest</p>	<p>During our contractual relationship and thereafter as long as there are any outstanding rights or obligations deriving from our contractual relationship.</p> <p>Thereafter only necessary information is stored up to ten years, as long as you can take legal action against us, deriving from our contractual relationship, with respect to the regulation concerning statute of limitation or the length of time invoked by the nature of the case</p>
<p>Provide, maintain and manage our web-based services</p>	<p>Identity information</p> <p>Contact</p>	<p><i>If to you personally</i></p> <p>Perform our</p>	<p>During our contractual relationship and thereafter as long as there are any outstanding rights or</p>

Purpose	Personal data	Legal basis	Storage period
<p>(cloud services) E.g.</p> <p>(a) to enable your access to such services,</p> <p>(b) to enable integration with third party services,</p> <p>(c) to offer support to users of our cloud services,</p> <p>(d) to send you alerts, reports or messages by email or otherwise;</p> <p>(e) to keep our services safe and secure</p> <p>(f) to detect and prevent security threats</p> <p>(g) to perform maintenance and debugging</p> <p>(h) to prevent abuse of our services</p> <p>(i) to ensure that content is presented effectively to you and your device,</p> <p>(j) to ensure the technical functioning of our cloud services and to monitor and prevent use of</p>	<p>information</p> <p>Assignment information</p> <p>Other categories of personal data regarding our services or contract</p> <p>Unique user information</p> <p>System and device information</p> <p>Traffic and usage information</p>	<p>contract with you</p> <p><i>If to a party for which you are a contact person</i></p> <p>Legitimate interest</p>	<p>obligations deriving from our contractual relationship.</p> <p>Thereafter, only necessary information is stored for up to ten years, as long as you can take legal action against us, deriving from our contractual relationship, with respect to the regulation concerning statute of limitation or the length of time invoked by the nature of the case</p>

Purpose	Personal data	Legal basis	Storage period
our services in breach of applicable terms, (k) troubleshooting, data analysis, testing, research and for statistical purposes, etc.			
Invoicing and debt collection	Identity information Contact information Assignment information Billing information	<i>If you are our customer</i> Perform our contract with you <i>If you are a contact person for our customer</i> Legitimate interest	During our contractual relationship and thereafter as long as there are any outstanding rights or obligations deriving from our contractual relationship. Thereafter only necessary information is stored up to ten years, as long as you can take legal action against us, deriving from our contractual relationship, with respect to the regulation concerning statute of limitation or the length of time invoked by the nature of the case
Improve our services and general business development E.g. improving the quality of our current services and website, developing new services, features and new business opportunities, performing customer analyses, carrying out external surveys	Identity information Contact information Assignment information Unique user information System and device information	Legitimate interest	During our contractual relationship and thereafter for Thereafter only necessary information is stored up to ten years, or the length of time invoked by the nature of the case

Purpose	Personal data	Legal basis	Storage period
(for example polls about customer satisfaction), etc.	Traffic and usage information		
Job applicants			
<p>Manage the recruitment process</p> <p>E.g. to (i) collect, administer and evaluate your application compared to our requested profile; (ii) assess and evaluate your eligibility for employment with us; (iii) verify your identity and verify your information you provided to us; (iv) communicate with you, etc.</p>	<p>Identity information</p> <p>Contact information</p> <p>Merit and recruitment information</p>	<p>Take steps at the request of you prior to entering into a contract</p>	<p>During the recruitment process.</p> <p>Thereafter only necessary information is stored up to ten years, as long as you or a third party, such as a union, can take legal action against us, deriving from the recruitment process, with respect to the regulation concerning statute of limitation</p> <p>Necessary data is also stored for eighth years to comply with statutory storage times for accounting.</p>
<p>Check references and perform background checks and tests</p> <p>E.g. to contact your submitted references and to confirm your submitted information, supplement the basis for our assessment and evaluate your</p>	<p>Identity information</p> <p>Contact information</p> <p>Merit and recruitment information</p>	<p>Legitimate interest</p> <p>From time to time we may perform checks and tests as well as request credit information where we will ask for your consent to our processing</p>	<p><i>If the legal basis is legitimate interest</i></p> <p>During the recruitment process.</p> <p>Thereafter only necessary information is stored up to ten years, as long as you or a third party, such as a union, can take legal action against us, deriving from the recruitment process, with respect to the regulation concerning statute of limitation.</p>

Purpose	Personal data	Legal basis	Storage period
suitability for employment with us, as well as carry out tests relevant to the requested employment.			Necessary data is also stored for eight years to comply with statutory storage times for accounting. <i>If the legal basis is your consent</i> During the recruitment process, as long as we have your consent.
Save for future recruitment E.g. in order to contact you and offer employment with us if a need arises.	Identity information Contact information Merit and recruitment information	Consent	Up to two years, as long as we have your consent.
General processes			
Interact with you and the party for which you are a contact person E.g. to establish, administer, maintain and develop the relationship with you or the party for which you are a contact person, to answer questions or other correspondence from you or take action in response to your correspondence.	Identity information Contact information Other categories of personal data regarding our services or contract	<i>If we are in a contractual relationship with you:</i> Perform our contract with you <i>Otherwise:</i> Legitimate interest	<i>If we are in a contractual relationship with you or the party for which you are a contact person:</i> During our contractual relationship and thereafter as long as there are any outstanding rights or obligations deriving from our contractual relationship. <i>Otherwise:</i> Until necessary actions, due to your correspondence, has been performed. After that, your correspondence may be saved for an additional time,

Purpose	Personal data	Legal basis	Storage period
			depending on the content of the correspondence.
<p>Manage our contractual relationship and perform our contract</p> <p>E.g. to fulfil our obligations and exercise our rights arising from any contract with you or a party for which you are a contact person and to administrate our relationship to you or such party, such as identification, etc.</p>	<p>Identity information</p> <p>Contact information</p> <p>Assignment information</p> <p>Billing information</p> <p>Other categories of personal data regarding our services or contract</p> <p>Other categories of personal data provided by you or the party for which you are a contact person or which we collect in connection with the performance of our assignment</p>	<p><i>we are in a contractual relationship with you:</i></p> <p>Perform our contract with you</p> <p><i>Otherwise:</i></p> <p>Legitimate interest</p>	<p><i>If we are in a contractual relationship with you or the party for which you are a contact person:</i></p> <p>During our contractual relationship and thereafter as long as there are any outstanding rights or obligations deriving from our contractual relationship.</p> <p><i>Otherwise:</i></p> <p>Until necessary actions, due to your correspondence, has been performed. After that, your correspondence may be saved for an additional time, depending on the content of the correspondence.</p>
<p>Market and inform about our business</p> <p>E.g. to invite you to our events, to communicate relevant news and information within our practise areas to</p>	<p>Identity information</p> <p>Contact information</p>	<p>Legitimate interest</p> <p>From time to time we may perform marketing measures where we will ask for your consent to</p>	<p><i>If the legal basis is legitimate interest</i></p> <p>Until you announce that you no longer want to receive marketing information from us, e.g. by unsubscribing from our newsletter.</p>

Purpose	Personal data	Legal basis	Storage period
you, to communicate relevant information about us and our products and services to you, to inform about and present products or service offers and promote new products or services that are closely related to the products or services already purchased or used.		our processing	<i>If the legal basis is your consent</i> For as long as we have your consent. We will refresh your consent as appropriate.
Provide and manage our website E.g. to manage our website and your access it, to optimize your experience of our website, to ensure that content is presented effectively to you and your device, including troubleshooting, data analysis, testing, research and for statistical purposes.	Contact information Unique user information System and device information Traffic and usage information	Your consent	For as long as we have your consent. We will refresh your consent as appropriate.
Comply with any applicable legislation or other legal obligations E.g. to comply with obligations arising	Identity information Contact information Assignment	Comply with legal obligations	During the time period stipulated in the relevant and applicable legislation or other legal obligation. I.e. necessary data is stored for eighth years to comply with

Purpose	Personal data	Legal basis	Storage period
<p>from our business, collective agreements, applicable laws, case law, regulations, other regulations or similar, such as rules on money laundering and terrorist financing, accounting laws, tax legislation, etc.</p>	<p>information</p> <p>Billing information</p> <p>Merit and recruitment information</p> <p>Unique user information</p> <p>System and device information</p> <p>Traffic and usage information</p>		<p>statutory storage times for accounting.</p>
<p>Manage mergers, restructurings and transfers</p> <p>E.g. to facilitate negotiations on and execute a merger, a restructuring, a transfer of shares or a business transfer relating to any part of our business, incentive programs etc.</p>	<p>Identity information</p> <p>Contact information</p> <p>Assignment information</p> <p>Billing information,</p> <p>Unique user information</p> <p>System and device information</p> <p>Traffic and usage information</p>	<p>Legitimate interest</p>	<p>During any contractual relationship and thereafter as long as there are any outstanding rights or obligations deriving from our contractual relationship.</p> <p>Thereafter only necessary information is stored up to ten years, as long as you or a third party, such as a union, can take legal action against us, deriving from the recruitment process, with respect to the regulation concerning statute of limitation or the length of time invoked by the nature of the case</p>

5.2 If you choose not to provide certain personal information to us?

You are not required to provide personal information to us except when provided by law. But please note, if you choose not to provide us with certain personal data or limit our right to process your personal data, that may result in that we cannot fulfil our obligations to you or to the party you represent and that you, or the party you represent, cannot assert your, or its, rights against us.

5.3 What are our legitimate interests?

We may process your personal information because it is necessary for the purposes of our legitimate interests. Our “legitimate interest” corresponds to the purpose for which we perform each processing based on our interest.

When we process your personal information for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests - we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

We do not consider that our processing disadvantages you in any way. We use your information only in ways you would understand and reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing.

You have a right to object to processing that is based on our legitimate interests. If you wish to do so please contact us at gdpr@groth.eu. For more information on your rights, please see “Your rights” section below.

5.4 If you do not want to receive marketing information from us

We may process your data to invite you to our events, to communicate relevant news and information within our practise areas to you, to communicate relevant information about us and our services etc. If you do not want to receive such communication, you are welcome to email us at gdpr@groth.eu.

5.5 How to revoke your consent

Some of our processing of your personal data is based on your consent. You have a right to revoke your consent to this processing of your personal data at any time. If you would like to make use of this right and revoke your consent, please contact us at gdpr@groth.eu.

Please note, if you revoke your consent, it does not affect the legality of the processing we have performed based on your consent before it was revoked.

5.6 Automated decision-making

We do not perform any processing that includes automated decision-making (including profiling).

6. Disclosure of your information

We may disclose your personal information to, chosen third parties in accordance with the provisions below. In the event of such sharing or transfer we will take every reasonable legal-, technical- and organizational action in order to make sure that your personal data is handled in a safe manner and that the level of security is adequate.

Employees

We may disclose your personal information to any of our employees or officers insofar as reasonably necessary for the purposes set out in this policy.

Our group of companies

We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.

Assignments

We may disclose your personal information when performing an assignment, if it is necessary to perform our assignment and to safeguard our customer's rights and does not violate the customer's instructions. This includes, in particular, passing on the data to domestic and/or

foreign patent attorneys and/or legal attorneys and/or representatives working in the field of industrial property consulted by us for the purpose of correspondence relating to handling and carrying out the customer's instructions. This also includes passing on the data to the other side in legal proceedings and their representatives (in particular their patent attorneys and/or legal attorneys and/or representatives working in the field of industrial property) as well as courts and other public bodies, in particular industrial property offices, for the purpose of correspondence and for the establishment and defence of your rights as well as obtaining or defending industrial property rights. Third parties may only use the data we pass on for the purposes mentioned.

Advisers, suppliers, subcontractors and other business partners

We may disclose your personal information to any of our insurers, professional advisers, agents, suppliers, subcontractors or business partners insofar as reasonably necessary for the purposes set out in this policy. Hence, we might share your personal data when a third party provide us with services such as providing, hosting and maintaining IT systems, technical support, marketing, client survey etc. on our behalf.

Other

We may disclose your personal information:

- (a) when it is specifically agreed with you or the party for which you are a contact person,
- (b) to the extent that we are required to do so by law or a court order;
- (c) in connection with any ongoing or prospective legal proceedings;
- (d) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);

Transfer

If we buy or sell a business or assets we may provide a potential seller or buyer of such business or assets with your personal data. If we, or a substantial part of our assets, are acquired by a third party, your personal data may be disclosed to such acquirer.

7. How do we protect your information?

You should always feel secure when you provide us with your personal data. Therefore, we have taken the suitable legal, technical and organisational precautions to prevent unauthorized access, use, change and deletion of your personal information. We have adopted an IT policy which applies to all our employees that set up the provisions for how we use our information systems. All our processing of your personal data is in accordance with current applicable data protection legislation.

8. Where are we processing your information?

It is our objective to process all your personal data within the EU/EEA. In some situations however, your personal data might be transferred to and processed by a company within our company group or by supplier, subcontractor or other business partner with registered office in a country outside the EU/EEA. All such sharing and processing of information will be in accordance with current applicable data protection legislation and we will take all reasonable legal-, technical- and organisational actions to make sure that your personal data will be processed securely and with an adequate level of protection comparable with, and at the same level as, the protection that is provided within the EU/ EEA.

9. Your rights

9.1 Right of access and to information

You have the right to obtain a confirmation from us as to whether or not personal data concerning you are being processed by us, and, where that is the case, you have the right to access that personal data.

We will provide a copy of your personal data undergoing processing. For any further copies requested, we may charge a reasonable fee based on administrative costs. If you make the request by electronic means, and unless otherwise requested by you, the information will be provided in a commonly used electronic form.

9.2 Right to rectification

You have the right to obtain from us, the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you also have the right to have incomplete personal data

completed.

9.3 Right to erasure ("right to be forgotten")

You have the right to obtain from us, the erasure of personal data concerning you and we have the obligation to erase your personal data in some situations, for example

- (a) if the personal data is no longer necessary in relation to the purposes for which they were collected,
- (b) if the processing is based on your consent and you withdraw that consent,
- (c) if the processing is based on our legitimate interests and you object to the processing and there are no overriding legitimate grounds for the processing,
- (d) if the personal data have been unlawfully processed, or
- (e) if the personal data have to be erased for compliance with a legal obligation, etc.

There might be reasons as to why we cannot immediately erase all your personal data. Our continuous processing of your personal data might for example be necessary in order for us to fulfil a legal obligation that requires processing of your personal data, for example bookkeeping and tax legislation, or to establish, exercise or defend a legal claim. In that case we will block the information that could not be immediately erased from use for any other purposes than the ones that hindered the information from being erased immediately.

9.4 Right to restriction of processing

You have the right, under certain conditions; to obtain from us restriction of processing of your personal data. Restriction of processing means that your stored personal data will be marked with the aim of limiting their processing in the future to certain given purposes. The right to restriction applies for example when you have contested the accuracy of your personal data, for a period enabling us to verify the accuracy of the personal data, and when you have objected to our processing based on our legitimate interests, pending the verification whether our legitimate grounds override yours.

9.5 Right to data portability

You have the right, under certain conditions, to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format and the right to transmit those data to

another controller without hindrance from us.

When exercising your right to data portability you have the right to have your personal data transmitted directly from us to another controller, where technically feasible.

9.6 Right to object

You have the right to object, on grounds relating to your particular situation, at any time to certain processing of your personal data. The right to object applies e.g. when we process your personal data on the basis of our legitimate interests.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to our processing of your personal data for such marketing.

9.7 Right to object to automated individual decision-making (including profiling)

You have the right, with certain exemptions, not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

9.8 Right to lodge a complaint

If you consider that our processing of your personal data infringes the GDPR you have the right to lodge a complaint with the *Datainspektionen*, which is the supervisory authority in Sweden.

9.9 Exercise your rights

If you wish to exercise any of your rights you can easily do that by contacting us through email at gdpr@groth.eu. In order to protect your integrity and your personal data we might require that you identify yourself when you require our assistance.

Our Integrity Policy was updated August 2018