

**INFORMATION ON DATA PROTECTION REGARDING OUR DATA PROCESSING
ACCORDING TO ARTICLES 13, 14 AND 21 OF THE GENERAL DATA PROTECTION
REGULATION (GDPR)**

We take data protection seriously and hereby inform you of how we process your data and what claims and rights you are entitled to under the data protection regulations.

I. Name and contact details of the party responsible for the processing of the data and of the company data protection officer

1. Identity of the party responsible

v. Einem & Partner mbB Rechtsanwälte (hereinafter "v. Einem & Partner")

Street: Schlachte 3 – 5

Postal code: 28195

Place: Bremen (Germany)

Telephone: (+49) 421/365050

Fax: (+49) 421/3650560

E-Mail: bremen@einem.de

2. Company data protection officer

The company data protection officer for the party responsible, i.e. v. Einem & Partner mbB Rechtsanwälte, is Mr Eugen Becker. He can be contacted at the above address and at becker@einem.de.

II. Collection and storage of personal data as well as type and purpose of their use

1. We process personal data in accordance with the provisions laid down in the General Data Protection Regulation (GDPR), the German Federal Data Protection Act (Bundesdatenschutzgesetz (BDSG)) and other applicable data protection regulations. Which specific data are processed and how they are used depends largely on the particular services requested / agreed upon.

2. When you mandate us, we collect the following information:

- salutation, first name, family name / surname,
- a valid e-mail address,
- postal address,
- telephone number (landline and/or mobile)
- information necessary to assert and defend your rights under the mandate

3. The processing of personal data takes place at your request to allow us to carry out our contracts with you, to execute your orders and to implement measures and activities in the context of pre-contractual relations, e.g. with interested parties.

4. These data are collected

- to identify you as our client,
- to provide you with appropriate legal advice and representation,
- for correspondence with you,
- for invoicing,
- to settle any liability claims that may exist and to assert possible claims against you,
- to implement measures to control and optimize business processes,
- to ensure the traceability of transactions, orders and other agreements,
- to guarantee IT security (incl. system and plausibility tests),
- for emergency management,
- to fulfil the general duties of care,
- for securing and exercising domiciliary rights (e.g. through access controls),
- for cost recording and controlling as well as reporting.

5. The data processing takes place upon your request and is, according to Art. 6 (1) (1) (b) of the General Data Protection Regulation (GDPR), required for the mentioned purposes for the appropriate processing of the mandate and for the mutual fulfilment of obligations arising from the mandate agreement / contract.

III. Duration of storage of your data

1. We process and store your data for the purpose of our business relationship. This also includes the initiation of a contract (the pre-contractual legal relationship) and the execution of a contract.

2. The personal data collected by us for the purpose of the mandate are stored until the expiry of the statutory document retention period for lawyers (6 years after the end of the calendar year in which the mandate was terminated) and then deleted, unless we are under GDPR Art. 6 (1) (1) (c) due to tax and commercial documentation and storage obligations (cf. the German Commercial Code (Handelsgesetzbuch (HGB)), the German Criminal Code (Strafgesetzbuch (StGB)) or the German Fiscal Code (Abgabenordnung (AO))) required to observe a longer storage period, we are due to professional law regulations for the purpose of collision checks required to observe a longer storage period, or you have consented to a storage period extending beyond that set out in GDPR Art. 6 (1) (1) (a).

3. Further, specific legal provisions may require a longer storage period, e.g. when evidence needs to be preserved within the framework of the statutory limitation periods. According to §§ 195 ff. of the German Civil Code (Bürgerliche Gesetzbuch (BGB)) the regular limitation period is three years; however, limitation periods of up to 30 may also apply.

4. If the data are no longer required for the fulfilment of contractual or legal obligations and rights, they are regularly deleted, unless their – limited – further processing is necessary for

the fulfilment of the aforementioned purposes for reasons of overriding legitimate interest. Such a predominant legitimate interest also exists, for example, if deletion is, due to the special type of storage, not possible or only possible with disproportionate effort and the processing for other purposes is excluded by suitable technical and organisational measures.

IV. Processing of your data in a third country or by an international organization

1. Data is transmitted to offices in countries outside the European Union (EU) or the European Economic Area (EEA) (so-called third countries) if this should be necessary for the execution of an order/contract from or with you, if it is required by law (e.g. tax reporting obligations), or if you have given us your consent.

2. Entsprechende Detailinformationen stellen wir Ihnen auf Anfrage zur Verfügung.

In this context the processing of your data in a third country can also take place in connection with the involvement of service providers engaged in order processing. Unless the EU Commission has decided on the appropriate level of data protection for the country concerned, we ensure, in accordance with EU data protection regulations, that your rights and freedoms are adequately protected and guaranteed. Further details are available upon request.

3. Information on the appropriate or reasonable guarantees may be requested from the Data Protection Officer.

V. Transfer of data to third parties

1. Your personal data will not be transmitted to third parties for purposes other than those listed below.

2. Insofar as this is required under GDPR Art. 6 (1) (1) (b) for the execution of client relationships with you, your personal data will be passed on to third parties. This includes in particular

- the transmission to litigants and opposing parties and their representatives (in particular their lawyers) as well as to
- courts and
- other public authorities for the purpose of correspondence as well as the assertion and defence of your rights,
- third-party debtors,
- the grantors and grantees of a collateral agreement
- banks,
- the representatives of legal and business consultancy professions and credit agencies.

3. Other than set out above, we will not pass on your data to third parties. Insofar that we commission service providers to assist us with the processing of an instruction, your data are subject to the same security standards as ours. The third party may use the data provided solely for the purpose for which they were provided.

4. The legal professional privilege remains unaffected. As far as data are concerned which are subject to the lawyer's code of secrecy, these are only passed on to third parties in consultation with you.

5. Within our company your data are shared with those internal departments or organizational units which require these to fulfil our contractual and legal obligations or to assert, whilst processing your data, our legitimate interest.

VI. Rights of persons concerned

You have the following rights as a person affected by data processing:

1. Revocation: In accordance with GDPR Art. 7 (3) you can revoke your once given consent at any time. As a result, we are no longer allowed to continue processing data based on this consent in the future.

2. Information: In accordance with GDPR Art. 15 you can request information about your personal data processed by us. In particular, you may request information about the purposes of processing, the category of personal data, the categories of recipients to whom your data have been or will be disclosed, the planned storage period, the existence of a right to correct, delete or restrict or to object to the processing, the existence of a right of appeal, the origin of your data, unless collected by us, as well as the existence of an automated decision-making function including profiling and, where appropriate, meaningful information on their details.

3. Correction: In accordance with GDPR Art. 16 you can, with regard to your personal data stored by us, request the immediate correction of incorrect as well as the completion of incomplete data records.

4. Deletion: In accordance with GDPR Art. 17 you can request the deletion of your personal data stored by us, unless their processing is necessary to exercise the right to freedom of expression and information or to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims.

5. Restriction: In accordance with GDPR Art. 18 you can request the restriction of the processing of your personal data if you dispute the accuracy of the data, if the processing is unlawful, but you refuse their deletion and we no longer need the data, but you need them to assert, exercise or defend legal claims or you have, pursuant to GDPR Art. 21, lodged an objection against their processing.

6. Data transferability: In accordance with GDPR Art. 20, you can request and obtain the personal data you have provided us with in a structured, current and machine-readable format or request its transfer to another person responsible.

7. Complaint: In accordance with GDPR Art. 77 you can complain to a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or our office.

VII. Right of objection according to GDPR Art. 21

1. You have the right to object to the processing of your data as occurring on the basis of GDPR Art. 6 (1) (1) (f) (data processing on the basis of a balance of interests) or GDPR Art. 6 (1) (1) (e) (data processing in the public interest) at any time, subject to there being reasons for this as arising from your particular situation. This also applies to profiling based on this provision within the meaning of GDPR Art. 4 (4).
2. If you object, we will no longer process your personal data, unless we can provide compelling reasons to do so that outweigh your interests, rights and freedoms, or where the processing serves the assertion, exercise or defence of legal claims.
3. We may also process your personal data for direct marketing purposes. If you do not wish to receive advertising, you have the right to object to it at any time; this also applies to profiling, insofar as it links to such direct advertising. We will take this contradiction into account in the future.
4. We will no longer process your data for direct marketing purposes if you object to the processing for these purposes.
5. If you would like to exercise your right of objection, please send an e-mail to becker@einem.de.

VIII. Information about your obligation to provide data as a data subject

1. The purpose of our law firm is to provide legal services. As part of the provision of this service, you as a client may be required by law to provide information to our law firm. In the context of the attorney-client relationship or its establishment, you must provide those personal data that are required for the establishment, execution and termination of the attorney-client relationship and the fulfilment of the associated contractual obligations or that we are obliged to collect by law. Without this data we generally have to refuse the conclusion of the legal services contract or the execution of specific legal procurement orders; likewise, we may no longer be able to execute an existing contract and may have to terminate it.
2. In particular, we are obliged under the provisions of the Money Laundering Directive to identify you before establishing the business relationship, for example on the basis of your identity card, and to collect and record your name, place of birth, date of birth, nationality as well as residential address. In order for us to comply with this legal obligation, you must provide us with the necessary information and documents in accordance with the Money Laundering Act and notify us immediately of any changes arising in the course of the business relationship. Should you do not provide us with the necessary information and documents, we may not be permitted to establish or continue the business relationship you have requested. Furthermore, in the event that we assert a claim against you from our own legal position and a contractual agreement is concluded in this connection between you as the debtor and our law firm regarding the collection of claims in the form of settlements (e.g. instalment payment agreements), we can make the conclusion of a settlement dependent on the provision of specific information (e.g. creditworthiness and asset information, data on existing employment relationships, bank data) by you.
3. Failure to provide this information, to which you are not obligated, may result in you not being able to enter into such agreements with our law firm. In the interest of the greatest

possible data protection transparency, we refer to any obligations to provide information on a case by case basis before carrying out the specific data collection procedure.
