

Description of personal data processing

1. Data controller and contact details

Company: Carlsson Capital Oy Ab Address: Ullasbackavägen 10a,

02700 Grankulla

Contact: Gustav Carlsson

Email: <u>gustav.gclaw@gmail.com</u>

2. GC-Law's processing of personal data

Carlsson Capital Oy Ab, hereinafter referred to as ("GC-Law") is a law firm operating mainly in Finland and Åland. Personal data is processed in connection with our operations, including for case business management, development recruitment. We are committed to protecting our clients' personal data, and this personal data processing policy describes how and in what situations personal data is processed, as well as your rights as a data subject. Below are a number of purposes for which personal data is processed, but which ones apply to you will vary depending on your role. For example, you may be a visitor to our website, a customer or a business partner. The personal data we process about you therefore depends on your own activity and our relationship with you.

3. Purposes and legal grounds

In order to develop GC-Law's products and services, develop its business, handle client cases in an appropriate manner, comply with applicable legislation, etc., GC-LAW processes personal data for the following main purposes and on the following grounds:

1) Handling of cases. When you contact us for help, we need personal data to be able to keep in touch with you and complete the delivery or services. The personal data we need for this purpose varies from case to case, and this type of processing is based on the general terms and conditions.

- 2) Handling invoicing, payments and debt collection. We naturally need to be paid for our work. We do this by invoicing for a case and keeping track of your payment, which is based on our general terms and conditions. If we do not receive payment, we may also turn to debt collection agencies, which is based on legitimate interests.
- 3) Development of GC-LAW's products, services and operations. It benefits both you and us that our products and services are relevant and up to date, and we want to be at the forefront of developments in the industry. Personal data that you provide, for example through your activity on our website or as a customer, helps us to achieve these goals. This is also based on legitimate interests.
- 4) Sending out newsletters and undertaking other types of marketing. We offer many different services that we want you to have access to, and we keep you updated on news about our services. Newsletters and other marketing are therefore a way of being more relevant to you, and this is also based on legitimate interests.
- 5) Manage invitations and registrations for events. We believe that events of various kinds are excellent opportunities to meet and network, and we would like you to participate as well. If you register, we need to manage the invitation and any allergies. This type of processing is based on our legitimate interests and the applicable terms and conditions for the event.
- 6) Management of supplier relationships. When we purchase goods and services from others, we process certain personal data in order to, among other things, maintain supplier lists, evaluate the product or service, and follow up and pay for purchases. Among other things, we need to keep track of how previous deliveries have worked so that we can continue to work with the best suppliers. This processing is based on agreements and legitimate interests.



- 7) Providing visitors to the website with a smooth experience. A smooth and user-friendly website helps to make the website more tailored to you and faster to use, which is in both your and our interest. This processing is based on legitimate interests.
- 8) Handling job applications, evaluating job applicants, conducting interviews and making selections. This means that GC-LAW may use your personal data to contact you, assess whether your work experience is suitable for GC-LAW, invite you to an interview and use certain basic personal data as a basis for a possible employment contract. The processing is based on GC-LAW's legitimate interests. In certain limited cases, the processing is based on your consent (e.g. if we use personal data in the recruitment process that we have collected from sources other than yourself).

For processing based on legitimate interests, GC-LAW has weighed up your interests, your fundamental rights and our interests. In many cases, our interests and yours are aligned, but regardless of this, based on the balancing of interests, we have limited the personal data, storage time and other processing to what is necessary for the purpose.

4. The categories of personal data covered by the processing

The categories of personal data processed vary depending on the type of data subject in question. The different categories of personal data are as follows:

- 1) Technical user data, such as cookies, IP addresses, language settings, location data, software and hardware versions, which parts of our website you have visited, and likes and comments on our social media.
- 2) Basic (contact) information, such as name, email address, postal address, postcode, town/city and website address.
- 3) Information about your position, such as employer, position and industry.

- 4) Registrations and any dietary requirements or allergies for events.
- 5) Marketing permissions and prohibitions.
- 6) Consents.
- 7) Areas of interest and the types of messages you wish to receive.
- 8) Social security number.
- 9) Customer details, such as legal or natural person and customer number.
- 10) Payment details, such as credit limits, invoice amounts, amounts paid, outstanding amounts, billing date, due date, reminders, billing address, contact person and account number.
- 11) Images, such as images of our customer references, etc.

The personal data processed by GC-LAW has been limited to what is necessary for the specific purpose. In order to perform tasks in accordance with applicable legislation and contractual terms, GC-LAW requires certain personal data. You have the right not to provide us with this personal data, but in that case we cannot guarantee that we will be able to deliver our products and services in the best possible way, or at all. For example, we cannot initiate a case if you do not provide us with the personal data we need to be able to send the delivery and invoice to the correct address.

5. Sources used by GC-LAW

Personal data is also generated by your own activity on our website and social media, among other places. In many cases, we can save you the trouble of providing all your personal data yourself by collecting it from third parties. We may also collect information from, for example, your employer's website. For case management, we collect the personal data we need, which may come from third parties and whose scope varies from case to case. In addition, GC-LAW may collect assessments of you from the references you have provided in your job application.



6. Categories of recipients

GC-LAW mainly processes personal data within its own organisation and for its own purposes. However, in certain situations, GC-LAW needs to allow third parties to access personal data. For example, GC-LAW organises certain events in collaboration with other organisations, and personal data may then need to be disclosed to other organisers or companies providing catering services.

7. Storage period

GC-LAW stores personal data for as long as it is necessary for the purpose for which it was collected. This varies depending on the category of personal data in question and the purpose for which it was collected. For example, cookies and other personal data we obtain through your activity on the website and our social media are stored for as long as GC-LAW needs them for your use of the website and for as long as GC-LAW needs them to develop its products, services and operations. This varies, but they are typically stored for up to a few years. You can choose to prevent your browser from storing cookies and to delete them. In such cases, GC-LAW will of course not store your personal data after you have deleted them.

Personal data needed to send out newsletters is stored for as long as GC-LAW considers that you may be interested in GC-LAW's products and services. Personal data used for events is generally only stored until the event is over. However, GC-LAW may store the data for longer in order to follow up on your opinions about the event and so that GC-LAW knows whether you are interested in similar events in the future.

For registration and maintenance of the customer relationship, GC-LAW stores personal data for as long as you are a customer. Personal data for payments, invoicing and debt collection is stored until the claim is paid and thereafter for as long as it is necessary to investigate any claims and demands in accordance with, among other things, applicable accounting legislation.

GC-LAW complies with applicable legislation that specifies a certain storage period, including accounting legislation. The storage period for recruitment data depends on whether it is an application process with a fixed timetable or an open application. After the application process itself has been completed, we store the personal data for at least one year in order to be able to contact the data subject in the event of new recruitment needs, for example.

8. Transfer of personal data outside the EEA GC-LAW processes your personal data mainly within the EU and the EEA. However, for technical reasons, GC-LAW may need to transfer some of your personal data to third countries where the level of personal data protection may be lower than in the EU and EEA. If such countries are not covered by a decision of the European Commission on an adequate level of protection, the processing of other appropriate safeguards is ensured. Such safeguards are primarily standard clauses developed by the European Commission, and more information about these can be found https://ec.europa.eu/info/law/lawtopic/data-protection sv (parts of the content are in English).

9. The rights of the data subject

You have the right to request access to, correction of, and deletion of the personal data that GC-LAW processes about you. You also have the right to request restriction of and to object to the processing of personal data. In addition, you have the right to request your right to data portability. The scope of these rights is determined by the General Data Protection Regulation and other applicable legislation.

You have the option to access and delete cookies, as well as to adjust certain other technical information in your browser, your phone or other device you use. In other cases, a request or objection must be submitted in writing to GC-LAW's contact person as specified above.

10. Consent



The processing of some personal data is based on your consent. In such cases, you always have the right to withdraw your consent. For example, in the case of cookies, you have the right to change your browser settings so that cookies are not collected.

11. Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint about GC-LAWS's processing of your personal data with the supervisory authority. The supervisory authority that monitors GC-LAWS's processing of personal data in Åland and Finland is the Data Protection Ombudsman's Office (www.tietosuoja.fi). You can also lodge a complaint with the supervisory authority that monitors compliance with the Data Protection Regulation in the country where you reside.

12. Profiling and automated decision-making

GC-LAW does not use automated decision-making, including profiling.

Last updated: 3 September 2025