

Appendix 1 – Moll Wendén – Detailed overview of our processing of personal data

This Appendix contains a detailed overview of Moll Wendén's processing of personal data, broken down by processing situation. For each purpose, it states which categories of personal data are processed, which legal basis applies, which categories of recipients may access the data, the retention period and, where applicable, the specific legitimate interest relied upon. Each row concerns an individual purpose with an individual legal basis.

Where Moll Wendén relies on legitimate interest as the legal basis (Article 6.1(f) of the GDPR), the firm has carried out a balancing test in which the data subject's interests, fundamental rights and freedoms have been weighed against the legitimate interest. The firm has assessed that the processing in each individual case is proportionate and necessary for the stated purpose, that the data subject may reasonably expect the processing against the background of their relationship with the firm, and that appropriate safeguards have been implemented. Data subjects have the right to object to processing based on legitimate interest, in which case the firm will carry out a renewed assessment in the individual case.

Where processing of special categories of personal data (Article 9 of the GDPR) or data concerning criminal offences (Article 10 of the GDPR) occurs within the scope of a purpose, this is stated in the column for data categories. Such processing is always carried out on the basis of an applicable exemption under Article 9.2 of the GDPR or national law, respectively. The most commonly occurring exemptions in the firm's business are Article 9.2(f) of the GDPR (establishment, exercise or defence of legal claims), Article 9.2(a) of the GDPR (explicit consent) and Article 9.2(b) of the GDPR (employment-law obligations). For data concerning criminal offences, support follows, among other things, from Section 5 of the Ordinance (2018:219) containing supplementary provisions to the EU General Data Protection Regulation.

A. Assignment-related processing – clients who are natural persons

Purpose	Categories of personal data	Legal basis	Recipients	Retention period	Legitimate interest
Assess whether an assignment can be accepted, carry out conflict checks and assess independence issues	Identity data, contact details, role and organisation data	Art. 6.1(b) GDPR (steps prior to entering into a contract)	Internally within the firm	During the assessment period; where an assignment is declined, normally for up to one year, unless longer retention is required for conflict documentation	–
Carry out client due diligence, identity verification and other checks under anti-money laundering regulations	Identity data, contact details, verification data, information concerning beneficial ownership	Art. 6.1(c) GDPR (legal obligation)	Internally within the firm; the Financial Intelligence Unit where a reporting obligation exists	In accordance with applicable anti-money laundering legislation (normally at least five years after the end of the business relationship, longer where ordered by an authority)	–
Enter into, administer and perform assignments and provide legal services	Identity data, contact details, financial data, communication data, matter data	Art. 6.1(b) GDPR (performance of a contract)	Internally within the firm; opposing parties, opposing counsel, courts, authorities, arbitral tribunals and other actors to the extent required for the assignment; IT suppliers (processors)	Matter documentation is archived for at least ten years from completion of the assignment under the Code, or longer if the nature of the assignment so requires	–
Safeguard the client's interests through legal analysis, litigation, negotiation, contract drafting, investigation and advice	Identity data, contact details, matter data, communication data; where applicable, sensitive personal data (Art. 9 GDPR) or data concerning criminal offences (Art. 10 GDPR)	Art. 6.1(b) GDPR (performance of a contract)	Internally within the firm; opposing parties, opposing counsel, courts, authorities, arbitral tribunals, banks and other actors to the extent required for the assignment	Matter documentation is archived for at least ten years from completion of the assignment under the Code	–
Handle invoicing, payments and accounting	Identity data, contact details, financial and billing-related data	Art. 6.1(b) GDPR (performance of a contract) and Art. 6.1(c) GDPR (legal obligation, bookkeeping)	Internally within the firm; banks; auditors; debt collection agencies where necessary; IT suppliers (processors)	Accounting records are retained for seven years under the Swedish Accounting Act	–

B. Assignment-related processing – representatives, contact persons, opposing parties and other third parties

Purpose	Categories of personal data	Legal basis	Recipients	Retention period	Legitimate interest
Carry out conflict checks and independence assessments concerning representatives, contact persons and opposing parties	Identity data, contact details, role and organisation data	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm	During the assessment period; conflict documentation is retained for as long as required to ensure future conflict checks	The interest in complying with independence requirements and avoiding conflicts of interest under the Code
Carry out client due diligence concerning representatives, authorised signatories and beneficial owners of clients	Identity data, contact details, verification data, information concerning beneficial ownership, role and organisation data	Art. 6.1(c) GDPR (legal obligation)	Internally within the firm; the Financial Intelligence Unit where a reporting obligation exists	In accordance with applicable anti-money laundering legislation	–
Communicate with representatives and contact persons of clients within the scope of assignments	Identity data, contact details, role and organisation data, communication data	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm; other actors in the assignment to the extent required	Matter documentation is archived for at least ten years from completion of the assignment under the Code	The client's and the firm's interest in the assignment being performed effectively through communication with relevant contact persons
Process personal data concerning opposing parties and persons at opposing parties in order to analyse the legal position, handle the assignment and safeguard the client's interests	Identity data, contact details, role and organisation data, matter data, communication data	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm; courts, authorities, arbitral tribunals, opposing counsel and other actors to the extent required for the assignment	Matter documentation is archived for at least ten years from completion of the assignment under the Code	The client's legitimate interest in the firm being able to safeguard the client's rights and interests in the assignment
Process personal data concerning other persons who appear in assignments (e.g. witnesses, experts, judges, arbitrators, mediators, guarantors, consultants, employees, board members)	Identity data, contact details, role and organisation data, matter data; where applicable, sensitive personal data or data concerning criminal offences	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm; courts, authorities, arbitral tribunals and other actors to the extent required for the assignment	Matter documentation is archived for at least ten years from completion of the assignment under the Code	The client's legitimate interest in the firm being able to perform the assignment, conduct proceedings and provide advice

C. Potential clients and enquiries

Purpose	Categories of personal data	Legal basis	Recipients	Retention period	Legitimate interest
Assess whether we can accept an assignment and handle initial communications with potential clients who are natural persons	Identity data, contact details, communication data, data provided in the enquiry	Art. 6.1(b) GDPR (steps prior to entering into a contract)	Internally within the firm	If the assignment is not accepted: normally for up to one year, unless longer retention is required for conflict documentation	–
Assess whether we can accept an assignment and handle initial communications with contact persons at potential clients that are legal persons	Identity data, contact details, role and organisation data, communication data	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm	If the assignment is not accepted: normally for up to one year, unless longer retention is required for conflict documentation	The firm's and the potential client's interest in being able to assess and initiate an assignment relationship

D. Business relationships, communication and marketing

Purpose	Categories of personal data	Legal basis	Recipients	Retention period	Legitimate interest
Administer relationships with suppliers and collaboration partners, enter into and follow up agreements	Identity data, contact details, role and organisation data, contract-related data, communication data	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm; suppliers and collaboration partners to the extent required for the relationship; IT suppliers (processors)	During the contract term and thereafter for as long as required for follow-up, warranty obligations and legal claims (normally for up to ten years)	The firm's interest in administering and following up its contractual and business relationships
Send newsletters, invitations and other relevant communications to persons with an existing relationship with the firm	Name, email address, employer, title, areas of interest, information about previous contacts	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm; mailing provider (processor)	Until the data subject objects, unsubscribes or the relationship is no longer active	The firm's interest in communicating relevant information about its business, services and events to existing contacts
Send marketing to persons with no existing relationship with the firm	Name, email address, employer, title	Art. 6.1(a) GDPR (consent)	Internally within the firm; mailing provider (processor)	Until consent is withdrawn or the data subject unsubscribes	–

E. Events and seminars

Purpose	Categories of personal data	Legal basis	Recipients	Retention period	Legitimate interest
Plan, carry out and follow up events, seminars, webinars and other events	Name, contact details, title, employer, participation status, registration details	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm; collaboration partners at joint events; event suppliers (processors)	For as long as necessary for planning, implementation, follow-up and relevant future invitations, unless the data subject objects	The firm's interest in arranging and administering events and maintaining contact with participants
Handle dietary preferences and accessibility requirements in connection with events	Dietary preferences, information concerning accessibility requirements (which may constitute sensitive personal data under Art. 9 GDPR)	Art. 6.1(a) GDPR (consent) and Art. 9.2(a) GDPR (explicit consent)	Internally within the firm; catering companies and event suppliers to the extent required	Erased after completion of the event	–
Take photographs at physical events for documentation and communication	Photographs, names	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm; may be published on the website and in social media	For as long as the photographs are relevant to the firm's communication, unless the data subject objects	The firm's interest in documenting and communicating about its business and its events

F. Recruitment

Purpose	Categories of personal data	Legal basis	Recipients	Retention period	Legitimate interest
Administer the recruitment process, evaluate candidates, conduct interviews, tests and reference checks, and make recruitment decisions	CV, covering letter, grades, assessments, test results, interview notes, identity data, contact details, reference information	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm; recruitment providers and test providers (processors); referees specified by the candidate	During the recruitment process and thereafter normally for up to two years in order to handle any claims, unless otherwise provided by law	The firm's interest in recruiting qualified employees and interns and evaluating candidates' suitability
Handle legal claims relating to the recruitment process, for example claims under the Swedish Discrimination Act	CV, covering letter, grades, assessments, test results, interview notes, identity data, contact details, reference information, communication data	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm; external advisers, courts and authorities where necessary	Normally for up to two years after completion of the recruitment process, or longer if a claim has been made or may reasonably be expected	The firm's interest in being able to establish, exercise or defend legal claims relating to recruitment
Process personal data concerning referees in order to contact them, document feedback and assess the candidate's suitability	Identity data, contact details, role and organisation data, reference statements	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm	During the recruitment process and thereafter normally for up to two years	The firm's interest in verifying candidates' qualifications and suitability through reference checks
Retain application documents for future recruitment with the candidate's consent	CV, covering letter, grades, contact details	Art. 6.1(a) GDPR (consent)	Internally within the firm	Until consent is withdrawn, but normally for no more than two years	–
Process sensitive personal data concerning job applicants where necessary in the recruitment process, for example data concerning disability in connection with workplace adjustments	Sensitive personal data under Art. 9 GDPR	Art. 6.1(f) GDPR (legitimate interest) and Art. 9.2(b) GDPR (employment-law obligations)	Internally within the firm	During the recruitment process and thereafter normally for up to two years	The firm's interest in fulfilling employment-law obligations and adapting the recruitment process

G. Whistleblowing matters

Purpose	Categories of personal data	Legal basis	Recipients	Retention period	Legitimate interest
Receive, investigate, document, follow up and close whistleblowing matters	Identity data, contact details, role and organisation data, work-related information, communication data, data concerning the circumstances reported; where applicable, sensitive personal data or data concerning criminal offences	Art. 6.1(c) GDPR (legal obligation) and/or Art. 6.1(f) GDPR (legitimate interest), depending on the nature of the matter	Internally within the firm; the client to the extent required for the assignment; authorities where a reporting obligation exists	In accordance with applicable whistleblowing legislation and the specific rules and assessments applicable to such matters	To the extent Art. 6.1(f) applies: the client's and the firm's interest in investigating and handling reported misconduct in accordance with applicable regulations

H. IT, security and technical operations

Purpose	Categories of personal data	Legal basis	Recipients	Retention period	Legitimate interest
Maintain the security of IT systems, carry out logging, access control and protection against misuse	IP addresses, logs, access data, security-related information	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm; IT suppliers (processors)	Security logs normally for 6–12 months; other logs normally for 30–90 days	The firm's interest in protecting its systems, data and business against unauthorised access, intrusion and misuse
Carry out troubleshooting, backups and incident management	Technical data, logs, backups, incident-related documentation	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm; IT suppliers (processors)	Backups in accordance with the firm's security procedures; incident documentation for as long as required for follow-up and legal requirements	The firm's interest in ensuring continuity, recoverability and traceability in its systems
Process technical data and cookie information when the firm's website is used	IP addresses, cookie information, data concerning use of the website	Art. 6.1(f) GDPR (legitimate interest) for necessary cookies; Art. 6.1(a) GDPR (consent) for non-essential cookies	Internally within the firm; website providers and analytics providers (processors)	Per the Cookie Policy; session cookies erased on browser close; others per their stated lifespan	For necessary cookies: the firm's interest in ensuring that the website functions technically and securely

I. Legal claims and disputes concerning the firm

Purpose	Categories of personal data	Legal basis	Recipients	Retention period	Legitimate interest
Establish, exercise or defend legal claims on the firm's own behalf	Identity data, contact details, matter data, communication data, financial data; where applicable, sensitive personal data or data concerning criminal offences	Art. 6.1(f) GDPR (legitimate interest)	Internally within the firm; external advisers, courts, authorities, arbitral tribunals, insurers, insurance intermediaries and auditors to the extent required	For as long as necessary having regard to limitation rules and the need to handle claims, normally for at least ten years	The firm's interest in being able to establish, exercise or defend legal claims
Comply with legal obligations under law, decisions by authorities or binding professional rules	Identity data, contact details and other data required to fulfil the relevant obligation	Art. 6.1(c) GDPR (legal obligation)	Internally within the firm; authorities and other recipients to the extent required under applicable regulation	In accordance with applicable legislation and regulation	–