

## Privacy Notice

Date: 23 March 2026.

In this privacy notice you will find information about how we process personal data about you. Please contact us if you have any questions or would like further information about our processing activities.

### 1. WHO WE ARE

Advokatfirmaet Wiersholm AS is the data controller for the processing of personal data described in this privacy notice.

### 2. WHOSE PERSONAL DATA WE PROCESS

As part of our business of providing business law advice, we process personal data about the following categories of individuals:

- Contact persons at corporate clients
- Private clients
- Contact persons at our suppliers and business partners
- Persons who are involved in, or mentioned in, the matters we handle
- Partners and senior employees in comparable law firms
- Participants at events
- Visitors to our social media profiles
- Job applicants

### 3. HOW WE USE YOUR PERSONAL DATA

The table below sets out the personal data we typically process about you and for what purposes, our typical sources of the data and our legal basis for the processing.

| Purpose                            | Categories of personal data   | Source   | Legal basis   |
|------------------------------------|---|--|---|
| Establishing a client relationship | Name, telephone number and email address. For private clients, we also register address.                | From you or your employer                      | For corporate clients: legitimate interest in following up matters and maintaining dialogue with the client.<br><br>For private clients: performance of a contract with the client. |
| Anti-money laundering measures     | Name, telephone number, address, email address, national identification number and passport information | From you, your employer, or relevant databases | Legal obligation under the Anti-Money Laundering Act.   |

| Purpose   | Categories of personal data  | Source  | Legal basis  |
|---|--|---|--|
| Performing legal assignments  | All information contained in case-related documents and correspondence (such as letters, emails, pleadings, notes, agreements and minutes), for example information about employees and owners of the client's and the counterparty's business, witnesses, the counterparty's lawyers and other persons affected by the matter. In some cases we may gain access to sensitive personal data, for example health data in employment law cases or information about criminal offences in matters concerning financial crime. | From you, your employer, the counterparty, witnesses or other third parties | For corporate clients: legitimate interest in providing services to our clients.<br><br>For private clients: performance of a contract with the client. For special categories of personal data: establishment, exercise or defence of legal claims. |
| Invoicing clients   | Contact information  | From you or your employer   | For corporate clients: legitimate interest in receiving payment for the services we provide.<br><br>For private clients: performance of a contract with the client.  |
| Managing the relationship with corporate clients, suppliers and other business partners | Name, position/title, email address and telephone number   | From you or your employer   | Legitimate interest in administering purchases, sales and other business activities.   |
| Recruiting employees  | Name, CV, contact information (home address, email address and telephone number), application, diplomas, references, certificates, contact details for referees, interview and reference notes, internal assessments, background checks, and results from personality and aptitude/skills tests.   | From you, from referees, from public sources                                | Legitimate interest in recruiting employees and assessing whether you are qualified for the position.  |
| Marketing our services, including newsletters and event invitations                     | Email address and telephone number   | From you  | Your consent; however, we may also rely on our legitimate interest in marketing our services to existing clients (clients we   |

| Purpose  | Categories of personal data  | Source  | Legal basis   |
|--|--|---|---|
|  |  |   | have assisted during the last three years). You may withdraw your consent at any time and unsubscribe by using the unsubscribe function or by contacting us.  |
| Administering our social media profiles              | Insights/statistics, communications (e.g., comments, likes, chat), profile information   | From you  | Legitimate interest in communicating with users and other business partners on social media.  |
| Knowledge management                                 | All information contained in case-related documents and correspondence (such as letters, emails, pleadings, notes, agreements and minutes)   | From you, your employer, the client, the counterparty, witnesses or other third parties | Legitimate interest in improving and further developing our services.   |
| Estate administration (bankruptcy/insolvency estate) | Name, national identification number, contact information, vehicle registration number, bank details, salary information, information about family circumstances and potentially other information. For bankruptcy estates, sensitive data may also be processed, such as health data, criminal convictions/offences and information about trade union membership. | (Source not specified in the provided text)   | Legal obligation under the Bankruptcy Act, the Creditors Security Act and the Wage Guarantee Act.<br><br>Performance of an agreement with the estate (e.g., if the estate sells assets).<br><br>For special categories of personal data: performance of a task carried out in the public interest or in the exercise of official authority. |
| Competitor analysis                                  | Age, salary, seniority level and practice areas  | Public registers, media, websites of comparable law firms                               | Legitimate interest in ensuring a competitive salary policy.  |

We may also collect or receive other types of personal data if this is necessary to fulfil the purposes described above.

We may also use your personal data for certain purposes that are compatible with the original purpose for which the data was collected, such as bookkeeping purposes, audits, analyses, reporting, innovation, and use of data that may be required if we as a law firm become involved in litigation, an acquisition or other process.

#### 4. WHO WE SHARE YOUR PERSONAL DATA WITH

Lawyers are subject to a duty of confidentiality. All information entrusted to us, or which we otherwise become aware of in connection with an assignment, is handled confidentially.

We share personal data with courts, counterparties and other advisers where this is necessary to carry out the assignment.

Our IT service providers and their sub-processors will have access to personal data if necessary for them to deliver their service to us. We have data processing agreements with them which ensure that they do not use the data for their own purposes.

We share data with other third parties if the client requests this, or if it is required to comply with law or requirements from public authorities.

#### 5. TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EEA

In some situations we transfer your personal data to countries outside the EEA, as some of our suppliers (or sub-suppliers) are located in such countries. We will ensure that your personal data is protected by implementing necessary or appropriate safeguards to protect your privacy (such as the EU Standard Contractual Clauses). We will provide further information about such international transfers upon request. If you would like a copy of the safeguards, please use the contact details below.

#### 6. How long we store your personal data

We store your personal data for as long as necessary for the purposes for which we collected it, and in accordance with our internal retention guidelines. The table below sets out the retention periods applicable to certain categories of personal data we process.

| Categories of personal data  | Retention period  |
|--|---|
| Contact information for relevant contact persons at our clients, suppliers and business partners | Normally stored for 5 years after the client relationship has ended.  |
| Case information   | Normally stored for up to 30 years. For matters involving access to information via third-party data rooms, shortly after the assignment is completed we will normally no longer have access to such information. |
| Information collected for anti-money laundering purposes   | Stored for a minimum of 5 years after the client relationship has ended.  |
| Invoicing information  | Normally stored for a minimum of 5 years.   |
| Competitor data  | Normally stored for 10 years.   |
| Contact information for marketing purposes (newsletters and event participation)                 | Stored for as long as consent exists where processing is based on consent.  |
| (General rule)   | Otherwise, the data is stored for as long as we have an ongoing client relationship with you or your business.  |

We emphasise that special situations may lead to longer or shorter retention periods than those described in the table.

## 7. YOUR PRIVACY RIGHTS

You have several rights relating to our processing of your personal data. These rights include:

| Right            | Description   |
|------------------|---|
| Information      | To receive further information about how we process your personal data.   |
| Access           | To request access to which personal data we have registered about you. Because lawyers are subject to a statutory duty of confidentiality, we cannot provide access to case information, unless you are a private client and the case information relates to assignments we have carried out for you. |
| Rectification    | To request rectification and completion of the information we have about you. We will not rectify information and assessments that you believe are incorrect, but which we or our client consider to be correct.  |
| Erasure          | To request deletion of data that we no longer have a basis for storing.   |
| Restriction      | To request that we restrict the processing of your personal data.   |
| Data portability | To request that your data is transferred to you in a structured, commonly used and machine-readable format.   |
| Object           | To object to our processing of your personal data. You also have the right to object to being subject to a decision based solely on automated processing. You can also object to our use of your data for marketing, including by using the link included in each email.                              |

Please note that these rights are subject to statutory conditions and limitations. Contact us if you wish to exercise your rights or if you would like more information about the conditions/limitations.

If you disagree with the way we process your personal data, you may submit a complaint to the Norwegian Data Protection Authority (Datatilsynet). We would appreciate it if you contact us first so that we can clarify any misunderstandings.

## 8. SOCIAL MEDIA

We have pages on social media where we inform about our services and interact with users, including Facebook, Instagram and LinkedIn. On such pages we may receive information that you choose to share with us, for example chat messages, comments and likes. We are joint controllers with the relevant platform for such processing. This means that you may contact us if you would like further information, or if you wish to exercise your privacy rights. Please note, however, that we may not be able to respond to all requests and may have to refer you to the social media platform for further information.

## 9. CHANGES TO THIS PRIVACY NOTICE

We will update this privacy notice when necessary. You will always find an updated version of the privacy notice on our website.

## 10. CONTACT INFORMATION

Please contact us if you have questions, comments or wish to exercise your rights. We will respond to your enquiry as soon as possible, and usually within one month. You can use the following contact details:

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E-mail: [privacy@wiersholm.no](mailto:privacy@wiersholm.no)

Tel: +47 21 02 10 00