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POCKET LAW'S PRIVACY POLICY

PocketLaw takes privacy and protecting the Personal Data handled by us seriously. All Personal Data is Processed in accordance with Applicable Law. In this Policy we describe how and the purposes for which we use your personal information as well as what lawful basis we use and what measures we take to protect Personal Data. We also provide information on how you exercise the rights you have linked to our processing of personal data.

WHY AND WHO?

Pocket Solutions AB, Reg. No. 559169-9623 ("**PocketLaw**", "**we**", "**us**", "**our**"), is the controller of all Personal Data listed in this Privacy Policy (the "**Policy**"). In order to be fully transparent regarding where your Personal Data is stored and processed, we will also provide a list of all our data Processors. This Policy provides information on how we handle Personal Data when you communicate with us, use our platform (available on app.pocketlaw.se) or visit our website www.pocketlaw.se (together the "**Services**").

The intended recipient of the information provided in this Policy is:

- Users of the Service
- Employees of potential customers
- Employees of existing customers
- Visitors of our website

DEFINITIONS

"Applicable Law" refers to the legislation applicable to the processing of Personal Data, including the GDPR, supplementary national legislation, as well as practices, guidelines and recommendations issued by a national or EU supervisory authority.

"Controller" is the company/organisation that decides for what purposes and in what way personal data is to be processed and is responsible for the Processing of Personal Data in accordance with Applicable Law.

"Data Subject" is the living, natural person whose Personal Data is being processed.

"Personal Data" is all information relating, directly or indirectly, to an identifiable natural person.

"Processing" means any operation or set of operations which is performed on Personal data, e.g. storage, modification, reading, handover and similar.

"Processor" is the company/organisation that processes personal data on behalf of the Controller and can therefore only process the Personal Data according to the instructions of the Controller and the Applicable Law.

"Specific Category of Personal Data" or "Sensitive Personal Data" means any information that reveals racial or ethnic origin, political views, religious or philosophical beliefs, trade union membership, genetic data, biometric data to uniquely identify a natural person, health information or information about a physical person's sexual life or sexual orientation.

The definitions above shall apply in this privacy policy regardless if they are capitalised or not.

POCKET LAW'S ROLE AS A CONTROLLER

The information in this Policy covers Personal Data Processing for which PocketLaw is the Controller. As a Controller we are responsible for the Processing for which we decide the purpose of ("the why") and the means for the Processing (what methods, what personal data and for how long it is stored).

PocketLaw provides a platform for legal work where users, among other things, i) get access to general legal information and suggested actions, ii) can prepare contracts and other legal documents, iii) can upload and store contracts and other documents in a digital archive and iv) can get legal services from a legal firm (Sw. *juristbyrå*). Our aim is to empower companies to manage and do legal work themselves by digitising legal knowledge and simplifying legal services.

The Policy does not describe how we process Personal Data in the role of a Controller - *i.e.* when we process Personal Data on behalf of our customers. That includes Personal Data that our customers enter into the platform when *e.g.* creating contracts.

POCKET LAW'S PROCESSING OF PERSONAL DATA

We have a responsibility to describe and demonstrate how we fulfill the requirements that are imposed on us when we process your Personal Data. This section aims to describe:

- That Processing of Personal Data is necessary in for the purpose
- That we have identified the lawful basis for the Processing

LAWFUL BASIS

Legitimate interest - PocketLaw may process Personal Data if we have assessed that a legitimate interest overrides the interest of fundamental rights and freedoms of the Data Subject, and if the processing is necessary for the purpose in question.

Performance of a contract - The Processing is necessary for the performance of a contract entered between us and the Data Subject, or to prepare for entering into an agreement with the Data Subject.

Consent - PocketLaw may process your personal data after you have given your consent to the Processing. Information regarding the processing is always provided in connection to the request of consent.

Legal obligation - We are required by laws and regulations to process Personal Data as a result of our business.

FOR HOW LONG DO WE STORE YOUR PERSONAL DATA?

We will keep your personal data as long as it is necessary for the purpose for which it was collected. Depending on the lawful basis on which we support the Processing, this may **a)** be regulated in a contract, **b)** be dependent on valid consent, **c)** be stated in legislation or **d)** follow by an internal assessment based on a legitimate interest assessment (LIA). In the list below, we indicate, where possible, the period during which the Personal Data will be stored and the criteria used to determine the storage period.

POCKET LAW'S PROCESSING PURPOSES

- 1. Purpose:** Register a user account to enable the customer to access the Services.
Personal Data: Name, E-mail address.
Source: Directly from the Data Subject or from a representative of the company that is a PocketLaw customer.
Lawful basis: The legitimate interest of providing the Services.
Storage period: As long as the Data Subject is entitled to a user account.
- 2. Purpose:** Verify user login credentials to increase security and prevent abuse.
Personal data: Name, E-mail address.
Source: Directly from the Data Subject or from a representative of the company that is a PocketLaw customer.
Lawful basis: The legitimate interest of verifying the user identity to increase security and prevent abuse.
Storage period: As long as the Data Subject is entitled to a user account.
- 3. Purpose:** Communicate in order to efficiently help our customers with any problems and provide relevant information regarding the Service.
Personal data: Name, E-mail address.
Source: Directly from the Data Subject or from a representative of the company that is a PocketLaw customer.
Lawful basis: The legitimate interest of providing the Service.
Storage period: As long as the Data Subject is entitled to a user account.
- 4. Purpose:** Activities to increase awareness of the Service for sales purposes.
Personal data: Name, E-mail address and other contact information.
Source: Directly from the Data Subject and Sourcing.
Lawful basis: The legitimate interest of conducting business and networking.
Storage period: 2 years
- 5. Purpose:** Provide information about the Service for marketing purposes.
Personal data: E-mail address.
Source: Directly from the Data Subject.
Lawful basis: The legitimate interest of marketing.
Storage period: 2 years or until the data subject unsubscribes.

YOUR RIGHTS

You are the one in control of your Personal data and we always strive to ensure that you can exercise your rights as efficiently and smoothly as possible.

Access - You always have the right to receive information about the Processing of data that concerns you. We only provide information if we have been able to verify that it is you that are requesting the information.

Rectification - If you find that the Personal Data we process about you is incorrect, let us know and we will fix it!

Erasure - Do you want us to completely forget about you? You have the right to be forgotten and request deletion of your Personal Data when the Processing is no longer necessary for the purpose for which it was collected. If we are required to retain your information under applicable law or a contract that we have entered with you, we will ensure that it is processed only for the specific purpose set forth in such applicable law or contract. We will thereafter erase the information as soon as possible.

Objections - Do you disagree with our assessment that a legitimate interest for Processing your Personal Data overrides your interest in protecting your privacy? Don't worry - in such case, we will review our legitimate interest assessment. Of course, we add your objection to the balance and make a new assessment to see if we can still justify our Processing of your Personal Data. If you object to direct marketing, we will immediately delete your personal information without making an assessment.

Restriction - You can also ask us to restrict our Processing of your Personal Data

- Whilst we are Processing a request from you for any of your other rights;
- If, instead of requesting erasure, you want us to limit the Processing of Personal Data for a specific purpose. For example, if you do not want us to send advertising to you in the future, we still need to save your name in order to know that we should not contact you; or
- In cases where we no longer need the information in relation to the purpose for which it was collected, provided that you do not have an interest in retaining it to make a legal claim.

Data portability - We may provide you with the data that you have submitted to us or that we have received from you in connection with a contract that we have entered with you. You will receive your information in a commonly used and machine-readable format that you can transfer to another personal data manager.

Withdraw consent - If you have given consent to one or several specific processing(s) of your Personal Data, you have the right to withdraw your consent at any time and thus ask us to terminate the Processing immediately. Please note that you can only withdraw your consent for future processing of Personal Data and not for Processing that has already taken place.

HOW YOU USE YOUR RIGHTS

Send us an e-mail at legal@pocketlaw.se and we will make sure you can exercise your rights.

TRANSFER OF PERSONAL DATA

In order to run our business, we may need help from others who will process Personal Data on our behalf, so-called Processors. In cases where our Processors transfer Personal Data outside the EU/EEA, we have ensured that the level of protection is adequate, and in compliance with Applicable Law, by controlling that either of the following requirements are fulfilled:

- The EU Commission has determined that the level of protection is adequate in the third country where the data is processed
- The Processor has signed up to the EU Commission's standard contract clauses (SCCs) for data transfer to non-EU/EEA countries
- The Processor is certified under the Privacy Shield
- The Processor has taken other appropriate safeguards prior to the transfer and that such safeguards comply with Applicable law

We have entered into Data Processing Agreements (DPA) with all our Processors. The DPA sets out, among other things, how the Processor may process the Personal Data and what security measures are required for the Processing.

We may also need to disclose your personal information to certain designated authorities in order to fulfill obligations under applicable law or legally binding judgements.

OUR PROCESSORS

1. **Processor:** Auth0
Personal data being processed: E-mail, full name, password, IP-number.
Instructions: Auth0 is a trusted authentication and authorisation provider that helps us to gather, store and manage sensitive user data such as passwords in a secure way.
2. **Processor:** Sendgrid
Personal data being processed: E-mail address and full name.
Instructions: Sendgrid helps us to provide a better communication experience by creating custom e-mail templates.
3. **Processor:** Freshchat
Personal data being processed: E-mail address, Full name, Company.
Instructions: Freshchat is a modern messaging software built for teams who want to ace customer conversations - marketing, sales, or support. We use freshchat to help us provide faster and smoother support to our customers.
4. **Processor:** Google (GSuite, Google Drive, Google Analytics)
Personal data being processed: E-mail address, Full name
Instructions: Google's products are helping us in different areas. We use Gmail as our email service and Google drive for our document storage. We also use Google Analytics to track how our customers are using our product to learn more about their needs in order to improve our product.
5. **Processor:** Cloudflare
Personal data being processed: IP-adress.
Instructions: Cloudflare is our first line of defence against malwares. It provides secure certification for all our services and protects us from DDoS attacks.
6. **Processor:** AWS
Personal data being processed: E-mail address, Full name

Instructions: AWS is the biggest and most secure cloud infrastructure provider and it is natural for us to choose them for managing and storing our application data.

7. **Processor:** Zendesk

Personal data being processed: E-mail address, Full name

Instructions: We are using Zendesk to provide a smooth customer support ticketing system for our customers.

8. **Processor:** Scrive

Personal data being processed: E-mail address, Full name.

Instructions: We have integrated Scrive as an e-signing provider in our system. Scrive is a subprocessor in relation to PocketLaw's customers.

9. **Processor:** Mailchimp

Personal data being processed: E-mail address, Full name.

Instructions: Mailchimp helps us to send and manage email campaigns across channels.

TRANSFER OF PERSONAL DATA TO ANOTHER CONTROLLER

In order to streamline the Know Your Customer (KYC) and conflict of interest process when referring our customers to a PocketExpert we collect personal data on behalf of the legal firm we have as a partner.

Fondia is helping us to provide the PocketExpert function in the Service.

For more information see Fondia's [Privacy Policy](#).

SECURITY MEASURES

PocketLaw has taken technical and organisational measures to ensure that your Personal Data is processed securely and protected from loss, abuse and unauthorised access.

OUR SECURITY MEASURES

Organisational security measures are measures that are implemented in work methods and routines within the organisation.

- Internal governance documents (policies/instructions)
- Login and password management
- Physical security (premises etc.)

Technical security measures are measures implemented through technical solutions.

- Encryption
- Access control level
- Access log
- SSL for all outside connections
- 2-step-authentication for all sensitive services
- Using password manager for all passwords

COOKIES

PocketLaw uses cookies and similar tracking techniques to analyse the use of the Service so that we can give you the best user experience. For more information on how we use cookies, see our Cookie Policy www.pocketlaw.se/cookies

IF WE DON'T KEEP OUR PROMISE

If you think that we are not Processing your Personal Data correctly, even after you have notified us of this, you are always entitled to submit your complaint to the Swedish Data Protection Authority.

More information about our obligations and your rights can be found at www.datainspektionen.se

You can contact the authority via e-mail at: datainspektionen@datainspektionen.se

CHANGES TO THIS POLICY

We reserve the rights to make changes to this Policy. In the event that the change affects our obligations or your rights, we will inform you about the changes in advance so that you are given the opportunity to take a position on the updated policy.

CONTACT

Please contact us if you have questions about your rights or if you have any other questions about how we process your personal information:

legal@pocketlaw.se