

## Aalbun privacy policy

### *Goal of the data protection policy*

This Privacy Policy covers the following areas:

1. What personal data we collect
2. How we may use your personal data and the lawful basis for doing so
3. Who we may disclose your personal data to
4. How we protect your personal data
5. Your privacy rights
6. Cookies
7. How long we process your personal data
8. How changes to this Privacy Policy will be made
9. Contacting us or the data protection authority

Arctic Alliance Limited including its subsidiaries ("Aalbun") is fully committed to protecting your individual rights and keeping your personal data safe. In this Privacy Policy we describe the collection, usage, storage and sharing practices of personal data. Within Aalbun, the data controller will be Arctic Alliance Limited.

We process individuals' personal data for a number of reasons. When we write «you», we mean you as a customer, a potential customer, our customer's employee, inventor in our customer's patent or patent application or other relevant parties, such as inventors, authorised representatives, and associated parties.

### 1. What personal data we collect

Personal data is in most cases collected directly from you or generated as part of the use of our services and products. Sometimes additional information is required to keep information up to date or to verify information we collect.

The personal data we collect can be grouped into the following categories:

- **Contact information:** name, phone numbers and addresses, including postal address, and possibly citizenship.
- **Financial information:** type of agreement, transactional data.

Aalbun does **not** collect any **special categories of data** that could include for example information concerning health, ethnic background or religion.

### *Personal data we may collect from you*

We collect information you provide directly to us. For example, when becoming a new customer, we collect personal data, such as name, e-mail address and phone number to be

able to provide you with the product or service in question. Aalbun also collects information which you provide us with such as messages you have sent us, e.g. feedback or a request in our digital channels. Calls and chat conversations with you may also be recorded and logged for verification of orders, documentation, and for quality and improvement purposes.

#### *Personal data that we may collect from third parties*

- Publicly available and other external sources; registers held by governmental agencies or international organizations (such as registers held by patent organizations, patent offices, tax authorities, company registration offices etc.).
- From other entities in Aalbun or other entities which we collaborate with.

## 2. How we may use your personal data and the lawful basis for doing so

We use your personal data to comply with contractual obligations as well as to provide you with offers, advice and services.

#### *Entering into and administration of service and product agreements (performance of a contract)*

The main purpose of our processing of personal data is to collect, verify, and process personal data prior to giving an offer and entering into a contract with you as well as documenting, administering and completing tasks for the performance of contracts.

Examples of the performance of a contract:

- processes needed to e.g. create an account or set up an online service
- customer service during the contract period
- creating and managing an IPR docketing system for a client

#### *Marketing, product- and customer analysis (legitimate interest)*

Personal data is also processed in the context of marketing, product- and customer analyses. This processing forms the basis for marketing, process-, business- and system- development, including testing. This is to improve our product range and optimize our customer offerings.

#### *Consent*

There are situations when we will ask for your consent to process your personal data. An example of such situation is for marketing purposes. The consent will contain information on that specific processing activity. If you have given consent to a processing of your personal data you can always withdraw the consent.

## 3. Who we may disclose your personal data to

We may share your personal data with others such as authorities, Aalbun companies, suppliers, and business partners. Before sharing we will always ensure that we respect relevant secrecy obligations.

To fulfil services and agreements we have to disclose information about you. If, for example you have asked us to file a patent, we need to disclose certain information to fulfil that filing.

#### *Third parties and Aalbun companies*

To provide our services, for example international patent filing, we disclose data about you that is necessary to identify you and perform an assignment or agreement with companies that we cooperate with in order to perform our services. These services include, but not limited to, international patent applications and prosecution in the relevant country and maintaining records of the IPR portfolios for our customers.

We have entered into agreements with selected suppliers, which include processing of personal data on behalf of us. Examples thereof are suppliers of paralegal services, IT development, maintenance, hosting and support.

#### *Third country transfers*

In some cases, we may also transfer personal data to organisations in so-called third countries (countries outside of the European Economic Area). Such transfers can be made if any of the following conditions apply;

- the EU Commission has decided that there is an adequate level of protection in the country in question, or
- other appropriate safeguards have been taken, for example the use of the standard contractual clauses (EU model-clauses) approved by the EU Commission or the data processor has valid Binding Corporate Rules (BCR) in place, or
- that there are exceptions in special situations, such as to fulfil a contract with you or your consent to the specific transfer.

You can access a copy of the relevant EU model-clauses used by Aalbun for transfers by going to [www.eur-lex.europa.eu](http://www.eur-lex.europa.eu) and search for 32010D0087.

#### 4. How we protect your personal data

Keeping your personal data safe and secure is at the centre of how we do business. We use appropriate technical, organizational and administrative security measures to protect any information we hold from loss, misuse, and unauthorized access, disclosure, alteration and destruction.

#### 5. Your privacy rights

You as a data subject have rights in respect of personal data we hold on you. You have the following rights;

- request access to your personal data. You have a right to access the personal data we are keeping about you. In many cases this information is already present to you in your online services from us. Your right to access may, however, be restricted by legislation, protection of other persons' privacy, protection of our customer's rights and consideration for Aalbun's business concept and business practices. Aalbun's know-how, business secrets as well as internal assessments and material may restrict your right of access.

- request correction of incorrect or incomplete data. If the data are incorrect or incomplete, you are entitled to have the data rectified, with the restrictions that follow from legislation.
- request erasure. You have the right request erasure of your data in case;
  - you withdraw your consent to the processing and there is no other legitimate reason for processing,
  - you object to the processing and there is no justified reason for continuing the processing,
  - you object to processing for direct marketing or
  - processing is unlawful
- limitation of processing of personal data. If you contest the correctness of the data which we have registered about you or lawfulness of processing, or if you have objected to the processing of the data in accordance with your right to object, you may request us to restrict the processing of these data to only storage. The processing will only be restricted to storage, until the correctness of the data can be established, or it can be checked whether our legitimate interests override your interests. If you are not entitled to erasure of the data which we have registered about you, you may instead request that we restrict the processing of these data to only storage. If the processing of the data which we have registered about you is solely necessary to assert a legal claim, you may also demand that other processing of these data be restricted to storage. We may process your data for other purposes if this is necessary to assert a legal claim or if you have granted your consent to this.
- object to processing based on our legitimate interest. You can always object to the processing of personal data about you for direct marketing and profiling in connection to such marketing.
- data portability. You have a right to receive personal data that you have provided to us in a machine-readable format. This right applies to personal data processed only by automated means and on the basis of consent or of fulfilling a contract.

Your request to exercise your rights as listed above will be assessed given the circumstances in the individual case. Please note that we may also retain and use your information as necessary to comply with legal obligations, resolve disputes, and enforce our agreements.

## 6. Cookies

We collect, process and analyse data regarding the use of our webpages. Traffic data is data connected to visitors on the webpage and data handled in communication fields for sending, distributing or making messages available.

We use cookies and similar technologies to deliver products and services to you, provide a secure online environment, to manage our marketing and provide a better online experience, track our website performance and to make our website content more relevant to you. The data will not be used to identify individual visitors except for Aalbun services customers.

You can set or amend your web browser controls to accept or reject cookies. If you choose to reject cookies, you may still use our websites and some services, however your access to some functionality and areas of our website or services may be restricted substantially.

## 7. How long we process your personal data

We will keep your data for as long as they are needed for the purposes for which your data was collected and processed or required by laws and regulations.

This means that we keep your data for as long as necessary for the performance of a contract and as required by retention requirements in laws and regulations. Where we keep your data for other purposes than those of the performance of a contract, such as for bookkeeping requirements, we keep the data only if necessary and/or mandated by laws and regulations for the respective purpose.

The data retention obligations will differ within Aalbun subject to local law.

Specific examples are:

- Bookkeeping regulations: up to ten years
- Details on performance of an agreement: up to ten years after end of customer relationship to defend against possible claims

The above is only for explanatory purposes and the retention times may differ country to country.

## 8. How changes to this Privacy Policy will be made

We are constantly working on improving and developing our services, products and websites, so we may change this privacy policy from time to time. We will not diminish your rights under this privacy policy or under applicable data protection laws in the jurisdictions we operate. If the changes are significant, we will provide a more prominent notice, when we are required to do so by applicable law. Please review this Privacy Policy from time to time to stay updated on any changes.

## 9. Contacting us or the data protection authority

If you have any questions or concerns regarding our privacy policy, you can always contact Aalbun's customer service at [info@aalbun.com](mailto:info@aalbun.com) or by sending a letter to: Arctic Alliance Limited, 16 Saxon Road, CB5 8HS Cambridge, United Kingdom.

You can also lodge a complaint or contact the data protection authority in any of the countries where we provide services or products to you.