

PRIVACY POLICY, 1 January 2026

Assignments and client data

This privacy policy describes how Attorneys Ruoholahti Ltd processes personal data. When processing personal data, we comply with data protection legislation¹, other applicable legislation² and the rules and guidelines of the Finnish Bar Association³.

Under the General Data Protection Regulation, **personal data** means (Article 4(1)(1)): “... *any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person*”.

‘Controller’ means, in accordance with the General Data Protection Regulation (Article 4(1)(7)): “...*the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law*”.

This privacy policy explains:

- Who is the controller?
- Whose personal data do we process?
- What categories of personal data do we process?
- Why and on what grounds do we process personal data?
- How do we collect personal data?
- Do we disclose personal data to third parties?

¹ This includes applicable data protection legislation, such as the European Union’s General Data Protection Regulation (EU) 2016/679 and the national Data Protection Act (2018/1050).

- Do we transfer personal data outside the EU/EEA?
- How have we protected personal data?
- How long do we retain personal data?
- What are the data subject’s rights regarding the processing of personal data?
- Changes to the privacy policy and complaints to the Data Protection Ombudsman

1. Data controller

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2. Categories of data subjects

This privacy policy applies to:

- our clients and their representatives,
- our prospective clients,
- our clients’ counterparties and their representatives,
- our clients’ clients,
- members of our clients’ staff or other contractual partners, and
- other persons involved in the assignment.

3. Categories of personal data we process

We process personal data relating to client relationships and assignments. The personal data we process depends on the nature of the client relationship and the assignment, as well as our statutory obligations, which is why the data varies on a case-by-case basis. For example, we collect the following personal data:

- name, date of birth, personal identity code, contact details (address, telephone number, email),
- name and contact details of the representative of the organisation,
- nationality,
- name, contact details, date of birth and personal identity code of the client’s representative,

² Including the Advocates Act (1958/496).

³ Including the Finnish Bar Association’s information security guidelines.

- personal data relating to the client's opposing and supporting parties,
- photographs,
- information relating to employment or service relationships,
- information relating to contractual relationships,
- information relating to positions of trust and signing authority,
- information concerning ownership or tenancy of property or other assets,
- assignment documentation and correspondence,
- personal identification data received via electronic signature,
- information relating to payments and invoicing,
- insurance details,
- information required to fulfil our statutory obligations, for example, information relating to the identification of the client as required by anti-money laundering legislation, such as a copy of an identity document.

Depending on the nature of the assignment, we may process personal data falling within special categories, such as:

- health-related data,
- personal data relating to criminal convictions, offences and security measures,
- information concerning trade union membership.

Cookies on our website collect information, for example, about the device used and how our website is used.

4. Purpose and legal basis for the processing of personal data

The processing of personal data may be based on:

- our statutory obligations,
- a legitimate interest,
- the performance or fulfilment of a contract, or
- consent.

We process personal data belonging to special categories of personal data only to the extent necessary to establish, exercise or defend a legal claim, or to comply with our statutory obligations,

if the data subject has not given their consent to the processing of such data.

We do not use personal data for profiling or automated decision-making.

Our legal obligations

We may process personal data in order to comply with our legal obligations. For example, anti-money laundering legislation imposes obligations on us to identify and get to know our clients. Furthermore, as a Law Firm, we are bound by the rules and guidelines of the Finnish Bar Association, such as the guidelines on proper professional conduct.

Our or our client's legitimate interests

When we process personal data on the basis of our legitimate interests in connection with the handling of an assignment, the purpose of the processing is, for example, to check for any conflicts of interest before commencing the assignment and to facilitate communication between the parties for the purpose of handling the assignment. We may also process data on the basis of our legitimate interests to communicate about our activities, for example for the purposes of developing our client relationships and marketing.

If the processing of personal data is not based on compliance with our statutory obligations, the processing may be based on our clients' legitimate interests in safeguarding their rights and property, or in preparing legal claims and engaging a legal representative to safeguard their rights and interests, as well as in handling civil and criminal matters in court. Our clients' legitimate interests may also be based on interests relating to contractual arrangements.

Performance or fulfilment of our mutual agreement

The processing of our private clients' personal data may be based on the performance or fulfilment of our mutual agreement.

Consent

The processing of personal data for the purposes of developing our client relationships and marketing, for example through the use of cookies on our website or mailing lists, may also be based on consent. You may withdraw your consent by contacting us by email at toimisto@ruoholahtilaw.fi.

The legal basis for the use of cookies on our website is consent, which may be withdrawn at any time. Withdrawal is carried out via the cookie banner on the website.

5. Collection of personal data

We generally collect personal data directly from the individual concerned, our clients or their representatives. Where necessary, we may also collect personal data from, for example, public authorities, public sources and registers, such as credit registers, association registers and commercial registers.

This privacy policy does not apply to third-party websites or services that can be accessed via links on our website, nor does it apply to our website provider. The privacy policies relating to these can be found on their respective websites.

6. Disclosure of personal data to third parties

As a general rule, we do not disclose personal data to third parties without consent, unless the execution of the assignment requires such disclosure, for example, to a counterparty. In some cases, we may also be obliged to disclose personal data to third parties, such as the Financial Supervisory Authority, if our statutory obligations so require.

We use external service providers, such as IT service providers, who may process personal data on our behalf as part of their service. We have ensured through contractual agreements that our external service providers process personal data solely for the purposes set out in this privacy policy and in accordance with applicable data protection legislation and this privacy policy.

7. Transfer of personal data outside the EU/EEA

As a general rule, we do not transfer personal data outside the EU/EEA, but in some cases such transfers may occur; for example, the international cloud services we use may transfer data outside the EU/EEA.

If personal data is transferred outside the EU/EEA, we ensure an adequate level of protection in accordance with the EU General Data Protection Regulation (GDPR), for example by using standard contractual clauses approved by the European Commission.

8. Protection of personal data

We process personal data confidentially and securely. We endeavour to safeguard the security of personal data through various technical and organisational measures. We also require our external service providers to process personal data confidentially and ensure its security.

Personal data in electronic form is backed up, for example to prevent loss, and is protected using technical measures that are generally accepted and reasonable within our industry, such as firewalls and passwords. Manual records are protected using measures that are generally accepted and reasonable within our industry, such as storing the data in locked premises.

9. Retention period of personal data

We process personal data to the extent necessary to fulfil the purpose of the processing. We delete data that is irrelevant to the purpose of the processing once it has been established that the data is irrelevant.

We archive data within one year of the end of the assignment. We retain personal data in our electronic and/or manual archives for as long as is necessary based on the purpose of the data, our operations, legislation or the obligations set out in the guidelines of the Finnish Bar Association. Consequently, the retention periods for personal data may vary depending on the purpose and legal basis for processing the data. As a general rule, we retain personal data for 10 years from the end of the assignment, in accordance with the recommendation issued by the Finnish Bar Association, after which we will delete the data relating to the assignment.

10. Rights of the data subject

The General Data Protection Regulation (GDPR) grants the data subject certain rights, under which the data subject is, as a general rule, entitled to:

- obtain confirmation of the processing of their personal data and to access that data,
- rectify data, erase data, have the right to be forgotten, and restrict the processing of data,
- have data transferred from one system to another,
- object to the processing of their data, and
- not be subject to automated decision-making.

However, the data subject's rights may be restricted in certain cases, for example, on the basis of the grounds for processing personal data. Regarding the content and exercise of these rights, the data subject may contact us by email at toimisto@ruoholahtilaw.fi.

Right to access own personal data and to obtain a copy of such data

In principle, the data subject has the right to obtain confirmation from the data controller as to whether their personal data is being processed. If personal data is being processed, the data subject has the right to access the data and to obtain a copy of it. However, access to the data may be refused on the basis of legislation. As a general rule, exercising this right is free of charge.

Right to request the rectification, erasure or restriction of processing

The data subject has the right to request the rectification of inaccurate data concerning them and, in some cases, the completion of incomplete data. On the grounds laid down by law, the data subject also has the right to request the erasure of their data or the restriction of its processing.

Right to transfer data from one system to another

If we process personal data provided to us by a data subject on the basis of a contract between us or the data subject's consent, the data subject may, in principle, have the right to receive such data in a machine-readable format and the right to transfer this data to another data controller.

Right to object to the processing of personal data

In certain circumstances, the data subject has the right to object to the processing of their personal data. If we process personal data on the basis of our legitimate interests, the data subject may object to the processing on the grounds of their particular personal circumstances.

However, in such cases, we may refuse the data subject's request to object to the processing of their personal data, for example if the processing is necessary for the establishment, exercise or defence of legal claims. The data subject may contact us by email at toimisto@ruoholahtilaw.fi, if they wish to object to the processing of their personal data. When making their request, the data subject must specify the specific personal circumstances on which they base their objection to the processing of their personal data.

If we process a data subject's personal data for direct marketing purposes or on the basis of the data subject's consent, the data subject has the right at any time to object to the processing of their personal data or to withdraw their consent by sending an email to toimisto@ruoholahtilaw.fi.

Right not to be subject to automated decision-making and profiling

The data subject's personal data will not be used for automated decision-making that would have legal or similar effects on the data subject, such as profiling based on personal characteristics.

11. Changes to the privacy policy and complaints to the Data Protection Ombudsman

We may make changes to this privacy policy, for example, if the processing of personal data or the purposes of such processing change. We will publish the updated privacy policy on our website at www.ruoholahtilaw.fi.

Questions regarding the processing of personal data can be sent by email to toimisto@ruoholahtilaw.fi.

If, in the data subject's view, we have not complied with the applicable data protection regulations in our operations, a complaint may be lodged with the competent supervisory authority, which, in matters relating to the processing of client's personal data, is the Office of the Data Protection Ombudsman. Contact details and instructions on how to lodge a complaint can be found on the Office of the Data Protection Ombudsman's website at: www.tietosuoja.fi.