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Linklaters

Global Standards for Processing Personal Data

Linklaters

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Ref

Table of Contents

Contents	Page
1 Scope and Purpose.....	2
2 Definitions and Interpretation	2
3 Access to the Standards	4
4 Standards Infrastructure.....	4
5 Processing Principles.....	4
6 Rights of Individuals	5
7 Security	5
8 Internal Processing of Personal Data	5
9 Third Party Processing of Personal Data.....	6
10 Marketing.....	6
11 Special or Sensitive Categories of Personal Data	6
12 Compliance Audit	6
13 Co-operation with EU Data Protection Commissioners	7
14 Rights of Redress.....	7
15 Conflicts.....	8
16 Updating the Standards	9
Appendix 1 Part I: Relevant EEA Countries.....	10
Appendix 1 Part II: Non-EEA Countries	11
Appendix 2 Linklaters Data Flow	12
Appendix 3 Core Purposes	13
Appendix 4 Linklaters BCR Group Entities	14

1 Scope and Purpose

- 1.1 These Global Standards for processing Personal Data (the “**Standards**”) relate to information about natural persons who can be identified from that information, whether directly or indirectly, and in particular by reference to one or more factors specific to their physical, physiological, mental, economic, cultural or social identity (“**Personal Data**”).
- 1.2 The Standards define the standards applicable to the Linklaters BCR Group Entities in relation to Personal Data:
- (i) that is processed by any of the Linklaters BCR Group Entities; and
 - (ii) the processing of which is subject to regulation by legislation implementing the Directive.
- 1.3 The Standards apply to:
- (i) the processing of Personal Data by a Linklaters Data Controller in the European Economic Area (“**EEA**”);
 - (ii) the processing of Personal Data in the EEA by a Linklaters Data Controller located outside of the EEA;
 - (iii) any transfer of Personal Data out of the EEA by one of the Linklaters BCR Group Entities to another; and
 - (iv) any processing or onward transfer of Personal Data (which was previously subject to a transfer described in (iii)) by one Linklaters BCR Group Entity to another Linklaters BCR Group Entity that is outside of the EEA.
- 1.4 The different types of Personal Data and the purposes for which, and the manner in which, they are processed can be found in Appendix 2 (*Linklaters LLP Data Flow*) and Appendix 3 (*Core Purposes*).

2 Definitions and Interpretation

2.1 Definitions

In these Standards the following terms and expressions have the meanings set out below save that if there is any conflict, apparent conflict or ambiguity in any of the terms set out below or any terms that are not defined in these Standards, such terms shall be interpreted in accordance with the Directive. “**Applicable Law**” means the mandatory requirements of applicable national legislation, which do not go beyond what is necessary in a democratic society on the basis of one of the interests listed in Article 13 (1) of the Directive, (that is, if they constitute a necessary measure to safeguard national security, defence, public security, the prevention, investigation, detection and prosecution of criminal offences or of breaches of ethics for regulated professions, an important economic or financial interest of the State or the protection of the individual or the rights and freedoms of others);

“**Deed Poll**” means the deed poll entered into by Linklaters LLP on [];

“**Directive**” means Directive 95/46/EC of 24 October 1995;

“**Entity**” means either a branch, local partnership or service entity within the Linklaters BCR Group;

“**Individual**” shall have the same meaning as ‘Data Subject’ (as defined in the Directive);

“**Linklaters LLP**” means the limited liability partnership established under English law whose registered office is at One Silk Street, London EC2Y 8HQ;

“**Linklaters BCR Group Entities**” (also referred to together as the “**Firm**”) means the entities in the table attached in Appendix 4, comprising all entities controlled by Linklaters LLP which are based in a Relevant EEA Country or in a Non-EEA Country and which are bound by the Firm’s binding corporate rules (“**BCR**”), as updated from time to time by Linklaters LLP;

“**Linklaters Data Controller**” means a Data Controller that is a Linklaters BCR Group Entity;

“**Partners**” means members (or employees or consultants with equivalent status and qualifications) of a Linklaters BCR Group Entity;

“**Personnel**” means individuals employed by a relevant Linklaters BCR Group Entity or consultants acting on behalf of, or embedded in, a relevant Linklaters BCR Group Entity;

“**Relevant EEA Country**” means a country listed in Part I of Appendix 1 to these Standards;

“**Non-EEA Country**” means a country listed in Part II of Appendix 1 to these Standards:

“**Personal Data**”, “**Sensitive Data**”, “**Data Subject**”, “**process/processing**”, “**Data Controller**” and “**Data Processor**” shall each have the same meanings as are given to them in the Directive.

2.2 Interpretation

2.2.1 References to a statute or statutory provision include:

- (i) that statute or provision as from time to time modified, re-enacted or consolidated, whether before or after the date of these Standards;
- (ii) any past statute or statutory provision (as from time to time modified, re-enacted or consolidated) which that statute or provision has directly or indirectly replaced; and
- (iii) any subordinate legislation made from time to time under that statute or statutory provision which is in force at the date of these Standards.

2.2.2 References to:

- (i) a person include any company, partnership or unincorporated association (whether or not having separate legal personality); and
- (ii) a company shall include any company, corporation or any body corporate, wherever incorporated.

2.2.3 References to one gender include all genders and references to the singular include the plural and vice versa.

2.2.4 References to the ‘**control**’ which Linklaters LLP has of any relevant Linklaters BCR Group Entity, include the effective control exercised by Linklaters LLP by virtue of: (i) any (direct / indirect) shareholding or other partnership or ownership interest held by Linklaters LLP (or any individual(s) or entity(ies) on behalf of (or on trust for) Linklaters LLP) in the relevant Linklaters BCR Group Entity, or (ii) members of Linklaters LLP, who have fiduciary duties to act in the best interests of Linklaters LLP, and whose welfare, career development and discipline is the responsibility of the Senior Partner of Linklaters LLP, acting as directors, members or partners of the relevant Linklaters BCR Group Entity with power to control or manage its business, and ‘**controlled**’ shall be interpreted accordingly.

3 Access to the Standards

The Standards will be made available on the Firm's website and intranet. Any queries in respect of the Standards should be addressed to the following:

Postal address: Head of Law and Compliance
Linklaters LLP
One Silk Street
London
EC2Y 8HQ

Email address: data.protection@linklaters.com

4 Standards Infrastructure

Linklaters LLP will ensure that:

- (i) adequate resource is provided to maintain compliance with the Standards. This includes ensuring appropriate senior management responsibility and oversight of the Standards;
- (ii) those who have permanent or regular access to Personal Data, or that are involved in the collection of Personal Data, or in the development of tools used to process Personal Data, are trained and informed of their rights and responsibilities in respect of the Standards; and
- (iii) the Standards, which form part of the Firm's BCR, will be incorporated into the Firm's policies applicable to all Linklaters BCR Group Entities.

5 Processing Principles

Unless otherwise permitted by Applicable Law, a Linklaters BCR Group Entity shall apply the following processing principles when acting as Data Controller.

A Linklaters BCR Group Entity shall:

- (i) only process Personal Data for purposes permitted by applicable data protection laws;
- (ii) process Personal Data fairly and lawfully;
- (iii) inform the data subject when Personal Data is being processed. In addition the relevant entity shall provide its name and address, the purpose of processing, the recipients of the data and all other information required to ensure the processing is fair;
- (iv) when notified of a change to Personal Data, update its records in accordance with the deadlines specified by Applicable Laws;
- (v) adopt appropriate measures to retain Personal Data for no longer than is appropriate for the purposes for which it was collected, unless the Personal Data is otherwise required to be kept by Applicable Law or regulation;
- (vi) obtain Personal Data only for one or more specified and lawful purposes, and shall not further process the Personal Data in any manner incompatible with that purpose or those purposes; and

- (vii) only process Personal Data which is adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed.

6 Rights of Individuals

When acting as a Data Controller:

- (i) A Linklaters BCR Group Entity shall provide in an intelligible form, upon written request from an individual, and in accordance with the deadlines specified by Applicable Laws, the information that constitutes Personal Data processed by that Linklaters BCR Group Entity in relation to the relevant individual, and such supporting information as is required by Applicable Laws, unless that Linklaters BCR Group Entity is permitted by Applicable Law to refuse or only comply partially with the request. All requests for access to Personal Data should be addressed either to the individual's usual contact at the relevant Linklaters BCR Group Entity or to the address provided in paragraph 3 above;
- (ii) A Linklaters BCR Group Entity may, where permitted by Applicable Law, charge a fee for the provision of copies of Personal Data requested by individuals;
- (iii) A Linklaters BCR Group Entity shall amend, update or delete, as appropriate or upon notification, any Personal Data which is found to be incorrect;
- (iv) A Linklaters BCR Group Entity shall respect individuals' statutory right to object to the way their data is processed by that Linklaters BCR Group Entity. Objections may be raised with the individuals' usual contact at the relevant Linklaters BCR Group Entity, HR contact or to the Firm's Head of Compliance (whose contact details are set out in paragraph 3) as appropriate. All legitimate objections will be investigated and necessary action taken, including rectification, erasure or destruction of data, where appropriate; and
- (v) A Linklaters BCR Group Entity shall take account of individuals' legitimate interests and inform them of the logic involved in respect of decisions that are made using their Personal Data purely by automatic means with no human involvement and which: (i) are intended to evaluate certain personal aspects relating to the individual; and (ii) produce legal effects concerning or significantly affecting the individual.

7 Security

Linklaters BCR Group Entities shall take reasonable technical and organisational measures with a view to protecting Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing (including taking reasonable steps to ensure the reliability of employees who have access to the Personal Data).

8 Internal Processing of Personal Data

Linklaters LLP will procure that all Linklaters BCR Group Entities which process Personal Data will follow the instructions of the relevant Linklaters Data Controller and will be bound by such instructions.

9 Third Party Processing of Personal Data

Before a Linklaters BCR Group Entity transfers Personal Data to a third party in furtherance of an outsourcing or other data processing arrangement or uses the services of a third party to process Personal Data on its own behalf, it shall ensure that where the third party acts as a Data Processor it is contractually bound to only process Personal Data in accordance with the relevant Linklaters BCR Group Entity's requirements and instructions. The relevant Linklaters BCR Group Entity shall ensure that third party Controllers and Processors to whom Personal Data is transferred afford a similar level of protection for that Personal Data as the Linklaters BCR Group Entity.

10 Marketing

- 10.1** Linklaters BCR Group Entities shall not use Personal Data to send marketing information to any individual (including any employee) who has requested not to receive marketing material.
- 10.2** If an individual requests a Linklaters BCR Group Entity to stop processing their Personal Data for direct marketing purposes, that Linklaters BCR Group Entity shall stop processing the Personal Data for those purposes in accordance with the deadlines specified by Applicable Laws.
- 10.3** An individual may make such a request to their usual Linklaters LLP contact or to the Head of Compliance at any time free of charge.

11 Special or Sensitive Categories of Personal Data

Each Linklaters BCR Group Entity in a Relevant Country shall comply with any additional legal steps required by applicable data protection laws in that Relevant Country when processing special (or sometimes called sensitive) categories of Personal Data.

12 Compliance Audit

- 12.1** Linklaters LLP's internal audit department shall evaluate, test and report on the Linklaters BCR Group Entity compliance with the Standards on a regular basis. Where any non-compliance with the Standards is identified in such audits, the relevant audit professional will work with the relevant business manager to design and implement remediation measures. The audit professional will then track the progress of the remediation measures.
- 12.2** Information from audit reports relating to compliance with the Standards will be sent to the Head of Compliance and the Linklaters Executive Committee.
- 12.3** Subject to paragraph 12.5 below, a Linklaters BCR Group Entity in a Relevant Country shall provide details of any relevant audit in that Relevant Country or in relation to Personal Data exported from the EEA (in so far as they relate to compliance with the Standards), to the local data protection authority in that Relevant Country (the "DPA"), upon request from that local DPA.
- 12.4** Subject to paragraph 12.5 below, a Linklaters BCR Group Entity in a Relevant Country shall permit its local DPA to audit that Linklaters BCR Group Entity in order that the local DPA may obtain the information necessary to demonstrate that Linklaters BCR Group Entity's compliance with the Standards.
- 12.5** To the extent permitted by Applicable Laws a Linklaters BCR Group Entity in a Relevant Country will only disclose compliance information to its local DPA provided that: (i) such information relates to compliance with the Standards; (ii) the information does not contain

any commercially sensitive information about or belonging to Linklaters LLP, any other Linklaters BCR Group Entity, or any of their respective clients; (iii) the information does not contain any confidential information about or belonging to a third party; (iv) the information is not subject to the law of privilege; and (v) disclosure of the information would not be contrary to Applicable Law. For the avoidance of doubt, nothing in paragraphs 12.1 to 12.5 above shall prevent a Linklaters BCR Group Entity from separating out the information in order to comply fully with the requirements of this paragraph.

13 Co-operation with EU Data Protection Commissioners

13.1 Each Linklaters BCR Group Entity in a Relevant Country shall respond to all reasonable requests for information from the local DPA in that Relevant Country which properly fall within that DPA's ambit, to the extent that such requests are consistent with Applicable Law, regulations, professional standards and due process.

13.2 Each Linklaters BCR Group Entity in a Relevant Country shall respect the decisions of the local DPA in that Relevant Country relating to the interpretation and application of the Standards to the extent consistent with Applicable Law, regulations, professional standards and due process and without waiving any defences and/or rights of appeal available to that Linklaters BCR Group Entity.

14 Rights of Redress

14.1 The Firm's **Internal Complaints Procedure** is available on the Firm's website to any individuals who wish to raise concerns in relation to a Linklaters BCR Group Entity's compliance with the Standards.

14.2 Linklaters LLP has executed a Deed Poll as part of the process of implementing BCR. Under the Firm's Internal Complaints Procedure individuals exercising their rights under the complaints procedure shall be entitled to a copy of the Deed Poll, on request, on a confidential basis. For the avoidance of doubt, disclosure of the Deed Poll to an individual's legal representative will not be considered a breach of confidentiality.

For further information regarding the Firm's complaints procedure please contact the firm's Head of Compliance using the contact details in paragraph 3 above.

14.3 The individual may also raise his or her concerns with the local DPA in their Relevant Country without having to go through the Linklaters Internal Complaints Procedure first.

14.4 Alternatively or additionally, where an individual has suffered damage as a direct result of a breach of the Standards by a Linklaters BCR Group Entity or any of their Personnel or Partners then, subject to the provisions of this paragraph 14 the individual shall be entitled to bring a claim against Linklaters LLP for remediation of the relevant breach of the Standards (where remediable) and/or compensation as a third party beneficiary either in:

- (i) the courts of England and Wales; or
- (ii) the courts of the EEA jurisdiction where the relevant Linklaters BCR Group Entity performed the transfer or processing that has given rise to the claim; or
- (iii) the courts of the EEA jurisdiction of establishment of the relevant Linklaters Data Controller that initially collected the Personal Data to which the claim relates; or
- (iv) the courts of the jurisdiction of establishment of the relevant Linklaters BCR Group Entity at the origin of the transfer or processing of the Personal Data.

a court chosen pursuant to this paragraph 14.4 being, the "**Selected Jurisdiction**".

- 14.5** An individual wishing to submit a claim in respect of a breach of the Standards must confirm to Linklaters LLP that it agrees to submit to the exclusive jurisdiction of the Selected Jurisdiction.
- 14.6** The submission by Linklaters LLP to the Selected Jurisdiction does not, in respect of any claims that do not relate to compliance by a Linklaters BCR Group Entity with the Standards or for any other purpose whatsoever, constitute a submission to the jurisdiction of such courts or a waiver of Linklaters LLP's rights to claim *forum non conveniens*.
- 14.7** A Linklaters BCR Group Entity shall not be deemed to have breached the Standards if it has observed the standard of care appropriate in the circumstances or otherwise acted in accordance with Applicable Law.
- 14.8** Subject to the other provisions of this paragraph, if an individual claims that a breach of the Standards has been committed outside the EEA by a Linklaters BCR Group Entity based in a Non-EEA Country (a "**Non-EEA Entity**"), then a breach of the Standards shall be deemed to have occurred unless Linklaters LLP demonstrates that either:
- (i) no breach of the Standards has occurred; and/or
 - (ii) the relevant Non-EEA Entity was not responsible for the alleged breach of the Standards.
- 14.9** If it is held that a breach of the Standards has occurred, it shall be the responsibility of the individual who brought the claim to prove that he or she incurred damage as a result of such breach and to prove the amount of such damage.
- 14.10** To the maximum extent permitted by Applicable Laws and regulations, Linklaters LLP shall not be liable to an individual for:
- (i) punitive or exemplary damages (i.e. damages intended to punish a party for its conduct, rather than to compensate the victim of such conduct); or
 - (ii) indirect loss, consequential loss or special damages, howsoever caused.

In any event, Linklaters LLP shall only be liable for damages which have been: (i) agreed by Linklaters LLP under a settlement or compromise agreement with the relevant individual; or (ii) awarded against Linklaters LLP by a non-appealable judgment, order, or by any other legal award of a court or tribunal with valid jurisdiction.

15 Conflicts

- 15.1** If a Linklaters BCR Group Entity has reason to believe that any Applicable Law prevents it from complying with the Standards and may have a substantial effect on the protections provided by the Standards, that Linklaters BCR Group Entity will promptly inform the Firm's Head of Compliance (whose contact details are set out in paragraph 3) (except where prohibited by a law enforcement authority, such as prohibition under criminal law to preserve the confidentiality of a law enforcement investigation). Linklaters LLP will make a decision on how to proceed and will consult the local DPA in cases of doubt. Linklaters LLP shall notify the relevant DPAs in accordance with paragraph 16 if Linklaters LLP determines that a change is required to the Standards to address the issue.
- 15.2** If any Applicable Law requires a higher level of protection for Personal Data than that set out in these Standards, the relevant Applicable Law will take precedence over these Standards in respect of that aspect of the Standards.
- 15.3** Linklaters LLP shall not be responsible for a breach of the Standards, to the extent compliance with the Standards is prevented by Applicable Laws in the relevant jurisdiction.

16 Updating the Standards

Linklaters LLP reserves the right to amend the Standards (including, without limitation, the addition of new Linklaters BCR Group Entity). Any substantive changes to these Standards shall be reported to each Linklaters BCR Group Entity in a Relevant Country and to the relevant DPAs as soon as practicable and within three months of the amendment or variation. Any other non-substantive amendments to these Standards shall be reported to each Linklaters BCR Group Entity in a Relevant Country and to the relevant DPAs on an annual basis.

Appendix 1
Part I: Relevant EEA Countries

- Belgium
- France
- Germany
- Italy
- Luxembourg
- Poland
- Portugal
- Spain
- Sweden
- The Netherlands
- United Kingdom

Appendix 1
Part II: Non-EEA Countries

- People's Republic of China (incl. Hong-Kong)
- United Arab Emirates
- Singapore
- United States of America
- Japan
- Russia
- Brazil
- India
- Thailand
- Korea

Appendix 2

Linklaters Data Flow

- 1** The Standards shall apply to the processing of all Personal Data of the following kinds:
- (a) human resources-related data;
 - (b) client-related data (predominantly contact details of individuals within client organisations); and
 - (c) other business-related data (e.g. contact details of third party suppliers).

- 2** A Linklaters BCR Group Entity may transfer:

- (a) personnel data;
- (b) sound and/or visual images;
- (c) client Personal Data; and
- (d) marketing data.

Personal Data may also include Sensitive Data. However, such data will only be processed and transferred to the extent permitted by Applicable Law.

- 3** In the context of its global practice, the Firm operates as a boundless firm and therefore Personal Data may be transferred between any of the Linklaters BCR Group Entities worldwide. The majority of the Firm's processing in the EU is carried out at the two UK-based data processing centres (UK1 and UK2), which service the Firm's offices in Europe. It is therefore likely that the bulk of data transfers out of the EEA will originate in the UK and be transferred to the Firm's remaining data centre in Hong Kong, which services the Asia region.

- 4** The Firm's disaster recovery system necessitates additional replication between data centres to ensure data availability in the event of a data centre failure. Replication for key business systems such as email and the Firm's document management system is as follows:

- UK1 replicated to UK2;
- UK2 replicated to UK1;
- Hong Kong replicated to UK2.

Appendix 3 Core Purposes

Personal Data covered by the Standards is processed and transferred for the following core purposes:

- (a) staff administration and human resources administration, including recruitment;
- (b) advertising and public relations;
- (c) licensing and registration;
- (d) information and database administration;
- (e) billing, accounts and financial records;
- (f) legal and financial services; and
- (g) information required for the prevention and/or prosecution of offenders.

Appendix 4
Linklaters BCR Group Entities

No	Entity	Function	Ownership/Control
1	Linklaters LLP	Headquarters	Members of Linklaters LLP
2	Linklaters (Partnership)	Headquarters	Simon Davies and Robert Elliott (partners)
BRANCHES			
1	Linklaters (Hong Kong)	Branch of the Linklaters (Partnership)	Linklaters Partnership
2	Linklaters – Antwerp and Brussels (Belgium)	Branch of Linklaters LLP	Linklaters LLP
3	Linklaters – Beijing and Shanghai (China)	Branch of Linklaters LLP	Linklaters LLP
4	Linklaters – Dubai (UAE)	Branch of Linklaters LLP	Linklaters LLP
5	Linklaters – Abu-Dhabi (UAE)	Branch of Linklaters LLP	Linklaters LLP
6	Linklaters – Paris (France)	Branch of Linklaters LLP	Linklaters LLP
7	Linklaters – Berlin, Düsseldorf, Frankfurt, Munich (Germany)	Branch of Linklaters LLP	Linklaters LLP
8	Linklaters – Luxembourg (Luxembourg)	Branch of Linklaters LLP	Linklaters LLP
9	Linklaters – Amsterdam (The Netherlands)	Branch of Linklaters LLP	Linklaters LLP
10	Linklaters – Lisbon (Portugal)	Branch of Linklaters LLP	Linklaters LLP
11	Linklaters – Singapore (Singapore)	Branch of Linklaters LLP	Linklaters LLP
12	Linklaters – New York and Washington (USA)	Branch of Linklaters LLP	Linklaters LLP
13	Linklaters – Seoul (Korea)	Branch of Linklaters LLP	Linklaters LLP

No	Entity	Function	Ownership/Control
LOCAL PARTNERSHIPS			
1	Studio Legale Associato – Milan (Italy)	Italian partnership	Two of the partners are Linklaters LLP members
2	Gaikokuho Kyodo Jigyo Horitsu Jimusho Linklaters – Tokyo (Japan)	Japanese partnership	Some of the partners are also Linklaters LLP members
3	Linklaters C. Wisniewski I Wspolnicy Spolka Komandytowa – Warsaw (Poland)	Polish partnership	Some of the partners are also Linklaters LLP members
SERVICE ENTITIES / OTHER			
1	Linklaters Business Services Holdings (UK)	Service entity	Linklaters LLP – sole shareholder
2	Linklaters Business Services (UK)	Service entity	Linklaters LLP and Linklaters Business Services Holdings – shareholders
3	Linklaters & Paines (UK)	Service entity	Linklaters LLP and Linklaters Business Services – shareholders
4	Linklaters (Europe) Holdings (UK)	Service entity	Linklaters LLP – sole shareholder
5	Belgian Branch of Linklaters (Europe) Holdings	Service entity (branch)	See entry 4
6	Hackwood Secretaries Limited (UK)	Service entity	Linklaters LLP - sole shareholder
7	Holdco Limited (UK)	Service entity	Hackwood Secretaries Limited – sole shareholder
8	Linklaters & Alliance Limited (UK)	Service entity	Hackwood Secretaries Limited – sole shareholder
9	Hackwood Directors Limited (UK)	Service entity	Hackwood Secretaries Limited – sole shareholder
10	Blueflagdotcom Limited (UK)	Service entity	Hackwood Secretaries Limited – sole shareholder
11	Blueflag.com Limited (UK)	Service entity	Hackwood Secretaries Limited – sole shareholder
12	Hacksub Limited (UK)	Service entity	Hackwood Secretaries Limited – sole shareholder

No	Entity	Function	Ownership/Control
13	Linklaters Blue Flag Limited (UK)	Service entity	Hackwood Secretaries Limited – sole shareholder
14	BH London Co (UK)	Service entity	Linklaters Business Services – shareholder
15	Hacklink (UK)	Service entity	Linklaters LLP and Linklaters Business Services – shareholders
16	LBSH Limited (UK)	Service entity	Linklaters LLP – sole shareholder
17	LBSC Limited (UK)	Service entity	Linklaters LLP – sole shareholder
18	Linklaters Services Limited (UK)	Service entity	Linklaters LLP – sole shareholder
19	Hackwood Nominees Limited (UK)	Service entity	Linklaters LLP – sole shareholder
20	Linklaters CIS (UK unlimited liability company) (Russia)	Service entity	Linklaters LLP – sole shareholder
21	Representative Office of Linklaters CIS (Russia)	Service entity (representative office)	See entry 20
22	Branch of Linklaters CIS (Russia)	Service entity (branch)	See entry 20
23	LCDE (Linklaters Consultores em Direito Estrangeiro / Direito Inglês) (Brazil)	Brazilian firm of consultants	Shares held on trust for Linklaters LLP
24	Miralta Assessoria em Gestão Empresarial Ltda. (Brazil)	Service entity	Members of Linklaters LLP are shareholders
25	Linklaters Business Services Holdings (H.K.) Limited (Hong Kong)	Service entity	Linklaters LLP – sole shareholder
26	Linklaters (HK) Limited (Hong Kong)	Service entity	Linklaters LLP – sole shareholder
27	Linklaters Business Services (Nominees) Limited (Hong Kong)	Service entity	(part of) shares held on trust for Linklaters LLP
28	Linklaters Business Services (Secretaries) Limited (Hong Kong)	Service entity	(part of) shares held on trust for Linklaters LLP
29	Linklaters Business Services (H.K.) Limited (Hong Kong)	Service entity	(part of) shares held on trust for Linklaters LLP
30	Linklaters Company Secretarial Services Limited (Hong Kong)	Service entity	Shares held on trust for Linklaters LLP

No	Entity	Function	Ownership/Control
31	Link-info Business Services Pte Limited (India)	Service entity	LBSH Limited – majority shareholding
32	Linklaters Business Services Italia (Italy)	Service entity	Linklaters Business Services – sole shareholder
33	Linklaters Business Services Europe B.V. (The Netherlands)	Service entity	Linklaters LLP – sole shareholder
34	Linklaters (Central & Eastern Europe) B.V. (The Netherlands)	Service entity	Linklaters LLP – sole shareholder
35	Linklaters Poland Sp.z.o.o (Poland)	Limited partner	Linklaters (Central & Eastern Europe) B.V. – sole shareholder
36	Linklaters Singapore Pte Limited (Singapore)	Service entity	Shares held on trust for Linklaters LLP
37	Hackwood Services Singapore (Private) Limited (Singapore Limited Company) (Singapore)	Service entity	Linklaters LLP – sole shareholder
38	Linklaters S.L.P. (professional services limited liability company) (Spain)	Service entity	Linklaters LLP – majority shareholder
39	Linklaters Advokatbyra Holding Aktiebolag (Swedish holding company) (Sweden)	Service entity	Linklaters (Europe) Holdings - shareholder
40	Linklaters Advokatbyra Aktiebolag (Swedish limited liability company) (Sweden)	Service entity	Linklaters Advokatbyra Holding Aktiebolag – sole shareholder
41	LTL Holdings Ltd (Thailand)	Service entity	Members of Linklaters LLP are shareholders
42	Linklaters (Thailand) Ltd (Thailand)	Service entity	Members of Linklaters LLP are shareholders