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INTERNATIONAL NETWORK OF INDEPENDANT LAW FIRMS

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# NEWSLETTER 1

May 2020

## DATA, INFORMATION & CYBER LAW

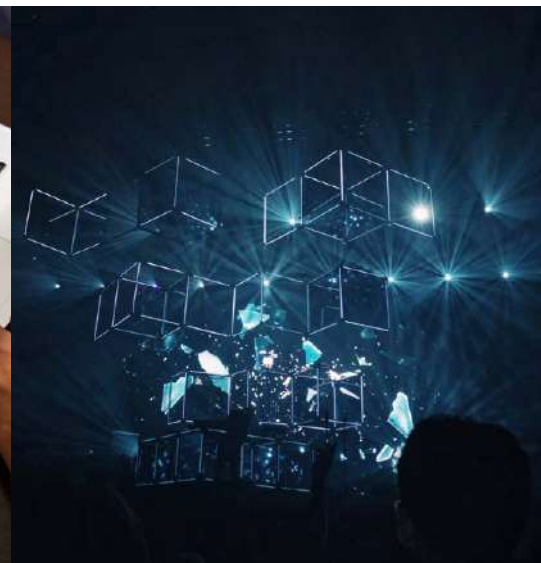
The Pangea DICL team is an international group of experienced and specialised lawyers dedicated to privacy, cybersecurity and open data issues. We support your digital transformation and guide you in the protection, use and defence of your immaterial assets from a legal perspective.



A multi-jurisdictional experts approach



A group of specialists familiar with their respective local laws and customs



A real curiosity and appetite for the latest technological developments & phenomena



# EDITORIAL

A NEW PANGEANET NEWSLETTER, DEDICATED TO DIGITAL LAW!

**PangeaNet, an international practice of law.** An international network of independent law firms, PangeaNet was born out of the conviction that it was essential to combine the skills of lawyers who are experts in their field, in different jurisdictions around the world, to assist companies and organisations in their projects, which often raise questions falling under the legislation of different countries.

## Digital technology and its singularities: overlapping of territories and extraterritoriality of legislation.

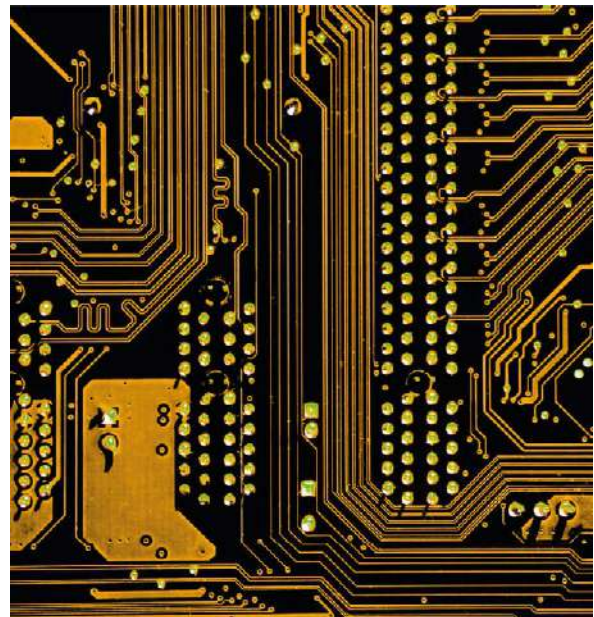
The use of digital technology, by its very nature, disregards physical borders. In addition, it increasingly falls within the scope of extraterritorial texts, such as the GDPR or the Cloud Act, to take just two examples.

## The crucial importance of digital technology.

The current health crisis demonstrates that digital technology is an essential resource for economic and social life. In other times, this health crisis would have led to a total standstill of all activity. Thanks to digital technology, part of the working population has been able to carry on by way of teleworking, social and family ties have been maintained, schooling has been able to continue, even if remotely...

## The creation of the « Data, Information & Cyber Law » (DICAL) Practice Group: a PangeaNet initiative to bring together the best experts in digital law from around the world.

Initially named the « GDPR » Practice Group, in reference to the famous EU regulation that came into force on 25 May 2018, PangeaNet's group of experts decided to broaden its spectrum to cover the entire field of digital law, namely the rules protecting personal data and privacy (Privacy), those relating to responsibility for content and intermediaries (Information), as well as those punishing network infringements; but also the legal aspects of emerging technologies such as Artificial Intelligence, Quantum Computing, Blockchain, Internet Of Things (IoT) or Biometrics (Cyber).



## A first edition of this newsletter dedicated to the GDPR, for the 2<sup>nd</sup> anniversary of its implementation.

This biannual newsletter is an information tool that the PangeaNet network makes available to all its clients, partners and contacts in order to share its practical analyses and feedback from around the world. For this first edition, we have chosen to devote it to the GDPR, the first text of direct applicability throughout the European Union in digital matters.

Happy reading everyone and take care of yourselves!

**Laurent Badiane & Matthieu Bourgeois**

*Partners*

[l.badiane@kgfr](mailto:l.badiane@kgfr)

[m.bourgeois@kgfr](mailto:m.bourgeois@kgfr)

[kgfr](http://kgfr)

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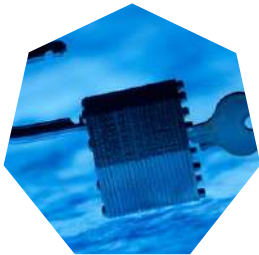
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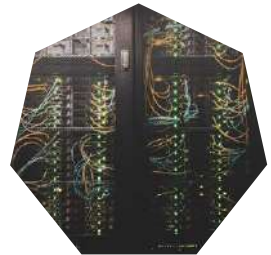
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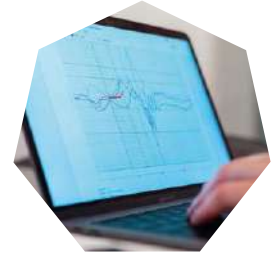
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## A protection extended to legal persons

« The Austrian Data Protection Act (...) also applies to legal persons/entities. 30% of the Austrian companies comply with GDPR; 54% are still implementing appropriate processes. »

The Austrian Data Protection Act has constitutional status in Austria and also applies to legal persons/entities. The rules of employee consent to the processing of data are interpreted extremely strictly. Also, any data processing which encompasses elements of surveillance of employees needs to be pre-agreed with the works' council. The age limit for valid consent is set at 14 years.

The Austrian DPA, headed by Dr. Jelinek, also currently Chair of the European Data Protection Board, has imposed Fine of EUR 18 million imposed on Österreichische Post AG for the sale of data or fine of EUR 2.400 imposed for non-material damages because of unlawful GPS monitoring of employees.

According to a survey conducted by Deloitte in January 2020, 30% of the Austrian companies comply with GDPR; 54% are still implementing appropriate processes. Most entities do not appoint a data protection officer but they rely on a « data protection coordinator ».

Barbara Kuchar & Anna Mertinz  
KWR Karasek Wietrzyk Rechtsanwälte GmbH

« an employer is required under the labour legislation to protect the health and safety of its employees ».

Tomislav Pedisic  
Vukmir & Associates

CROATIA • 

## Data Privacy & Covid-19 Disease

« The Croatian Data Protection Authority has recently published an official position on the processing of employee health data (...) in the context of the Covid-19 pandemic. (...) Such processing may be based on the (...) DPPR », because « an employer is required under the labour legislation to protect the health and safety of its employees ».

The Croatian Data Protection Authority (DPA) recently published an official opinion on processing of employee health data (e.g. measuring of body temperature at the business premises entrance) in the circumstances caused by the pandemic of Covid-19 disease.

According to the DPA, legal grounds for such processing could be found in Art. 6(1)(c), as well as Art. 6(1)(d) and Art. 9(2)(b) of the GDPR. The DPA holds that an employer is required under the labour legislation to protect the health and safety of its employees, and hence the mentioned legal grounds would apply. It is interesting that the DPA concludes in its opinion that in line with point 4 of the GDPR recitals, processing of personal data should be envisaged in such a way to be in the service of the mankind.

**The right to data privacy is not an absolute right and as such, it should be perceived in line with its function in the society and harmonized with other human rights in line with the principle of proportionality.**

Tomislav Pedisic  
Vukmir and Associates



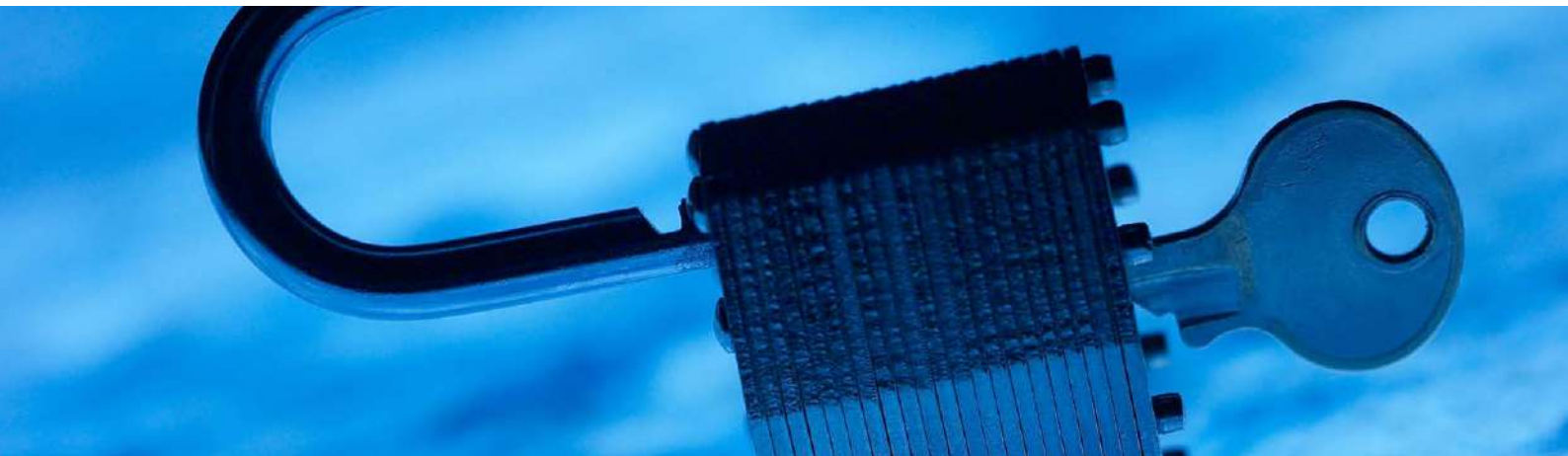
## Companies show an increased awareness of data protection

« Spanish companies have reacted positively by expressing their intention to comply with the GDPR, but there is still a significant percentage of small and medium companies that have not implemented it. The Covid-19 health crisis is causing doubts about the application of the GDPR regarding health controls in companies, geolocation and teleworking. »

Organic Act 3/2018, of 5 December, includes certain clarifications and developments of the GDPR. There are specific regulations for different sectors such as health, Internet, among other. Also, the Spanish Data Protection Authority has prepared various guides and legal reports for the application of the GDPR.

Spain is the EU country that has imposed the greatest number of fines (81) - since the application of the GDPR, and the largest fine imposed has been 250.000 EUR. The main reasons for these sanctions are the insufficient technical and organizational measures to ensure information security and the insufficient legal basis for data processing. The sectors that have received the greatest number of sanctions are: Internet and telecommunications services.

Antonio Munoz  
*Absis Legal*



## Ireland records a big jump in complaints

In Ireland, there were « 7215 complaints (...) received in 2019 », « an increase of 75 per cent over the total number of complaints (4113) received in 2018 ». At the same time, there are « many positive changes, including the organizations across Ireland appointing Data Protection Officers (...). »

The Data Protection Commission (DPC) is the Irish supervisory authority responsible for data protection in Ireland. It published its 2019 annual report in February 2019 which is the first full calendar year report since the introduction of the GDPR. 7,215 complaints were received in 2019 representing a 75% increase on the total number of complaints (4,113) received in 2018. The largest single category was access rights accounting for 29% of total complaints received.

The Commissioner for Data Protection, Helen Dixon is of the view that there have been many positive changes, including organizations across Ireland appointing Data Protection Officers. An independent survey on the impact of GDPR indicates that 68% of organizations surveyed believe they are « materially compliant. »

Patricia McGovern  
*DFMG Solicitors*



 • ITALY

## Extra vigilant authorities

The fines applied in 2019 by the Italian Supervisory Authority amount to approximately Eur 16 million against Eur 8.1 million applied in 2018 and the numbers look set to rise significantly in the current year.

In January 2020 the Supervisory Authority ordered TIM S.p.A., one of the major telecommunications services provider, to pay a fine of Eur 27.8 million, the highest amount ever applied in Italy, for several unlawful processing of personal data for marketing purposes.

The complex investigations carried out brought to light severe infringements of personal data protection regulation. Among others, TIM was proven to be not sufficiently familiar with fundamental features of the processing activities carried out by the same directly or through third party partners (infringement of the accountability principle). Its data breach system was found ineffective and the implementation and management systems regarding data protection fell short of privacy by design requirements.

Marta Margiocco  
*Cocuzza & Associati*

MEXICO • 

## GDPR & Mexican law

Both documents (Mexico's privacy regulation and GDPR) aim to protect privacy, but their approach is different: GDPR protects data subjects, while Mexican law protects data.

The most prominent feature of GDPR is its extraterritorial scope. On its 2nd anniversary, many questions regarding such scope remain unanswered, all the more for non-Europeans. For many businesses outside the EU, it is challenging to comply not only with their local data privacy regulation, but potentially with GDPR as well.

Mexico's privacy regulation - the LFPDPPP (admittedly, we're not as good with acronyms) - came into force in 2010. Mexican businesses with European customers/employees or targeting Europeans for advertising purposes, may be obligated to follow both Mexican law and the GDPR.

This simultaneous burden makes us focus on the differences between both regulations. Certainly, both documents aim to protect privacy, but their approach is different: GDPR protects data subjects, while Mexican law protects data. Deadlines to respond to the data subjects rights are shorter in Mexico (15 days) and sanctions are higher in the GDPR.

Having these differences in mind is essential for an adequate legal assistance.

Isaac D. López & José Camarena  
*Cayad*



## The role of the judicial branch

**In order to raise personal data protection standards, not only supervisory, but also judicial authorities are needed.**

Legal regulations take shape by practice. The main starting challenge was ensuring that the information about the new regulation was presented in an approachable and understandable way to those obligated as well as the ones entitled to protection. Among others, the Polish-specific regulations specified rules of conduct, liability for breach as well as compliance rules regarding the regulation.

2019 resulted in first administrative fines being imposed, the most prominent one amounting over PLN 2.8 million (i.e more than 600.000 EUR) on an online retailer for insufficient organizational and technical safeguards, which led to unauthorized access to the personal data of 2.2 million people.

We plainly saw that to raise personal data protection standards not only supervisory, but also judicial authorities are needed. The regular citizen has also become more aware of this need and more often acts accordingly, fighting for this right, which can be seen in more personal complaints being filed.

Michał Matuszczak  
*Babiczak, Skrocki i Wspólnicy*



BULGARIA • 

## Moderate level of compliance - the state as major infringer

**« Overall, the level of compliance is moderate, whereas mainly the internationally active companies (adopting vertical corporate GDPR guidelines) and extremely exposed controllers (e.g. travel agencies, online shops, etc.) tend to adopt adequate measures. »**

The legal frame governing data protection legal relationships is formed generally by GDPR 2016/679 and the Bulgarian Data Protection Act, as well as some data protection stipulations in other acts. Since May 2018 the Bulgarian Data Protection Act has been amended two time ever since (February and November 2019).

The Bulgarian Commission for Personal Data Protection (« CPDP ») has not been very active in conducting inspections. For 2019 CPDP has imposed administrative fines in the amount of approx. BGN 7 mio, whereas the most significant one was to the Bulgarian Revenue Agency (main Tax Authority) in the amount of BGN 5 mio due to caused leakage of personal data as a result of massive hacker attack.

Nikolay Belokonski  
*KWR Belokonski Gospodinov & Partners*





## Czech Republic - a new implementation law

The Czech Republic adopted an implementing law to the GDPR in April 2019, but the companies started to prepare themselves much earlier. Most Czech companies have tried to meet the requirements of the GDPR at least on tolerable level. In addition, they have been willingly developing data protection measures since then, so the compliance level is increasing.

The Czech DPA has conducted a constructive dialogue. The general range of fines is between 1.000 – 4.000 EUR, higher fines are exceptional and almost exclusively for repetitive violation of data protection legislation or for gross/arrogant ignorance of respective legislation. However, the most used sanction is imposition of remedial measures.

Unfortunately, the public sector has shielded itself by the new Data Protection Act from administrative fines so the reaction of public sector to GDPR is naturally less motivated.



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MOST CZECH COMPANIES HAVE TRIED TO MEET THE REQUIREMENTS OF THE GDPR AT LEAST ON TOLERABLE LEVEL.

Tomáš Mudra  
*UEPA Advokáti s.r.o.*

Tomáš Mudra  
*UEPA Advokáti s.r.o.*

### INTERVIEW WITH

## Miroslava Matoušová, Data Protection Expert

Miroslava Matoušová (PhD) is a recognized personal data protection expert and was involved on the first Czechoslovak Act on Personal Data Protection. She works at the Office for Personal Data Protection, as an inspector from 2001 until 2011, and currently on the implementation of a new legal Framework of personal data protection. She co-authored several publications on information services and personal data protection. Questions by Tomáš Mudra.

**What, in your opinion, did the comprehensive European regulation of data protection bring to entrepreneurs across the EU?**

MM: « Without much thought, it is a common ground – which means the principles, basic obligations of the controllers and rights of the data subjects. How quickly and to what extent the expectations of further convergence are met depends on how the individual member states will use the authorization of Article 23 of the General Data Protection Regulation (GDPR) and how they will proceed with the implementation of the law enforcement directive. »

**Can you specify the highest fine imposed for infringement of the GDPR in the Czech Republic and within the EU? Do the members of the European Data Protection Board (EDPB) share similar ideas about the principle amount of fines for individual infringements or does the practice of the individual member states vary?**

MM: « The highest fine imposed by the Czech DPA was in the amount of CZK 250,000 [approx. EUR 9,500] and was imposed for the infringement of Article 5, par. 1, letters c) and e) of the GDPR. In the case of the fine of approx. CZK 50 million imposed by the French authority (CNIL) on the



controller - Google LLC - the final decision has not been yet made. Otherwise, up to this day, no significant European fine under the GDPR has been imposed as a result of the cooperation of several national DPAs. So at the moment, we are not yet in the situation of sharing opinions on the amount of fines. »

**The EDPB has recommended the European Commission to make more efforts in adopting the Regulation on privacy and electronic communications. Which benefits exactly the supervisory authorities expect from the new Regulation on privacy and electronic communications? Is such regulation really needed when its implementation has been unsuccessfully discussed for three years already?**

MM: « This could be discussed for a long time and the EDPB has also commented on this topic in several documents. Very briefly, it is because the Europeans have already become used to the specific protection of privacy in this area and that the privacy of legal persons is protected as well. If the new regulation is adopted, its main advantage will be the specific nature of its rules. »

**The new Czech Act on personal data protection in its Section 62, par. 2 effectively ruled out the possibility to impose fines for GDPR infringement on public authorities and public bodies in general. Is this a unique interpretation of Article 83 of the GDPR in the European context? In your opinion, is the tension created thereby going to be sustainable long-term in the European context?**

MM: « The non-imposition of sanctions in the form of fines on public authorities and public bodies is definitely nothing extraordinary among the



member states of the EU. Precisely because many of the member states do not use fines to enforce the obligations imposed by law to this category of subjects, we also have this possibility of derogation in the GDPR. The Czech legislator focused precisely on this possibility and, according to the opinion of the Czech DPA, did so without duly taking Article 84 of the GDPR into consideration. We will see, if the European Commission finds the merits of criminal offences notified by the Czech Republic as measures under Article 84 effective, adequate and discouraging for the public authorities and other public bodies under the Data Protection Act and sufficient to compensate the non-imposition of fines.»



THE EUROPEANS HAVE ALREADY BECOME USED TO THE SPECIFIC PROTECTION OF PRIVACY.





Which is the main experience of the Czech DPA derived from the 6 cases, where it has been the lead supervisory authority for cross-border personal data processing? Does the GDPR provide sufficient procedural basis for the supervisory authorities of smaller member states in the position of lead supervisory authority?

MM: « The Czech DPA has, as an active participant of the EDPB, more or less the same experience as the other members of the EDPB. The GDPR does not include detailed procedural rules, which would allow us to follow the same procedure. This situation is the result of the will of the Union legislator, which also expresses the will of the member states. Differing national provisions, which correspond to our Administrative Code and the laws regulating administrative penalties, create small, but sometimes

hard to overcome, obstacles to a quick and efficient cooperation on individual cases. »

The media have reported about suspicions of a serious infringement of personal data protection regulations by the company Avast. Given the global scope of this company's products is it possible to perceive such case as an opportunity for the Czech DPA to significantly influence the European practice of personal data protection?

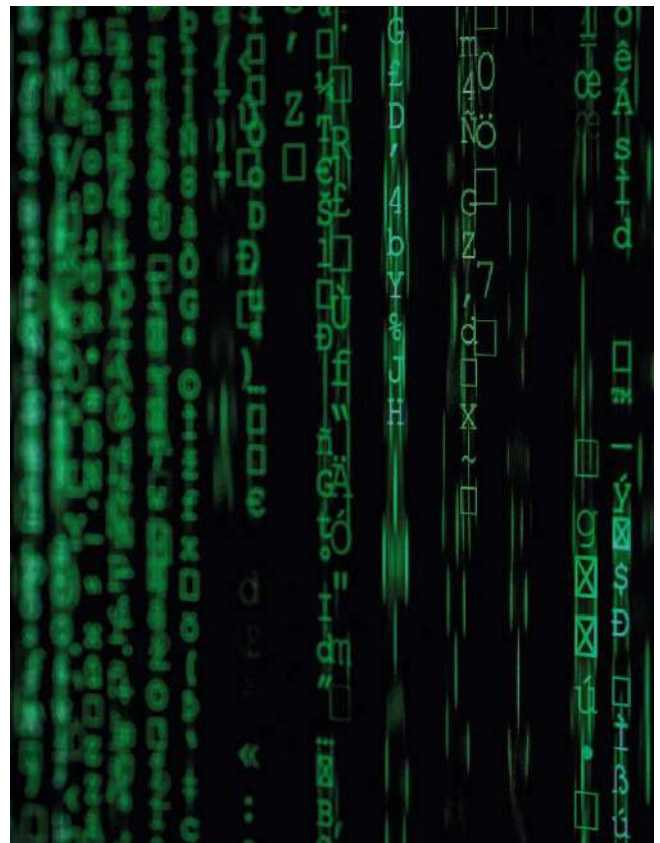
MM: « Certainly not. The Czech DPA has only taken on the role of the lead supervisory authority with all that it implies. The case was duly formally opened on the national level, as well as on the level of the EDPB. What makes this case interesting is a problem called monetization, i.e. whether the person, whose personal data are at stake, can or cannot get any consideration or even a monetary equivalent for providing them. »

“

THE NON-IMPOSITION OF SANCTIONS IN THE FORM OF FINES ON PUBLIC AUTHORITIES AND PUBLIC BODIES IS DEFINITELY NOTHING EXTRAORDINARY AMONG THE MEMBER STATES OF THE EU

May it with regard to measures against the spreading of the COVID-19 infection be assumed that the supervisory authorities will in the near future pay more attention to personal health data processing by the state? Do discussions regarding appropriate safeguards e.g. during the processing of personal data on the movement of citizens through data provided by telephone operators, take place on the level of the EDPB?

MM: « Our partner supervisory authorities are in a similar situation as we are, this topic keeps us quite busy. The EDPB, even though working only remotely, operatively expresses itself, partly on request, partly from its own initiative, on legal issues that create a natural framework for any initiative pursuing the battle against COVID-19 as its goal. And due emphasis is placed on the guarantees - for such processing of data generated by the use of mobile phones or payment cards, the guarantees are seen in the interference of public health protection authorities, in its legal basis and in the voluntary participation by persons suspected of being infected. »





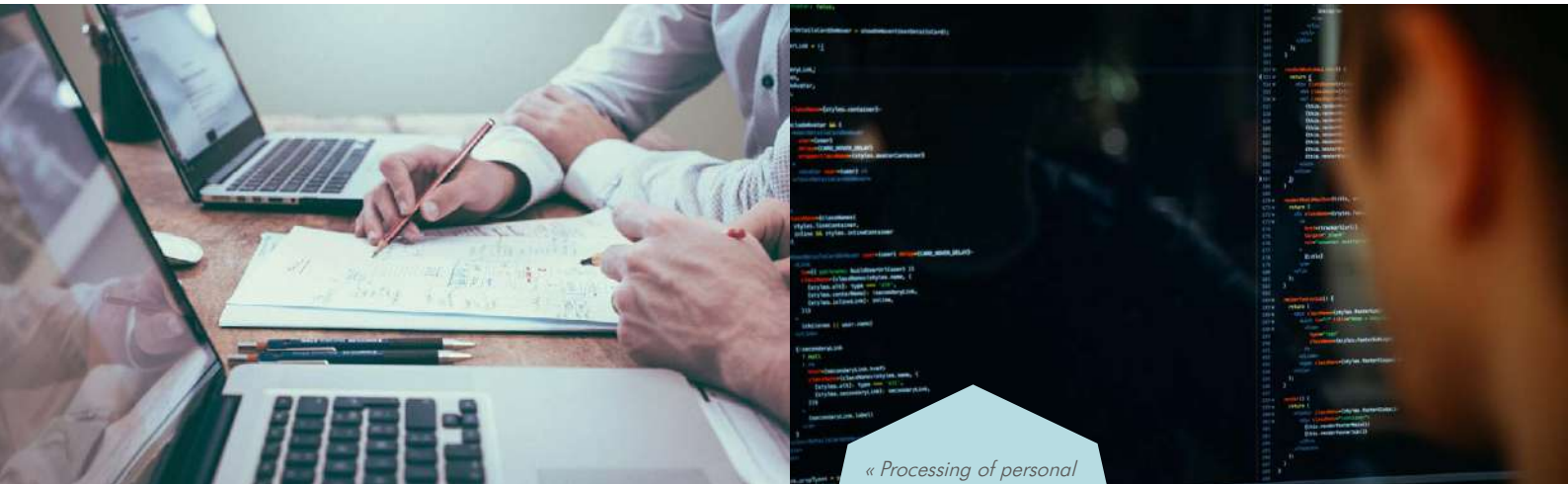
## A gradual but firm process

The Slovak Republic harmonized its legislation with the GDPR back in May 2018. A massive information campaign explaining the new rules and the necessity to adopt them took place in Slovakia approximately one year before the effectiveness of the GDPR.

Most of companies (especially large and medium-sized ones) have therefore aligned their processes to the current data protection regulation. Some shortcomings can still be noticed among small companies, which find the new regulation to be an unnecessary bureaucratic burden.

However, the level of the broad awareness of GDPR is gradually improving. The Slovak DPA continuously issues instructions on application issues. In terms of the imposition of fines, these have so far been imposed very sporadically and in the range between EUR 1,000 - EUR 10,000. The DPA has officially stated that it will always impose fines with regard to the economic strength of the entity. However, it still should still serve its preventive and deterrent purpose.

Tomáš Mudra  
UEPA Advokáti s.r.o.



« Processing of personal data in Switzerland is primarily governed by the Federal Act on Data Protection (DPA) ».

Julia Bhend  
Probst Partner AG

SWITZERLAND • 

## Processing of personal data

Processing of personal data in Switzerland is primarily governed by the Federal Act on Data Protection (DPA).

Since not in the EU or the EEA, Swiss companies and organizations have to observe the GDPR only when the processing activities relate to the offering of goods or services to data subjects in the EU or the monitoring of their behaviour.

Nevertheless, many Swiss companies have voluntarily implemented or are in the course of implementing internal rules and processes, which are compliant with the GDPR, in particular, regarding processes, contracts with providers and customers and privacy policies.

The revision of the DPA, with similar rules proposed as under the GDPR, was originally intended to be in force by August 2018 but it's still being discussed. Against the current background, it seems rather unlikely that it will come into force this year.

Julia Bhend  
Probst Partner AG



DATA, INFORMATION & CYBER LAW

# Members & Contacts

## Theresa Adamek

Wenner

70, boulevard de Courcelles, F-75838 Paris Cedex  
17, France  
T: +33 1 42 66 89 00  
E: [theresa.adamek@wenner.eu](mailto:theresa.adamek@wenner.eu)

## Isaac D. López

Cayad - Cancino Ayuso Abogados

Mexico city, Mexico  
T: 52 20 01 01, ext. 119  
E: [ilopez@cayad.com](mailto:ilopez@cayad.com)

## Razvan Miutescu

Whiteford, Taylor & Preston

7 St. Paul Street, Baltimore, MD 21202-1636, USA  
T: +1 410 347 8744  
E: [rmiutescu@wtplaw.com](mailto:rmiutescu@wtplaw.com)

## Laurent Badiane

KGA Avocats

44, avenue des Champs-Élysées, 75008 Paris, France  
T: +33 1 44 95 20 00  
M: +33 7 88 18 01 25  
E: [l.badiane@kga.fr](mailto:l.badiane@kga.fr)

## Marta Margiocco

Cocuzza & Associati Studio Legale

Via San Giovanni Sul Muro 18, 20121 Milano, Italy  
T: +39 02-866096  
E: [mmargiocco@cocuzzaeassociati.it](mailto:mmargiocco@cocuzzaeassociati.it)

## S. Keith Mouldale

Whiteford, Taylor & Preston

7 St. Paul Street, Baltimore, MD 21202-1636, USA  
T: +1 410 347 8721  
E: [skmouldale@wtplaw.com](mailto:skmouldale@wtplaw.com)

## Nikolay Belokonski

KWR Belokonski Gospodinov & Partners

Alexander Zendov str. 1, fl.6, Nr.38, Sofia 1113, Bulgaria  
T: +359 2 971 55 32  
M: +359 887 40 94 95  
E: [nikolay.belokonski@kwr.bg](mailto:nikolay.belokonski@kwr.bg)

## Michał Matuszczak

Babiaczyk, Skrocki i Wspólnicy Sp. K

ul. Wyspińskiego 43, 60 – 751 Poznan, Poland  
T: +48 61 8441 733  
E: [m.matuszczak@bsiw.pl](mailto:m.matuszczak@bsiw.pl)

## Tomáš Mudra

UEPA advokáti s.r.o.

Voctárova 2449/5, 180 00 Prague, Czech Republic  
T: +420 234 707 444  
E: [TMU@uepa.cz](mailto:TMU@uepa.cz)

## Julia Bhend

Probst Partner AG

Bahnhofplatz 18, CH-8401 Winterthur, Switzerland  
T: +41 52 269 14 00  
E: [julia.bhend@probstpartner.ch](mailto:julia.bhend@probstpartner.ch)

## Patricia McGovern

DFMG Solicitors

Embassy House, Ballsbridge, Dublin D04 H6Y0, Ireland  
T: +353 1 637 6600  
D: +353 1 637 6614  
E: [pmcgovern@dfmg.ie](mailto:pmcgovern@dfmg.ie)

## Antonio Muñoz de Gispert

Absis Legal

c/ Muntaner 379, Ent. 1º, 08021 Barcelona, Spain  
T: +34 93 531 91 00  
M: +34 650 41 33 70  
E: [amunoz@absislegal.com](mailto:amunoz@absislegal.com)

## Matthieu Bourgeois

KGA Avocats

44, avenue des Champs Élysées, 75008 Paris, France  
T: +33 1 44 95 20 00  
M: +33 6 64 41 63 27  
E: [m.bourgeois@kga.fr](mailto:m.bourgeois@kga.fr)

## Anna Mertinz

KWR Karasek Wietrzyk Rechtsanwälte  
GmbH

Fleischmarkt 1, 3 rd floor, A-1010 Vienna, Austria  
T: +43 1 24 500 3131  
E: [anna.mertinz@kwr.at](mailto:anna.mertinz@kwr.at)

## Tomislav Pedišić

Vukmir & Associates

Gramaca 2L, 10000 Zagreb, Croatia/Hrvatska  
T: +385 1 390 0508  
E: [tomislav.pediscic@vukmir.net](mailto:tomislav.pediscic@vukmir.net)

## Barbara Kuchar

KWR Karasek Wietrzyk Rechtsanwälte  
GmbH

Fleischmarkt 1, 3 rd floor, A-1010 Vienna, Austria  
T: 43 1 24 500 3145  
E: [barbara.kuchar@kwr.at](mailto:barbara.kuchar@kwr.at)

## Sebastian Meyer

BRANDI Rechtsanwälte

Adenauerplatz 1, 33602 Bielefeld, Germany  
T: +49 521 96535 812  
E: [sebastian.meyer\(at\)brandi.net](mailto:sebastian.meyer(at)brandi.net)

## Katharina Windisch

KWR Karasek Wietrzyk Rechtsanwälte  
GmbH

Fleischmarkt 1, 3 rd floor, A-1010 Vienna, Austria  
T: +43 1 24 500 3131  
E: [katharina.windisch@kwr.at](mailto:katharina.windisch@kwr.at)

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