
The Paris office of Hogan Lovells is pleased to provide this English language edition of our monthly e-newsletter, which offers a legal and regulatory update covering France and Europe for July and August 2020.

Please note that French legal concepts are translated into English for information only and not as legal advice. The concepts expressed in English may not exactly reflect or correspond to similar concepts existing under the laws of the jurisdictions of the readers.

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- **Audio-visual**

France – Creation of a tax credit for audiovisual and cinematographic creation expenses

On 31 July 2020, [Rectifying Finance Law no. 2020-935 of 30 July 2020](#) was published in the Official Journal.

Specifically, its Article 49 creates a tax credit for audiovisual creation expenses, royalties paid to collective management organizations and compensation directly paid to authors.

Only companies operating television publishing services, radio services or audiovisual media services within the meaning of [Law no. 86-1067 of 30 September 1986](#), subject to corporate income tax and able to demonstrate a decrease in turnover of, at least, 10% over the period from 1st March 2020 to 31 December 2020 compared to the same period in 2019, are concerned.

The tax credit is equal to 15% of the total amount of expenditure incurred from 1st March 2020 to 31 December 2020 in France and the European Union concerning in particular the development of the production of cinematographic and audiovisual works relating to the purchase of broadcasting rights of works, the investment in producer shares in works' funding, the funding of writing and development of works, the promotion of works, the royalties paid to cinematographic or audiovisual works' authors and the royalties paid to collective management organisations.

These provisions come into force on a date fixed by Decree.

France - Amendments to the legal framework for broadcasting of cinematographic works and television advertisement

Two Decrees amending the applicable regulatory framework were published in the Official Journal on 6 August 2020.

The [Decree no. 2020-984 of 5 August 2020](#) modifying the regime for broadcasting cinematographic works on television services, amends the [Decree no. 60-66 of 17 January 1990](#) by providing the possibility for television services to broadcast cinematographic works on

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Saturday evenings at 8.30 pm under certain conditions.

These provisions are intended to respond to the observation of obsolescence of previous regulations adopted before the emergence of linear access services to works.

The [Decree no. 2020-983 of 5 August 2020](#) modifying TV advertisement framework, authorises segmented advertising for all TV adverts with the exception of certain advertising messages. This type of advertising messages is targeted on the basis of various criteria, notably geographical or stemmed from the profile of viewers, defined by the Internet service providers' boxes.

The Decrees came into force on 7 August 2020.

- **Commercial**

France – Law on cold calling and fraudulent calls enacted

The [Act n°2020-901](#) of July 24, 2020 provides for a reinforcement of consumer information about the existence of Bloctel service, as well as the obligation for companies performing cold calling to comply with the ethical rules developed by the industry professionals. All cold calling relating to energy renovation is now prohibited. Any professional who has taken advantage from commercial solicitations is now presumed to be liable for non-compliance with the legal provisions, and any unfairly concluded contract may be declared null and void.

Concerning fraudulent calls, telephone providers can now suspend or even terminate access to a subscriber's value-added number when the mandatory information associated with such number are missing, inaccurate or incomplete, when no real product or service is associated with such number, or when the said product or service is prohibited by the operator's ethical rules. If the operator does not proceed to this suspension or termination, as the case may be, any provider of publicly available telephone services may suspend the access of its subscribers to the value-added numbers concerned and, in the event of reiteration, to all the numbers of the value-added product or service provider in question. Finally, operators are also required to prevent the transmission of calls or messages presenting a French number made by a user located outside the European Union territory.

The sanctions incurred for abusive cold calling or fraudulent calls have been significantly increased to 75,000 euros for a natural person and 375,000 euros for a legal entity.

- **Data Protection**

France – CNIL: Publication of a practical guide to "authorised third parties" and a compendium of procedures

In order to help professionals concerned by a request from an authorised third party, such as an authority, jurisdiction or agency, the CNIL published a practical guide and a compendium of the most common procedures on July 10, 2020.

A number of authorities are "authorized third parties" in the sense that they have the power under statutory and regulatory provisions to require organizations transmitting documents or information that may include personal data. To this end, the companies subject to a request from an authorised third party may refer to the practical guide which presents challenges that may be encountered by the controller and warning points when processing a request for the communication of personal data.

Companies can also refer to the compendium of the main procedures listing the actors likely to request the communication of personal data, published jointly with the practical guide.

The CNIL imposes a 250,000 euro sanction and an injunction to comply with the GDPR combined with a penalty

On 28 July 2020, the CNIL fined the e-commerce company Spartoo €250,000 and ordered it, under penalty of €250 per day of delay, to comply with the GDPR within three months.

In light of the seriousness of the breaches observed in 2018, in terms of data minimisation, storage limitation, data subjects' information and security of personal data, the CNIL has decided to make its sanction public. This decision is the first issued by the CNIL as "lead supervisory authority" and implementing a cooperation mechanism with other European data protection authorities.

CNIL: Publication of three toolkits for the health industry

On July 28, 2020, the CNIL adopted and published three toolkits for the health industry to assist controllers in the management of routine treatment in medical and paramedical practices and in the choice of data retention periods.

Two toolkits deal with data retention periods in the health sector and include the periods determined by regulations and recommendations from the CNIL. A third toolkit deals with the processing of personal data for the management of medical and paramedical practices, and applies to healthcare professionals working independently, in individual or group practices, or in nursing homes.

Compliance with these standards ensures that the processing of health data, which is commonly used in the medical and administrative management of a patient, complies with data protection principles.

European Union – Schrems II: The "Privacy Shield" invalidated by the CJEU

In its judgment of 16th July 2020, DPC v. Facebook Ireland Ltd and M. Schrems, case C-311/18, known as "Schrems II", the Court of Justice of the European Union ("CJEU") invalidated the "Privacy Shield", but found the European Commission's standard contractual clauses valid under certain conditions.

Following the invalidation of the "Safe Harbor" by the "Schrems" ruling of October 6, 2015, which allowed the transfer of personal data to companies located in the United States, the European Commission and the US government concluded a new agreement, known as the "Privacy Shield", on which transfers of personal data between the European Union and the United States could be based, through a certification mechanism. In the Schrems II judgment, the CJEU has invalidated it, ruling that the legislation currently in force in the United States, in particular as regards surveillance, does not provide an adequate level of protection for European individuals whose data are transferred to the United States.

However, the validity of the European Commission's Standard Contractual Clauses (SCCs) is not called into question by the CJEU, which does however specify that the data exporter and the recipient of the transfer must verify, beforehand, that the level of protection of personal data is respected by the third country concerned and implement, if necessary, appropriate measures to remedy any discrepancies found. The Court considers that the use of SCCs require conducting an in concreto analysis of the transfers and the applicable legislation.

- **Employment**

France - Reduction in the rate of the partial activity allowance

[Decree no. 2020-810](#) of June 29, 2020 (JORF no. 060 of June 30, 2020) sets the hourly rate of the partial activity allowance applicable from June 1, 2020 to September 30, 2020.

It reduces the common law rate of the partial activity allowance paid to the company is reduced to 60% of the employee's gross reference hourly rate, instead of 70% (, within the limit of 4.5 SMIC), i.e. a maximum hourly reimbursement amount of €27.40 (compared to €31.98 previously).

This decree also sets the list of sectors particularly affected by the consequences of the epidemic and whose employers and as such benefit from an increased rate of partial activity allowance. It also defines the list of sectors whose activity depends on those of the above-mentioned sectors and in which employers also benefit from an increased rate of partial activity allowance when they experience a very sharp drop in turnover.

France - Implementation of the APLD (Long-term partial activity allowance)

The [decree n°2020-926](#) of July 28, 2020 (JORF n°0186 of July 30, 2020) sets up the long-term partial activity.

This enables a company faced with a lasting reduction in its activity to reduce its employees' working hours and receive an allowance for the hours not worked (in return for commitments, particularly in terms of job retention).

The employer receives an allowance equivalent to a share of the gross hourly remuneration of the employee placed in long-term partial activity equal to 60% of the gross hourly remuneration limited to 4.5 times the SMIC (minimum income) hourly rate for agreements sent to the administrative authority before October 1, 2020(56% of this remuneration for agreements sent to the administrative authority as of October 1, 2020). The scheme is intended to last until June 30, 2022.

The APLD may not be combined, over the same period and for the same employee, with the ordinary law partial activity scheme provided for in Article L. 5122-1 of the French Labour Code.

The collective agreement of establishment (or company or group), must in particular define the activities as well as the employees concerned by the specific partial activity, the maximum reduction of the working hours and the commitments in terms of employment and professional training.

France - Contributions of the 3rd Amending Finance Act for 2020

The [law n° 2020-935](#) of last July 30 (JORF n°0187 of July 31, 2020) updates the economic forecasts for 2020 and brings numerous social provisions to help companies following the Covid-19 epidemic. Among them: exemptions and rebates of contributions, financial aid - especially hiring aid (see below), clearance plans, cancellation of URSSAF controls, extension of the duration of payment of the exceptional purchasing power bonus (PEPA), abolition of the tax on fixed-term contracts and provisions in favor of apprenticeship.

France - Abolition of the tax on fixed-term contracts

The aforementioned amended finance law for 2020 abolishes the €10 tax on fixed-term contracts to help boost the economy. This tax was initially instituted by the Finance Act for 2020 with a view, in particular, to limiting the use of one-day or several-day contracts. However, and according to the author of the amendment at the origin of the abolition, fixed-term contracts for use are unavoidable for the sectors that have suffered most strongly from the effects of the crisis (hotels, cafes, restaurants, events).

France - Cancellation of URSSAF inspections

Article 59 of the Amending Finance Act for 2020 allows for the cancellation of URSSAF controls not closed on March 22, 2020, until December 30, 2020. Thus, certain controls initiated by the URSSAF but also by the MSAs may be cancelled. The URSSAF (and the MSA funds for the agricultural scheme) may as an exception, terminate before December 31, 2020 the controls that have not been closed before March 23, 2020.

France - Introduction of an aid for the hiring of young people under 26 years of age

[Decree no. 2020-982](#) of August 5, 2020 (JORF no. 0192 of August 6, 2020) sets up and defines the terms and conditions of assistance for the hiring of young people under 26 years of age: the contracts in question must be for an indefinite period or for a fixed term of at least 3 months, and the remuneration must be less than or equal to 2 times the minimum hourly wage for growth. The aid applies to hirings carried out by a company or an association within a period of 6 months from August 1, 2020. The amount of the aid amounts to a maximum of 4,000 euros per employee. Details of the measures concerning the employment bonus.

France - Allocation of Apprenticeship Hiring Assistance

The [decree n°2020-1084](#) of August 24, 2020 (JORF n°0207 of August 25, 2020) sets up an exceptional aid for the recruitment of people on professionalization contracts.

This aid covers contracts concluded between July 1, 2020 and February 28, 2021, for a professional diploma. The aid is intended for companies with fewer than 250 employees, as well as for companies with 250 or more employees under certain conditions. Its amount, for an apprentice under the age of 18, is 5,000 euros, and 8,000 euros for an apprentice over 18 years of age (per apprenticeship contract).

France - Details on the training of persons on an apprenticeship contract

[Decree no. 2020-1086](#) of August 24, 2020 (JORF no. 0207 of August 25, 2020) specifies the financial coverage of the training period in an apprentice training center for persons seeking an apprenticeship contract as provided for in the 3rd amended Finance Act for 2020 (see above). This measure opens up the possibility for a person, under certain conditions, to begin a training cycle between August 1, 2020 and December 31, 2020 without having been hired by an employer.

France - Finalization of the reform of the posting of European workers

[Decree no. 2020-916](#) of July 28, 2020 (JORF no. 0185 of July 29, 2020) relating to posted workers has been published with the aim of combating unfair competition.

It is in application of the EU Directive n°957 of June 28, 2018, the provisions of which had to be transposed into national law by July 30, 2020 at the latest.

It sets the terms and conditions for the coverage of professional expenses by the employer posting employees, as well as those of the exemption mechanism for the application of the status of long-term posted workers. For employees seconded to France, the hard core of provisions applicable to them has been strengthened (remuneration and professional expenses), the situation of temporary workers has been clarified, and finally, the formalities for secondment have been adjusted with the widespread use of teleservices.

France - Postponement of the unemployment insurance reform

A [decree n°2020-929](#) (JORF n°0186 of July 30, 2020) acts the postponement to January 1, 2021 of the second part of the unemployment insurance reform. It also suspends measures that penalize the insured, in particular the tightening of the opening of unemployment rights.

Thus, the overhaul of the method of calculating compensation is also postponed. Finally, with regard to the highest incomes, the tightening of the opening of rights and the reduction of unemployment benefits in force since November 1, 2019, are suspended until next year.

France - Generalization of the wearing of masks in companies

The Deconfinement Protocol, originally published on June 24, 2020 and updated on August 5, was amended on August 31. It systematizes the wearing of masks for the general public within companies and in enclosed collective places. Exceptionally, these measures depend on the level of virus circulation in the company's (or establishment's) establishment department. However, there are exceptions: in the Ile-de-France region, which belongs to the red zone, there is the possibility to derogate from the permanent wearing of masks only in premises with mechanical ventilation and a space of 4m²; "in individual offices, employees working alone do not have to wear masks either. In collective closed spaces (open space) the mask must be worn throughout the working day". Transparent screens can nevertheless be set up by the employer between employees.

- Insurance

France – ACPR: compliance with EIOPA's guidelines on outsourcing to cloud service providers

The *Autorité de Contrôle Prudentiel et de Résolution* ("ACPR") published on 22 July 2020, an [opinion](#) ("Opinion") on the implementation of the European Insurance and Occupational Pensions Authority's ("EIOPA") guidelines on outsourcing to cloud service providers ([EIOPA-BoS-20-002](#)) ("Guidelines") [see [Legislative and regulatory updates – February 2020](#)]. In its Opinion, the ACPR indicates that it complies with the Guidelines, applicable to insurance and reinsurance undertakings and to the participating and parent companies referred to respectively in the second and third paragraphs of Article L. 356-2 of the French Insurance Code, subject to the supervision of the ACPR.

Previously, on 8 July 2020, the ACPR published a [notice relating to the terms and conditions for the implementation by supplementary occupational retirement organizations of the Guidelines on Subcontracting to Cloud Services Providers](#) ("Notice"), the purpose of which is to provide for the implementation of the Guidelines by institutions for occupational retirement provision ("IORPs"). In the Notice, the ACPR states that because the governance and outsourcing requirements for IORPs are similar to those of insurance entities, IORPs are expected to implement all of the Guidelines. The Notice is applicable as of the date of its publication in the ACPR Official Register.

France – Modification of the French government guarantee scheme for reinsurance transactions by the *Caisse centrale de réassurance*

[Decree no. 2020-849 of 3 July 2020 amending Decree no. 2020-397 of 4 April 2020 setting the terms and conditions for the application of Article 7 of the Amending Finance Act for 2020 in order to define the terms and conditions for granting the State guarantee for reinsurance transactions of certain credit insurance risks carried out by the *Caisse centrale de réassurance*](#) ("Decree"), published in the French Official Journal on 4 July 2020, modifies [decree n° 2020-397 of 4 April 2020 on the terms and conditions for granting a State guarantee to reinsurance operations of certain credit insurance risks carried out by the *Caisse centrale de réassurance*](#) [see [Legislative and regulatory updates – April 2020](#)]. The Decree came into force the day after its publication.

In particular, the Decree adds a third category of operations, known as risk portfolio reinsurance, for which the State guarantee can be obtained from the *Caisse centrale de réassurance* ("CCR"), in addition to the operations of supplementary guarantees for individual risks and of substitution guarantees for individual risks previously provided for. For this third category of operations (*i.e.*, risk portfolio reinsurance), Article 5 of the Decree provides that the benefit of the State guarantee can be obtained only to the extent that (i) the CCR's exposure is no more than 75% for each reinsured risk and (ii) the reinsurance treaties entered into with insurance companies provide that the CCR's maximum commitment is five (5) times the amount of premiums ceded under these reinsurance operations by these insurance companies.

European Union – EIOPA: Clarification of supervisory expectations on product oversight and governance requirements in the context of Covid-19

In a [statement](#) published on 8 July 2020, EIOPA clarified its expectations regarding product oversight and governance (“**POG**”) requirements within the context of the Covid-19 pandemic, indicating that it aims at ensuring fair and consistent consumer outcomes through an insurance product’s lifecycle. In particular, EIOPA stated that:

- Insurance manufacturers must systematically identify products the main characteristics of which (features, risk coverage or guarantees) have been materially impacted by the Covid-19 pandemic;
- When such impacts are identified, insurers must assess if and how to continue to offer value to the target market, taking into account its needs, characteristics and objectives. EIOPA further clarifies the scope and criteria upon which such assessment should be based;
- If following such assessment manufacturers identify products which are no longer sufficiently aligned with the target market, insurers must assess whether this can result in unfair treatment, looking at whether, as a result of the reductions in risks covered, the product no longer provides sufficient utility to the target market.
- Should possible unfair treatment be identified, manufacturers must take measures, aimed at both mitigating the situation and preventing further occurrences of detriment. These measures should also take into account relevant legal requirements under national and civil law. EIOPA also states that such measures must be proportional to the potential unfair treatment and reflect possible extended changes in product utility. EIOPA emphasises that measures may take many forms and gives some examples.

European Union – EIOPA: Statement on Solvency II supervisory reporting in the context of COVID-19

On 27 July 2020, EIOPA indicated in a [statement on Solvency II supervisory reporting in the context of COVID-19](#) (“**Statement**”) that it considers that insurance and reinsurance undertakings should now be in a position to comply with the reporting deadlines provided in the Solvency 2 regulatory framework. Consequently, the flexibility granted in EIOPA’s 20 March 2020 recommendation at the start of the Covid-19 pandemic is no longer in place [see [Legislative and regulatory updates – March 2020](#). EIOPA also urges national competent authorities to submit the information received on a quarterly basis to EIOPA no later than two (2) weeks upon receipt in order to allow EIOPA to monitor the situation in a timely manner.

European Union – EIOPA: Supervisory Statement on the Solvency II recognition of schemes based on reinsurance with regard to COVID-19 and credit insurance

EIOPA published a [statement on the Solvency II recognition of schemes based on reinsurance with regard to COVID-19 and credit insurance](#) (“**Statement**”) dated 20 July 2020. In the Statement, EIOPA indicates that national schemes regarding credit insurance implemented by Member States through the European Commission’s Temporary Framework for State aid measure to support the economy in the current COVID19 outbreak” (“**Temporary Framework**”) vary significantly between Member States. Thus, to ensure a level playing field and consistent treatment of schemes with the same economic consequences as reinsurance, EIOPA outlines several supervisory recommendations for national competent authorities on how such schemes based on reinsurance should be treated for Solvency II purposes and which criteria must be met for such schemes to be recognised as risk-mitigation technique for the Solvency Capital Requirement (SCR) calculation.

European Union – EIOPA: Publication of a Solvency II Single Rulebook

EIOPA announced on 31 July 2020 that it has published a [Solvency II Single Rulebook](#) (the “**Rulebook**”), an online documentation tool. The Rulebook aims at providing access to regulatory and supervisory texts falling within the scope of the Directive 138/2009/EC of the European Parliament and the Council on the taking-up and pursuit of the business of insurance and reinsurance (Solvency 2) (“**Solvency 2 Directive**”) and thus to promote a consistent implementation of the Solvency 2 framework. In a first stage, the Rulebook comprises the Solvency II Directive, the Solvency 2 Delegated Regulation (EU) 2015/35, Delegated Regulation (EU) 2016/467, Delegated Regulation (EU) 2018/1221, implementing technical standards, and EIOPA's guidelines, opinions, and supervisory statements. EIOPA indicated that it plans, in the near future, to enrich the Rulebook to include questions and answers (Q&As) submitted to EIOPA.

- **Intellectual Property**

European Union – Publication by the European Commission of guidelines for the transposition of the AVMS Directive

On 2 July 2020, the European Commission adopted a set of two guidelines to help Member States transpose the [Directive 2018/1808](#) of 14 November 2018, known as the AVMS Directive.

The first [Guidelines](#) relate to European works and aim at providing a guide for the calculation of the share of European works in the catalogues of on-demand media service providers, which must be at least 30% under Article 13 of the Directive, and for the definition of a low audience and a low turnover in the application of the provisions derogating from this obligation.

The second relates to video sharing platforms. The [Guidelines](#) provide criteria and sub-criteria for Member States to analyze whether, in application of the definition of video-sharing platform services given in Article 1(1), the provision of programs, user-generated videos or both is an essential functionality of the service in question. This analysis grid takes into account, in particular, the relationship between the audiovisual content and the main economic activities of the service, the quantitative and qualitative relevance of the audiovisual content available on the service, the creation of revenue from the content and tools to enhance the visibility or attractiveness of the content.

European Union - Authorisation by the Council of the European Union of the signature of the European Union - People's Republic of China Agreement for the Protection of 100 Geographical Indications

The Council of the European Union approved, by [Decision](#) on 9 July 2020, the signing of the [European Union - People's Republic of China Agreement](#) for the protection of 100 geographical indications, which was the subject-matter of a bilateral agreement on 6 November 2019 (see [Legislative and Regulatory Newsletter - November 2019](#)).

This approval is part of the legal scrutiny of the Agreement.

The date of signature of the Agreement has not yet been defined but, once executed, the Agreement will have to receive the assent of the European Parliament before its final adoption and effectiveness.

European Union – Unified Patent Court: final withdrawal of the United Kingdom

Following the publication by the UK Government on 27 February 2020 of its Negotiating Objectives Report announcing the UK's withdrawal from the Unitary Patent System and Unified Patent Court, the UK formally filed the [Notification](#) of withdrawal of ratification to the Agreement on Unified Patent Court at the Secretariat of the Council of the European Union on 20 July 2020 (see [Legislative and Regulatory Newsletter – February & March 2020](#)).

Internally, the final withdrawal was recorded on 20 July 2020 by a [Written parliamentary declaration](#) addressed to the House of Commons by the UK government.

This withdrawal had immediate effect.

- **Life Sciences**

France – New French anti-benefits regulations - The thresholds finally published

Major changes to the rules governing the interactions between the industry and healthcare professionals were introduced through an Ordinance dated 19 January 2017. Since then, the health sector has been awaiting the adoption of implementing texts setting out the details of the implementation of this new legal framework.

Among these awaited texts, two Orders which set forth the thresholds for the determination of the notion of negligible value of benefits provided in kind or in cash, as well as the thresholds for the agreements triggering the authorization procedure were published on 14 August 2020 in the Official Journal.

These Orders were the subject of a [newsflash](#) drafted by our firm, which presents these thresholds in detail and the obligations they trigger.

- **Telecom**

France – Law on cold calling and fraudulent calls enacted

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