

## PERSONAL DATA PROCESSING POLICY

### WE PROTECT YOUR PERSONAL DATA

In the company BRODEC & PARTNERS s.r.o., law firm, ID No. 243 03 321, with its registered office at Rubešova 162/8, Vinohrady, 120 00, Prague 2, registered in the Commercial Register maintained by the Municipal Court in Prague under file No. C 194724 (hereinafter referred to as “**Company**” or “**Law Firm**”) undertake to protect the personal data provided.

The processing of personal data in the Company is always carried out only to the extent determined by the specific purpose of the processing, which follows in particular from the contract for the provision of legal services concluded between you and our Law Firm. When processing your personal data, we act with due care and in accordance with legal regulations, in particular with the Act No. 85/1996 Coll., on advocacy (hereinafter referred to as “**Advocacy Act**”), the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation; hereinafter referred to as “**Regulation**”) and Act No. 110/2019 Coll., on the processing of personal data.

In this document, you will find information on why, when, how and what personal data is processed by the Company. You will also find here information on how to contact us if you have questions about the processing of your personal data or how to correct your personal data.

In certain circumstances, we may change and update our personal data processing policy. Therefore, we recommend that you monitor this document to make sure you always have the most up-to-date information.

**We recommend you read the information carefully. We have done our best to make it as clear as possible.** If something is still not clear to you, we will gladly explain any term or part to you.

**You can contact us at any time in writing at Rubešova 162/8, Vinohrady, 120 00, Prague 2, by e- mail at [info@akbrodec.cz](mailto:info@akbrodec.cz) or by phone at +420 224 247 215.**

### USEFUL TERMS

Let us explain some basic concepts relating to data protection. We hope this will give you a better understanding and appreciation of why we at the Company process personal data in the way we have chosen. For the purpose of this policy, we mean by:

<b>personal data</b>	any information relating to an identified or identifiable natural person (“ <b>data subject</b> ”); 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;
<b>sensitive data</b>	data that are indicative of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation of a natural person;
<b>processing of personal data</b>	any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
<b>restriction of processing</b>	the marking of stored personal data with the aim of limiting their processing in the future;
<b>pseudonymization</b>	the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
<b>filing system</b>	any structured set of personal data which are accessible according to specific criteria, whether centralised,

	decentralised or dispersed on a functional or geographical basis;
<b>controller</b>	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;
<b>processor</b>	a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
<b>recipient</b>	a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
<b>third party</b>	a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
<b>consent of the data subject</b>	any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
<b>personal data breach</b>	a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
<b>genetic data</b>	personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural

	person and which result, in particular, from an analysis of a biological sample from the natural person in question;
<b>biometric data</b>	personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
<b>supervisory authority</b>	an independent public authority which is established by a Member State pursuant to Article 51;

## CATEGORIES OF DATA SUBJECTS

The data subject can be:

- the Company's client pursuant to Advocacy Act, his employee or representative;
- a business partner of the Company, its employee or representative;
- any other person who is in a contractual relationship with the Company;
- visitors and other persons on the Company's premises;
- an employee of the Company;
- an applicant for employment with the Company.

## WHAT PERSONAL DATA DO WE PROCESS?

We respect the principle of data minimisation. We process only the personal data that is necessary for the practice of law and the provision of legal services, to comply with our legal obligations and to protect our legitimate interests. In particular, we process the personal data of our clients.

In particular, we process the following categories of personal data:

- identification and address data: name, surname, title, date of birth, permanent address, birth number, picture of your signature; if you are a business, your registration number, registered office, VAT number;
- contact details: contact address, telephone number, fax, e-mail and other similar information;
- data necessary for the performance of the contract: bank account.

We process particularly the personal data we have received from you, as well as data from public registers.

## **WHY DO WE PROCESS YOUR PERSONAL DATA?**

We process your personal data to the extent necessary for the relevant purpose. We need to identify you to enter into a contract, we also need the data in order to perform the contract and therefore provide you with the relevant legal service(s). We are obliged to process personal data are also by law. For example, we must process many data for archiving purposes. We process some data because it is necessary for the protection of rights and legally protected interests of our Company. However, processing for this reason is limited. We carefully assess the existence of a legitimate interest. In other cases, we only process your data with your consent.

### **Vacancy selection procedures**

For the purpose of selection procedures for vacancies in the Company, we collect your personal data through your CVs and also through the communications that occur within this selection procedure. We use this personal data for the purposes of the specific selection procedure and only for the duration of that selection process. Keeping a record of applicants after the end of the of the specific selection procedure and subsequent communication in the event of a vacancy are subject to your consent.

#### **Legal basis:**

- contractual negotiations,
- your consent.

### **Conclusion and performance of contracts and provision of legal services**

For the purposes of entering into a contract, in particular a contract for the provision of legal services, compliance with the requirements of clients (i.e. the performance of legal services under the relevant legislation on the practice of law), we process your personal data that are necessary for your identification. Your contact details, or where applicable, identification and contact data of employees or representatives, we process for the purposes of the proper performance of the contract, as well as other personal data necessary for the performance of the contract (e.g. bank contact details).

#### **Legal basis:**

- conclusion and performance of the contract.

### **Fulfilment of legal obligations**

We may also process your personal data for the purposes of compliance with legal obligations, in particular legal obligations within the meaning of accounting and tax legislation, i.e. for the transmission of personal data to the authorities of tax administration and other public authorities in accordance with the relevant legislation. We collect and process your identification and performance data for the purpose of fulfilling our accounting and tax obligations to the administrative authorities imposed by the Accounting Act, the Value Added Tax Act and other accounting and tax regulations. At the same time, the Advocacy Act imposes several obligations on us which we must fulfil and therefore we must process your personal data related to the legal services provided.

#### **Legal basis:**

- fulfilment of legal obligations,
- our legitimate interests.

### **Email and other communication**

You can contact us with any questions or comments via our email address. We process the personal data you provide in your email for the purpose of handling your request, complaint or to answer your query. Also in the case of other forms of communication, we process your personal data only for as long as necessary to handle the communication with you, unless we have other legal basis for processing your personal data.

#### **Legal basis:**

- your consent,
- our legitimate interests.

### **Visiting the website**

In general, you can visit the Company's website without having to provide your identity or any other information about yourself. We may collect anonymous information regarding the use of our website by you. We use the so-called cookies to do this. Through these files we evaluate and monitor the performance of our website. This information enables us to improve the quality of our website or our marketing services. We also process your IP address.

**Legal basis:**

- your consent,
- our legitimate interests.

**Execution or defence of rights**

In the event that we are forced to enforce our claims through legal means, or if we are a party to court proceedings and the proceedings concern you or if we resolve a dispute with you out of court, or if you can provide information relevant to the resolution of the dispute, we will use to the necessary extent your identification data, data about our legal relationship with you, data from our communication and interaction, or other data necessary to protect our rights.

**Legal basis:**

- our legitimate interests.

**Internal administration, process optimization, certification**

Your data is handled by the Company's employees as part of the performance of their duties in connection with the provision of legal services.

**Legal basis:**

- our legitimate interests,
- fulfilment of legal obligations.

**HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

We only keep your personal data for as long as necessary. We process personal data particularly for the duration of the contractual relationship. We also retain personal data after the termination of the contract for a period of time specified by law or for ten (10) years after its termination where the law does not specify a retention period.

The category of data that we process with your consent is retained by the Company for the period for which the consent is validly given. For the avoidance of doubt, the consent itself and the modification or withdrawal of consent is retained by the Company on the basis of our legitimate interests for as long as the consent is valid and for additional ten (10) years after the consent has expired.

## **ARE YOU OBLIGED TO PROVIDE US WITH PERSONAL DATA?**

The provision of the data you provide to us with your consent is voluntary. We require the transfer of other data, as its processing is necessary for the conclusion or performance of a contract, the performance of our legal obligations or to protect our legitimate interests. If you do not provide us with such data, we cannot enter into the relevant contract with you or provide you with the relevant service or other performance for which we require the personal data from you.

## **CONSENT**

If we ask for your consent to the processing of your personal data by the Company, the request for your consent or rather the consent itself, which we will provide to you for review and signature or other confirmation, will be clearly formulated and will provide you with a reasonable basis for decision making. You may withdraw your consent at any time by using the contacts listed at the beginning and end of this of this Policy.

## **DISCLOSURE AND TRANSFER OF PERSONAL DATA**

Principally, we manage your personal data within the Company. Where necessary to achieve any of the purposes set out above, in particular where an external body in the area concerned has the necessary professionalism and expertise, your data is processed by the cooperating entities, or cooperating lawyers, only to the extent necessary and on the basis of an appropriate legal title. If we entrust someone else to carry out certain activities as a part of our services, the processing of the relevant personal data may take place. In some cases, these entities become the processor of the personal data. The processor is entitled to handle the data solely for the purpose of carrying out the activity for which it has been authorised by the relevant controller. In such case, your consent is not required for the purposes of the processing activity.

### **The possible recipients of personal data include in particular:**

- financial institutions, public authorities (courts, administrative authorities in the performance of their legal obligations set out in the relevant legislation);
- providers of information systems;
- other persons involved in the implementation of the Company's activities and persons who cooperate with the Company in the fulfilment of its legal obligations;
- providers of IT services, including cloud storage;
- other recipients according to the needs and instructions of the client within the meaning of Advocacy Act;
- providers of printing and mailing services, including couriers.

Beyond the above mentioned, we only transfer personal data outside the Company if we have your consent or if required by law. Certain authorities of public administration and other organizations are entitled to request information about you.

### **PERSONAL DATA OF THIRD PARTIES**

Personal data of third parties, i.e. personal data of employees, customers, clients, suppliers of the Company and other natural persons involved in cooperation with the Company, will be processed in accordance with applicable data protection legislation. The Company will process the personal data of third parties for the duration of the contractual relationship and for the period specified by applicable legislation.

### **SECURITY**

We strive to keep the data entrusted to us by you as secure as possible. To this end, we have put in place a number of technical and organisational measures to protect your personal data from unintentional or unlawful destruction, inadvertent loss or alteration, unauthorised disclosure or access and any other unlawful forms of processing.

We limit access to your personal data to only those Company employees and entities who need the information for the purposes of its processing on our behalf and who are contractually obligated to maintain the security and confidentiality of your personal information.

As mentioned above, in certain cases we transfer, or are required to transfer, personal information to third parties. In such cases, we choose trusted partners with whom we have ensured that they will maintain at least the same level of privacy protection that we provide in the Company.

We always use the most appropriate and secure means when transferring personal data to the administrative authorities. When we use cloud storage, it is principally located within the EU and a high level of data security is always ensured.

### **YOUR RIGHTS IN RELATION TO THE PROCESSING OF PERSONAL DATA**

In order to exercise your rights in relation to the personal data we process, we require your identification.

Please note that if we are unable to verify your identity electronically or if we have reasonable doubts about your identity, we will ask you to provide an identity document or other proof of identity.

This is the only way we can avoid giving your personal data to another person or unauthorised modification of your personal data.

You can also exercise your rights relating to the processing of personal data by means of a request, a sample of which can be found on the Company's website, [www.akbrodec.cz](http://www.akbrodec.cz).

### **Right to information and access to personal data**

We respect the principle of transparency in the processing of personal data. In accordance with this principle, we will always provide you with information about what personal data we process.

We will deal with your requests as soon as possible, up to a maximum of one month. In more complex cases, we are entitled to extend the time limit by up to two months.

If you request information about the processing of your personal data, we will provide you with information about the purpose of the processing of personal data, the personal data or categories of personal data that are subject to processing, including any available information on the source, recipient or categories of recipients. In addition, you will be informed of the intended duration for which the personal data will be stored or, if this cannot be determined, the criteria used to determine this period, and the existence of the right to request the rectification or erasure of your personal data or the restriction of their processing, or to lodge a complaint with a supervisory authority.

You have the right to request a copy of the personal data processed from the Company, unless this will adversely affect the rights and freedoms of other persons. We may charge a reasonable fee for further copies at your request based on administrative costs. If you make a request in electronic form, we will provide you with the information in an electronic form that is commonly used, unless you request other method.

### **Right to correction**

When processing your personal data, we strive to ensure that it is accurate and up-to-date. We will endeavour to delete or correct inaccurate or incomplete personal data. If you find that any personal data we process about you is incorrect or out of date, please notify us. You have the right to have the Company correct inaccurate personal data relating to you without undue delay. Considering the purposes of the processing, you have the right to have incomplete personal data completed.

In some cases, we cannot rectify personal data. These are in particular cases where your incorrect or outdated personal data is contained in a tax document which, according to the law we archive.

Any corrections will also be communicated to the recipients to whom the personal data was provided, except where this is impossible or requires disproportionate effort.

### **Withdrawal of consent to the processing of personal data**

Further processing of your personal data that is carried out on the basis of your consent to processing personal data may be prevented at any time. Simply withdraw your consent to such processing. The right to withdraw consent to the processing of personal data at any time does not apply if the client's personal data are processed because of the performance of a contract with the client and not on the basis of consent to the processing.

### **Right to erasure (right "to be forgotten")**

You can also exercise your right "to be forgotten". You have the right to have the Company erase the personal data relating to you without undue delay and the Company is obliged to erase the personal data without undue delay if one of the following reasons applies:

- the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- you withdraw the consent on the basis of which the personal data was processed and there is no further legal basis for the processing;
- personal data has been unlawfully processed;
- personal data must be erased to comply with a legal obligation under the law of the European Union or of the Czech Republic.

In this case, we will delete all your personal data that we process. Exceptions are cases where the processing is carried out under a legal obligation or for reasons of our legitimate interest to exercise and defend legal claims.

The deletion will also be communicated to the recipients to whom the personal data has been provided, except where this is impossible or requires disproportionate effort.

### **Right to restriction of processing**

You have the right to have the Company restrict processing in any of the following cases:

- you contest the accuracy of the personal data, for the time necessary for the Company to verify the accuracy of the personal data;

- the processing is unlawful and you refuse to erase the personal data and instead request a restriction of their use;
- the Company no longer needs the personal data for processing purposes, but you request it for establishment, exercise or defence of legal claims;
- an objection to processing has been raised, pending verification that the legitimate interests of the Company outweigh your grounds for objection.

Any restrictions will also be communicated to the recipients to whom the personal data has been provided, except where this is impossible or requires disproportionate effort.

### **Right to portability of personal data**

You have the right to obtain the personal data concerning you that you have provided to the Company in a structured format, in a commonly used and machine-readable format, and the right to transmit that data to another controller without the Company preventing you from doing so, in the event that:

- processing is based on consent to the processing of personal data or the personal data is being processed for the purposes of concluding and performing a contract; and at the same time
- processing is carried out by automated means.

In exercising your right to the portability of personal data, you have the right to have personal data transferred by the Company directly to another controller, if technically feasible. Right to the portability of personal data must not adversely affect the rights and freedoms of other persons.

### **The right not to be subject to automated decisions, including profiling**

You have the right not to be subject to any decision based solely on automated processing, including profiling (i.e. any form of automated processing of personal data) consisting of using it to evaluate certain personal aspects relating to you), which has legal effects on you or similarly significantly affects you. This right does not apply if the automated decision is necessary for the conclusion or performance of a contract between you and the Company or is based on your express consent; however, in these cases you have the right to human intervention in the automated decision by the Company, the right to express your opinion and the right to challenge the automated decision. However, such processing of personal is currently not being carried out by the Company.

### **Right to raise an objection**

If personal data is processed, for example, for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing, which includes profiling (i.e. any form of automated processing of personal data consisting of the use of such data to evaluate certain personal aspects relating to the data subject), insofar as such direct marketing is concerned. If you raise an objection to processing for direct marketing purposes, the personal data will no longer be processed for these purposes.

Where personal data is processed on the basis of the legitimate interests of the Company, you have the right to raise an objection to the processing of personal data concerning you for those legitimate interests at any time. This objection must be substantiated by you in order for us to be able to assess it properly. Your objection and the reasons for it will then be assessed and weighed against the legitimate interests of the Company. If your reasons outweigh the legitimate interests of the Company, the processing of your personal data will be restricted or your personal data will be erased.

### **Right to lodge a complaint with the supervisory authority**

You have the right to lodge a complaint against the processing of your personal data with the supervisory authority, which is The Office for Personal Data Protection, with its seat at Pplk. Sochor 27, 170 00 Prague 7.

In view of the specific nature of the Company's activity, i.e. the practice of advocacy, the exercise of certain rights of data subjects can be restricted, especially in the case of processing of personal data concerning individual legal cases.

**In case of any uncertainties or questions regarding the processing of your personal data and for exercise of any of the above-mentioned rights, you can contact to us at any time in writing at the address Rubešova 162/8, Vinohrady, 120 00, Prague 2, by e-mail at [info@akbrodec.cz](mailto:info@akbrodec.cz) or by phone at +420 224 247 215.**