

PERSONAL DATA PROTECTION POLICY
INFORMATION PROVIDED TO DATA SUBJECTS (CLIENTS)

Bányaiová Vožehová, s.r.o., advokátní kancelář, Company ID No.: 24682098, having its registered address at Prague 2, Lazarská 13/8, PSČ 12000, entered in the commercial register maintained by Prague City Court, section C, entry no. 165725 (hereinafter referred to as the “**Company**”), which in its activities as a controller of personal data processes the personal data of natural persons (data subjects), pursuant to Regulation (EC) 2016/679 of the European Parliament and of the Council (hereinafter referred to as the “**GDPR**”), hereby in accordance with Article 13 of the GDPR provides the following information to data subjects (its clients).

1. INTRODUCTION

As a law firm, the company provides its clients with legal services mainly comprising representation in proceedings before courts and other bodies, defence in criminal matters, giving legal advice, drafting documents, drawing up legal analysis and other forms of legal assistance, including verification of signatures, and it also administers third-party property, mainly consisting of accepting money and documents into legal custody. All these activities are carried out at the request of clients, or based on oral or written contracts, the subject of which is the provision of the aforementioned services by the Company (hereinafter jointly referred to as the “**Contract**”). In connection with the Contract, during its performance and on the basis of it you have provided/shall provide the Company with the following personal data. The Company hereby informs you of the following with regard to those personal data.

2. HOW DO WE PROCESS PERSONAL DATA?

Depending on the type, nature and scope of the services provided, the Company processes your following personal data:

a) Identification and contact details

These include, in particular, name and surname, home address (registered office), date of birth and birth ID number (Company ID No., VAT No.), email address, phone number.

b) Data relating to the contractual relationship between the client and the Company

This mainly concerns all data on the remuneration for the legal services provided, the client's invoice and transaction data, including bank details, as well as data on the establishment and termination of the contractual relationship with the client or the termination of the client's representation.

c) Data relating to the service provided

These data are all personal data of clients and other third parties relating to the client's legal dispute or other legal issue in the resolution of which the Company as a law firm participates and in respect of which legal services are provided to the client. Due to the diversity of the legal issues that we resolve it is not possible in this regard to give even an illustrative list of such personal data – they concern all personal data of the client or third parties that the client provides to us in connection with a particular legal issue during the contractual relationship or which have been/shall be found by the Company

from publicly available sources (business, trade, insolvency register, real estate cadastre, etc.).

It is possible that when resolving a legal issue it will be necessary for the Company to also have data on the medical condition of the client or third parties (in particular, medical reports, expert opinions on healthcare, etc.). In this regard, the Company would like to point out that all data on a person's medical condition and related data come under a special category of personal data in accordance with Article 9 of the GDPR.

d) Data processed for signature verification

These data are name, surname, address (or place of residence), date of birth, signature, information on how the person's identity was ascertained, including the document type and number.

e) Data necessary to fulfil the Company's AML obligations

If the Company provides its client with such services which involve obligations for the Company under Act No. 253/2008 Coll., on Selected Measures Against Legitimation of Proceeds of Crime and Financing of Terrorism, as amended (hereinafter also referred to as "**AML**") (for example, accepting money into legal custody), the Company is (may be) required to process the following personal data:

- name, surname, birth name, title, date of birth/birth ID number, place of birth, gender, permanent or other address, nationality, phone number, email, profession, employer;
- information on whether the person is acting as an entrepreneur and, if so, further data (company/designation, company ID number, registered office, nature of the client's business)
- information on whether the person is a politically exposed person and relating data;
- type and number of card/ID card, the country (or authority) that issued the card, card validity;
- information on the origin of the funds or other assets that are the subject of the transaction, or information on the origin of the assets of a politically exposed person, bank details, purpose and nature of the transaction;
- other data and documents obtained from publicly available sources, registers or databases;

and any copies of papers and documents, in which these personal data are given or which prove or verify these personal data.

(Note: In the case of a client that is a legal entity, the aforementioned personal data of the statutory bodies and actual owners of this legal entity are processed, as well as the data of persons in the legal entity's senior management and of persons acting in the particular transaction.)

f) Data necessary to fulfil the Company's other obligations

These are data mainly necessary for tax and similar purposes and all other data necessary to fulfil the obligations that the Company has according to legal regulations due to the existence of a contractual relationship between the client and the Company (i.e. including professional and legal regulations in the field of advocacy).

3. FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA AND WHAT IS THE LEGAL BASIS FOR PROCESSING?

The Company processes and stores your personal data in connection with the provided services and concluded Contract and the related activities for the following purposes and under the conditions and within the limits set by applicable legislation, in particular in accordance with the following GDPR provisions:

a) Provision of services/performance of the Contract and the Company's related legitimate interests

Because the Company as a law firm provides you as a client with its services and a Contract has been entered into with you, the Company processes your personal data as this is necessary for the purposes of providing services and performing the Contract, on the basis of Article 6 (1b) of the GDPR.

The Company processes and stores all the aforementioned data also on the basis of its legitimate interest in order to protect its rights, especially in defence against your legal claims against the Company, or for the Company's potential legal claims against you, on the basis of Article 6 (1f) of the GDPR.

b) Fulfilment of the Company's legal obligations

Due to the provision of services by the Company and the existence of a contractual relationship established between you and the Company by the Contract and in view of the Company's position as a law firm, the Company has a wide range of obligations under legal regulations (in particular professional and legal regulations in the field of advocacy, AML, tax and accounting regulations, etc.), for the fulfilment of which it is necessary to process your personal data. For this reason, the Company processes your aforementioned personal data, on the basis of Article 6 (1c) of the GDPR.

c) Processing of special categories of personal data

The Company may also process data on the medical condition of the client or third parties and all related data which can be included in a special category of personal data within the meaning of Article 9 of the GDPR. As this processing is necessary for the establishment, exercise or defence of legal claims, the Company shall be entitled to process them, on the basis of Article 9 (2f) of the GDPR.

4. DURATION OF PERSONAL DATA PROCESSING

All personal data shall be processed for the entire period that the service is provided/for the entire duration of the contractual relationship established by the Company and also for a certain period after its termination.

The personal data processed for the purpose of protecting the Company's rights shall be processed for the entire period that the service is provided/for the entire duration of the contractual relationship established by the Company and also for the longest possible limitation period regarding all claims that could be exercised in connection with the Contract and associated relations.

All personal data necessary to fulfil the Company's obligations shall be processed for the period specified in individual legal regulations or which is necessary in order to fulfil obligations set out in legal regulations (in particular legal regulations governing taxes and accounting, AML

and the data retention period specified therein of 10 years from the execution of a transaction or the termination of the relationship with the client, professional and legal regulations in the field of advocacy and the client file archiving period specified therein of 5 years from the termination of the legal services or 10 years from the termination of asset management, etc.).

As soon as the purpose of the processing ceases or the Company no longer has any legal reason to process the personal data, the Company shall erase them.

5. FURTHER INFORMATION ON THE PROCESSING OF PERSONAL DATA (RECIPIENTS OF PERSONAL DATA)

The Company may also pass on your personal data to other entities:

- suppliers of external services to the Company, for example accounting, tax, auditing, consulting and other services, as well as IT services and services related to network and database management,
- translation agencies, especially if it is necessary to translate foreign language documents containing your personal data into Czech or from Czech into a foreign language,
- entities to which the Company is required to provide data on the basis of legal regulations (public authorities, Czech Bar Association bodies, etc.).

Furthermore, your personal data shall be passed on to lawyers with whom the Company works permanently or on a one-off basis in providing legal services as well as to tax consultants with whom the Company also works to resolve your legal problems. These cooperating persons shall also process your personal data, similarly in the position of controller. All compulsorily provided information on the processing of personal data contained in this document shall therefore similarly apply to and be used for the relationship between you as the data subject and these cooperating persons as controllers, thus fulfilling their obligation to inform you about the processing of personal data (for this reason these controllers shall not provide you with any further information on the processing of personal data beyond the information contained in this document).

6. YOUR RIGHTS IN CONNECTION WITH THE PROCESSING OF PERSONAL DATA

You have in particular the following rights in connection with the processing of personal data:

- a) The right to obtain from the Company confirmation as to whether or not your personal data are being processed and, where that is the case, the data subject has the right to obtain access to the personal data (for more details see Article 15 of the GDPR).
- b) The right to obtain from the Company without undue delay the rectification of inaccurate personal data. Taking into account the purposes of the processing the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement (for more details see Article 16 of the GDPR).
- c) The right to obtain from the Company the erasure of personal data if any of the reasons specified in Article 17 of the GDPR are met, for example if the personal data are no longer needed for the purpose of the processing, the data subject has objected to the processing of the personal data and there are no overriding legitimate grounds for the processing, etc.

- d) The right to obtain from the Company the restriction of processing in cases specified in Article 18 of the GDPR, for example, if the data subject contests the accuracy of the personal data, for a period enabling the Company to verify the accuracy of the personal data, if the Company no longer needs the personal data for the purpose of the processing but the data subject requests them for the establishment, exercise or defence of legal claims, or the data subject has objected to the processing of the personal data.
- e) The right to data portability, under the conditions specified in Article 20 of the GDPR.
- f) The right to object to the processing of the personal data concerning you, under the conditions specified in Article 21 of the GDPR, i.e. in particular with regard to data that are processed on the basis of and for the purposes of the Company's legitimate interest.
- g) The right to not be subject to a decision based solely on automated processing, including profiling, within the meaning of Article 22 of the GDPR.
- h) The right to file a complaint with the relevant supervisory authority if the data subject believes that the processing of personal data is contrary to law. The relevant supervisory authority in the Czech Republic is the Office for Personal Data Protection. For more information see www.uoou.cz.

Please note that due to the Company's legal duty of confidentiality as a law firm and the duty of confidentiality of individual (permanently collaborating) lawyers, the exercise of the right of access to personal data (as well as the exercise of other aforementioned rights) may be denied or restricted.

7. TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES

Your personal data may be transferred to third countries but only if your legal dispute or other legal issue (in the resolution of which the Company as a law firm participates and in respect of which legal services are provided to the client) is in any way related to that third country and in order to properly provide the service it is necessary, for example, to ensure legal assistance in that third country from a collaborating lawyer or to communicate with the public authorities in that third country.

In such case, the Company shall ensure that the personal data is transferred only if the special conditions under Article 44 et seq. of the GDPR are met.

8. REQUIREMENT FOR THE PROVISION OF PERSONAL DATA

The provision of personal data is a legal or contractual requirement to the extent that the processing of personal data is necessary in order to fulfil the Company's legal obligation or to fulfil the Contract between the Company and you. If your personal data are not provided, these obligations cannot be properly fulfilled by the Company.

9. CONTACT DETAILS OF THE COMPANY

In all matters concerning the protection of personal data and related matters, please contact the Company in one of the following ways.

- in writing to the Company's registered address: Praha 2, Lazarská 13/8, PSČ 12000,

- by email sent to the email address: lawoffice@bvlaw.cz,
- by phone on number +420 222 513 681.

Note: if the Company's client is a legal person, this information document shall apply *mutatis mutandis* to the natural persons representing the legal person or with whom the Company communicates and acts in the provision of services.