

RULES ON PERSONAL DATA PROCESSING

Valid as of 25th of May 2018

The protection of your personal data is extremely important to us. These terms explain the way how law office V4 Legal, s.r.o. processes personal data when providing legal services.

Our law firm is committed to continuously improving its policies, procedures and the privacy protection system of your personal data, and to innovating them accordingly. In order to ensure the protection of personal data, we are committed to acquiring and applying the latest knowledge in practice. At the same time, we are committed to building a corporate culture of personal data security and to ensuring and subsequently increasing general awareness of its importance.

Our law firm acts in relation to the protection of personal data in the same way as in any area of its business, i.e. with professional care, fairly, conscientiously and consistently, in the interests and for the benefit of our clients and other data subjects. At the same time, we ensure the usefulness and effectiveness of the provided legal services.

During the processing of personal data, our law firm is governed primarily by the General Data Protection Regulation (hereinafter referred to as "**GDPR**") and the provisions of the Act on the Personal Data Protection applicable to attorneys (in particular § 78), the Act on Advocacy (Section 18), the Code of Conduct adopted by the Slovak Bar Association (hereinafter referred to as "**SAK**") and other relevant regulations. Our law firm also uses the recommendations of ISO/IEC 27001: 2013 titled as "Information Technologies. Security techniques. Information security management systems. Requirements" and also the latest legislative and academic recommendations.

Employees of our law firm and other persons cooperating with us are required to keep confidential any facts that they have learned in the course of our cooperation or in the course of providing other services related to the practice of advocacy. All direct or indirect information concerning our clients and any and all confidential or sensitive information obtained in connection with any and all activities performed for our law firm are subject to the obligations of confidentiality and discretion. This obligation is the basic pillar of our legal services.

If you have any questions, please, do not hesitate to contact us by phone at: +421 41 321 12 90, by e-mail at: info@v4legal.sk or by post office at: Tvrdého 783/4, 010 01 Žilina.

V4 Legal, s.r.o.

tel.: +421 41 321 12 91
fax: +421 41 321 12 92
e-mail: info@v4legal.sk
Tvrdého 783/4
010 01 **Žilina**

tel.: +421 2 321 012 30
tel.: +421 2 321 012 32
email: bratislava@v4legal.sk
Obchodná 2
811 06 **Bratislava**



1 WHAT ARE PERSONAL DATA?

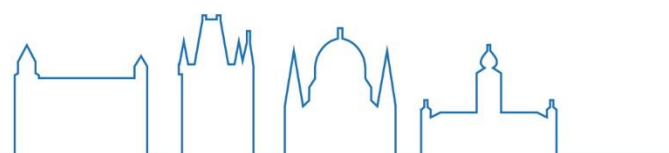
- 1.1 Personal data mean any data that we can use to identify you, directly or indirectly. For example, personal information may be a name, surname, photo or IP address.
- 1.2 The GDPR also recognizes a special category of personal data that needs to be treated with particular sensitivity. Such data are data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data and biometric data such as fingerprints for the purpose of your unique identification, data concerning health or data relating to your sexual life or sexual orientation.

2 WHY DO WE PROCESS PERSONAL DATA?

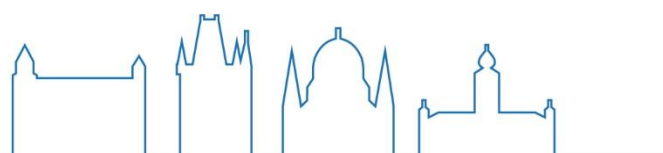
- 2.1 Processing of personal data means any operation or set of operations which is performed on personal data, whether or not by automated means, such as collection, organisation, structuring, storage, retrieval, use, dissemination, erasure or destruction.
- 2.2 The processing of personal data by our law firm is necessary, especially in order to:
- 2.2.1 Provide legal services to our clients and practise advocacy;
- 2.2.2 Fulfil various statutory, professional and contractual obligations; and
- 2.2.3 Protect the legitimate interests of our clients, our law firm and others.

3 WHAT ARE THE PURPOSES AND LEGAL BASIS OF OUR PERSONAL DATA PROCESSING?

We need your personal data for:	We process your personal data on the legal basis of:	During the processing, we act particularly with the following legislation:
Practise of advocacy, i.e. the provision of legal services	Compliance with our legal obligations and performance of the contracts, or in the case of the special category of personal data, if the processing is necessary for the establishment, exercise or defence	The GDPR, the Act on the Personal Data Protection, the Act on Advocacy, the Conditions of Advocacy, the Civil Code and the Commercial Code



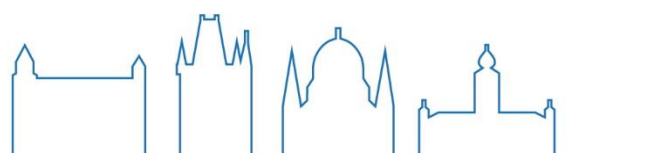
	of legal claims or whenever courts are acting in their judicial capacity	
Provision of the non-legal services	Compliance with our legal obligations and performance of the contracts	The GDPR, the Act on the Personal Data Protection, the Civil Code, the Commercial Code, the Act on Register of the Public Sector Partners, the Act on e-Government, the Act on Lease of the Non-residential Premises
Ensuring the compliance of our activities with the legislation and regulations of the SAK	Compliance with our legal obligations and the legitimate interests of our law firm or others, public interest or the establishment, exercise or defence of legal claims	The GDPR, the Act on Advocacy, the Conditions of Advocacy, the Anti-Money Laundering Act, the Act on Notification of Antisocial Activities
Purposes regarding the legitimate interests of our law firm	Legitimate interests of our law office or third parties grounded in our effort to inform our clients about our activities and in cooperation with other organisations within V4 group	The GDPR, the Act on the Personal Data Protection, the Civil Code, the Commercial Code, the Criminal Code, the Criminal Procedural Code, the Civil Procedural Code for Adversarial Proceedings, the Civil Procedural Code for Non-adversarial Proceedings, the Administrative Procedural Code, the Administrative Code, the Act on Administrative Offences
Marketing	Consent, if you give it to us or in some cases the legitimate interest of our law firm or third parties	The GDPR, the Act on the Personal Data Protection, the Act on Advocacy, the Conditions of Advocacy, the Civil Code, the Act on Electronic Communication, the Act on Advertisement, the Act on Consumer Protection
Statistic and archive purposes in the public interest and scientific	Compliance with our legal obligations	The GDPR, the Act on the Personal Data Protection, the Act on Archives and Registry



or historical research purposes		
HR and wage purposes	Compliance with our legal obligations, the legitimate interest or performance of the contracts or in the case of the special category of personal data, only if processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by law of the Slovak Republic or a collective agreement pursuant to Slovak law providing for appropriate safeguards for the fundamental rights and the interests of the data subject	The GDPR, the Act on the Personal Data Protection, the Labour Code, the Act on Advocacy, other work norms and regulations
Accounting and tax purposes	Compliance with our legal obligations	The GDPR, the Act on the Personal Data Protection, special accounting and tax norms and regulations
Work selection procedure purposes	Performance of the contracts till the end of the respective selection procedure	The GDPR, the Act on the Personal Data Protection, the Labour Code
Creation and provision of a database of job applicants	Consent, if you give it to us, for a period of three years or until the moment of its withdrawal	The GDPR, the Act on the Personal Data Protection

4 WHO CAN ACCESS YOUR PERSONAL DATA?

- 4.1 We make personal data of our clients and other data subjects available only to the extent necessary for the provision of legal services and the fulfilment of legal obligations. Their recipients are required to maintain confidentiality and are especially persons authorized to act on our behalf while providing legal services, cooperating attorneys, other companies belonging



to V4 group, the SAK (in the case of disciplinary proceedings), software providers or technical support of our law firm, including the staff of those persons. If we make your personal information available to such recipients, we will provide you with a specific list of them at your request.

- 4.2 Although we have a limited obligation to provide your personal data to public authorities because of our commitment of confidentiality, we are responsible for preventing a criminal offense, and we also have a duty to report information concerning money laundering and terrorist financing.
- 4.3 However, please note that if you visit our group V4 Legal on the [Facebook](#) or our group V4 Legal, s.r.o. on the [LinkedIn](#), your personal data are collected by the controllers of these social networks in accordance with their privacy policy and your settings. We do not influence these processing. If you are interested in the information we publish on these social networks and at the same time you do not want your personal data to be processed by the aforementioned controllers, please contact us and we will deliver you the information and news about our law firm in a different form.
- 4.4 Our law firm is part of the international group of law firms V4 Legal, which operates in the Slovak Republic, the Czech Republic, the Republic of Poland and Hungary. All necessary contacts and information about law firms can be found on our website in the section "[Contact](#)". These law firms concluded an agreement of joint controllers to ensure legal and transparent processing of your personal data. The joint processing of your personal data is based on the legitimate interest of the above-mentioned law firms and is reasoned by our goal to provide legal advice to our clients through highly qualified international lawyers' teams while increasing your level of security. We also use international network of law firms to protect your personal data, for example by backing up on shared servers. The above-mentioned law firms have carefully and thoroughly assessed the impact of the joint processing of personal data on your interests and fundamental rights, and have modified their duties so that you are not exposed to increased risk or discomfort as a result of the joint processing of personal data. Consequently, nothing changes for you as the data subject and all our duties and your rights under this notice are valid and granted also in such cases.

5 TO WHICH COUNTRIES DO WE TRANSPORT YOUR PERSONAL DATA?

- 5.1 We do not transfer your personal data to the third countries outside the European Economic Area (EU, Iceland, Norway and Liechtenstein). We use secure cloud services from a vendor with servers located in the EU.
- 5.2 However, please note that if you visit our group V4 Legal on the [Facebook](#) or our group V4 Legal, s.r.o. on the [LinkedIn](#), your personal data are collected by the controllers of these social networks, in accordance with their privacy policy and your settings, whose servers are located in the United States of America. We do not influence this storage. If you are interested in the information we publish on these social networks and at the same time do not want your personal data to be transferred out of the European Economic Area in this way, please do not hesitate to contact us at any time and we will provide you with information and news about our law firm in a different form.

6 HOW LONG DO WE STORE YOUR PERSONAL DATA?

- 6.1 We retain personal data as long as it is necessary for the purposes for which they are being processed or until time we are obliged to do so by law, such as accounting and personnel legislation or the Anti-Money Laundering Act.
- 6.2 When storing your personal data, we also comply with retention periods recommended by the SAK Resolution No. 29/11/2011, which includes, for example, the retention period for the client file of 10 years as of the date on which all the conditions for storing the file in the archive are fulfilled.
- 6.3 The law firm furthermore has to comply with the professional regulations interpreting the duties of attorneys under the Act on Advocacy, according to which there are certain circumstances that prolong the periods of retention of personal data. Such norms prevent us from liquidation of some documents for understandable reasons. Consequently, it is not possible to liquidate following documents:
- 6.3.1 The client's file containing the original documents delivered to our law firm by the client;
- 6.3.2 The client's file or part thereof, which the law firm is obliged to submit to the state archive;

6.3.3 The Client's file, if there are proceedings before the courts, public authorities, law enforcement agencies or the SAK that are linked to the content of such file, or if the subject of such proceedings is the provision of legal services or omissions of the law firm.

7 HOW DO WE COLLECT YOUR PERSONAL DATA?

7.1 If you are a client of our law firm, we usually obtain personal data directly from you. Depending on the particular case, the denial to provide us with your personal data may have a significant impact on our ability to provide high-quality legal advice and, in exceptional cases, our duty to provide legal advice. Personal data about our clients can also be obtained from publicly available sources, from public authorities or from other persons.

7.2 If you are not a client of our law firm, we often obtain your personal data from our clients or from other public or legal sources, e.g. from public authorities, public registers or while we are obtaining evidence in favour of our client. In that case, we may also obtain personal data against your will on the basis of our legal authorization and the obligation to practice our activities in accordance with the Act on Advocacy.

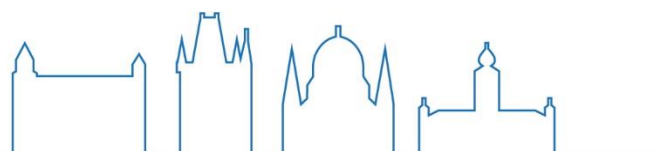
7.3 If you are an employee of a law firm or a cooperating person, you have provided us with all or most of your personal data we process. Their processing is governed, in particular, by labour law and accounting regulations, and we inform you about the rules for the processing of your personal data upon each conclusion of the respective contract.

8 WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

8.1 If we process personal data on the legal basis of your consent, you have the right to revoke it at any time.

8.2 You have the right to object to the processing of personal data on the basis of legitimate or public interest as well as for the purposes of direct marketing, including profiling.

8.3 As our client, you have the right to request access to your personal data and to correct it in the event of an error. If we process personal data for the purpose of the provision of legal services, you have no right to object to such processing as a client or any other natural person (e.g. a counterparty).



8.4 If personal data relate to a client, the right of access to data or the right to portability is not granted to other persons, due to our legal duty of confidentiality and by reference to Article 15 Section 4 and Article 20 Section 4 of the GDPR and provision of § 18 Section 8 of the Act on Advocacy, according to which: *"The attorney is under no obligation to provide information about the processing of personal data, to allow access or portability of personal data according to a special regulation if this could lead to a violation of the attorney's obligation to keep confidentiality under this law."*

8.5 You have always the right to bring a complaint before the Office for Personal Data Protection of the Slovak Republic or the SAK.

9 PERSONAL DATA PROCESSING VIA COOKIES

9.1 Cookies that are used on our website do not collect any personal data. Its use is thus safe and you are granted full respect of your privacy and personal data protection.

9.2 On our website, you will find one cookie that has the sole purpose of securing the functioning of the page and will be deleted from your browser right after you close it, i.e. at the end of the session.

9.3 We use Google Analytics to statistically evaluate website traffic, but your IP addresses are anonymized and cannot be identified.

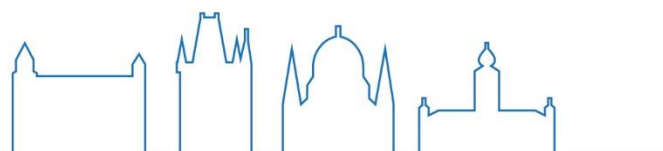
10 AMENDMENTS OF THE RULES ON PERSONAL DATA PROCESSING

10.1 Privacy is not a one-time issue for us. This rules and information may change or cease to be up to date. For this reason, we reserve the right to modify and change these rules at any time. If we change these terms in an essential way, we will notify you of this change on our web site or by e-mail.

11 LEGISLATION USED IN THESE RULES

11.1 **"Civil Procedural Code for Non-adversarial Proceedings"** means act no. 161/2015 Coll. Civilný mimosporový poriadok;

11.2 **"Civil Procedural Code for Adversarial Proceedings"** means act no. 160/2015 Coll. Civilný sporový poriadok;



- 11.3 “**GDPR**” means regulation of the European Parliament and of the Council (EÚ) 2016/679 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);
- 11.4 “**Civil Code**” means act no. 40/1964 Coll. Občiansky zákonník;
- 11.5 “**Commercial Code**” means act no. 513/1991 Coll. Obchodný zákonník;
- 11.6 “**Administrative Code**” means act no. 71/1967 Coll. o správnom konaní;
- 11.7 “**Administrative Procedural Code**” means act no. 162/2015 Coll. Správny súdny poriadok;
- 11.8 “**Criminal Procedural Code**” means act no. 301/2005 Coll. Trestný poriadok;
- 11.9 “**Criminal Code**” means act no. 300/2005 Coll. Trestný zákon;
- 11.10 “**Act on Advocacy**” means act no. 586/2003 Coll. o advokácii a o zmene a doplnení zákona č. 455/1991 Coll. o živnostenskom podnikaní (živnostenský zákon);
- 11.11 “**Act on Archives and Registry**” means act no. 395/2002 Coll. o archívoch a registratúrach;
- 11.12 “**Act on E-Government**” means act no. 305/2013 Coll. o elektronickej podobe výkonu pôsobnosti orgánov verejnej moci a o zmene a doplnení niektorých zákonov;
- 11.13 “**Act on Electronic Communication**” means act no. 351/2011 Coll. o elektronických komunikáciách;
- 11.14 “**Act on Lease of the Non-residential Premises**” means act no. 116/1990 Coll. o nájme a podnájme nebytových priestorov;
- 11.15 “**Act on the Personal Data Protection**” means act no. 18/2018 Coll. o ochrane osobných údajov a o zmene a doplnení niektorých zákonov;
- 11.16 “**Anti-Money Laundering Act**” means act no. 297/2008 Coll., o ochrane pred legalizáciou príjmov z trestnej činnosti a o ochrane pred financovaním terorizmu a o zmene a doplnení niektorých zákonov;

11.17 “**Act on Consumer Protection**” means act no. 250/2007 Coll. o ochrane spotrebiteľa a o zmene zákona Slovenskej národnej rady no. 372/1990 Coll. o priestupkoch;

11.18 “**Act on Notification of Antisocial Activities**” means act no. 307/2014 Coll. o niektorých opatreniach súvisiacich s oznamovaním protispoločenskej činnosti a o zmene a doplnení niektorých zákonov;

11.19 “**Act on Administrative Offences**” means act no. 372/1990 Coll. o priestupkoch;

11.20 “**Act on Register of the Public Sector Partners**” means act no. 315/2016 Coll. o registri partnerov verejného sektora a o zmene a doplnení niektorých zákonov;

11.21 “**Act on Advertisement**” means act no. 147/2001 Coll. o reklame a o zmene a doplnení niektorých zákonov;

11.22 “**Labour Code**” means act no. 311/2001 Coll. Zákonník práce.