## Terms of personal data protection

The protection of the personal data of our clients and other natural persons is important to us. These terms explain how we process personal data within the law firm **MEINL LEGAL**, **s. r. o.**, with registered office: Seberíniho 9, 821 03 Bratislava, ID: 47 234 814 (hereinafter referred to as "**We**"). If you have any questions, you can contact us by phone at +421 220 606 202, by e-mail at <a href="mailto:info@meinllegal.com">info@meinllegal.com</a> or by mail at our registered office address.

When processing personal data, we are primarily governed by the EU General Data Protection Regulation ("GDPR"), which also regulates your rights as a data subject, those provisions of the Personal Data Protection Act that apply to us (especially § 78), the Act on advocacy (§ 18) as well as other regulations.

# Why do we process personal data?

The processing of personal data is necessary on our part mainly so that we can:

- provide legal services to our clients and practice law;
- various legal, status and contractual obligations; and
- to protect the legitimate interests of us, our clients and other persons.

## What purposes and on what legal grounds do we process personal data?

Categories of processing purposes	Legal basis	Related Regulations
Performing of a profession (providing legal services)	Fulfilling the legal obligation according to Art. 6 par. 1 letter c) GDPR (relating to special categories of personal data, there may be additional conditions according to Article 9, paragraph 2, lit. f) GDPR)	The Law on Advocacy, the Code of Attorneys, the Civil and Commercial Code
Provision of other than legal services	Performance of a contract according to Article 6(1)(b) GDPR and, where applicable, fulfilment of a legal obligation under Art. 6(1) lit. c) GDPR	Act on the Register of Public Sector Partners, Act on e- Government, Civil and Commercial Code, Act on Lease of Non-Residential Premises
Ensuring compliance with the laws and regulations of the Slovak Bar Association.	Fulfilment of a legal obligation under Art. 6 par. 1 pism. c) GDPR, the legitimate interest of lawyers or third parties under Art. 6 para. 1 lit. f) GDPR, public interest under Art. 6 lit. (e) GDPR or defence of legal claims under Art. 9(2) (f) GDPR	Act on Advocacy, Bar Code, Act on Protection against Money Laundering, Act on Whistleblowing, GDPR
Purposes relating to the protection of legitimate interests	The legitimate interest of lawyers or third parties according to Art. 6(1)(f) GDPR	GDPR, Civil and Commercial Code, Code of Criminal Procedure, Criminal Code, Code of Civil Adversarial Procedure, Code of Civil Extra-Adversarial Procedure, Code of Administrative Procedure, Code of

		Administrative Procedure, Code of Offences
Marketing Purposes	Consent of the data subject under Art. 6 para. 1 lit. a) GDPR or legitimate interest of lawyers or third parties according to Art. 6 para. 1 lit. f) GDPR	Advocacy Act, Electronic Communications Act, Advertising Act, Consumer Protection Act, Civil Code
Statistical purposes, archival purposes in the public interest and historical and scientific research purposes	Article. 89 GDPR	Archives Act
Human Resources and Payroll	Fulfilment of a legal obligation under Art. 6 par. 1 lit. c) GDPR, legitimate interest according to Art. 6 para. 1 lit. f) GDPR and, where applicable, the performance of a contract under Article 6(1)(b) GDPR (about special categories of personal data, additional conditions may apply under Article 9(2)(b) GDPR)	Labour Code, Act on Advocacy and other regulations
Accounting and tax purposes	Fulfilment of a legal obligation under Art. 6 par. 1 lit. c) GDPR	Special laws in the field of accounting and tax administration

## What legitimate interests do we pursue when processing personal data?

Our legitimate interest is the protection of our rights and legitimate claims arising from legal relationships in which we are a party, e.g. enforcing our due claims from legal relationships, protecting our name and reputation, etc.

Our legitimate interest is also advertising and promotion of our legal services and non-legal services.

# What personal data do we process about you?

We process personal data about you to the following extent: name, surname, date of birth, address of permanent residence, nationality, type and number of identity document, telephone number and address for electronic mail delivery.

## To whom do we disclose your personal data?

We disclose the personal data of our clients and other natural persons only to the extent necessary and always while maintaining the confidentiality of the recipient of the data, e.g. to our employees, persons whom we commission to perform individual acts of legal services, representing or cooperating attorneys, our accounting and tax advisors, the Slovak Bar Association (e.g. in the case of disciplinary proceedings) or providers of software or support of our office, including employees of such persons.

Although we have a limited obligation to provide your personal data to public authorities due to confidentiality<sup>1</sup>, we are obliged to prevent the commission of a crime and we are also

<sup>&</sup>lt;sup>1</sup> Which are not considered recipients within the meaning of Art. 4(9) GDPR.

obliged to report information in the field of preventing money laundering and terrorist financing.

#### To which countries do we transfer your personal data?

We do not intend to transfer your data across borders to third countries outside the European Economic Area (EU, Iceland, Norway and Liechtenstein).

## What automated individual decision-making do we perform?

When processing personal data, we do not use automated processing of personal data, including profiling.

## How long do we keep your personal data?

We store personal data for no longer than is necessary for the purposes for which the personal data are processed. When storing personal data, we follow the recommended retention periods under the Resolution of the Presidium of the Slovak Bar Association No. 29/11/2011, e.g.:

- The incoming mail book and the outgoing mail book are kept by the lawyer for ten years from the date of receipt or dispatch in the book of the last registered mail;
- The inventory list shall be archived by the lawyer for ten years from its compilation;
- If the lawyer keeps the names of clients and the protocol of the client's file electronically, he/she shall draw up a printed form of the client file for the calendar year at the end of the calendar year and deposit it in the office without time limit;
- The shredding period of the client's file is 10 years and runs from the day when all conditions for storing the file in the archive are met.

Attorneys are subject to professional transcripts interpreting attorneys' obligations under the Act on Advocacy, according to which certain circumstances prolong our personal data retention periods or prevent us from shredding certain documents for understandable reasons. For example:

- The client's file containing the original documents handed over to the lawyer by the client cannot be shredded;
- It is not possible to shred logs of client files and names of client files;
- It is not possible to shred the client's file or its part, which the lawyer is obliged to submit to the State Archives;
- It is not possible to shred a client's file if any proceedings are conducted before a court, state administration body, law enforcement authorities, or the Slovak Bar Association that relates in content to the content of the client's file or the subject of which was the act or omission of the lawyer in providing legal assistance in the matter to the client.

#### How do we collect personal data about you?

If you are our client, we most often obtain your personal data directly from you. In this case, the collection of your personal data is voluntary. Depending on the individual case, failure to provide personal data to clients may affect our ability to provide quality legal advice or, in exceptional cases, our obligation to refuse to provide legal advice. We may also obtain personal data about our clients from publicly available sources, from public authorities or other persons.

If you are not our client, we most often obtain your personal data from our clients or other public or legal sources, such as requests from public authorities, extracts from public registers, obtaining evidence in favour of the client, etc. In such a case, we may obtain personal data about you without informing you and also against your will based on our legal authorization and obligation to practice advocacy under the Act on Advocacy.

# What rights do you have as a data subject?

If we process personal data about you based on your consent to the processing of personal data, you have the right to withdraw your consent at any time.

Irrespective of this, you have the right to object at any time to the processing of personal data based on legitimate or public interest, as well as for direct marketing purposes, including profiling.

As a client, you have the right to request access to your personal data as well as their correction. If we process personal data when providing legal services, you as a client or as another natural person (e.g. a counterparty) do not have the right to object to such processing under Article 22 of the GDPR. If personal data relates to a client (regardless of whether the client is a legal or natural person), neither the right of access to data nor the right to portability of other persons have due to our legal obligation of confidentiality and by reference to Art. 15 para. 4 GDPR, 20 para. 4 GDPR and § 18 para. 8 of the Act on Advocacy: 'The lawyer is not obliged to provide information about the processing of personal data, allow access or portability of personal data under a special regulation if this could lead to a breach of the lawyer's duty of confidentiality under this Act.' You also have the right to complain with the Office for Personal Data Protection or the Slovak Bar Association at any time.

## **Processing of cookies**

Cookies are small text files that improve the use of the website, e.g. by allowing to recognize previous visitors when logging into the user environment, remembering the visitor's choice when opening a new window, measuring website traffic or how it is used for user improvement. Our website uses the following cookies: necessary (necessary to activate the basic functions of the website. These cookies do not store any personal data), functional (help perform certain functions, such as sharing website content on social media platforms, collecting feedback and other third-party features), analytical (used to understand how visitors interact with the website. These cookies help provide information on metrics such as the number of visitors, bounce rate, traffic source, etc.), performance (used to understand and analyze key website performance indices, which helps in providing a better user experience for visitors), advertising (used to provide personalized ads to visitors based on pages they have previously visited and to analyze the effectiveness of advertising campaigns). You can accept or reject cookies; If cookies are rejected, only the necessary cookies will be used, which form the basis for the operation of our website and enable the use of its basic functions.

#### Changes to the Privacy Policy

Data protection is not a one-time issue for us. The information we are obliged to provide to you due to our processing of personal data may change or cease to be up-to-date. For this reason, we reserve the right to modify and change these terms and conditions to any extent at any time. If we materially change these terms and conditions, we will bring this change to your attention, e.g. by a general notice on this website or a special notice by email.

# MEINL LEGAL, s.r.o.