



# Personal data processing policy and legal notice

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## PERSONAL DATA PROCESSING POLICY AND LEGAL NOTICE

**Greats advokáti, s.r.o.**, with its registered office at Národní 973/41, Staré Město, 110 00 Prague 1, ID No.: 291 27 785, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, Insert 202218, **Greats Compliance, s.r.o.**, with its registered office at Národní 973/41, Staré Město, 110 00 Prague 1, ID No: 211 82 345, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, Insert 397937 a **Greats advisory, s.r.o.**, with its registered office at Národní 973/41, Staré Město, 110 00 Prague 1, ID No: 19893604, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, Insert 393372 (hereinafter referred to as “**Companies**”), process personal data manually, automatically, in documentary and electronic form, as joint or independent controllers and in accordance with applicable legislation, in particular in accordance with 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 “**GDPR**”) and Act No. 110/2019 Coll, on Personal Data Processing, as amended.

### PURPOSE OF THE PROCESSING

The Companies process the personal data, in particular of its clients and business partners, if they are natural persons, employees, website users and possibly other persons (hereinafter referred to as “**data subjects**”), solely for the purposes stated below, on the basis of the legal ground set out in the GDPR and to the extent necessary to fulfil the purpose for which they were collected.

- **Performance of contracts, including related negotiations**; in particular, agreements for the provision of legal services or the performance of client instructions, i.e. the actual performance of legal services in accordance with the legal regulations governing the practice of law; agreements for the provision of compliance services; agreements for the provision of accounting and tax services, the performance of obligations set out in agreements with business partners (in particular partner law firms or suppliers of products and services); the performance of labour contracts, pre-contractual negotiations with candidates for positions in the Companies, etc;
- **Fulfilment of legal obligations**; in particular, obligations set out in accounting, tax and labour law; compliance with obligations set out in financial regulation, proper maintenance of attorney files (including e-mail communication); compliance with obligations under Act No. 85/1996 Coll, Act on Advocacy as amended, Act No. 253/2008 Coll., on Selected Measures against Legitimation of Proceeds of Crime and Financing of Terrorism as amended (hereinafter referred to as the “**AML Act**”); receipt of notifications of breaches or threatened breaches of requirements set out in legal and internal regulations (whistleblowing), etc.;
- **Protection of legitimate interest**; in particular, the protection of rights and legally protected interests of the Companies and third parties, i.e. primarily the Companies’ clients, in the performance of concluded contracts, or the possibility of legitimate and effective exercise of claims arising from these contracts, the proper and safe operation of the Companies, the presentation and development of services provided to clients, the protection of health, safety and property of the Companies, their employees and third parties, etc;
- **Marketing**; in particular, sending commercial communications or newsletters on the basis of Act No. 480/2004 Coll., on Certain Information Society Services and on Amendments to Some Acts (Act on Certain Information Society Services) as amended, sending greeting cards, congratulations, etc.;
- **The purposes stated in the specific request for consent**; e.g. taking and using photographs for the purpose of promotion and presentation on the website, profiles and social networks, in promotional materials, etc.; keeping a register of job applicants or further contacting them with an offer of employment in the event of a relevant job vacancy; making and processing an audio recording of a verbal announcement (whistleblowing), etc.

## **PROCESSED PERSONAL DATA**

The Companies process in particular the following categories of personal data:

- identification data (name, surname, title, date of birth, Company identification number, VAT number);
- contact details (address, telephone number, e-mail address);
- financial data (bank account number);
- the details on the identity card;
- data processed on the basis of the use of cookies;
- data on the data subject's relationship with the Companies;
- data necessary for the fulfilment of the record-keeping and reporting obligations of the Companies as employers;
- data on the qualifications and work experience of the data subject as an applicant for employment with the Companies;
- data provided to the Companies by their clients or their legal representatives in the context of the performance of a contract for the provision of legal services, a contract for the provision of compliance services or a contract for the provision of accounting and tax services, or in the performance of activities directly related thereto.

## **DURATION OF PERSONAL DATA PROCESSING**

Personal data are processed by the Companies for the duration of the contract with the data subject or for the duration of the binding legal relationship in connection with which the personal data of the data subject are processed. For longer periods, personal data are processed only if this is provided for by law or if such processing is justified by the need or potential for full settlement of claims arising from the contractual legal relationship concluded between the Companies and the data subject or a third party. The Companies shall further process personal data provided on the basis of a specific consent until its revocation or for the period specified therein.

## **RECIPIENTS OF PERSONAL DATA**

The Companies shall only disclose personal data to authorised employees, cooperating advocates or other collaborators or processors of personal data on the basis of a written agreement, or to other joint or separate controllers, but only to the extent necessary for the fulfilment of the individual purposes of processing and on the basis of the corresponding legal ground for the processing of personal data. Current list of personal data processors is available at the registered office of the Companies.

The Companies' business partners must comply with the provisions of the GDPR and related legislation and ensure an adequate level of protection of personal data and the rights of data subjects under the GDPR and related legislation.

The Companies are entitled or obliged to transfer certain personal data to public authorities or entities entrusted with the performance of tasks in the public interest on the basis of applicable legislation in the cases provided for by law.

In the event that the transfer of personal data is strictly necessary for the provision of legal services by another legal services provider, the Companies shall proceed in accordance with the Act on Advocacy, according to which an advocate is bound by the duty of confidentiality when providing legal services.

## RIGHTS OF DATA SUBJECTS

Data subjects have the following rights under data protection legislation:

- **right of access** – the data subject has the right to obtain information from the Companies as to whether the Companies process his or her personal data and, if so, what data is involved and how it is processed;
- **the right to rectification** – the data subject has the right to request the rectification of inaccurate or incomplete personal data concerning him or her. The Companies shall carry out the rectification or completion without undue delay, but always taking into account technical possibilities.
- **the right to erasure** (right to be forgotten) – the data subject has the right to request the erasure of his or her personal data. Upon request, Companies will erase the personal data they process about the data subject if the personal data:
  - are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
  - the data subject objects to the processing and there are no overriding legitimate grounds for the processing or the data subject objects to the processing for direct marketing purposes;
  - personal data have been unlawfully processed;
  - the personal data must be erased or compliance with a legal obligation under EU or Member State law to which the controller is subject; or
  - personal data have been collected in relation to the offer of information society services.
- **the right to restriction of processing** – the data subject has the right to obtain from the Companies restriction of processing where one of the following applies:
  - the accuracy of the personal data is contested by the data subject, for a period enabling the Companies to verify the accuracy of the personal data;
  - the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  - the Companies no longer need the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
  - the data subject has objected to the processing pending the verification whether the legitimate grounds of the Companies override those of the data subject;
- **the right to data portability** – the data subject has the right, if the processing is based on consent or contract and is carried out by automated means, to receive from the Companies the personal data he or she has provided to the Companies and to transmit them to another controller or, if technically feasible, to request that the controllers transfer the personal data between themselves;
- **the right to object to processing** – the data subject has the right to object at any time to processing which is based on the legitimate interests of the Companies, a third party or which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority, or where personal data are processed for direct marketing purposes;
- **the right not to be subject to automated individual decision-making, including profiling** – the data subject has the right not to be subject to any decision based solely on automated processing, including profiling, which has legal effects concerning him or her or similarly significantly affects him or her;
- **the right to withdraw consent** – if the Companies process the personal data of the data subject on the basis of his/her voluntary consent, the data subject has the right to withdraw his/her consent at any time, either by sending a letter to the Companies' registered office or by e-mail to [law@greats.cz](mailto:law@greats.cz);
- **the right to unsubscribe from commercial communications** – the data subject may unsubscribe from commercial communications at any time by email to [law@greats.cz](mailto:law@greats.cz).

In case of any questions or complaints regarding the processing of personal data carried out by the Companies, you can contact the Companies directly in writing at their registered office or by e-mail at [law@greats.cz](mailto:law@greats.cz), or at the Office for Personal Data Protection, address: Pplk. Sochora 27, 170 00 Prague 7, website: <https://uouu.gov.cz/>, e-mail: [posta@uouu.gov.cz](mailto:posta@uouu.gov.cz), tel.: +420 234 665 800.

## WEBSITE, COOKIES AND EMAIL

Emails sent from the Companies' system are intended only for their specific addressee or addressees or persons otherwise expressly designated and their content is confidential. The message enjoys special protection as attorney's correspondence. If you have received a message in error, even if you are listed as one of the recipients, but it is clear from the content of the message that it is not intended for you, please do not read it or continue to read, copy or otherwise use the message, or distribute or otherwise disclose its contents to others. Please notify the Companies that you have received this email in error and then delete the email and any copies of it. Thank you.

Electronic communication poses certain risks. The transmission of email cannot be guaranteed to be secure or error-free, as information sent by electronic communication may be corrupted, lost, destroyed, delayed, intercepted by a third party or contain viruses. The Companies accept no liability for any of these risks associated with the transmission of electronic communications.

The purpose of cookies on the Companies' website is to improve the use of the website by its users while respecting privacy. For this reason, a description of the cookies used can be found below, as well as information on how to prevent them from being stored on the user's device. Companies are required to obtain the consent of the website user in order to use cookies on their website. If consent is not given, the user is in no way prevented from using the website. Consent is given by the user via a pop-up window (so-called cookie bar) when the user first visits the website. The user's consent is not required for the use of so-called technical or strictly necessary cookies.

### **Enabling/blocking cookies**

When visiting a website for the first time, the user can either give collective consent to the use of all categories of cookies (Allow all), select only strictly necessary cookies (Strictly necessary only) or select individual types of cookies (Settings). Most web browsers also offer the possibility to control the cookies stored via the browser settings. The settings may vary from browser to browser, so you should always follow the instructions in the browser help.

### **Details about cookies**

The cookies used on the website fall into the following categories:

1. Necessary,
2. Analytics,
3. Marketing.

#### *Necessary*

These are technical or strictly necessary cookies, without which it would not be possible to operate the website. They include, for example, cookies for storing selected settings or remembering logins. The user's consent is not required to use these cookies.

#### *Analytics*

These cookies are used to measure and analyse website traffic (number of visitors, pages viewed, average browsing time, etc.). When using these cookies we can work with your contact details. The user's consent is required to use these cookies.

#### *Marketing*

They are used for the purposes of advertisements displayed on third party websites, including social media and contextual advertising. They are tailored to user preferences and help the Companies measure the effectiveness of advertising campaigns. Google tools are used in connection with these cookies. User consent is required for the use of these cookies.

## Cookies used on the website

Name of cookies	Processing time	Source	Description	Cookie type
_gid	1 day	Google Analytics	The _gid cookie, installed by Google Analytics, stores information about how visitors use the website and also generates analytics report on the performance of the website. The data collected includes the number of visitors, their source and the pages visited anonymously.	Analytical
_ga	400 days	Google Analytics	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also tracks site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.	Analytical
_gat_gtag_*	1 minute	Google Analytics	A variant of the _gat cookie set by Google Analytics and Google Tag Manager that allows website owners to track visitor behaviour and measure website performance. The element pattern in the name contains the unique identification number of the account or website to which it relates.	Analytical
cookies_and_content_security_policy	300 days	Web page	The cookie is used to store consent values for the processing of personal data.	Necessary
wp-wpml_*	1 day	Web page	The cookie is used to store the language settings of the pages displayed.	Necessary
Wp-*	300 days	Web page	The cookie is used to run the website.	Necessary

The Companies have made every effort to ensure the accuracy of the information on this website and the links contained therein. However, in view of the nature of the medium and the risk of data corruption or interruption, the Companies do not accept any liability arising from the use of or exclusive reliance on the information and links provided on this website.

The Companies may, to a reasonable extent and in compliance with applicable law, use artificial intelligence (AI) tools and systems in the provision of their services. The Companies have adopted appropriate measures, in particular through an internal policy governing the use of AI and regular staff training, to ensure an adequate level of data protection and protection of personal data.

#### CONTACT PERSON UNDER THE AML ACT

In case of fulfilling the notification obligation under the provisions of Section 18 (6) of the AML Act and to ensure continuous contact with the Financial Analysis Office in accordance with the provisions of Section 22 of the AML Act, the Companies designated **Mgr. Jakub Joska**, Managing Director and Partner, e-mail: [jakub.joska@greats.cz](mailto:jakub.joska@greats.cz).

#### NOTICE TO CONSUMERS

According to Act No. 634/1992 Coll., on Consumer Protection as amended, in the event of a dispute between an attorney and a client, the client is entitled to file a motion for out-of-court dispute resolution with the Czech Bar Association within one year of the date on which he or she first asserted his or her right, which is the subject of the dispute, with the attorney. The right of the parties to the dispute to seek protection of their rights and legitimate interests through the courts is not affected by the initiation of out-of-court settlement of a consumer dispute. More information can be found on the website of the Czech Bar Association: <https://www.cak.cz/>.