



# 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 in Section C, Insert 202218 (hereinafter referred to as the “**Law Firm** “), processes personal data manually, in documentary and electronic form, as a data controller 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 the Processing of Personal Data, as amended.

### PURPOSE OF THE PROCESSING

The Law Firm processes the personal data of its clients and business partners, if they are natural persons (hereinafter referred to as “**data subjects**”), solely for the purposes stated below, on the basis of the legal titles set out in the GDPR and to the extent necessary to fulfil the purpose for which they were collected.

- **Performance of contracts** for the provision of legal services, including their negotiation; performance of obligations set out in contracts with business partners (in particular with partner Law Firms or suppliers of products and services); pre-contractual negotiations with candidates for positions in the Law Firm, etc.;
- **Fulfillment of legal obligations**; in particular the obligations set forth by accounting and tax legislation for the Law Firm as an employer and the related transfer of personal data to public authorities; proper maintenance of the attorney’s file, including email communication; client identification within the meaning of Act No. 85/1996 Coll., on Advocacy, as amended, and Act No. 253/2008 Coll., on Selected Measures against Legitimization of Proceeds of Crime and Financing of Terrorism, as amended (hereinafter referred to as the “**AML Act**”), etc.;
- **Protection of legitimate interest**; in particular, protection of the rights and legally protected interests of the Law Firm and third parties, i.e., primarily the Law Firm’s clients, in the performance of concluded contracts, or in the possibility of legitimate and effective exercise of claims arising from these contracts, in the proper and safe operation of the Law Firm, in the presentation and development of services provided to the Law Firm’s clients, etc.;
- **Sending commercial communications and offering services via email**; 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.;

### PROCESSED PERSONAL DATA

The Law Firm processes in particular the following categories of personal data:

- identification data – name, surname, title, date of birth, ID number, Tax identification number, ID Card number;
- contact details - address, telephone number, email address;
- financial data - bank account number;
- data on the relationship between the data subject and the Law Firm;
- data necessary for the fulfilment of the Law Firm’s recording and reporting obligations as an employer;
- data on the qualifications and work experience of the data subject who is an applicant for employment in the Law Firm;
- data provided to the Law Firm by its clients or their legal representatives as part of the performance of the contract for the provision of legal services and in the performance of activities directly related to it.

## DURATION OF PERSONAL DATA PROCESSING

Personal data are processed by the Law Firm 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. Personal data shall be processed for longer periods only if that is set out by a legal regulation or if such processing is justified by the need or potential for full settlement of claims arising from the legal relationship concluded between the Law Firm as the controller and the data subject or a third party, if the personal data of the data subjects are processed in this context.

## RECIPIENTS OF PERSONAL DATA

The Law Firm only makes personal data available to authorized employees and cooperating attorneys or to individual personal data processors contracted by the Law Firm, or to other controllers, but only to the extent necessary for the fulfilment of the individual purposes of processing and on the basis of the corresponding legal title for the processing of personal data. The current list of personal data processors is available at the Law Firm's registered office.

In cases established by law, the Law Firm is entitled or obliged to make certain personal data available to public authorities or entities entrusted with the performance of tasks in the public interest on the basis of applicable legal regulations.

In the event that making personal data available to other parties is strictly necessary for the provision of legal services by another legal services provider, the Law Firm proceeds in accordance with the Act on Advocacy, according to which an attorney 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 Law Firm as the data controller as to whether it processes their personal data and, if so, what the data is and how it is processed;
- **right to rectification** – the data subject has the right to obtain from the Law Firm without undue delay the rectification of inaccurate personal data concerning him or her;
- **right to erasure ('right to be forgotten')** – the data subject has the right to obtain from the Law Firm the erasure of personal data concerning him or her without undue delay if the specified conditions are met and the data subject so requests;
- **right to restriction of processing** – the data subject has the right to obtain from the Law Firm restriction of processing in certain cases;
- **right to data portability** – the data subject has the right, if the specified conditions are met, to obtain from the Law Firm the personal data they have provided to the Law Firm and to transfer it to another data controller or, if technically possible, to request that the data controllers transfer the personal data between themselves;
- **right to object** – the data subject has the right to object at any time to processing based on the legitimate interests of the Law Firm, a third party or being necessary for the performance of a task carried out in the public interest or in the exercise of official authority;
- **right to withdraw consent** – if the Law Firm processes the personal data of the data subject on the basis of their voluntary consent, the data subject has the right to withdraw their consent at any time.

In case of any questions or complaints regarding the processing of personal data carried out by the Law Firm, you can contact the Law Firm directly in writing at the address of its registered office or via email at [law@greats.cz](mailto:law@greats.cz), or you can contact the Office for Personal Data Protection at: Pplk. Sochora 27, 170 00 Prague 7, email: [posta@uoou.cz](mailto:posta@uoou.cz), telephone number: +420 234 665 800.

## WEBSITE, COOKIES AND EMAIL

Emails sent from the Law Firm's 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-client correspondence. If you have received a message in error, even if you are listed as one of the addressees, but it is clear from the content of the message that it is not intended for you, please, do not read or continue to read, copy or otherwise use the message, or distribute or otherwise disclose its contents to others. Please inform the Law Firm that you have received this email in error and then delete the email and any copies of it. Thank you.

Electronic communication presents 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 Law Firm accepts no responsibility for any of these risks associated with the transmission of electronic communications.

The aim of cookies on Law Firm's 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. The Law Firm is required to obtain the consent of the website user for the use of cookies on its website. If consent is not given, the user is in no way prevented from using the Law Firm's website. Consent is given by the user via a pop-up window (the so-called cookie bar) on the first visit to the Law Firm's website. The user's consent is not required for the use of the so-called technical or strictly necessary cookies.

### **Enabling/blocking cookies**

When visiting the Law Firm's 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**). In addition, most web browsers also offer the possibility to control the cookies stored through the browser settings. The settings may vary from browser to browser, so you should always follow the instructions in the browser help.

### **Details on cookies**

Cookies used on the Law Firm's website are divided into the following categories:

1. strictly necessary/technical,
2. analytical,
3. marketing.

#### *Strictly necessary/technical cookies*

These are essential 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.

#### *Analytical cookies*

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

#### *Marketing cookies*

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 Law Firm measure the effectiveness of advertising campaigns. Google tools are used in connection with these cookies. The user's consent is required.

More information about cookies can be found on the website <https://www.aboutcookies.org/>.

## Cookies used on the Law Firm's website

Name of cookies	Duration of processing	Source	Description	Category
_gid	1 day	Google Analytics	The _gid cookie, installed by Google Analytics, stores information on how visitors use the website and also generates an 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 visitors, 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, installed by Google Analytics and Google Tag Manager, allows website owners to track visitor behavior 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.	Strictly necessary/technical
wp-wpml_*	1 day	Web page	The cookie is used to store the language settings of the displayed pages.	Strictly necessary/technical
Wp-*	300 days	Web page	The cookie is used to run the website.	Strictly necessary/technical

The Law Firm has made every effort to ensure the accuracy of the information on this website and the links contained therein. However, given the nature of the medium and the risk of data corruption or interruption, the Law Firm assumes no liability arising from the use of or exclusive reliance on the information and links provided on this website.

#### CONTACT PERSON ACCORDING TO THE AML LAW

For the cases of fulfilling the notification obligation under the provisions of Section 18 (6) of the AML Act and to ensure continuous contact with the Financial Analytical Office in accordance with the provisions of Section 22 of the AML Act, the designated contact person is **Mgr. Jakub Joska**, Managing Partner of the Law Firm, email: [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 from 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/scripts/detail.php?id=15607>.