

Privacy Notice

General Section

**Who processes your personal data?
Who is the data controller?**

In the course of processing your personal data, Szabó Levente Antal Law Firm (the "Law Firm") will act as the data controller.

**What are the data controller's
contact details?**

The Law Firm's
registered office: 1011 Budapest, Corvin tér 10.
telephone number: +36 1 796 36 00
fax number: +36 1 796 36 36
e-mail address: info@klartlegal.eu

**Which data are considered to be
personal data?**

Personal data means any information relating to an identified or identifiable natural person (the "data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Which personal data are included in
the special categories of personal
data?**

Special categories of personal data are considered to be personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data and biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**Who is considered to be a data
subject?**

The Law Firm may process the personal data of the following natural persons in particular:

- potential clients, their agents, representatives and contact persons (Chapter II/1)
- persons requesting an offer, their agents, representatives and contact persons (Chapter II/2)
- clients (Chapters II/3 and II/4)
- natural persons connected with clients (e.g. relatives, representatives, agents, contact persons, beneficial owners) (Chapters II/3 and II/4)
- other natural persons participating and appearing in the procedure related to the subject-matter of the assignment (e.g. opposing party, legal representative) (Chapters II/3 and II/4)
- persons applying to attend and attending the Law Firm's events (Chapter II/5)
- persons contacting the Law Firm as well as their agents, representatives and contact persons (Chapter II/6)
- within the framework of providing legal protection for whistleblowers pursuant to Act CLXV of 2013 on complaints and public interest disclosures, whistleblowers contacting the Law Firm and persons affected by a disclosure (whose conduct or omission gave rise to the disclosure or who may have substantive information about the contents of the disclosure) (Chapter II/7)
- persons visiting the websites klartlegal.hu, klartlegal.eu, klartlegal.com and csaladalkotmany.hu (Chapter II/8)
- persons who subscribe to the Law Firm's newsletters (Chapter II/9)

This Privacy Notice does not contain information related to the processing of the personal data of employees and applicants for jobs advertised by the Law Firm.

Which are the most important laws and regulations governing the processing activity of the Law Firm?

Data processing is governed mainly by the following legislation:

- Regulation (EU) 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" or "GDPR")
- Act LXVI of 1992 on keeping records of the personal data and addresses of citizens ("Data Records Act")
- Act C of 2000 on accounting ("Accounting Act")
- Act CXII of 2011 on the right of informational self-determination and on freedom of information
- Act LII of 2017 on the implementation of the financial and asset restraint measures imposed by the European Union and the UN Security Council
- Act LIII of 2017 on the prevention and combating of money laundering and terrorist financing ("Anti-Money Laundering Act")
- Act LXXVIII of 2017 on legal practice ("Legal Practice Act")
- Act CL of 2017 on taxation ("Tax Act")
- Hungarian Bar Association regulations, in particular HBA Regulation 14/2018 of 25 June 2018 on the fulfilment of obligations, the assessment of risks, supervisory procedures and guidance defined in Act LIII of 2017 on the prevention and combating of money laundering and terrorist financing and Act LII of 2017 on the implementation of the financial and asset restraint measures imposed by the European Union and the UN Security Council

On what principles does the Law Firm perform its data processing activity?

The Law Firm processes data based on the following principles, by taking the necessary measures to enforce these principles in order that the personal data are

- a) processed on a lawful, fair and appropriate legal basis (lawfulness, fairness and transparency),
- b) collected only for specified, clear and lawful purposes and are not processed in a way that is incompatible with such purposes,
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation),
- d) accurate and, where necessary, kept up to date; if possible, personal data that are inaccurate are erased or rectified without delay (accuracy),
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may only be stored for longer periods for statistical purposes subject to the implementation of the appropriate technical and organisational measures (storage limitation),
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (integrity and confidentiality),
- g) processed with an awareness of responsibility for and an ability to demonstrate compliance with the above principles (accountability).

For what purpose, on what legal basis and for how long does the Law Firm process personal data and which personal data are processed?

The purpose, legal basis and duration of processing personal data and a description of the personal data are given in the Special Section of this Privacy Notice.

Does the Law Firm use automatic decision-making or profiling?

The Law Firm does not use automatic decision-making and does not create profiles of data subjects from available data.

What rights do data subjects have?

The Law Firm ensures the following rights for data subjects in cooperation with the data subjects in exercising these rights noting that Union or Member State law applicable to the Law Firm (in particular the Legal Practice Act) may restrict the assertion of the rights of the data subject to the necessary and proportionate extent in order to protect the data subject or to protect the rights and freedoms of others or to enforce civil claims (Article 23, GDPR):

- a) the right to information:
The Law Firm provides data subjects with the information required and specified by law in accordance with the principles of fair and transparent processing.
The Law Firm provides the information specified by law to the data subject even where personal data have not been obtained from the data subject unless the personal data must remain confidential subject to an obligation of professional secrecy regulated by Union or Member State law (in particular the Legal Practice Act), including a statutory obligation of secrecy,
- b) the right of access:
data subjects are entitled to obtain confirmation from the Law Firm as to whether their personal data are currently being processed and, if that is the case, they are entitled to access their personal data and the information specified by law. The Law Firm will provide a copy of the personal data undergoing processing to the data subject free of charge on one occasion. For any further copies requested by the data subject, the Law Firm may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, the Law Firm – unless otherwise requested by the data subject – will provide the information requested in a commonly used electronic format. The right to obtain a copy may not adversely affect the rights and freedoms of others (in particular a person deemed a client of the Law Firm enforcing a civil claim) and access may be granted, irrespective of the request for a copy, in accordance with the provisions on legal professional privilege,
- c) the right to withdraw consent:
where the legal basis of data processing is the data subject's consent, the data subject may withdraw consent for data processing at any time but the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. The Law Firm may continue to process personal data after the withdrawal of consent for the purposes of fulfilling its legal obligations or legitimate interests provided that ensuring that the legitimate interest prevails is proportionate with the restriction of the right to the protection of personal data,
- d) the right to rectification:
the data subject may request the Law Firm to rectify inaccurate or supplement missing personal data concerning him or her without undue delay,
- e) the right to erasure:
the data subject may request the Law Firm to erase personal data concerning him or her without undue delay. The performance of such a request may only be denied in cases specified by law, in particular if data processing is necessary for compliance with a legal obligation which requires the processing of personal data laid down by Union or Member State law applicable to the Law Firm, or for the establishment, exercise and defence of legal claims. Where the law provides for an obligation of data processing, the Law Firm may not erase the data of the data subject,
- f) the right to be forgotten:
this right compels the Law Firm where it has made the personal data public and, in consequence of the right to erasure, is obliged to erase the personal data to take reasonable steps, including technical measures, taking account of available technology and the cost of implementation, to inform controllers which are processing the data that the data subject has requested the erasure of any links to, or copy or replication of, those personal data,

- g) the right to restriction:
the data subject may request the Law Firm to restrict data processing if
- the accuracy of the personal data is contested by the data subject (in this case restriction is for a period that enables the Law Firm 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 Law Firm no longer needs the personal data for the purposes of the processing, but the data are required by the data subject for the establishment, exercise or defence of legal claims, or
 - the data subject has objected to processing exercising the right to object pending the verification whether the legitimate grounds of the Law Firm override those of the data subject,
- h) the right to be informed about the recipients advised of the rectification or erasure of personal data, or the restriction of processing:
the Law Firm will inform all recipients to whom the personal data have been communicated of the rectification, erasure or restriction of the processing of the personal data at the data subject's request unless this proves impossible or requires disproportionate effort. At the request of the data subject, the Law Firm will provide information about such recipients,
- i) the right to data portability:
where the legal basis of data processing is the data subject's consent or the performance of the contract, and the processing of personal data is carried out by automated means, the data subject has the right to
- receive the personal data concerning him or her, which he or she has provided to the Law Firm, in a structured, commonly used and machine-readable format,
 - transmit those data to another controller without hindrance from the Law Firm,
 - where technically feasible, request the Law Firm to directly transmit the personal data to another controller,
- j) the right to object:
the data subject has the right to object, on grounds relating to his or her particular situation, at any time to the processing of his or her personal data necessary for the performance of a task on the grounds of the legitimate interests of the Law Firm or a third party. The Law Firm will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
- k) the right to remedy:
if the data subject considers that the processing of personal data relating to him or her infringes the legal regulations, the data subject has the right to lodge a complaint with a supervisory authority or to seek judicial remedy.

How can the data subject submit requests concerning data processing or for the withdrawal of the consent given for data processing?

The data subject may submit requests concerning data processing

- by post to the address: 1011 Budapest, Corvin tér 10,
- in person at the registered office of the Law Firm (1011 Budapest, Corvin tér 10),
- by telephone (+36 1 796 36 00),
- by fax (+36 1 796 36 36),
- by e-mail (info@klartlegal.eu).

Dealing with the data subject's requests

The Law Firm will inform the data subject of the action taken in response to his or her request within one month of the receipt of the request. Where necessary, this time limit may be extended by another two months. The Law Firm will inform the data subject of any such extension within one month of the receipt of the request, together with the reasons for the delay.

Where the data subject makes the request by electronic means, the Law Firm will provide the information by electronic means where possible unless otherwise requested by the data subject.

If the Law Firm does not take action in response to the data subject's request, it must provide information about the reasons for not taking action within one month of the receipt of the request, and advise the data subject of the option of lodging a complaint with a supervisory authority and seeking a judicial remedy.

Joint data processing

The Law Firm, as the head office of the KLART Legal Attorneys' Association, cooperates in the course of its activities with the following lawyers and law firms participating in the KLART Legal Attorneys' Association, thus they are considered to be joint data controllers:

- Dr Tóth Eszter Vera Law Firm (registered office: 1011 Budapest, Corvin tér 10)
- Dr Adrienn Orosz, sole practitioner attorney (registered office: 1011 Budapest, Corvin tér 10)
- Dr Anna Ránky, sole practitioner attorney (registered office: 1011 Budapest, Corvin tér 10)
- Dr Halász Miklós Law Firm (registered office: 1011 Budapest, Corvin tér 10)

Who are the recipients of your personal data?

The recipients of the personal data are the participating partners and data processors of the controller.

Which data processor does the controller use?

The Law Firm may use the services of data processors to process the personal data handled.

The data processor may be a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

The Law Firm will only use a data processor who or which provides sufficient guarantees for the implementation of appropriate technical and organisational measures to ensure that the data processing complies with the legal requirements and that the rights of the data subjects are protected.

The data processor may not engage an additional data processor without the prior written specific or general authorisation of the Law Firm.

The Law Firm uses the companies below for data processing services:

- Rendszerinformatika Zrt. (address: 1134 Budapest, Váci út 19. IV. em.): cloud service, operating servers, administrator's activities
- Recomp Informatikai Zrt. (address: 1044 Budapest, Íves út 8): ensuring use of corporate management program package
- IGL Tax Quality Kft. (address: 1157 Budapest, Zsókavár u. 38. 4. em. 16): accounting services
- Legito s.r.o (address: Pod Lipami 19, Zeměchy, 278 01 Kralupy nad Vltavou, Czech Republic, ID no. 02649659, Ref. no. C 221946, Municipal Court in Prague): document automation software if the data subject uses the application
- Dealsign Solutions Oy (address: Lönnrotinkatu 11, Helsinki, Finland): document negotiating software if the data subject uses the application
- Trustchain Systems Kft. (address: Gogol utca 26. 1. em., 1133 Budapest): platform service provider for concluding electronic contracts if the data subject uses the application
- REISSWOLF BUDAPEST Adat- és Dokumentumkezelő Kft. (address: 1097 Budapest, Illatos út 6): destroying documents
- Europorto Bt. (registered office: 1137 Budapest, Pozsonyi út 40): postal service

- Magyar Posta Zrt. (registered office: 1138 Budapest, Dunavirág utca 2-6): postal service

In the above cases, the contracts for the provision of data services are for an indefinite period.

For specific assignments the Law Firm may use other data processors (e.g. a translator or financial expert) apart from the above and will inform the data subject about this individually during the performance of the assignment.

Does the Law Firm transmit the personal data processed by it to third countries?

The Law Firm does not transmit personal data to third countries on a regular basis. In the event of transmission in a particular case, information will be provided to the data subject in accordance with the contents of the section entitled "What rights do data subjects have?".

What measures does the Law Firm take to protect personal data?

The Law Firm takes technical and organisational measures to protect the personal data processed by it, in particular against unauthorised access, alteration, transmission, disclosure, erasure or destruction, as well as accidental destruction, damage and inaccessibility due to changes in the technology used. To this end, inter alia,

- access to data stored in the corporate governance and document management systems is only possible with a password and appropriate authorisation,
- the use of computers is conditional on individual passwords,
- mobile data management (MDM) software is used,
- the information technology system is regularly checked from the aspect of data protection and IT security,
- protection against malicious software is provided,
- physical measures are taken against access and for protection (dividing the building into sections, entry system, locking doors),
- a burglar alarm system is used,
- personal security measures are taken,
- appropriate resources are provided for assignments; employees are made aware of the importance and requirements of data security,
- fire protection devices and a fire alarm system is used,
- access to documents is logged,
- back-up copies are stored on a separate data storage product; live and back-up servers and back-up copies are located in a redundant manner and physically separated.

In order to protect the data files processed electronically in the various registers, the Law Firm ensures by means of an appropriate technical solution that the stored data cannot be directly linked and assigned to the data subject unless permitted by law.

Who is liable for damage caused by processing personal data?

The Law Firm is liable for damage caused by the unlawful processing of personal data or a breach of the data security requirements and for an infringement of the data subject's personal rights, and is obliged to compensate the damage if the violation is acknowledged or legally established. In the event of the infringement of the data subject's personal rights, the data subject may claim restitution pursuant to Section 2:52 of Act V of 2013 on the Civil Code. The Law Firm is also liable for any damage caused by the data processor used by it.

The Law Firm will be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

What legal remedies do you have as

In connection with the lawfulness of data processing, the data subject may initiate a procedure with the Hungarian National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11, postal address: 1374 Budapest, Pf. 603, website:

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www.naih.hu, telephone: +36 (1) 391-1400, fax: +36 (1) 391-1410, central e-mail address: ugyfelszolgalat@naih.hu) or, at the choice of the data subject, apply to the court for the place where he or she is habitually or temporarily resident in Hungary or where the Law Firm is based. The court of habitual or temporary residence in Hungary may be found on the web page <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.

The Law Firm has not appointed a data protection officer in the absence of a specific provision laying down such an obligation.

II Special Section

II/1 Processing of personal data for direct marketing purposes				
Purpose of data processing	Personal data processed	Legal basis of data processing	Duration of data processing	Information on the provision of data by the data subject / source of the data
enquiry for purposes of direct marketing	name, address, e-mail address, telephone number of potential natural person client	consent	until the cessation of the purpose or interest but no later than the withdrawal of consent	in the absence of data provision no enquiry for the purposes of direct marketing is possible / the source of data is the potential client; data provision is voluntary
	name, e-mail address, telephone number, position of the agents, representatives, contact persons of a potential client	legitimate interest	until the cessation of the purpose or interest but no later than successful objection	the source of data is the potential client or the client's agent, representative or contact person, or some other public source

II/2 Processing of personal data for the purposes of making an offer				
Purpose of data processing	Personal data processed	Legal basis of data processing	Duration of data processing	Information on the provision of data by the data subject / source of the data
making an offer	name, address, e-mail address, telephone number of natural person requesting the offer	consent	the period of validity indicated in the offer but no later than the withdrawal of consent	data provision is a prerequisite of making the offer; failure to provide data renders making the offer impossible / the source of data is the potential client requesting the offer; data provision is voluntary
	name, e-mail address, telephone number, position of the agents, representatives, contact persons of a client requesting the offer	legitimate interest	the period of validity indicated in the offer but no later than until successful objection	data processing is a prerequisite of making the offer; in the absence of data no offer can be made / the source of data is the potential client or the client's agent, representative or contact person, or some other public source

II/3 Processing of personal data for the purposes of signing a legal service contract and the performance of the assignment				
Purpose of data processing	Personal data processed	Legal basis of data processing	Duration of data processing	Information on the provision of data by the data subject / source of the data
conclusion and performance of the legal service contract	forename and family name, address, mother's name, and place and date of birth of the natural person client, data related to the subject-matter of the assignment (e.g. marital status)	performance of contract	unless otherwise provided for by the Legal Practice Act, the limitation of claims arising from or connected to the contract (5 years or as specified by the contract)	data provision is a prerequisite of the conclusion and performance of the contract; failure to provide data renders the conclusion of the contract impossible or may reduce the effectiveness of, or render impossible, the performance of the contract / the source of data is the potential natural person client; data provision is voluntary
	name, e-mail address, telephone number, position of the agents, representatives, contact persons of a client	legitimate interest	unless otherwise provided for by the Legal Practice Act, the limitation of claims arising from or connected to the contract (5 years or as specified by the contract) but no later than successful objection	data provision is a prerequisite of the conclusion and performance of the contract; failure to provide data renders the conclusion of the contract impossible or may reduce the effectiveness of, or render impossible, the performance of the contract / the source of data is a client other than a natural person
performance of assignment	name and other personal data of natural persons connected with the clients (thus in particular relatives, and the representative or agent of non-natural persons) in relation to the subject-matter of the assignment which are shared with the Law Firm	legitimate interest	unless otherwise provided for by the Legal Practice Act, the limitation of claims arising from or connected to the contract (5 years or as specified by the contract) but no later than successful objection	data provision is a prerequisite of the performance of the assignment; failure to provide data may reduce the effectiveness of, or render impossible, the performance of the assignment / the source of data is the client or the data subject or some other public source or documents related to the case
	apart from the persons indicated above in the table, data (e.g. name, telephone number, e-mail address, person represented, representative capacity, and data about a judicial or administrative case) referring to natural persons participating and appearing in judicial, administrative or other proceedings related to the subject-matter of the assignment in any capacity (e.g. opposing party, intervener, witness, legal representative, judge, administrator)			
	data belonging to special categories of	for a natural	unless otherwise provided for by	data provision is a prerequisite of the

	personal data	person client, consent; for any other data subject, legitimate interest (Article 6(1)(a)(f), GDPR); or necessary for the establishment, exercise or defence of legal claims related to data protection (Article 6(1)(f), GDPR)	the Legal Practice Act, the limitation of claims arising from or connected to the contract (5 years or as specified by the contract); in the case of consent, until withdrawal; in the case of legitimate interest, no later than successful objection	performance of the assignment; failure to provide data may reduce the effectiveness of, or render impossible, the performance of the assignment / the source of data is the client or the data subject
identification and verification based on the Anti-Money Laundering Act	the following data of the natural person client and of a non-natural person client's agent, authorised representative, representative: forename and family name, forename and family name at birth, nationality, place and date of birth, mother's birth name, address (or temporary address), type and number of identification document, classification as a politically exposed person (for natural person clients), a copy of the document verifying identity, audio and video recording of the natural person made in the course of identification using an electronic communications network	compliance with legal obligation (Sections 7, 19, Anti-Money Laundering Act)	8 years or in exceptional cases 10 years from the cessation of the business ties or the performance of the assignment (Sections 56, 57 and 58, Anti-Money Laundering Act)	data provision is based on a statutory obligation; the data subject is obliged to provide the data; if data are not provided, the contract cannot be signed
	the following data of the beneficial owner: forename and family name, forename and family name at birth, nationality, place and date of birth, address (or temporary address), classification as a politically exposed person, type and degree of ownership interest, audio and video recording of the natural person making a declaration with regard to the beneficial owner made in the course of identification using an electronic communications network	compliance with legal obligation (Sections 8, 9, Anti-Money Laundering Act)		
identification of the client and the person	data received from the contacted registers in the course of data request in order to check	compliance with legal obligation	until the identification is performed	data provision is based on a statutory obligation; if data are not provided, the

representing the client based on the Legal Practice Act	the presented identification document pursuant to Section 32 of the Legal Practice Act: natural personal identification data (forename and family name, forename and family name at birth, place and date of birth, mother's birth forename and family name), nationality (statelessness, refugee, immigrated, settled or EEA national status), address, facial image, signature, and other data given in Section 32 of the Legal Practice Act	(Section 32, Legal Practice Act)		contract cannot be signed
signing an official document or acknowledging a signature as one's own in the course of countersignature using an electronic communications network	video and audio recording of a previously identified natural person made using an electronic communications network	compliance with legal obligation (Section 44(2), Legal Practice Act)	while the countersigned official document is retained pursuant to the Legal Practice Act	data provision is based on a statutory obligation; the data subject is obliged to provide the data; if data are not provided, countersigning cannot take place or only after obtaining a personal statement
compliance with tax regulations	personal data indicated in the Tax Act	compliance with legal obligation (Sections 34(2), 78(3)(4), 202 to 205, Tax Act)	until the limitation of the right to establish taxes; in the event of deferred tax, for 5 years from the last day of the calendar year in which the deferred tax is due	data processing is based on a legal obligation
compliance with accounting regulations	personal data in accordance with the regulations for accounting documents, thus in particular the name and address	compliance with legal obligation (Sections 168, 169, Accounting Act)	8 years	data processing is based on a legal obligation

II/4 Fulfilment of obligation to keep records

Purpose of data processing	Personal data processed	Legal basis of data processing	Duration of data processing	Information on the provision of data by the data subject / source of the data
<p>keeping records in cases requiring compulsory legal representation (promoting the security of legal transactions and in order to enforce the limits of legal practice)</p>	<p>natural personal identification data (forename and family name, forename and family name at birth, place and date of birth, mother's birth forename and family name), address, nationality (statelessness, refugee, immigrated, settled or EEA national status), the type and number of the identification document used for the identity check, the ID number of the reply received in response to the data request to carry out the identity check, the ID number of cases in which the identification of a natural person is compulsory, and other data given in the Anti-Money Laundering Act</p>	<p>compliance with legal obligation (Section 33, Legal Practice Act)</p>	<p>8 years or in exceptional cases 10 years of the cessation of the business ties or the performance of the assignment (Section 33, Legal Practice Act, Sections 56, 57, 58, Anti-Money Laundering Act)</p>	<p>data provision is based on a statutory obligation; the data subject is obliged to provide the data</p>
	<p>natural personal identification data (forename and family name, forename and family name at birth, place and date of birth, mother's birth forename and family name) of the representative of the identified legal entity or another organisation</p>			
<p>keeping records about cases performed under the assignment (in order to allow compliance with rules on legal practice to be checked)</p>	<p>case ID number generated by the lawyer, name of the client, subject-matter of the case, date of entering into the service contract, registration number of court proceedings related to the case and the reference number of other procedures</p>	<p>compliance with legal obligation (Section 53, Legal Practice Act)</p>	<p>5 years of the cessation of the assignment; in the event of countersigning an official document, 10 years of countersigning; in cases affecting the entry of a right concerning a property in a public register, 10 years of registering that right</p>	<p>data processing is based on a statutory obligation</p>

II/5 Processing the personal data of persons applying to attend and attending the Law Firm's professional events				
Purpose of data processing	Personal data processed	Legal basis of data processing	Duration of data processing	Information on the provision of data by the data subject
organising and staging professional events arranged by the Law Firm	name, telephone number, e-mail address, workplace, position	consent	until withdrawal of consent	providing data is voluntary and not providing data may hinder participation in the event organised by the Law Firm

II/6 Processing the personal data of natural persons and of the agents, representatives and contact persons of legal persons and organisations without legal personality who contact the Law Firm for reasons other than those listed in II/1 to II/5				
Purpose of data processing	Personal data processed	Legal basis of data processing	Duration of data processing	Information on the provision of data by the data subject / source of the data
replying to enquiries by a natural person made to the Law Firm	for natural persons, name, telephone number, e-mail address, any other personal data communicated to the Law Firm	consent	until withdrawal of consent	the provision of data is a prerequisite for receiving a reply to the enquiry / the source of data is the data subject
	name, telephone number, e-mail address, any other personal data disclosed to the Law Firm of the agents, representatives and contact persons of the person making the enquiry	legitimate interest	until the cessation of the purpose or interest or until successful objection	communication by the person making the enquiry; the provision of data is a prerequisite for receiving a reply to the enquiry / the source of data is the data subject or the person making the enquiry

II/7 Processing of personal data for the purpose of providing legal protection for a whistleblower

Purpose of data processing	Personal data processed	Legal basis of data processing	Duration of data processing	Information on the provision of data by the data subject / source of the data
providing legal protection for a whistleblower pursuant to Act CLXV of 2013 on complaints and public interest disclosures	the personal data of the natural person whistleblower to the degree essential for the investigation of the disclosure (including special data and criminal personal data)	consent	until withdrawal of consent but a) if the disclosure is unfounded, the data will be deleted immediately b) if no further action is required, for not more than 60 days following the closure of the investigation c) if measures are taken based on the investigation, until the final completion of the procedures started on the basis of the disclosure	the provision of data is a prerequisite for providing legal protection for the whistleblower; failure to provide data hinders or makes impossible the performance of the activity / the source of data is the whistleblower For the attention of complainants: without separate consent personal data will NOT be forwarded to the company the complaint is about.
	if the whistleblower a legal entity, the name of the legal representative submitting the complaint	compliance with legal obligation (Section 14(6), Act CLXV of 2013)	a) if the disclosure is unfounded, the data will be deleted immediately b) if no further action is required, for not more than 60 days following the closure of the investigation c) if measures are taken based on the investigation, until the final completion of the procedures started on the basis of the disclosure	
	the personal data essential for the investigation of the disclosure (including special data and criminal personal data) of the natural person whose conduct or omission provided the ground for the disclosure	public interest		
	the personal data essential for the investigation of the disclosure (including special data and criminal personal data) of the natural person who may have substantial information about the contents of the report			

11/8 Cookies used on the website

Purpose of data processing	Cookie type	Legal basis of data processing	Duration of data processing	Information on the provision of data by the data subject / source of the data
distinguishing between users	_ga	consent	2 years	external (Google Analytics) cookie, whose use may be blocked / the source of data is the data subject
regulating the frequency of the request	_gat_gtag_UA_...	consent	7 days	external (Google Analytics) cookie, whose use may be blocked / the source of data is the data subject
distinguishing between users	_gid	consent	7 days	external (Google Analytics) cookie, whose use may be blocked / the source of data is the data subject
ensuring the appropriate functioning of the website, identifying the session	PHPSESSID	legitimate interest	1 hour / until the expiry of the session	the source of data is the data subject
ensuring the appropriate functioning of the website, identifying the session	session-klart_COOKIE-OK	legitimate interest	1 hour / until the expiry of the session	the source of data is the data subject

Further information about cookies used by Google Analytics: <https://policies.google.com/technologies/types>

II/9 Processing of personal data of subscribers to the Law Firm's newsletters				
Purpose of data processing	Personal data processed	Legal basis of data processing	Duration of data processing	Information on the provision of data by the data subject
forwarding the newsletter released by the Law Firm by electronic means	name, telephone number, e-mail address, workplace, position	consent	until withdrawal of consent	providing data is voluntary and not providing data may hinder sending the Law Firm's newsletters