

## Privacy policy

### 1. Opening clause

- 1.1. This policy on personal data processing (hereinafter referred to as "**Policy**") has been created to comply with Regulation of the European Parliament and of the Council No. 2016/679, the General Data Protection Regulation ("**General Data Protection Regulation**") and also the professional rules for practicing the legal profession, especially Act No. 85/1996 coll., on the Legal Profession ("**Law on the Legal Profession**").
- 1.2. The purpose of this Policy is to provide information on collecting and processing personal data by the Law Office to the clients and potential clients ("**Clients**") of the company **KLB Legal, s.r.o., Law Office**, established and existing in accordance to the laws of the Czech Republic, based in Letenská 121/8, 118 00 Praha 1, IČ 294 14 709, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, File 205262 ("**Law Office**").
- 1.3. The Law Office regards all personal data of the Client as strictly confidential.

### 2. Personal data protection policy

- 2.1. The Law Office is bound mainly by the following rules when processing personal data:
  - 2.1.1. personal data must be processed correctly and the method must be legal and transparent;
  - 2.1.2. personal data may only be collected for certain, explicitly stated and legitimate, purposes and it must not be processed further in a way not consistent with these purposes;
  - 2.1.3. personal data may only be processed to the extent necessary for the purpose in question;
  - 2.1.4. it is necessary to pay attention to accuracy of the processed data;
  - 2.1.5. personal data may only be stored for a necessary period of time; and
  - 2.1.6. personal data must be processed with appropriate security measures in place.

### 3. Information for Clients

The Law Office provides the Clients with the following information on private data processing:

- 3.1. Private data administrator
  - 3.1.1. The administrator, i.e. the one collecting and responsible for the data is the Law Office. The address of the Law Office is stated above; other contact information is stated on the website [www.nehodavzahranici.cz](http://www.nehodavzahranici.cz).
- 3.2. Personal data protection officer
  - 3.2.1. The personal data protection officer is Ing. Mgr. David Hanel, e-mail: [info@klblegal.cz](mailto:info@klblegal.cz).
- 3.3. Purposes of processing and the legal ground
  - 3.3.1. The Law Office processes personal data mainly to be able to provide legal services properly to Clients and also to meet the requirements stemming from legislation, to perform a contract, and, with the Client's permission, also for marketing purposes.

- 3.3.2. The legal ground for collecting personal data is the legislation of the Czech Republic, especially Act No. 85/1996 coll., on the Legal Profession ("**Law on the Legal Profession**") and the professional rules for practicing the legal profession.
- 3.3.3. The Law Office processes personal data for justified reasons. The primary purpose of data processing is personal data processing to perform a contract to which the subject of the data is a party, or to take measures asked for by the subject of the data before concluding a contract. In rare cases, the Law Office processes personal data with an explicit permission to process personal data. The explicit permission can be revoked by the Client at any time.
- 3.3.4. The Law Office processes identification and contact data of the Client, such as name and surname, date of birth, national ID number, home address, e-mail address or phone number, bank account number, or state of health. Marginally and only with explicit permission of the Client, the Law Office processes personal data for marketing purposes as well.
- 3.4. Obligation to provide personal data
  - 3.4.1. The Law Office must not enter into a contract with any person refusing to provide personal data required by legislation. If the Client refuses to provide the data in question, the Law Office must not enter into any contract with them or must terminate any existing contracts.
  - 3.4.2. The Client is not obliged to grant the Law Office permission to process personal data for marketing purposes. If the Client refuses to grant such permission, the decision has no impact on creating and fulfilling contractual obligation.
- 3.5. Archiving period
  - 3.5.1. The Law Office archives personal data of the Clients for a period of time necessary with regards to the purpose it was collected for. The Law Office is obliged to keep the documents and files of the Client for five (5) years after legal services were last provided.
- 3.6. Personal data recipient categories
  - 3.6.1. Personal data is primarily processed directly in the Law Office. In some cases, personal data of the Client can be disclosed to other recipients for the purpose of concluding an agreement to provide legal services. The recipients might be expert witnesses, translators or lawyers working with the Law Office. The Law Office provides other recipients with personal information only to the necessary extent.
  - 3.6.2. To be able to practice law properly, the Law Office is allowed to deny a request to provide personal data of the Client placed by third parties. A third party is mainly the adverse party and their representatives, a party to the proceedings, a witness and the aggrieved party in criminal issues.
- 3.7. Providing personal data to third countries
  - 3.7.1. The Legal Office does not expect any information to be disclosed outside the European Union.
  - 3.7.2. In the rare event of disclosing personal data outside the EU countries, the Law Office uses the European Commission contract clause templates.

#### **4. Clients' Rights**

- 4.1. The primary owner of the personal data is always the Client who has the rights stated below and specified in more detail in the General Data Protection Regulation.

- 4.2. The Law Office, however, informs the Clients that, while legal services are being provided, their rights for personal data protection may be limited by the Law on the Legal Profession, professional rules for practicing the legal profession and related public interest.
- 4.3. Right to access personal data
  - 4.3.1. The Client has the right to get a statement from the Law Office saying whether their personal data is being processed and the right to access the data and information on it.
- 4.4. Right to correction or amendment
  - 4.4.1. The Client can ask for their personal data to be corrected or amended. The Law Office must satisfy the requirement in justified cases.
- 4.5. Right to be deleted
  - 4.5.1. The Client is entitled to ask the Law Office to delete their personal data if any of the legal reasons for deletion are present.
  - 4.5.2. The Client does not have the right to be deleted if processing of their personal data is necessary to assess, perform or defend their legal claims or to meet legal requirements stemming from or related to the Law on the Legal Profession.
- 4.6. Right to limit processing
  - 4.6.1. In case of uncertainty regarding the accuracy or legitimacy of personal data processing, the Client can ask the Law Office to limit processing of their personal data temporarily.
- 4.7. Right to transfer of data
  - 4.7.1. If all the legal conditions are met, the Client has the right to ask the Law Office to provide their personal data in a machine readable format and the right to ask for transfer of the data to another administrator.
  - 4.7.2. The Client has the right to transfer of data if data processing is based on a contract to provide legal services or on permission to process personal data and the personal data is processed electronically.
- 4.8. Right to raise an objection
  - 4.8.1. The Client has the right to raise an objection against their personal data processing by the Law Office for reasons related to their specific situation (and in case of direct marketing at any time). If there are no significant justified reasons for data processing, the Law Office will stop processing the Client's data. The person authorized to accept and process such objections is the personal data protection officer (see above).
- 4.9. Right to file an appeal
  - 4.9.1. Each Client has the right to file an appeal to a supervisory body in the European Union if they believe the processing of their data is inconsistent with the General Data Protection Regulation. The supervisory body in the Czech Republic is the Office for Personal Data Protection, address: Pplk. Sochora 27, 170 00 Praha 7, www.uoou.cz.

## **5. Final Provisions**

- 5.1. The Law Office may change this Privacy Policy unilaterally at any time.
- 5.2. This Privacy Policy is effective as of 1 May 2018.