

Privacy policy on personal data protection in the provision of legal services

1. Introductory information and our contact information

Protection of personal data of our clients and other natural persons is important to us. This Privacy Policy provides an explanation on how we process personal data of our clients (i.e. personal data of clients who are natural persons and, in case of legal entities, personal data of their representatives, employees and others who represent them, including former and future clients) (hereinafter referred to as the “**client**”) and other data subjects in the extent necessary for the purpose of practicing our profession (for instance a counterparty to our client and/ or its representatives or others who represent such counterparty, other contracting party within the contractual relations of our client, other parties to proceedings held before public authorities) (hereinafter referred to as the “**connected data subject**”), i.e. while providing legal services at our Law Firm BAK & PARTNERS s. r. o., with registered seat at: Panská 14, 811 01 Bratislava, Company ID No. (IČO): 47 254 840 (hereinafter “**We**” or “**Our Law Firm**”).

Our Law Firm processes personal data of data subjects also in cases other than the practice of our profession. These cases for instance involve processing of personal data of our business partners in the provision of other than legal services, processing of personal data of persons seeking work in Our Law Firm, or processing of personal data within the activities related to the internal procedures of Our Law Firm. Please find more information about how Our Law Firm processes personal data in such other cases at the following link - <http://www.bakpartners.sk/en/#contacts>.

As for the processing of personal data in the provision of legal services, Our Law Firm provides legal services to its clients both directly and by the attorneys of Our Law Firm listed on our website, who provide legal services based on the request of Our Law Firm and in the extent specified by it. Within the provision of legal services, personal data of data subjects is processed by Our Law Firm and for the purposes of the legal regulation stated hereunder that regulates the protection of personal data it is therefore considered to be the controller, while our attorneys who process personal data provided by Our Law Firm are considered to be processors. The mutual relationship between Our Law Firm and our attorneys in the processing of personal data is regulated by special contracts on the processing of personal data that are based on and fully in compliance with the respective legal regulation, by which it is ensured that all rights of our clients and other data subjects to which we refer hereunder are duly preserved.

In the processing of personal data, we follow

- (i) the EU General Data Protection Regulation, i.e. 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 the “**GDPR**”), which also governs your rights as a data subject (see Articles 12 to 22 of the GDPR);
- (ii) those parts of the Slovak Act No. 18/2018 Coll. on Personal Data Protection and on the Amendment and Supplement to Certain Acts, as amended (hereinafter the “**Act on Personal Data Protection**”) that are applicable to us (in particular Section 78);
- (iii) the Slovak Act No. 586/2003 Coll. on Advocacy and on Amendment and Supplement to Act No. 455/1991 Coll. on Trade Licensing (Trade Licensing Act), as amended (hereinafter the “**Act on Advocacy**”) (in particular Section 18); and
- (iv) other applicable legal and professional regulations of the Slovak Bar Association (hereinafter the “**SBA**”).

We also follow the Code of Conduct adopted by SBA that further explains processing of personal data by attorneys. You can familiarize yourself with the SBA’s Code of Conduct in more detail at the following website of the SBA:

https://www.sak.sk/web/sk/cms/document/224/section/_docList_/rows/729/attr/name/preview

If you have any questions regarding the processing of personal data by Our Law Firm or in case you wish to file an application or other requests under the provisions of GDPR or Personal Data Protection Act, you can contact Our Law Firm by telephone at the following phone number: + 421-2-20758391, by email at office@bakpartners.sk, or by post to the following address: Panská 14, 811 01 Bratislava.

2. Why we process personal data?

Processing of personal data by Our Law Firm is necessary for us to be able to:

- (i) provide legal services to our clients and to practice our legal profession;
- (ii) comply with various legal, professional and contractual obligations; and
- (iii) protect legitimate interests of Our Law Firm, our clients and other persons.

Collecting and processing of personal data in connection with the provision of legal services is in the light of the foregoing a requirement arising under the respective legal regulation (e.g. the Slovak Act No. 297/2008 Coll. on the Protection Against Money Laundering and on the Protection Against Terrorist Financing and on the Amendment and Supplement to Certain Acts, as amended (hereinafter the “**AML Act**”), special accounting and tax laws, etc.), as well as a requirement necessary to conclude a contract with a client and to duly provide legal services resulting therefrom.

Depending on the specific case and type of legal services to be provided, the failure to provide personal data establishes the right (and in certain cases stipulated by law also the obligation) of Our Law Firm to refuse to enter into a contract with a client, to terminate a contract with a client or to refuse to perform a specific legal service.

3. For what purposes and on what legal basis we process personal data?

As for our **clients**, we process their personal data as follows:

Purposes of the processing	Legal basis for the processing	Categories of the personal data	Period for which the personal data will be stored
Practicing the profession - provision of legal services	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, performance of a contract pursuant to Article 6 (1) (b) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR and, in case of processing of special categories of personal data establishment, exercise or defence of legal claims pursuant to Article 9 (2) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly the protection of property of Our Law Firm and the asserting</p>	<p>Ordinary personal data including identification data (e.g. name, surname, title, address of permanent residence, date of birth, etc.) (hereinafter also referred to as the “identification data”), contact information (e.g. postal address, e-mail address, phone number, etc.) (hereinafter also referred to as the “contact information”) and other personal data in the extent necessary for the provision of legal services.</p> <p>Special categories of personal data if the</p>	<p>Depending on the applicable legal basis, we store personal data for a period of max. 10 years from the date when all conditions for the depositing of the client’s file into the archive according to the relevant regulation are fulfilled, unless the relevant legal or professional regulations stipulate any other period (e.g. client file protocols and list of client file names cannot be shredded and shall be kept in the office without any time limit).</p>

	<p>and protection of rights and legal claims that could arise to Our Law Firm from contractual relationships with our clients, applicable legislation or from other legal facts while providing legal services. The legitimate interest of Our Law Firm is also to ensure the due practice of the legal profession in accordance with the Act on Advocacy and the provision of legal services in the best interests of our clients.</p>	<p>processing is necessary for establishment, exercise or defence of legal claims.</p>	
<p>Provision of other than legal services</p>	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, performance of a contract pursuant to Article 6 (1) (b) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly the protection of property of Our Law Firm and the asserting and protection of rights and legal claims that could arise to Our Law Firm from contractual relationships with our clients, applicable legislation or from other legal facts while providing other than legal services. The legitimate interest of Our Law Firm is also to ensure the due practice of the legal profession in accordance with the Act on Advocacy and the provision of legal and other services in the best interests of our clients.</p>	<p>Ordinary personal data including identification data, contact information and other personal data in the extent necessary for the provision of other than legal services.</p>	<p>Depending on the applicable legal basis, we store personal data for a period of max. 10 years from the date when all conditions for the depositing of the client's file into the archive according to the relevant regulation are fulfilled, unless the relevant legal or professional regulations stipulate any other period (e.g. personal data of the ultimate beneficiary owner are being stored for the period of 5 years from the date of termination of the status of the ultimate beneficiary owner in a particular company, if such data is not a part of a verification document available online etc.).</p>
<p>Ensuring compliance with legal regulations and regulations of SBA</p>	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR, the establishment, exercise or defence of legal claims pursuant to Article 9 (2) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is,</p>	<p>Ordinary personal data including identification data, contact information and other personal data (including special categories of personal data where applicable) to the extent required by the applicable legal regulation or regulations of SBA to ensure compliance with our</p>	<p>Depending on the applicable legal basis, we store personal data for a period of max. 10 years from the date when all conditions for the depositing of the client's file into the archive according to the relevant regulation are fulfilled, unless the relevant legal or professional</p>

	<p>in this regard, particularly to ensure the due fulfilment of all obligations of Our Law Firm under the relevant legal and professional regulations, as well as due documentation of their fulfilment.</p>	<p>obligations arising from such regulations and other personal data processed in the provision of legal services.</p>	<p>regulations stipulate any other period.</p>
<p>Ensuring compliance with the laws in the area of prevention and detection of money laundering and terrorist financing</p>	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly to ensure the due fulfilment of all obligations of Our Law Firm under the relevant legal and professional regulations, as well as due documentation of their fulfilment.</p>	<p>Ordinary personal data including identification data, contact information and other personal data to the extent set forth in the AML Act.</p>	<p>We store the personal data to the extent and for the period specified in the AML Act.</p>
<p>Ensuring compliance with personal data protection legislation</p>	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly to ensure the due fulfilment of all obligations of Our Law Firm under the relevant legal and professional regulations, due documentation of their fulfilment, as well as to provide a qualified response and reply to our clients' requests and applications while exercising their rights under GDPR.</p>	<p>Ordinary personal data including identification data, contact information and other personal data to the extent set forth in the applicable legal regulation, particularly in GDPR and in Personal Data Protection Act, or stated in the applications of clients exercising their rights under GDPR.</p>	<p>We store the personal data for a period of 5 years from the processing of the data subject's application under GDPR, the fulfilment of the respective obligation arising from GDPR or Personal Data Protection Act, or other legally relevant fact.</p>
<p>Ensuring security and protection of personal and other data processed by Our Law Firm</p>	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly the introduction</p>	<p>Ordinary personal data including identification data, contact information and other personal data (including the special categories of personal data where applicable) processed in the provision of legal services and non-legal services.</p>	<p>We store the personal data for a period during which it is necessary to process it for another relevant purpose (e.g. practicing the profession - provision of legal services), otherwise for a period of 5 years from the fulfilment of the relevant obligation stipulated in GDPR,</p>

	and due maintenance of appropriate technical and organizational measures necessary to ensure protection of the information systems of Our Law Firm.		or other legally relevant fact.
Asserting and defending the rights and legal claims of Our Law Firm before the competent public authorities	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly the protection of property of Our Law Firm and the asserting and protection of rights and legal claims that could arise to Our Law Firm from contractual relationships with our clients, applicable legislation or from other legal facts while providing legal and other services.</p>	Ordinary personal data including identification data, contact information and other personal data to the extent necessary for asserting and defending the rights and legal claims of Our Law Firm before public authorities.	We store the personal data until the final decision of the relevant public authority issued in proceedings in which Our Law Firm exercised and / or defended its rights or legal claims comes into force.
Recording of incoming and outgoing correspondence	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly to ensure the due maintenance of evidence of the incoming and outgoing correspondence, as well as to ensure the provision of a qualified response and reply to the correspondence received by Our Law Firm.</p>	Ordinary personal data including identification data, contact information and other personal data constituting the contents of correspondence or our electronic mailbox.	We store the personal data to the extent and for the period stipulated in relevant legal and professional regulations (e.g. we store the book of incoming correspondence and the book of outgoing correspondence for a period of 10 years from the date of receipt or dispatch of the last consignment entered in such books).
Accounting and tax purposes	Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR.	Ordinary personal data including identification data, contact information and respective financial data pursuant to applicable legislation.	We store the personal data to the extent and for the period stipulated in the special accounting and tax legislation.
Ensuring communication	Performance of pre-contractual measures at	Ordinary personal data including	We store the personal data until the end

<p>with potential clients and other persons who contact Our Law Firm through its contact details or social networks</p>	<p>the request of the potential client prior to entering into a contract under Article 6 (1) (b) GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly the necessity to establish a communication channel between a potential client and Our Law Firm, or, alternatively, the provision of a reply to requests of other third persons addressed to Our Law Firm.</p>	<p>identification data, contact information and other and other data that potential clients or other third persons provide in the course of communication addressed to Our Law Firm through its contact details or social networks.</p>	<p>of the pre-contractual relationship with a potential client or for the period necessary to provide a response to other third persons.</p>
<p>Promotional and communication purposes of Our Law Firm to introduce Our Law Firm and its results (including its work and activities)</p>	<p>Performance of pre-contractual measures at the request of the potential client prior to entering into a contract under Article 6 (1) (b) GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly the performance of marketing activities of Our Law Firm with the intention to expand the range of our clients, maintain contractual relations with our clients, or to extend the range of legal services provided to our clients.</p>	<p>Ordinary personal data including identification data and contact information.</p>	<p>We store the personal data until the end of the pre-contractual relationship with a potential client or for a period of 3 years from the end of cooperation with our client.</p>
<p>Sending legal news and newsletters</p>	<p>Legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly the performance of marketing activities of Our Law Firm with the intention to expand the range of our clients, maintain contractual relations with our clients, or to extend the range of legal services provided to our clients.</p>	<p>Ordinary personal data including identification data and contact information.</p>	<p>We store the personal data for a period of 3 years from the end of cooperation with our client.</p>

As for **connected data subjects**, we process the personal data of these persons in the following manner:

Purposes of the processing	Legal basis for the processing	Categories of the personal data	Period for which the personal data will be stored
<p>Practicing the profession - provision of legal services</p>	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR and, in case of processing of special categories of personal data establishment, exercise or defence of legal claims pursuant to Article 9 (2) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly to ensure the due practice of the legal profession in accordance with the Act on Advocacy and the provision of legal services in the best interests of our clients.</p>	<p>Ordinary personal data including identification data, contact information and other personal data in the extent necessary for the provision of legal services.</p> <p>Special categories of personal data if the processing is necessary for establishment, exercise or defence of legal claims.</p>	<p>Depending on the applicable legal basis, we store personal data for a period of max. 10 years from the date when all conditions for the depositing of the client's file into the archive according to the relevant regulation are fulfilled, unless the relevant legal or professional regulations stipulate any other period (e.g. client file protocols and list of client file names cannot be shredded and shall be kept in the office without any time limit).</p>
<p>Provision of other than legal services</p>	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly to ensure the due practice of the legal profession in accordance with the Act on Advocacy and the provision of legal and other services in the best interests of our clients.</p>	<p>Ordinary personal data including identification data, contact information and other personal data in the extent necessary for the provision of other than legal services.</p>	<p>Depending on the applicable legal basis, we store personal data for a period of max. 10 years from the date when all conditions for the depositing of the client's file into the archive according to the relevant regulation are fulfilled, unless the relevant legal or professional regulations stipulate any other period.</p>
<p>Ensuring compliance with legal regulations and regulations of SBA</p>	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR, the establishment, exercise or defence of legal claims pursuant to Article 9 (2) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly to ensure the due fulfilment of all obligations of Our Law</p>	<p>Ordinary personal data including identification data, contact information and other personal data (including special categories of personal data where applicable) to the extent required by the applicable legal regulation or regulations of SBA to ensure compliance with our obligations arising from such regulations and other personal data processed in the</p>	<p>Depending on the applicable legal basis, we store personal data for a period of max. 10 years from the date when all conditions for the depositing of the client's file into the archive according to the relevant regulation are fulfilled, unless the relevant legal or professional regulations stipulate any other period.</p>

	<p>Firm under the relevant legal and professional regulations, as well as due documentation of their fulfilment.</p>	<p>provision of legal services.</p>	
<p>Ensuring compliance with the laws in the area of prevention and detection of money laundering and terrorist financing</p>	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly to ensure the due fulfilment of all obligations of Our Law Firm under the relevant legal and professional regulations, as well as due documentation of their fulfilment.</p>	<p>Ordinary personal data including identification data, contact information and other personal data to the extent set forth in the AML Act.</p>	<p>We store the personal data to the extent and for the period specified in the AML Act.</p>
<p>Ensuring compliance with personal data protection legislation</p>	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly to ensure the due fulfilment of all obligations of Our Law Firm under the relevant legal and professional regulations, due documentation of their fulfilment, as well as to provide a qualified response and reply to connected data subjects' requests and applications while exercising their rights under GDPR.</p>	<p>Ordinary personal data including identification data, contact information and other personal data to the extent set forth in the applicable legal regulation, particularly in GDPR and in Personal Data Protection Act, or stated in the applications of connected data subjects exercising their rights under GDPR.</p>	<p>We store the personal data for a period of 5 years from the processing of the data subject's application under GDPR, the fulfilment of the respective obligation arising from GDPR or Personal Data Protection Act, or other legally relevant fact.</p>
<p>Ensuring security and protection of personal and other data processed by Our Law Firm</p>	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly the introduction and due maintenance of appropriate technical and organizational measures</p>	<p>Ordinary personal data including identification data, contact information and other personal data (including the special categories of personal data where applicable) processed in the provision of legal services and non-legal services.</p>	<p>We store the personal data for a period during which it is necessary to process it for another relevant purpose (e.g. practicing the profession - provision of legal services), otherwise for a period of 5 years from the fulfilment of the relevant obligation stipulated in GDPR, or other legally relevant fact.</p>

	necessary to ensure protection of the information systems of Our Law Firm.		
Recording of incoming and outgoing correspondence	<p>Compliance with legal obligations pursuant to Article 6 (1) (c) of GDPR, legitimate interests pursuant to Article 6 (1) (f) of GDPR.</p> <p>The legitimate interest of Our Law Firm is, in this regard, particularly to ensure the due maintenance of evidence of the incoming and outgoing correspondence, as well as to ensure the provision of a qualified response and reply to the correspondence received by Our Law Firm.</p>	<p>Ordinary personal data including identification data, contact information and other personal data constituting the contents of correspondence or our electronic mailbox.</p>	<p>We store the personal data to the extent and for the period stipulated in relevant legal and professional regulations (e.g. we store the book of incoming correspondence and the book of outgoing correspondence for a period of 10 years from the date of receipt or dispatch of the last consignment entered in such books).</p>

4. Storage periods of your personal data

We store the personal data only to the extent necessary and as long as is necessary for the purposes for which the personal data are processed. When storing personal data, we ensure the compliance with the relevant legal regulations (e.g. special accounting and tax legislation, AML Act, etc.), internal regulations, as well as recommended storage periods under the Resolution of Council of SBA No. 29/11/2011, e.g.:

- (i) an attorney has to store the book of incoming correspondence and the book of outgoing correspondence for a period of 10 years from the date of receipt or dispatch of the last consignment entered in such books;
- (ii) an attorney has to store the inventory list for a period of 10 years after it has been made;
- (iii) if an attorney keeps a list of client names and client records electronically, at the end of the calendar year the attorney shall make its printed form for the calendar year and store it in the office without any time limit;
- (iv) the shredding period for a client's file is 10 years and commences on the date when all the conditions for depositing of the file into the archive are fulfilled.

Attorneys are subject to professional regulations of the SBA that interpret the obligations of attorneys under the Act on Advocacy, according to which there are certain circumstances that extend our storage periods of personal data and explicitly prevent us from shredding some documents on reasonable grounds, such as:

- (i) a client's file that contains original documents handed over to the attorney by clients cannot be shredded;
- (ii) it is not possible to shred client file protocols and list of client file names;
- (iii) it is not possible to shred a client's file or a part of it, which the attorney is obliged to hand over to the state archives;
- (iv) it is not possible to shred a client's file if any proceedings before the courts, state administration bodies, law enforcement authorities, or the SBA are pending that have a material relation to the contents of the client's file or that concern the attorney's legal action or omission in providing legal services in that client's matter.

For more information about the processing and storage of personal data please see the Section 3 above and, if needed, we will provide you with additional information or explanations based on your inquiry.

5. To whom do we disclose your personal data?

We disclose personal data of our clients and other natural persons (including connected data subjects) only to the extent necessary and always while maintaining the confidentiality of the data recipients, e.g. our employees, persons authorised to take individual legal actions within provision of legal services, our representing or cooperating attorneys, our accountants and tax advisors, the SBA (e.g. in the case of disciplinary proceedings) or the software and IT support providers of Our Law Firm. In specific cases when providing legal services, personal data may also be provided to translators, notaries, companies providing email services or postal and delivery services.

Although our obligation to disclose your personal data to public authorities is limited for confidentiality reasons, we are required to frustrate the commission of criminal offences and we also have the obligation to report information regarding prevention of money laundering and terrorism financing. Specific cases of disclosure of personal data of clients or connected data subjects to the competent public authorities may also occur in the framework of the provision of legal and other services in accordance with the relevant legal regulation in connection with proceedings held before the courts, administrative bodies or other public authorities, including the proceedings for the registration, modification or deletion of rights, obligations or other legal facts in the relevant registers held by the competent public authorities (e.g. commercial register, the land registry, notarial central register of liens, register of public sector partners) which are the subject of, or related to the provision of relevant legal or other services by Our Law Firm for our clients.

6. To which countries do we transfer your personal data?

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

7. What automated decision-making do we pursue?

We do not perform automated decision-making, nor profiling.

8. How do we collect your personal data?

If you are our client, we most often obtain your personal data directly from you. In that case, obtaining your personal data is voluntary. We may also obtain personal data about our clients from publicly available sources, public authorities or other third persons.

If you are not our client, but you are a connected data subjects, we most often obtain your personal data from our clients or from other public or legal sources (e.g. by making requests to public authorities, obtaining evidence in favour of our client, obtaining information from public registers, inspecting records kept in proceedings before courts or other public authorities, etc.). In such case, we may obtain your personal data without your knowledge and even against your will on the basis of our statutory authorization and the obligation to practice law in accordance with the Act on Advocacy.

9. What rights do you have as a data subject?

GDPR regulates several rights of data subjects whose personal data are processed. These rights among others include the right to withdraw the consent to the processing of personal data, the right of access to personal data, the right to rectification of personal data, the right to erasure of personal data ('right to be forgotten'), the right to restriction of the processing of personal data, the right to data portability, the right to object the processing of personal data and the right to lodge a complaint with the supervisory authority. Given the special nature of the practice of the legal profession and our special obligations under the Act on Advocacy and other legal and professional regulations

(in particular our statutory confidentiality obligation), the abovementioned rights of data subjects are not of absolute nature and in certain cases these may also be limited as set out below.

As a data subject, you may exercise your rights as specified below through the contact information of Our Law Firm stated in Section 1 above.

a) Right to withdraw the consent to the processing of personal data

If we process your personal data based on your consent to the processing of personal data (within the meaning of Article 6 (1) (a) of GDPR), you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of the processing based on the consent before its withdrawal. You can withdraw your consent to the processing of personal data given to Our Law Firm by email at office@bakpartners.sk or in writing to the address of the registered seat of Our Law Firm.

b) Right of access to personal data relating to the data subject

If you are our **client**, you have the right to obtain from Our Law Firm a confirmation as to whether or not we process your personal data. If we do process your personal data, you have the right to access such personal data and information about (i) the purpose of processing, (ii) the categories of your personal data concerned, (iii) the recipients or category of recipients to whom your personal data have been or will be provided; (iv) the period for which we will store your personal data; (v) the right to rectification and erasure of the personal data processed by Our Law Firm, the right to restriction or to object to the processing of personal data, (vi) the right to file a complaint with the supervisory authority (Personal Data Protection Office of the Slovak republic or SBA); (vii) the source of the personal data if we had not obtained them from you, as our client; (viii) the existence of automated decision-making, including profiling pursuant to Article 22 (1) and (4) of GDPR; and (ix) the appropriate safeguards established under Article 46 of GDPR, should we transfer personal data to a third country or an international organization.

As our **client**, you also have the right to be provided with a copy of the personal data undergoing processing. Our Law Firm may charge a reasonable fee corresponding to administrative costs for any additional copy that will be requested from your part.

If you are not our client, but you are a **connected data subject**, the individual rights of access to your personal data do not belong to you in the extent described above, especially if providing such information could jeopardize or violate our statutory confidentiality obligation under the Act on Advocacy and professional regulations. Under certain circumstances, this case could occur even by mere confirmation that we process your personal data as a connected data subject.

c) Right to rectification of personal data

If we process your personal data, you have the right as our **client** or **connected data subject** to obtain from Our Law Firm without undue delay the rectification of inaccurate personal data concerning you. With respect to the purpose of processing personal data, you also have the right to have incomplete personal data concerning you completed, including by means of providing a supplementary statement.

d) Right to erasure ('right to be forgotten')

As our **client** or a **connected data subject**, you have the right to obtain from Our Law Firm the erasure of your personal data which are processed if (i) your personal data are no longer necessary in relation to the purposes for which we collected or otherwise processed them (ii) you have withdrawn your consent to the processing of your personal data (if applicable) and there is no other legal ground for the processing of your personal data; (iii) you have exercised your right to object to the processing of your personal data (such as described in Section 9 (g) below) and at the same time there are no overriding legitimate grounds for the processing of your personal data, (iv) your personal data has been processed unlawfully, or (v) your personal data must be erased in order to comply with any obligation applicable to Our Law Firm.

However, your right to erasure of the personal data is not an absolute right and Our Law Firm is entitled to reject your application if any of the reasons set forth in Article 17 (3) of GDPR apply, e.g. (i) the processing of your personal data is necessary to fulfil our legal obligation (e.g. the period of storage of personal data for the purpose of practicing the profession - provision of legal services, applicable to attorneys, still lasts), (ii) the processing of your personal data is required for the purposes of archiving in the public interest; and/ or (iii) the processing of your personal data is necessary to establish, exercise or defend any legal claims, in particular the claims of our clients or, as the case may be, claims of Our Law Firm.

e) Right to restriction of the processing of personal data

If we process your personal data, you have the right as our **client** or **connected data subject** to obtain from Our Law Firm the restriction of processing if any of following applies: (i) you contest the accuracy of the personal data for a period enabling us to verify the accuracy of the personal data, (ii) the processing of your personal data is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead, (iii) your personal data are no longer needed for the purposes of the processing, but you require them to establish, exercise or defend your legal claims or (iv) you have exercised your right to object to the processing of your personal data (as described in Section 9 (g) below) pending the verification whether the legitimate grounds of Our Law Firm override the legitimate grounds of yours.

If, after exercising your right to restriction of the processing of your personal data in the above cases, the processing of your personal data has been restricted, Our Law Firm may, with the exception of storage of such personal data, process such personal data only with your consent or for the establishment, exercise of defence of legal claims of Our Law Firm or for the protection of the rights of another natural or legal person or for important public interest of the European Union or a member state of the European Economic Area Agreement.

f) The right to data portability

If we process your personal data, you have the right as our **client** to receive your personal data which you have provided to us in a structured, commonly used and machine-readable format and to transmit this data to another controller, or the right to transfer this personal data directly to the other controller, if (i) we process your personal data based on your consent or based on a contract and (ii) the processing is carried out by automated means (i.e. electronically).

However, the aforementioned rights do not apply to personal data that we process on a legal basis other than the consent or performance of the contract (e.g. ensuring compliance with our legal obligations). Further, the exercise of your rights as described above shall not adversely affect the rights and freedoms of others, and therefore, Our Law Firm is not obliged to comply with your request if the disclosure of personal data would be contrary to our statutory confidentiality obligation.

As a **connected data subject**, you do not have the right to data portability.

g) Right to object the processing of personal data

As our **client** or **connected data subject**, you have the right to object the processing of your personal data that is based on the legal grounds of public or our legitimate interest, including profiling based on legitimate interest.

After exercising this right, Our Law Firm will no longer process your personal data processed on the given legal grounds unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or the reasons for the establishment, exercise or defence of legal claims.

If we process your personal data for direct marketing purposes, you also have the right to object at any time to the processing of your personal data for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing. After exercising this right, Our Law Firm will no longer process your personal data for such purposes.

h) Right to lodge a complaint with the supervisory authority

If you believe that your rights under GDPR or Personal Data Protection Act have been violated within the processing of your personal data by Our Law Firm, as our **client** or **connected data subject**, you have the right to lodge a complaint with the supervisory authority, in particular in the Member State of your habitual residence, place of work or place of alleged infringement. The supervisory authority in Slovak Republic is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava.

10. Cookie processing

Cookies are small text files that improve website usage, e.g. by allowing us to recognise previous visitors when logging in to a user environment, remembering a user's choice when opening a new window, measuring website traffic, or evaluating usage of the website for improvement. Our website (<http://www.bakpartners.sk>) does not currently use cookies.

11. Changes of Privacy Policy

Protection of your data is not a one-time issue for us. The information we give you with regard to processing of personal data may change or cease to be up to date. For these reasons, we may change this Privacy Policy at any time and to any extent. If we change this Privacy Policy substantially, we will bring such changes to your attention, for example through a general notice posted on this website or by explicit notice delivered by email.

Yours sincerely,

Law Firm BAK & PARTNERS s. r. o.