

Personal Data Processing Policies

1. Introductory Provisions

- 1.1 1.1 These policies (hereinafter referred to as "**policies**") are issued by the data controller, who is JUDr. Petr Novotný, attorney at law, r. n. ČAK (CBA ČR) 11884, Business ID 714 66 819, with its registered office at Jugoslávských partyzánů 1599/31, Dejvice, 160 00 Praha 6 (hereinafter referred to as „**the controller**“).
- 1.2 The contact details of the controller are:

JUDr. Petr Novotný, attorney at law
address: Jugoslávských partyzánů 1599/31, Dejvice, 160 00 Praha 6
Data Mailbox ID: 3c7j2jk
e-mail: novotny@advokat21.cz
- 1.3 These policies are issued by the controller for the purpose of fulfilling its information obligations towards data subjects in accordance with the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 (hereinafter referred to as "the Regulation").
- 1.4 These policies apply to the processing of personal data carried out by the controller in the provision of legal services, the execution of measures before entering into a contract for the provision of legal services, and in asset management, unless specific policies stipulate otherwise for certain cases.
- 1.5 The controller is a subject obligated under Act No. 253/2008 Sb., on certain measures against the legalization of proceeds from criminal activity and financing of terrorism, and is required to carry out measures according to this law and other regulations, including performing identification and verification of the client. For this purpose, the controller is obliged to collect and store the personal data of the client and make copies of documents from which this data was verified. In these policies, the data subject refers to a natural person to whom the personal data relates.

2. Processing of Personal Data

- 2.1 In the provision of services, the controller processes personal data for the following purposes:
 - fulfillment of the contract for the provision of legal services or asset management entered into with the data subject, or fulfillment of measures upon the request of the data subject before entering into such a contract,
 - fulfillment of legal obligations applicable to the controller,
 - protection of the controller's legitimate interests,
 - marketing purposes.
- 2.2 The legal basis for the processing of personal data is Article 6(1)(b), (c), and (f) of the Regulation. The legal basis for processing to fulfill obligations imposed on the controller is specified in Article 4. The legal basis for processing personal data for marketing purposes is the consent of the data subject, or possibly the provision of § 7(3) of Act No. 480/2004 Sb., on certain services of the information society.
- 2.3 The provision of personal data results from the data subject's request for services, and its provision is not an obligation. Failure to provide data may affect the outcome of activities performed by the controller in favor of the data subject or result in the creation of a right or obligation for the controller not to enter into a contractual relationship with the data subject or to terminate such a relationship.
- 2.4 The legitimate interests of the controller, for the purposes of whose protection personal data may be processed, are particularly its rights related to the provision of services to the data subject.

2.5 Recipients of personal data are:

- the controller and his employees, who are bound by confidentiality obligations,
- other lawyers who substitute the controller in fulfilling his obligations towards the data subject, and their employees, who are bound by confidentiality obligations,
- the Czech Bar Association, if so required by legal or professional regulation,
- in the case of accounting and tax documents, also persons conducting accounting for the controller,
- third parties including public authorities to which the controller is obliged to transfer the data or to which it is necessary to transfer the data for the purpose of fulfilling a contract or measures in favor of the data subject or to protect the legitimate interests of the controller.

2.6 In the event that it is necessary to transfer personal data to a third party, the controller shall provide the data only to the extent necessary in the given case.

2.7 Personal data are processed for the duration of the provision of legal services or asset management until their termination. Thereafter, personal data are stored:

- for the period necessary to protect the legitimate interests of the controller, but at least for a period of 4 years from the termination of the provision of services to the data subject or from the termination of measures before entering into a contract,
- for a period of 5 years from the termination of the provision of legal services in the case of data that are part of the client file,
- for a period of 5 years from the end of the relevant accounting period in the case of accounting documents,
- for a period of 10 years from the termination of asset management in the case of documents related to asset management,
- for a period of 10 years from the end of the calendar month in which the provision of services was terminated, in the case of data mentioned in § 16 of Act No. 253/2008 Sb.,
- for a period of 10 years from the end of the tax period in which the transaction occurred, in the case of tax documents,
- for a period of 10 years from the performance of the authorized conversion of the document, in the case of data that are part of the identification of entry in the record of conversions performed,
- until the return of the book of declarations of signature authenticity to the Czech Bar Association, if the data are part of it.

3. Rights of Data Subjects

3.1 Under the conditions set out in Articles 15 to 21 of the GDPR, the data subject has the right:

- to access personal data relating to him or her (Article 15 GDPR),
- to rectification of personal data (Article 16 GDPR),
- to erasure of personal data (Article 17 GDPR),
- to restriction of processing of personal data (Article 18 GDPR),
- to object to the processing of personal data (Article 21 GDPR),

- to data portability (Article 20 GDPR).
- 3.2 Furthermore, if the data subject believes that the processing of their personal data has violated legal regulations, they have the right to lodge a complaint with the supervisory authority, which is:

The Office for Personal Data Protection

address: Pplk. Sochora 727/27, Holešovice, 170 00 Praha 7

Data Mailbox ID: qkbaa2n

e-mail: posta@uoou.cz

4. Legal and Other Regulations Imposing an Obligation on the Controller to Process Personal Data

- 4.1 The legal basis on which the Controller is obliged to process personal data in connection with the provision of legal services or asset management are:
- § 11 and § 31(2)(b) of Act No. 563/1991 Sb., on Accounting,
 - § 25(1), § 25a(4), and § 56a(3) of Act No. 85/1996 Sb., on Advocacy,
 - Article 3 of the Resolution of the Board of the Czech Bar Association No. 9/1999 of the Bulletin dated November 8, 1999, which specifies certain details about the documentation of a lawyer conducted in providing legal services,
 - § 28, § 29, and § 35 of Act No. 235/2004 Sb., on Value Added Tax,
 - § 16 of Act No. 253/2008 Sb., on certain measures against the legalization of proceeds from criminal activity and financing of terrorism,
 - § 26 of Act No. 300/2008 Sb., on Electronic Acts and Authorized Conversion of Documents.

These policies were issued on March 11, 2024, and are effective from this date.