



BEATOW PARTNERS

Information of processing of personal data („Information“)

BEATOW PARTNERS s. r. o. (hereinafter referred to as the “**BEATOW PARTNERS**” or “**controller**”, “**BP**” or “**we**”) respects and fully applies the requirements for the protection of personal data stipulated by the relevant legislation, in particular 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) (“**GDPR**”), the Act No. 18/2018 Coll. on the protection of personal data, as amended (“**AoPPD**”) and the Act No. 586/2003 Coll. on Advocacy, as amended by the Act No. 455/1991 Coll. on Business Licensing, as amended, (“**Act on Advocacy**”).

BEATOW PARTNERS also complies with the Code of Conduct adopted by the Slovak Bar Association (“**SBA**”), which explains the processing of personal data by attorneys. You can get acquainted with the Code of Conduct adopted by the SBA on: <https://www.sak.sk/web/sk/cms/document/224>.

1. Who is this Information intended for?

This Information is intended for:

- a) **BEATOW PARTNERS’ clients**, who are natural persons, natural persons entrepreneurs and legal persons,
- b) **BEATOW PARTNERS’ suppliers**, who are natural persons entrepreneurs and legal persons,
- c) **BEATOW PARTNERS’ business partners**, who are natural persons entrepreneurs and legal persons,
- d) **natural persons authorized to act on behalf** of clients, suppliers, and business partners of BEATOW PARTNERS,
- e) **contact persons/employees** of BEATOW PARTNERS’ clients, suppliers, and business partners,

BEATOW PARTNERS s. r. o.
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- f) **other natural persons other than those listed above**, whose personal data BEATOW PARTNERS processes within provision of legal services or in carrying out other processing activities listed in this Information,

(hereinafter collectively referred to as the “**Data subjects**”). The aim of this Information is to provide the Data subjects sufficient overview of how their personal data are processed by BEATOW PARTNERS and their rights towards BEATOW PARTNERS in relation to these data.

2. Who processes your personal data?

Your personal data in the position of a **controller** is processed by **BEATOW PARTNERS s. r. o.**, a limited liability company established pursuant to section 15 of Act No. 586/2003 Coll. on Advocacy, as amended, registered in the Commercial Register of the District Court of Bratislava I, section Sro, file number 66108/B, having its corporate seat at Panenská 23, 811 03 Bratislava, Slovak Republic, Entity ID No.: 36 868 841, email: info@beatow.com, tel: **+421 2 5273 1235**.

3. What types of your personal data do we process?

BEATOW PARTNERS mainly processes the following personal data of the Data subjects:

- ❖ **BP’s clients, who are natural persons and natural persons - entrepreneurs:** *title, name and surname (in case of a natural person - entrepreneur, name and surname represents business name of an entrepreneur), address of the permanent residence / place of business, birth date, tel. contact, email address, payment and billing data, any additional data related to the provision of legal services*
- ❖ **BP’s suppliers, who are natural persons - entrepreneurs:** *title, name and surname (in case of a natural person - entrepreneur, name and surname represents business name of an entrepreneur), address of the permanent residence / place of business, tel. contact, email address, payment and billing data*
- ❖ **BP’s business partners, who are natural persons - entrepreneurs:** *title, name and surname (in case of a natural person - entrepreneur, name and surname represents business name of an entrepreneur), address of the permanent residence / place of business, tel. contact, email address, payment and billing data*

- ❖ **natural persons authorized to act on behalf of clients, suppliers, and business partners of BEATOW PARTNERS:** *title, name and surname, function / job position, tel. contact, email address*
- ❖ **contact persons/employees of BEATOW PARTNERS' clients, suppliers, and business partners:** *title, name and surname, function / job position, tel. contact, email address*
- ❖ **other persons besides those listed above:** *common personal data in the essential extent to achieve the purpose of processing listed in this Information*

4. Why are your personal data processed, on what legal basis do we process them and how for long do we store them?

We process your personal data for the following purposes, on the following legal bases and store them for the period of:

Purpose of processing	Legal basis of processing	Period of storage
<p>1. Performance of advocacy - clients</p> <p><i>Note: Provision of personal data in this purpose is necessary to conclude a contract, which will not be closed in the event of their failure to provide</i></p>	<p>performance of a contract pursuant to Article 6 par. 1 letter a) of GDPR, if the contractual party is a natural person or a natural person - entrepreneur, legitimate interest pursuant to Article 6 par. 1 letter f) of GDPR, if the contractual party is a legal person, i.e. the need for conclusion of contractual relationships and conducting mutual assistance</p>	<p>during the period of a contractual relationship and until the event of the expiry of the limitation, absolute, warranty, storage or other similar periods, and that until the expiry of the last of the above-mentioned periods</p>



Purpose of processing	Legal basis of processing	Period of storage
2. Performance of advocacy – counterparties and other persons	legitimate interest pursuant to Article 6 par. 1 letter f) of GDPR , which is the performance of activities of an attorney at law	during the period of a contractual relationship and until the event of the expiry of the limitation, absolute, warranty, storage or other similar periods, and that until the expiry of the last of the above-mentioned periods
3. Own activity program in the framework of anti-money laundering	compliance with a legal obligation pursuant to Article 6 par. 1 letter c) of GDPR - the Act No. 287/2008 Coll. on protection against money laundering and terrorist financing, as amended	during the duration of a contractual relation and 5 years after its termination
4. Management of internal client database	legitimate interest pursuant to Article 6 par. 1 letter f) of GDPR , which is efficiency improvement of service provision	during the duration of a contractual relationship with a client



Purpose of processing	Legal basis of processing	Period of storage
5. Marketing communication	legitimate interest pursuant to Article 6 par. 1 letter f) of GDPR , which is maintaining a professional relationship with clients (e.g. in the form of sending newsletters, legal updates or festive greetings)	during the duration of a contractual relation
6. Performance of contractual obligations (in relation to suppliers and business partners) <i>Note: Provision of personal data in this purpose is necessary to conclude a contract, which will not be concluded in case they are not provided.</i>	performance of a contract pursuant to Article 6 par. 1 letter a) of GDPR , if the contractual party is a natural person or a natural person - entrepreneur, legitimate interest pursuant to Article 6 par. 1 letter f) of GDPR , if the contractual party is a legal person, i.e. the need for conclusion of contractual relationships and conducting of mutual assistance	during the period of a contractual relationship and until the event of the expiry of the limitation, absolute, warranty, storage or other similar periods, and that until the expiry of the last of the above-mentioned periods



Purpose of processing	Legal basis of processing	Period of storage
7. Keeping accountancy documentation and fulfillment of related obligations	compliance with a legal obligation pursuant to Article 6 par. 1 letter c) of GDPR in terms of the Act No. 431/2002 Coll. on Accounting, the Act No. 595/2003 Coll. on Income Tax, the Act No. 222/2004 Coll. on Value Added Tax and other relevant legal acts and on their amendments	during the duration of that obligation, generally 10 years
8. Fulfillment of registry originator duties (registry management)	compliance with a legal obligation pursuant to Article 6 par. 1 letter c) of GDPR in terms of the Act No. 395/2002 Coll. on Archives and Registries and on the Amendments of Certain Acts, as amended	until the event of the expiry of the legal periods for archiving certain documents in accordance with relevant legislation



Purpose of processing	Legal basis of processing	Period of storage
9. Acceptance, handling and registration of the data subject request for exercising her/his rights on the basis of GDPR	compliance with a legal obligation pursuant to Article 6 par. 1 letter c) of GDPR in relation to legitimate interest pursuant to Article 6 par. 1 letter f) of GDPR , which is in particular correct management of the request in connection with verifying identity	5 years – objective period for the control carried out by the Office for Personal Data Protection
10. Contacting existing and potential clients for the purpose of providing legal services	legitimate interest pursuant to Article 6 par. 1 letter f) of GDPR , which is conducting business operations	during the duration of a contractual relation and 3 years after its termination
11. Evidence of received and sent correspondence, including electronic correspondence	compliance with a legal obligation pursuant to Article 6 par. 1 letter c) of GDPR , especially the Act No. 395/2002 Coll. on Archives and Registries, as amended	legal periods for archiving important documents

Note:

Personal data storage period in relation to the provision of legal services

Please note that, when storing personal data, we follow the recommended storage periods in accordance with the Resolution of the Council of the Slovak Bar Association No. 29/11/2011, e.g.:

- After the book of incoming mail and the book of outgoing mail become full, the attorney at law shall store it for a period of ten years from the date of receipt or date of sending of the last mail registered in the book;
- The inventory list shall be archived ten years after it was drawn up;
- The list of names of clients and the client-file protocol is kept without any time limit;
- The client file is kept for the duration of shredding period which is 10 years, and which starts from the date when all the conditions for storage of the file in the archive are met.

Attorneys at law are subject to professional rules, which specify the obligations of attorneys at law under the Act on Advocacy according to which there are certain circumstances that prolong our storage periods of personal data or prevent us from shredding some documents for comprehensible reasons, e.g.:

- The client file containing the originals of the documents handed over to the attorney at law by the client may not be shredded;
- Client-file protocols and lists of client names may not be shredded;
- Client files or any part thereof, which the attorney at law is obliged to submit to the state archive, may not be shredded;
- Any client file subject to any proceedings before any court, state administration body, law enforcement authorities, the Slovak Bar Association, related to the contents of the client file or the substance of which was formed by any action or omission of the attorney at law in providing legal aid in the matter of and to the client, may not be shredded.

Note:

Legitimate interest as a legal basis

Please note that, in all cases we process your personal data on a legal basis of legitimate interest („mentioned purposes“), our legitimate interests were assessed by the so-called „proportionality test“.

Within the proportionality tests, we analyzed the need for processing your personal data for the mentioned purposes on the one hand and intervention of that processing into your fundamental rights, freedoms, and interests on the other.

By performing proportionality tests, we found out that the processing of your personal data is in all cases for the mentioned purposes necessary and our processing does not threaten your fundamental rights, freedoms, and interests in any excess.

5. Where are your personal data processed?

Your personal data is processed within the territory of the European Union, in particular the Slovak Republic, in accordance with the legislation in force in this territory. BEATOW PARTNERS does not transmit nor plan to transfer your personal data to a third country or international organization.

6. To whom are your personal data provided?

Provision of legal services

Within the provision of legal services, respectively in all cases, in which we process your personal data in relation to the performance of attorney's profession and we are bound by specific legislation, we disclose your personal data to the extent strictly necessary and while always maintaining the confidentiality of the data recipient, especially to the following recipients:

- representative or cooperating attorneys at law,
- accounting advisors of BEATOW PARTNERS,
- banks and payment companies, which keep accounts of BEATOW PARTNERS,
- the Slovak Bar Association (e.g. in case of disciplinary proceedings),
- authorities of public administration or public enforcement (but only after verification whether we have a legal obligation to provide your personal data to these authorities),
- IT service providers,
- server and cloud storage providers,

- recipients in connection with electronic communication with state administration and guaranteed conversion (E-Government Act), (and including employees of these subjects).

Please note that, even if we have a limited obligation to provide your personal data to public authorities, we are obliged to reveal the commitment of a crime and also the obligation to report any information regarding protection against money laundering and terrorist financing.

Other cases of processing

In other cases of processing your personal data than mentioned above, we disclose your personal data to the extent strictly necessary and while always maintaining the confidentiality of the data recipient, especially to the following recipients:

- accounting advisors of BEATOW PARTNERS,
- banks and payment companies, which keep accounts of BEATOW PARTNERS,
- authorities of public administration or public enforcement authorized to request such data from BEATOW PARTNERS under relevant legislation,
- persons providing BEATOW PARTNERS professional services, such as IT support providers, software equipment providers or server and cloud storage providers.

7. Are your personal data processed by automated individual decision-making?

Your personal data are not processed by automated decision-making, including profiling.

8. From what resources do we collect your personal data?

Provision of legal services

Within the provision of legal services, respectively in all cases, in which we process your personal data in relation to the performance of attorney's profession and we are bound by specific legislation, we acquire personal data most often directly **from you**.

Depending on a particular case, failure to provide personal data may affect our ability to provide you with quality legal advice or in exceptional cases, the obligation to refuse to provide you with legal advice. Furthermore,

personal data on clients can also be acquired from **publicly available resources, from public authorities or from other persons.**

If it is not a client - natural person, respectively a client - a natural person entrepreneur, the personal data are most often acquired from **our clients - legal persons** or from **other public or statutory resources**, such as a request from public authorities, an excerpt from public registers, acquiring evidence for benefit of our client, etc. In such a case, personal data can be acquired without informing and against the will of the data subject under the legal authorization and the obligation to carry out advocacy in accordance with the Act on Advocacy.

Other cases of processing

In other cases of processing your personal data than mentioned above, we acquire your personal data by the following ways:

- directly from you,
- from our suppliers and business partners,
- from publicly available resources, from public authorities or from other persons.

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

Restrictions on the rights of the Data subjects if BEATOW PARTNERS provides legal services

As a client, you shall have the right to request access to your personal data as well as any rectification thereof. If we process personal data with regard to the provision of legal services, respectively in all cases, in which we process your personal data in relation to the performance of attorney's profession and we are bound by specific legislation you, neither as a client, nor as any other natural person (e.g. an adverse party) shall have the right to object to such processing under Article 21 of the GDPR. If the personal data relates to a client (regardless of whether the client is a legal entity or a natural person), no other persons shall have the right to access data or the right to portability due to our statutory duty of confidentiality and with reference to Article 15 par. 4 of the GDPR, 20 par. 4 of the GDPR and Section 18 par. 8 of the Act on Advocacy: *"An attorney at law shall not be obliged to provide information on the processing of personal data, to allow access or portability of personal data under a special regulation, if it could lead to a breach of the duty of confidentiality of the attorney at law under this Act."*

Rights of the Data subjects

In the other events than above mentioned restrictions, in relation to personal data which are related to you and which we process for all purposes and all legal bases mentioned in point 4 of this Information, you have the following rights:

- **the right of access to personal data** – you shall have the right to obtain from BEATOW PARTNERS confirmation as to whether or not your personal data are being processed, and, where that is the case, access to the personal data and information relating their processing;
- **the right to rectification** – you shall have the right to obtain from BEATOW PARTNERS without undue delay the rectification of inaccurate personal data concerning you or the right to have incomplete personal data completed;
- **the right to restriction of processing** – you shall have the right to obtain from BEATOW PARTNERS restriction of processing your personal data only for their storage and for the establishment, exercise or defence of legal claims or for the protection of the rights of another person or for reasons of important public interest; you can require to obtain restriction of processing especially in case, if you contest the accuracy of the personal data, and that for a period enabling BEATOW PARTNERS to verify the accuracy of the personal data;
- **the right to lodge a complaint with a supervisory authority** – additional to above mentioned rights you shall have the right to lodge a complaint with a supervisory authority, which is Office for Personal Data Protection of the Slovak Republic. The office can be contacted in writing at: Hraničná 12, 820 07 Bratislava 27, the Slovak Republic, by phone: +421 /2 3231 3214 or by e-mail: statny.dozor@pdp.gov.sk.

Furthermore, in specific cases, you shall also have the following rights in relation to personal data concerning you:

- **the right to erasure** – you shall have the right to obtain from BEATOW PARTNERS the erasure of your personal data concerning you if the conditions laid down in GDPR are met (applying of this right is bound to comply with the conditions such as processing purpose fulfilment, expiration of the storage period, etc.);
- **the right to object to processing** – you shall have the right to object, on grounds relating to your particular situation to processing

of personal data concerning you (however you shall have the right only if your personal data are processed **on the legal basis of legitimate interest and for the purposes specified to this legal basis in point 4 of this Information**);

- **the right to data portability** – you shall have the right to receive from BEATOW PARTNERS the personal data concerning you, which we have processed about you, and transmit those data to another controller, if the conditions laid down in GDPR are met (however you shall have the right only if your personal data are processed **on the legal basis of performance of contract and for the purposes specified to this legal basis in point 4 of this Information**).

10. Information on whether the provision of personal data is a statutory or contractual requirement, or the requirement for conclusion of a contract whether the data subject is obliged to provide personal data as well as possible consequences of failure to provide such data

We explain that the provision of personal data is partly required by law (such as tax legislation) or may also result from contractual provisions (such as contracting partner information). If the contract is necessary to conclude, e.g. contract on the provision of legal services, the data subject shall provide us with his or her personal data that we must subsequently process. For example, the data subject is obliged to provide us with his or her personal data when concluding a contract with our company. Failure to provide personal data would result in the contract with the data subject could not be concluded. Before the data subject provides personal data, he or she can contact our company's employee. The employee of our company will clarify the data subject whether the provision of personal data is required by law or contract or is necessary for contract concluding whether there is an obligation to provide personal data and what are the consequences of failure to provide personal data.

11. How can you contact us?

If you have additional questions about the processing of your personal data or wish to apply the above-mentioned rights, you can do so by e-mail at: marek.noga@beatow.com or post to BEATOW PARTNERS's corporate seat address.

12. Changes to this Information

By virtue of the possibility of change of personal data processing conditions, we reserve the right to modify or change the processing conditions provided for in this Information at any extent and any time. If



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their substantial change occurred, we will inform you about that by announcement on our website or by email.



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