

Personal Data Processing Notice to Clients of bnt attorneys-at-law s.r.o.

bnt attorneys-at-law s.r.o., ID No. 27117723, with its seat at Na příkopě 859/22, Prague 1, entered in the Commercial Register kept by the Prague Municipal Court in Section C, File No. 165030 – hereinafter "**bnt**" is processing personal data in the pursuit of its business, i.e., the provision of legal advice and representation of clients.

bnt in its capacity as the controller of personal data made available to it based on an agreement with its client hereby undertakes that it will always treat such data in accordance with the applicable law, i.e., in particular, Act No. 85/1996 Coll. (the Advocacy Act) and Regulation (EU) 2016/679 of the European Parliament and 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.

Purpose and duration of the data processing

bnt will process the personal data for the following purposes:

- for the purposes of acting as attorneys under the Advocacy Act in the course of performance under the agreement with the client, for as long as bnt acts as the client's legal advisor;
 - for recording-keeping purposes (i.e., as a part of bnt's files), based on bnt's justified interest, for as long as bnt acts as the client's legal advisor and beyond that for no more than 10 years from the moment in which bnt ceased to provide legal advice to the client;
 - for the purposes of discharging legal duties of bnt, on the basis of duties arising from, in particular, the AML Act, the Accounting Act (Act No. 563/1991 Coll., as amended), or the VAT Act (Act No. 235/2004 Coll., as amended), in each case for as long as set out in the relevant regulation or law, but for no more than 10 years from the moment in which bnt ceased to provide legal advice to the client;
 - for the purposes of offering the client additional services which bnt is able to provide, on the basis of legitimate interest in the promotion of one's own services, for as long as bnt acts as the client's legal advisor and for an additional 10 years thereafter;
- Personal data is understood to mean the personal data of the client (in the case of a natural person) and the identifiers and contact data of the statutory representatives of the client (in the case of a legal entity), as well as identifiers, information on commercial transactions, and such other data as is necessary for acting as legal counsel to the client, and as relates to third parties whose personal data is contained in the attorney's files.

Recipients of personal data

Depending on the client's instructions, the above-mentioned personal data may be disclosed to public authorities (such as the courts or administrative authorities) as well as other entities as per the client's instructions. The personal data may also be passed on to persons in a contractual relationship with bnt who are bound by commitment to secrecy or NDA and who provide and manage the information system for bnt, and to professional advisors: attorneys-at-law (*advokáti*), chartered accountants (*auditoři*), accountants, and tax advisors.

Client's rights

Data subjects have the right to demand access to their personal data which is being processed, i.e., in particular, to obtain information on the processing or, as the case may be, copies of the personal data concerning them; the right to rectification of personal data which is being processed and which concerns them, if the data is inaccurate or outdated; the right to object against the processing of personal data concerning them, if the processing is based on legitimate interest or serves the purposes of direct marketing; the right to demand the erasure of personal data concerning them, especially if there exists no legal basis for the processing; the right to demand that the processing of personal data concerning them be restricted, especially if they seek the rectification of said data or if they brought an objection against the processing; these rights can be raised with bnt via (among other channels) e-mail: gdpr.cz@bnt.eu. However, the provision of information on the personal data which is being processed, and the way in which data subjects exercise their rights, must not be in conflict with the attorney's duty to secrecy under the law.

Data subjects may moreover lodge a complaint with the Czech Data Protection Office (*Úřadu pro ochranu osobních údajů*) against the processing of their personal data by bnt.

The client has the right to obtain the data which it made available to bnt and which bnt has been processing electronically for the purposes of acting as legal counsel to the client, in a commonly used, structured, and machine-readable format.

Additional information on the rights of clients can be found on the website of the Czech Data Protection Office (*Úřad pro ochranu osobních údajů*) at <https://www.uoou.cz/6-prava-subjektu-udaj/d-27276>.

This Data Processing Notice was drawn up following the methodology for processing personal data issued by the Czech Bar Association (ČAK).

May 2018