

**INFORMATION MEMORANDUM ON THE PROCESSING OF PERSONAL DATA  
OF THE COMPANY  
KŠD LEGAL ADVOKÁTSKA KANCELÁRIA S.R.O.**

(A) **INTRODUCTORY PROVISIONS**

**1. PURPOSE OF INFORMATION MEMORANDUM ON THE PROCESSING OF PERSONAL DATA**

- 1.1 The company **KŠD LEGAL advokátska kancelária s.r.o.**, having its registered office at Prievozská 6, 821 09 Bratislava, ID No.: 35 978 741, registered in the Commercial Register kept with the District Court Bratislava I, Section Sro, Insert No. 39381/B (the “**Company**” “**We**”) is the company the subject of business activities of which is the provision of legal services, i.e. the performance of legal profession pursuant to Act No. 586/2003 Coll., on Legal Profession and on changes and amendments to Act No. 455/1991 Coll. on Licenced Trades (Trade Licensing Act), as amended (the “**Act on Legal Profession**”).
- 1.2 With reference to obligations arising to the Company from legal regulations in the area of the protection of personal data, the Company hereby issues this information memorandum on the processing of personal data carried out by the Company as the controller of personal data (the “**Memorandum**”).
- 1.3 The purpose of this Memorandum is to inform you (“**You**”), as the data subjects; therefore, persons whose personal data are processed by the Company (namely customers (clients) of the Company, business partners (suppliers) of the Company, seekers of jobs in the Company, visitors of the website of the Company and other natural persons, whose personal data are processed within the performance of legal profession), of the processing of your personal data by the Company, as the controller of personal data, as well as of your rights related to such processing.
- 1.4 This Memorandum relates only to such processing of personal data that is carried out by the Company, as the controller of personal data (or for the Company, as the controller of personal data, by an authorized third party, as the processor of the personal data).
- 1.5 By contrast, this Memorandum does not relate to the processing of personal data that is (that may be) carried out by the Company, as the processor of personal data, for third parties who define grounds and means of such processing (and, in relation to such processing, they are in the position of the controller of personal data).
- 1.6 This Memorandum may be changed, amended, and updated in another manner by the Company. The updated wording of this Memorandum is available at the website of the Company: [www.ksd.cz](http://www.ksd.cz) (in the *electronic form*) or in the registered office of the Company (in the printed form).

**2. CONTACT DETAILS OF COMPANY**

- 2.1 If You have any questions related to the matters of the processing of your personal data and their protection by the Company, contact us through the following contact details:
- telephone number +421 903 274 292; or
  - email address [ondrej.novak@ksd.sk](mailto:ondrej.novak@ksd.sk).

## TECHNICAL TERMS

2.2 If it is not stated in this Memorandum expressly otherwise, technical terms used in this Memorandum have the following meaning:

<b>“sensitive personal data”</b>	means the specific categories of personal data that are personal data that are revealing racial or ethnic origin, political opinions, religious /belief/ or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation, and data on criminal activities;
<b>“cookies”</b>	means text (data) files containing small amounts of the information (data) that are within visits of website stored in a user's computer, mobile phone or other equipment. Subsequently, within the next visit of the website, cookies are sent back to the website (or other sites) that identify cookies; therefore, they enable to the website to identify the user's computer, mobile phone, or other equipment;
<b>“hash”</b>	means a digital footprint of the specific behaviour of the website user included in cookies;
<b>“personal data”</b>	means any information of your person that identifies You or permits direct or indirect identification of your person;
<b>“recipient”</b>	means a natural or legal person (another company), public authority, agency or another body, to which your personal data are disclosed (e.g. a transport company or a police authority);
<b>“controller” or “controller of personal data”</b>	means a person who determines the purposes and means of the processing of the personal data. In the case of the processing of your personal data to the extent stated in this Memorandum, the controller of your personal data is the Company;
<b>“data subject”</b>	means your person, as a natural person, to whom the personal data relates and whose personal data are processed;
<b>“third country”</b>	means other state than the Member State of the European Union, Iceland, Norway, and Lichtenstein;
<b>“website user”</b>	means the visitor (user) of the Company's website;
<b>“website of the Company”</b>	means <a href="http://www.ksd.cz">www.ksd.cz</a> ;

**“processing” or “processing of personal data”** means any manner of handling personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction; and

**“processor” or “processor of personal data”** means a natural person or a legal person, agency, or another body that is processing personal data for the Company (e.g. an accountant or law firms).

(B) **COMPLIANCE WITH LEGAL REGULATIONS AND BASIC PRINCIPLES OF PROCESSING**

3. **COMPLIANCE WITH LEGAL REGULATIONS**

3.1 Protection of your personal data is our priority; therefore, when processing your personal data, We observe all obligations and fulfil all requirements defined by the relevant legal regulations in the area of the protection of personal data.

4. **BASIC PRINCIPLES OF PROCESSING OF PERSONAL DATA**

4.1 When processing personal data, We observe the following basic principles of the processing of personal data.

*Principle of lawfulness, fairness, and transparency*

4.2 We process your personal data fairly and in a lawful and transparent manner.

*Principle of purpose limitations*

4.3 We collect (and process) your personal data only for specifically defined (definite), explicitly stated and legitimate purposes, and not in a manner that is incompatible with these purposes.

*Principle of data minimisation*

4.4 We process your personal data only to the extent that is adequate, relevant, and necessary for purposes of the processing of your personal data.

*Principle of accuracy*

4.5 We process only the correct and accurate personal data and, if necessary, We update your personal data.

*Principle of storage limitation*

4.6 We process (store) your personal data only for the time that is necessary considering purposes of the processing of your personal data or the time defined by the relevant legal regulations.

*Principle of integrity and confidentiality*

4.7 We process your personal data only in a manner that ensures appropriate security of your personal data against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

Principle of accountability

- 4.8 We are responsible for the observance of the above-stated principles of processing and compliance of the processing of your personal data with legal regulations.

(C) **EXTENT OF PROCESSING OF PERSONAL DATA**

5. **PERSONAL DATA (CATEGORIES OF PERSONAL DATA)**

In general, the Company processes the following personal data on data subjects (categories of personal data); however, in relation to the specific data subject always depending on the character of the relationship between the Company and the relevant data subject (therefore, whether it is a customer (client) of the Company, seeker for a job in the Company or other data subject, whose personal data are processed by the Company) and depending on the specific position of the relevant data subject (e.g., whether it is a customer (client) of the Company whom the Company provides with legal services in the area of civil law, or a customer (client) of the Company whom the Company provides with legal services in the area of criminal law matters:

Identification data

- (a) data used for the identification of a certain person, namely an academic degree, name, surname, date of birth, birth number, data on identity documents, data on occupation or office;

Contact data

- (b) data used for contacting and communicating with a certain person, namely a telephone number, email address, identifiers in communication platforms (e.g. Skype), the address of a permanent residence or a temporary residence or another contact address;

Payment data

- (c) data used for making payments, mainly a bank account number;

Contractual data

- (d) data on products and/or services supplied to the Company or by the Company, on related requirements, complaints, claims, including data on related communication;

Basic profile data

- (e) data on basic physical characteristics of a certain person (sex, age, etc.) and basic social and demographic characteristics of a certain person (sex, citizenship, personal (family) status, number of children, etc.);

Professional profile data

- (f) data on education received and professional qualifications, namely they are data stated in CVs;

Data on property situation

- (g) data of a certain person on property situation, economic credibility, and payment ethics, including property situation and data on potential indebtedness of a certain person;

Data on rights and legal claims

- (h) data on rights and legal claims of data subject on a certain person (or *vice versa*);

Sensitive personal data

- (i) sensitive personal data, including data concerning criminal proceedings and judgments in criminal matters if their processing is necessary in connection with the provision of legal services (the performance of legal profession);

Audio-visual data

- (j) data captured in the form of audio-visual recordings, mainly photographs, video recordings, audio (voice) recordings;

IP address

- (k) data on your equipment from which You visit the website of the Company;

Hash

- (l) data obtained through cookies concerning your behaviour on the website of the Company;

Other data

- (a) it is possible that, in relation to You, We are also processing other personal data that are not stated here explicitly (mainly in relation to the provision of legal services (the performance of legal profession), in any case, they will be personal data necessary for the fulfilment of purposes stated in this Memorandum.

(D) **PROCESSING OF PERSONAL DATA**

6. **SOURCES OF PERSONAL DATA PROCESSED**

6.1 We acquire personal data from several sources. The primary source of your personal data is You in person (e.g. when We enter with You, as our customer (client) into an agreement on the provision of legal services and, for this purpose, You hand over to us your identification data or payment data or you provide us with personal data necessary for due provision of legal services (the performance of legal profession)). We also obtain your personal data from resources available to the public sources, such as public lists, registers (e.g. the Commercial Register or Trade Licence Register), or social media networks. We may obtain your personal data also from third parties, such as public authorities, your advisors, etc.

6.2 The source of personal data on website users of the Company are (may be) to the significantly restricted extent also “cookies” acquired by the Company in connection with activities of website visitors of the Company’s website – You will find more detailed information in our [Notice on cookies](#).

6.3 If You are interested in a specific source of the processing of your personal data, You can address us with this question.

7. **LEGAL REASONS AND GROUNDS FOR PROCESSING OF PERSONAL DATA**

7.1 We process your personal data on the basis of the following legal grounds:

- (i) on grounds of performing an agreement that You entered into with our Company;

- (ii) on grounds of performing legal obligations defined for the Company by legal regulations;
- (iii) on grounds of legitimate interests of the Company or third parties;
- (iv) on the basis of your consent, if You provided us with consent to the processing of your personal data; and
- (v) in exceptional situations, We may process personal data also on grounds of protecting your vital legitimate interests or vital legitimate interests of another natural person.

7.2 We process your personal data only for purposes stated in this Memorandum. If We process your personal data for other purposes than those stated below in the future, We will inform You of this fact immediately through an update of this Memorandum or in another appropriate manner.

7.3 If You are interested in a specific legal title related to the processing of your personal data, You can address us with this question.

**A. Processing of personal data on grounds of the performance of an agreement between the Company and You**

7.4 If You entered into an agreement with us, the processing of your personal data is based in particular on such an agreement (e.g. the agreement on the provision of legal services entered into with a customer (client) of the Company or the agreement on the supply of goods entered into with suppliers of the Company). Without the processing of your personal data, it would not be possible to enter into said agreement and perform the relevant agreement subsequently.

7.5 We process your personal data on the basis of these legal grounds for the following purposes:

Contractual matters

The purpose of contractual matters includes the processing of personal data for purposes of entering into contractual relationships with the Company, their changes, and termination (including pre-contractual negotiations), the performance of rights and obligations from an agreement entered into (e.g. the provision of legal services agreed), including keeping records on such contractual relationships and related communication.

**B. Processing of personal data on grounds of performing legal obligations**

7.6 We further process your personal data, because We are required to do so by the relevant legal regulations for the following purposes:

Tax matters

(a) This concerns the processing of personal data for purposes of tax matters; therefore, for purposes of preparation, processing, and submission of tax returns, tax statements, and other tax reports, communication with the relevant authorities of state administration and performance of other obligations defined by tax regulations.

Accounting matters

(b) This concerns the processing of personal data for purposes of bookkeeping and carrying out bookkeeping audits, performing registration and recording obligations, performing obligations in relation to reporting, communication with the relevant authorities of public administration, and performing other obligations defined by accounting regulations.

Legal profession matters

- (c) This concerns the processing of personal data for purposes of the fulfilment of obligations defined by regulations that regulate the performance of a legal profession (namely by the Act on Legal Profession and regulations issued by the Slovak Bar Association), namely the obligation to protect and promote rights and justified interests of a client and obligations within the keeping of lawyer's files, etc.

Archiving

- (d) This concerns the processing of personal data on grounds of the performance of archiving obligations defined by the relevant legal regulations, namely the act on archiving and filing services, tax regulations, accounting regulations, and also regulations that regulate the performance of legal profession.

Audits

- (e) The processing of personal data on grounds of enabling obligatory audits in the Company, e.g. accounting, tax, etc.

Cooperation with public authorities

- (f) The processing of personal data on grounds of the provision of the obligatory information to public authorities, e.g. law enforcement authorities, financial administration, etc., if they are included in the information that We are obliged to provide to such authorities.

**C. Processing of personal data on the basis of legitimate interests**

7.7 We further process your personal data also on the basis of the "legitimate interests" of the Company or third parties (namely, customers (clients) of the Company); however, always under the condition that your interests or fundamental rights and freedoms, requiring the protection of personal data, do not have priority over such legitimate interests.

7.8 We process your personal data on the basis of these legal grounds for the following purposes:

Performance of legal profession and specification, performance or protection of legal claims

- (a) This concerns the processing of personal data on grounds of the performance of legal profession and the provision of legal services, including the due specification, performance and/or protection and defence of legal claims, rights, and legal interests of customers (clients) of the Company in connection with the provision of legal services to clients of the Company.

Efficient management and governance of the Company

- (b) This concerns the processing of personal data on grounds of securing the efficient management and governance of the Company; therefore, namely for purposes of organisation and management of the Company, the definition and realization of the Company's objectives, the ensuring of administrative processes within the Company or to the restricted extent within a business grouping of which the Company is the part (the "KŠD group"), and the performance of obligations in the area of compliance (therefore, in the area of ensuring legal consistency of activities and processes by the Company with requirements of legal regulations). This justified interest of the Company is the interest of the Company in securing the efficient management and governance of the Company.

Marketing and promotion

- (c) This concerns the processing of personal data for purposes of promotion of the Company and their services, including potential obtaining of audio-visual data (namely photographs) and their use within promotional materials of the Company. This legitimate interest of the Company is the interest of the Company in the development of the Company's business, promotion of the Company's services, maintaining and expanding the client portfolio.

Protection of legal interests (claims) of the Company

- (d) This concerns the processing of personal data in relation to the protection of legal claims and interests of the Company protected by law whether the Company asserts claims against You, or the Company is protecting itself against claims asserted by You in an out-of-court settlement, a court proceeding, or an execution proceeding. In this case, the legitimate interest of the Company is the interest of the Company in protecting its rights and interests; therefore, the assertion of the Company's claims against third parties, and in ensuring the protection of the Company against claims asserted against it.

Security and protection

- (e) This concerns the processing of personal data on grounds to ensure security in the Company (including IT and network security) and the protection of assets of the Company and assets of other persons. For this purpose, the Company has security systems in the form of registration of access to the premises of the Company maintained manually. This registration of contractual relationships is maintained exclusively manually, and it is not kept in any specific operational automated programme or system of the Company. In this case, the legitimate interest of the Company is the protection of assets of the Company and third parties and ensuring the security of persons in the premises of the Company. The legitimate interest is in this case also the Company's interest in ensuring IT and network security.

Recruitment of new employees

- (f) We process personal data of seekers of employment in the Company also for purposes of recruiting new employees of the Company; therefore, accepting, processing, and filing resumes, selecting job applicants, holding employment related interviews, evaluating job applicants, offering jobs in the Company, and communicating with job applicants within the whole recruitment process. The legitimate interest of the Company is in this case the recruitment of new employees of the Company; therefore, the effective operation of the Company.

We further process personal data of seekers of employment in the Company for purposes of maintaining a database (register) of seekers of employment in the Company within which We register personal data of selected unsuccessful seekers of employment in the Company in relation to whom it is probable that a new offer of employment in the Company may be made to them (e.g. for a reason that the Company will establish a new position that is identical or similar to the position that the seeker sought originally or because the position that the seeker of employment sought originally was subsequently vacant). The justified interest of the Company in this case is the filling of positions in the Company that will be open in the future; therefore, the effective operation of the Company.

**D. Processing of personal data on the basis of your consent**



7.9 We process (We may process) your personal data also on the basis of your consent to their processing if You provide us with your consent to the processing of personal data. In such a case, We process the relevant personal data only for purposes of the processing of personal data to which You provide your consent.

7.10 The provision of your consent to the processing of personal data is absolutely voluntary; therefore, and You have the right to withdraw your consent to the processing of your personal data at any time.

## 8. **RECIPIENTS (CATEGORIES OF RECIPIENTS) OF PERSONAL DATA**

8.1 In relation to the above-stated purposes, your personal data are transferred to third parties who are designated as recipients of personal data. They are companies (or natural persons) with whom the Company cooperates either as with its business partners or within the use of services of such companies, or within the fulfilment of its statutory obligations.

8.2 Such recipients of personal data may be divided into:

### *Recipients who are processors of personal data*

Processors of your personal data are third parties, whom the Company uses for its own purposes, and who process your personal data exclusively for the Company (e.g. accounting and tax consultants, suppliers of software and IT systems, personnel agencies).

We select only such processors who provide sufficient guarantees for the implementation of appropriate technical and organizational measures necessary for purposes of ensuring the protection of your personal data.

The written agreement on the processing of personal data is always entered into with processors, and the subject of this agreement is the regulation of conditions of involvement of a processor in the processing of your personal data, regulation of related obligations of processors, all the above for purposes of ensuring the relevant protection of your personal data.

### *Recipients who are (independent) controllers of personal data*

(a) Those recipients are in the position of independent controllers, and they process your personal data for their own purposes. They are primarily public authorities and further, e.g. certain business partners of the Company.

No special agreement on the procession of your personal data is entered into with such recipients of your personal data, because those persons have the same obligations as the Company in relation to the processing of your personal data; therefore, they themselves are liable for the processing of your personal data.

8.3 The summary with recipients (categories of recipients) to which your personal data are provided by the Company are in schedule no. 1 of this Memorandum.

## 9. **TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES**

9.1 Your personal data are not normally transferred to third countries. Therefore, your personal data are transferred to third countries only in exceptional cases when such a transfer is absolutely necessary (namely in the case that it is required by the provision of certain legal service to a customer (client) of the Company).

- 9.2 However, your personal data are transferred in the following exceptional cases by the Company to third countries only if some of the following conditions are fulfilled:
- (a) under a condition that personal data are transferred to a third country in relation to which the European Commission has issued a decision on the appropriate protection of your personal data, i.e. to a third country that the European Commission assessed as a secure country from the perspective of the protection of your personal data (the “Decision on Appropriate Protection”); or
  - (b) if, in relation to the relevant third country, the European Commission has not issued the Decision on Appropriate Protection:
    - (i) under a condition that a recipient of personal data (therefore, a person to whom personal data are transferred) provides appropriate safeguards of personal data protection the most frequently through standard data protection clauses adopted by the European Commission that are entered into with the relevant recipient (the “**Transfer Based on Appropriate Safeguards**”); or (in the event of the non-existence of such appropriate safeguards);
    - (ii) upon the fulfilment of conditions defined by the relevant legal regulations in the area of the protection of personal data, namely if (1) the transfer of personal data to a third country is required for the fulfilment of an agreement between the Company and You or the Agreement entered into to the benefit of your person, or (2) the transfer is required for the definition, performance, or defence of legal claims, or (3) You provided your explicit consent to the above.

### 9.3 **STORAGE (PROCESSING) PERIOD OF PERSONAL DATA**

- 9.3 We process (store) your personal data only for the time that is necessary considering purposes of the processing of your personal data.
- 9.4 In the event of processing your personal data on the basis of statutory obligations, We process your personal data for the time defined by the relevant legal regulations, namely legal regulations in the area of archiving, tax and accounting regulations, and regulations that regulate the performance of legal profession.
- 9.5 If We perform an agreement, We process your personal data for the time of duration of a contractual relationship between You and the Company and further for the time of subsequent ten (10) years after the termination of this contractual relationship, namely considering the potential future claims towards You or from You towards the Company.
- 9.6 In the event of the processing of your personal data on the basis of the Company’s legitimate interest, We process your personal data for the adequate (necessary) time considering the relevant legitimate interest – You will find more detailed information on the relevant period of processing (storage) in schedule no. 2 of this Memorandum.
- 9.7 In the event of granting consent to the processing of personal data, We process your personal data for the time stated in such consent.

### 10. **LINKS TO OTHER WEBSITES**

- 10.1 If links to websites operated by third parties are presented on the website of the Company, websites of third parties are absolutely independent, and they are outside any control of the Company.

Therefore, the Company is not liable in any manner for the content of any websites of third parties that You can access through links presented on the website of the Company, and the Company is not liable in any manner whatsoever for their content, compliance with principles of the protection of personal data, or their use.

## 11. **USE OF PLUG-IN MODULES FOR SOCIAL NETWORKS**

11.1 The website of the Company uses plug-in modules of various social networks. The plug-in module of a social network is a button intended for sharing posts from the website of the Company and other users of the relevant social network.

11.2 On our website, We use plug-in modules of the following social networks.

### Twitter

(a) This plug-in module is operated by the company Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, U.S.A. the plug-in module is marked with the Twitter logo. The information on principles of the protection of personal data of the Twitter company is on the twitter.com website.

11.3 Design and content of plug-in modules in a browser is specified by those social networks. The modules are automatically integrated in the website.

11.4 If You visit any of the websites of the Company through one of those plug-in modules, your web browser (e.g. Internet Explorer) will automatically create a link to a server of the relevant social media network regardless of the fact whether You used a plug-in module. The information of the fact that You visited the website of the Company is then shared through that link.

11.5 If, during the visit at the website of the Company, You are logged in to some of the social media networks, data transferred will be allocated to your user account at the social media network. This is also applicable in the event if You use a plug-in module.

## (E) **YOUR RIGHTS**

### 12. **GENERAL INFORMATION**

12.1 This part of the Memorandum contains the information on your rights related to the processing of personal data carried out by the Company or for the Company.

12.2 However, in this regard, We also state that your certain rights related to the processing of personal data may be restricted considering the statutory obligation defined of an attorney-at-law to maintain confidentiality of all facts of which said attorney-at-law has learned in relation to the provision of legal services (the performance of legal profession).

### 13. **RIGHTS TO WITHDRAW CONSENT TO PROCESSING OF PERSONAL DATA**

13.1 If We process your personal data on the basis of your consent, You have the right to withdraw your consent to the processing of your personal data at any time in any of the manners stated in part (F) below.

13.2 You can withdraw your consent to the whole extent or only partially only in relation to some of your personal data or in relation to some of the grounds of processing.

### 14. **RIGHT TO ACCESS PERSONAL DATA**

- 14.1 You have the right to obtain from the Company a confirmation of the fact whether We process your personal data or not.
- 14.2 If We really process your personal data, You have the right to get access to your personal data and the right to receive the information stated in this Memorandum.
- 14.3 We will provide You with access to personal data processed in a manner that We will provide You with a copy of personal data processed. The provision of the first copy is free of charge. We may charge an adequate fee (considering administrative costs spent) for the provision of further copies upon your request).
- 14.4 The Company will provide You with the above-stated confirmations, information, and copies in the written or electronic form. However, if You file a request in the electronic form, confirmations, information, and copies will be provided to You in the electronic form, unless You request another form.

**15. RIGHT TO RECTIFICATION AND COMPLETION OF PERSONAL DATA**

- 15.1 You have the right to obtain from us the rectification of inaccurate personal data concerning You without undue delay. Considering purposes of processing, You also have the right to the completion of incomplete personal data also based on the provision of an additional statement.

**16. RIGHT TO ERASURE (“RIGHT TO BE FORGOTTEN”)**

- 16.1 You have the right to obtain from us the erasure of your personal data without undue delay if:
- (a) your personal data are not necessary for purposes for which they were collected or processed otherwise by the Company;
  - (b) You withdraw your consent to the processing if We process your personal data on the basis of your consent and if any other legal ground for processing your personal data does not exist;
  - (c) You raise objections against the processing of your personal data, and also no overriding legitimate grounds for the processing exist;
  - (d) You raise objections against the processing for purposes of direct marketing;
  - (e) We processed personal data unlawfully; or
  - (f) Your personal data must be erased in order to fulfil legal obligations defined by the relevant legal regulations by which We are bound.
- 16.2 In the event of exercising the right to erasure and meeting conditions of such erasure, We will erase your personal data without undue delay, if We do not need your personal data for the performance of a legal obligation, for the establishment, exercise or defence of legal claims or for purposes of archiving.
- 16.3 If your personal data were published, taking into account technology available and costs of performance, We will take adequate steps, including technical measures in order to inform other controllers who process personal data that You have requested erasure of your personal data.

**17. RIGHT TO RESTRICTION OF PROCESSING**

- 17.1 You have the right to obtain from us the restriction of the processing of your personal data in the following events:
- (a) You will contest and deny the accuracy /correctness/ of your personal data for a period enabling us to verify the accuracy of the personal data;
  - (b) the processing of your personal data is unlawful, and You will oppose the erasure of the personal data and You will request the restriction of their use instead;
  - (c) We will no longer need your personal data for the purposes of the processing, but You will require them for the establishment, exercise, or defence of your legal claims; or
  - (d) You will object to processing (see more details in Article 21 stated below) pending the verification whether our legitimate grounds override your legitimate grounds.
- 17.2 If the processing of your personal data is restricted upon your request, your personal data, except their storage, may be processed by the Company only with your consent or on grounds of the establishment, exercise or defence of legal claims, on grounds of the protection of rights of another natural or legal person or on grounds of important public interest.
- 17.3 If the processing of your personal data is restricted upon your request, We will inform You of the potential reversal of the restriction of the processing.

## 18. **RIGHT TO DATA PORTABILITY**

- 18.1 You have the right to request us to transfer your personal data (that You have provided to us yourself) to another controller (i.e. a company that You will specify yourself); however, only in the following cases:
- (a) the processing of your personal data is established on your consent or the performance of an agreement between the Company and You; and (also)
  - (b) the processing is carried out by the Company automatically (not manually).

## 19. **RIGHT TO OBJECT**

- 19.1 For grounds related to your specific situation, You have the right to object to the processing of your personal data based on your legitimate interest at any time.
- 19.2 If You exercise this objection, We will not process your personal data further, unless (a) We demonstrate serious justified grounds for such processing that would override your interests or rights and freedoms, or (b) it would be necessary for the establishment, exercise, or defence of legal claims.
- 19.3 Further, You have the right to object to the processing of your personal data for purposes of direct marketing any time – if You exercise this objection, We will not continue with the processing of your personal data in any case.

## 20. **RIGHT TO COMPENSATION**

- 20.1 In relation to the Company, You have the right to compensation for all (material or non-material) damage that is caused to You by breaching the Company's obligations in the area of processing and protecting personal data; therefore, the Company is obliged to compensate You for damage suffered. The Company is also liable for damage caused to You by processors to which the Company transmitted your personal data.

21. **RIGHT TO LODGE COMPLAINT WITH SUPERIOR AUTHORITY**

21.1 If You have doubts on lawful processing of your personal data or if the Company does not comply with your request related to your personal data, You have the right to address the Office for Personal Data Protection as the supervisory authority in the area of personal data protection.

21.2 You can address the Office for Personal Data Protection with your suggestion without the prior request addressed to the Company as well.

21.3 If the Office for Personal Data Protection does not comply with your complaint, if it does not handle said complaint at all, or if it does not inform You within three months on the progress in handling your complaint, You have the right to judicial redress against such steps taken by the Office for Personal Data Protection.

22. **RIGHT TO JUDICIAL REDRESS**

22.1 If You have doubts on lawful processing of your personal data or if You find breaches of your rights in relation to the processing of your personal data, You have the right to effective judicial redress.

23. **MANNER OF EXERCISING RIGHTS OF DATA SUBJECTS AND HANDLING REQUESTS OF DATA SUBJECTS**

24. **MANNER OF EXERCISING RIGHTS OF DATA SUBJECTS**

24.1 You may make requests in the matter of your rights in relation to the processing of personal data by the Company (the "Request") with the Company through:

- telephone number +421 903 274 292; or
- email address [ondrej.novak@ksd.sk](mailto:ondrej.novak@ksd.sk)

**HANDLING REQUESTS OF DATA SUBJECTS**

*Handling request free of charge*

24.2 If it is not explicitly stated in this Memorandum otherwise, your Requests are handled and any subsequent measures are taken free of charge.

*Requirements of request*

24.3 It must be clear from your Request that You are making the relevant Request and the subject of your Request. The Company may ask You for more detailed specification of the Request or its grounds.

*Acceptance of request of data subject*

24.4 If your Request is filed through email, its acceptance will be confirmed to You without undue delay by the Company depending on the manner of filing the Request by email or in another appropriate manner.

*Manifestly unfounded or excessive requests*

24.5 Manifestly unfounded or excessive Requests (in particular repeated Requests) may be subject to a charge of an adequate fee (considering administrative costs) or rejected.

*Handling requests of data subjects*

- 24.6 Requests are handled without delay and in every case within one (1) month from the date of accepting the Request.
- 24.7 In exceptional cases (namely taking into account complexity and number of all Requests handled), this term may be prolonged with two (2) months at maximum. We will inform You of such an exceptional prolongation of the term for handling the Request no later than within the term of one (1) month from the date of accepting your Request together with grounds for such a suspension.
- 24.8 In the event of the rejection of your request, We will inform You of such a fact and also of the possibility to file a complaint at the supervisory authority – i.e. of the possibility to file a petition at the Office for Personal Data Protection to start a proceeding on the protection of personal data, as well as of the possibility to request judicial redress.

**SCHEDULE NO. 1**

**SUMMARY WITH RECIPIENTS (CATEGORIES OF RECIPIENTS)**

<b>RECIPIENTS (CATEGORIES OF RECIPIENTS)</b>
Matters of legal profession, mainly cooperating attorneys at law and the Slovak Bar Association
Consultancy services (e.g. consultants in the area of accounting and tax matters and services of auditors), mainly KŠD ECONOMIC s.r.o., ID No.: 27952266, Hvězdova 1716/2b, 140 00 Prague 4, and Larus & Lebrant, spol. s r.o., ID No.: 35 822 872, the registered office at Ružová 1002/12, 900 31 Stupava
Suppliers of services in the area of IT (hardware, software, internet), mainly e-invent s.r.o., ID No. 27428907, Na Cihlářce 30, 150 00 Prague 5
Graphic and web studios, advertising agencies, mainly e-invent s.r.o., ID No. 27428907, Na Cihlářce 30, 150 00 Prague 5
Authorities of state administration, e.g. courts, law enforcement authorities, and other administrative authorities
Banks and insurance companies, mainly UniCredit Bank Czech Republic and Slovakia, a.s., ID No. 64948242, Želetavská 1525/1, 140 92 Prague 4, and Tatra banka, a.s., ID No.: 00 686 930, the registered office at: Hodžovo námestie 3, Bratislava 1 811 06
Other persons from the KŠD group



**SCHEDULE NO. 2**

**STORAGE (PROCESSING) PERIOD OF PERSONAL DATA**

<b>LEGITIMATE INTEREST</b>	<b>STORAGE (PROCESSING) PERIOD OF PERSONAL DATA</b>
Performance of legal profession and specification, exercise, or protection of legal claims	For the time that is necessary for the purposes of the due performance of the provision of legal services and the specification, exercise, or protection of legal claims, and the provision of legal services related thereby.
Effective management and governance of the Company	For 1 year from the collection of personal data.
Marketing and promotion	For the duration of a contractual relationship and for 5 years after its termination; in other cases for the time of 5 years from the collection of personal data.
Protection of legal interests (claims) of the Company	For the time of duration of a contractual relationship and for 10 years after its termination.
Security and protection	Generally, for 1 year, in the area of IT security for 6 months at maximum.  However, in the event of a security incident, personal data may be processed for a longer period; however, always only for a period that is necessary for the clarification and solution of the relevant security incident.
Recruitment of new employees	For the time of duration of a selection process, and in the event of keeping records of seekers for employment, for the time of 3 months after the termination of a selection process.