

INFORMATION ABOUT PERSONAL DATA PROCESSING

provided according to article 12 of the Regulation 2016/679 of the European Parliament and of the Council (EU) 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 (hereinafter the "**Regulation**") (up to date to 25 May 2018)

Mgr. Peter Šmehýl, attorney, with seat at Krakovská 1256/24, Praha 1, Post Code 110 00, Id. No. 71466967, attorney registered in the attorney registry maintained by the Czech Bar Association under reg. No. 11848, as the controller of personal data, hereby in compliance with article 12 par. 1 of the Regulation provides following information related to processing of personal data.

PERSONAL DATA CONTROLLER:

Firm: Mgr. Peter Šmehýl, attorney
Seat at: Krakovská 1256/24, Praha 1, Post Code 110 00
Contact: office@smehyl.eu

PURPOSE OF PERSONAL DATA PROCESSING

The purpose of personal data processing expresses the reason, why we process your personal data. We process your personal data strictly and only for a specific reason, which is the fulfilment of our legal or contractual obligation or the enforcement of fulfilment of third persons' obligations including you or exercising rights against third persons including you.

We process your personal data only for the following purposes:

- (i) fulfilment of legal obligations, which our firm has in the sense of respective legislation;
- (ii) fulfilment of a contract on providing legal services, which we concluded with you, and execution of operations required for conclusion of a contract on providing legal services and further of operations leading to conclusion of a contract on providing legal services, where these purposes of processing are used also in the case of personal data processing of persons, with who we are in contact because they represent the person, with who we intend to conclude a contract or with who we already concluded a contract, or persons, against who our legal services to our clients are provided;
- (iii) protection of our property from deceptive or other unlawful conduct, enforcement of legal obligations and protection of rights, or direct marketing, which is the legitimate interest of promotion of our products and services.

LEGAL BASIS OF PERSONAL DATA PROCESSING

Under the legal basis of personal data processing is understood the reason, with which the Regulation connects our right, as the controller of personal data, to process your personal data. Our office processes your personal data solely on the basis of following legal grounds, which are a concluded contract or legislation, or measures, which are required to be taken before entering into a contract, or processing is required for our legitimate interests, as stated above. On the basis of other legal grounds we do not presume personal data processing, but we can not fully rule it out, although we can reassure, that if we process personal data on the basis of other legal grounds, we make so strictly in compliance with the Regulation and other legislation. Personal data, which we process, are partial data, which you are obliged to provide us with on the basis of a contract, or data, which are required for fulfilling a contract or legal obligation and without the provision of such data it would not be possible to conclude respective contract with you.

MINIMISATION OF PROCESSED PERSONAL DATA

Our office, following the principle of minimisation of processed data, processes only the data, which are required for effective fulfilment of contractual and legal obligations.

CATEGORIES OF RECIPIENTS OF YOUR PERSONAL DATA

Personal data are processed by our workers, and that solely by those, who need respective personal data for their actions.

Those can be our employees or third persons, who we use while performing our actions.

We provide several categories of recipients with your personal data, who perform specialised activities for us, by which we fulfil mainly legal obligations. These categories are accountants, tax advisors, auditors, IT specialists and other subjects, always processing your personal data for the purpose of fulfilment of our contractual or legal obligation, or for the purpose of protection of our interests.

We also provide public authorities (e.g. courts, administrative bodies) with your personal data.

DURATION OF PERSONAL DATA PROCESSING

We process your personal data only for a necessary duration, so that the purpose of the processing, and at the same time contractual and legal obligations, which we have, are fulfilled. We process personal data in connection with a contract or in connection with fulfilment of legal obligation for the duration of the existence of the contract or for the duration of fulfilling of the legal obligation and also for the duration, which is required by legislation for archiving of your personal data, and if the obligation of archiving does not apply to your personal data, then for the duration of 3 years from the day of fulfilment of the purpose of personal data processing.

THE REGULATION PROVIDES YOU WITH IMPORTANT RIGHTS IN RELATION TO YOUR PERSONAL DATA

The Regulation lays down essential rights, with which you can influence the processing of your personal data, though always within boundaries of the Regulation. One of these rights is the right to be informed about the facts, rights and information, which are included in this document. Other essential rights, about which we have to notify you, are as follows:

(A) RIGHT TO INFORMATION

You have right to access your personal data, which we process about you, including the information about the purpose of processing, categories of personal data processed by us, recipients of these personal data, planned duration of processing and your rights in connection with personal data processing. You can utilise this right also by using a template, which can be found on www.smehyl.eu in section GDPR.

(B) RIGHT TO WITHDRAW CONSENT

If you have given us consent with personal data processing, you can withdraw it at any time. You can make so via email sent to the above stated contact email, or via post to the address of our seat, using the form made available by us.

(C) RIGHT TO OBJECT

You have the right to object to processing of your personal data. If the objection is legitimate, we will terminate processing of your personal data at once.

(D) RIGHT TO RECTIFICATION

You have the right to rectification of inaccuracies in your personal data and right to have incomplete personal data completed.

(E) RIGHT TO ERASURE

You have the right to demand termination of processing (erasure) of your personal data and the right to be forgotten. You can exercise the right to termination of processing if:

- (i) the purpose no longer exists,
- (ii) the consent with personal data processing is withdrawn and no other legal ground for the processing exists,
- (iii) you object to the processing, and the objection is found legitimate,
- (iv) the personal data are processed unlawfully,
- (v) the personal data have to be erased to fulfil a legal obligation or
- (vi) the personal data have been collected in connection with the offer of information society services to a child below the age of 16 years.

(F) RIGHT TO RESTRICTION OF PROCESSING

You have the right to restriction of processing of your personal data. Right to restriction of processing can be exercised if:

- (i) the processed personal data are inaccurate, for a period required by the controller to verify the accuracy of the personal data,
- (ii) the processing is unlawful and you refuse the erasure of the personal data and request the restriction of their use instead,
- (iii) we no longer need your personal data for the purposes of the processing, but you require these for the exercise or defence of your legal claims, or
- (iv) you objected to the processing, until it is verified, whether our legitimate grounds override your legitimate grounds.

(G) RIGHT TO DATA PORTABILITY

You have the right to portability of your personal data processed based on the consent or for the purpose of fulfilling a contract. You have the right to receive your personal data, which you provided us with, in a structured commonly used and machine-readable format, and the right to transmit those data to another controller, i.e. right to transmit those data by us straight to the other (by you chosen) controller, if it is technically possible.

(H) RIGHT TO LODGE A COMPLAINT

You have the right to lodge a complaint about the processing of your personal data by us with the Office for Personal Data Protection, with its seat at Pplk. Sochora 27, Prague 7, Post Code 17000, www.uoou.cz/en.

You can find additional information about your rights in connection with protection of your personal data at the Office for Personal Data Protection's website <https://www.uoou.cz/6-prava-subjektu-udaj/d-27276>.