**PERSONAL DATA PROCESSING INFORMATION**

We, **REALS advokátní kancelář s.r.o.**, law firm, with registered address at Na Doubkové 1281/2, Smíchov, 150 00 Praha 5, Czech Republic, Business ID: 17772591**,** registered in the Commercial Register kept by the Municipal Court in Prague, under File No. C 376410 (hereinafter the “**Company**”), in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data (hereinafter referred to as the “**Regulation**”), hereby would like to inform all our clients and business partners, if they are natural persons, about the processing of their personal data.

However, this information does not concern the personal data of legal entities, including the name, legal form and contact details of the legal entity.

**WHO IS THE DATA CONTROLLER AND HOW CAN YOU CONTACT US?**

The controller of the personal data you have provided is REALS advokátní kancelář s.r.o. The Company is responsible for the processing of your personal data, and you can invoke most of your rights against the Company as set out below.

The Controller has not appointed a Data Protection Officer but has designated a person who is responsible for this area and who oversees the proper processing and protection of personal data.

You can contact us about the processing of your personal data in one of the following ways:

* In person at the Company's registered office at the following address: Na Doubkové 1281/2, Smíchov, 150 00 Praha 5, Czech Republic;
* By letter delivered to our registered address: Na Doubkové 1281/2, Smíchov, 150 00 Praha 5, Czech Republic;
* By email sent to the Company’s email address: office@reals.law.

**TYPES AND SOURCES OF PERSONAL DATA PROCESSED BY THE COMPANY**

In particular, the Company processes the following types of personal data about its clients:

1. Identification and contact data;
2. Contact and/or delivery address;
3. Billing and payment data;
4. Data on business activities (in particular, data on pending/completed/threatened legal/enforcement/administrative proceedings, data on possible criminal proceedings and criminal cases, information regarding financial situation, bank account,);
5. Data from mutual communications (personal, written, telephone, etc.);
6. Data on the client's preferences for the purpose of sending newsletters (if not a client, only in the case of consent to receive them) and invitations to the Company's events.

The provision of data a) to e) above (at least in the basic scope) is necessary for the purpose of fulfilling contractual obligations. The provision of this information is thus mandatory for the purpose of providing legal advice.

The provision of data f) above is entirely voluntary.

**THE ABOVE PERSONAL DATA PROCESSED BY THE COMPANY COMES FROM THE FOLLOWING SOURCES:**

We primarily obtain personal data directly from clients or in connection with a mutual contractual relationship (at the time of entering into a contract with the Company or during the term of the contract).

We may also obtain some personal data from public sources, lists and registers such as the Commercial Register, Trade Register, Insolvency Register, etc.

In some cases, we also obtain personal data from other controllers, but we are obliged to inform you about this (e.g. from a file kept as part of judicial / administrative / criminal proceedings by a state authority).

**WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?**

The legal basis for processing personal data is as follows:

1. Processing of personal data is necessary for the performance of the contract concluded with you (in respect of personal data of our employees, managing directors, permanently cooperating lawyers, clients – natural persons and employees or representatives of clients of legal persons);
2. Giving your consent to the processing of personal data for one or more specific purposes – for example, if you are applying for a job with our Company or sending out invitations to Company events and newsletters if you are not our client);
3. Fulfilling the Company's legal obligations arising from legal regulations (e.g. Act No. 262/2006 Coll., the Labour Code; Act No. 582/1991 Coll., on the organisation and implementation of social security; Act No. 589/1992 Coll., on social security contributions and contributions to state employment policy, etc.);
4. Existence of our legitimate interest – we base the processing of personal data on this legal ground only in cases where your interests or your fundamental rights and freedoms requiring the protection of personal data do not take precedence over our interests – this applies to the processing of personal data of job applicants, the processing of personal data for the purpose of defending a dispute or recovering claims, and the processing of personal data for the purpose of offering our other services or promoting and presenting our Company.

**WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA FOR?**

We determine the purposes for which we process personal data mainly due to the nature of the contractual or other relationship with you or due to the services provided or our legitimate interests.

The primary purpose of processing your personal data is the performance of a contract concluded with you or our client.

We also process your personal data for the purpose of fulfilling our legal obligations in connection with the practice of law.

We process personal data of job applicants for the purpose of selecting a new employee or creating a database of job applicants and contacting persons included in the database with a job offer.

We process photographs of employees, managing directors, partners, permanently cooperating attorneys for the purpose of promotion and presentation of our company and our business.

We may process personal data of former employees, managing directors, partners, permanently cooperating attorneys, clients – natural persons and employees or representatives of our corporate clients for the purpose of defending a dispute with the person concerned or for the purpose of enforcing claims against that person.

We also process personal data for the purpose of direct marketing, i.e. sending newsletters and invitations to the Company's events if you are our client and, if not, only with your consent, as well as to promote and present our services externally (this applies only to employees, associates and clients of the Company with whom this has been individually agreed).

In this context, we would like to inform you that you have the right to object under Article 21 GDPR to the processing of your personal data on the grounds of our legitimate interests as defined above. You can object by email to office@btmanagement.cz. If you object to the use of your email address for direct marketing purposes, your email address will no longer be used for this purpose.

**HOW AND FOR WHAT PURPOSE IS PERSONAL DATA PROCESSED BY THE COMPANY?**

Personal data will be processed in electronic form in the Company's electronic system or in the electronic system of the persons to whom the personal data will be transferred.

Personal data will also be processed in the form of a tangible document (a document on paper or similar tangible medium), which will be stored in the Company's archives.

The archive of paper documents shall be secured against unauthorised access, misuse or loss. Electronically processed personal data shall be stored in a secure database.

The processing of personal data is necessary for the implementation of the contract concluded between the Company and the Client, on the basis of which the related rights and obligations of the Company and individual data subjects are exercised and fulfilled, respectively. The Company does not use the above data for decisions based purely on automated processing or profiling, see Article 22(2) of the Regulation.

**WHO ARE THE RECIPIENTS OF PERSONAL DATA?**

The recipient of your personal data is primarily our Company, i.e. our employees and cooperating attorneys who need it to provide legal advice.

The transfer of personal data outside our Company only occurs in necessary and justified cases, in particular to:

* Postal service providers or couriers (here the name and address of the client is provided);
* Translators and translation agencies, experts and expert institutes;
* Marketing agencies, rating agencies for the purpose of recommending the Company or individual cooperating lawyers (e.g. Legal 500, Chambers, etc.), in the Company's promotional and representation materials; all in case of individual agreement with the client on the use of the client's identification data for marketing purposes / rating agencies / publication in promotional materials);
* Persons providing IT services/support;
* Other providers of legal, administrative and technical services that we use for fulfilling our contractual obligations towards you;
* Where applicable, to other entities in situations where the provision of such data to the Company is required by law or where it is necessary to protect the legitimate interests of the Company (this mainly involves the transfer of personal data to government authorities or bodies);

In justified cases and to the extent necessary, the Company may also transfer personal data abroad within the European Union in connection with the relevant proceedings; this mainly involves the transfer of personal data to the competent courts, state authorities or other authorities. We never transfer your personal data to a third country (i.e. outside the European Union or the European Economic Area) or to international organisations.

**PERIOD FOR PERSONAL DATA PROCESSING AND STORING**

The Company processes and stores the personal data of clients only for the time necessary for the purpose of processing. With regard to the performance of the contract concluded between the Company and the client, the Company processes and stores the client's personal data for the duration of the contractual relationship. Personal data processed on the basis of consent is stored for the period for which the consent was given and, of course, only until the consent is withdrawn. In the event that the processing of personal data is necessary for the purposes of our legitimate interest, we only process it for as long as this legitimate interest lasts. After this period of time, the personal data of clients is discarded by the Company, unless the Company is entitled or obliged to further process and store this data on the basis of another legal title.

**CLIENT RIGHTS**

The Company hereby informs its clients that, pursuant to the Regulation, all clients have the following rights against the Company:

1. Right to access their personal data and right to obtain a copy of the personal data processed (unless the rights and freedoms of others are adversely affected);
2. Right to rectification or completion of inaccurate personal data concerning the client, including by providing an additional statement; and
3. Right to have their personal data erased if any of the following situations occur:
* Personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
* Client has withdrawn the consent on the basis of which her/his personal data was processed and there is no further legal basis for processing it;
* Client has objected to being the subject of a decision based on automated processing of his/her personal data and there are no overriding legitimate grounds for such processing; or the client has objected to the processing of his/her personal data for direct marketing purposes;
* Client's personal data has been processed unlawfully;
* Client's personal data must be erased to comply with the legal obligation under the Union or Member State law to which the controller is subject;
* Client's personal data has been collected in connection with the offering of information society services
1. Right to request that the Company restrict the processing of their personal data if:
* Client disputes the accuracy of his/her personal data, for the time necessary for the Company to verify the accuracy of such personal data;
* Processing is unlawful and the client refuses to erase his/her personal data and requests instead that the use of such data be restricted;
* Company no longer needs the client's personal data for the purposes of the processing but the client requires it for the establishment, exercise or defence of legal claims; and
* Client has objected to the processing pursuant to Article 21(1) of the Regulation, pending verification that the Company's legitimate grounds outweigh the client's legitimate grounds;
1. Right to the portability of their personal data processed on the basis of consent or contract and also by automated means;
2. Right to object, free of charge, to processing carried out on the basis of the legitimate interest of the Company, in particular to direct marketing carried out on the basis of the legitimate interest of the Company;
3. Right to be informed in the event of a breach of security of the client's personal data where the breach is likely to result in a high risk to the rights and freedoms of natural persons, including the client; and
4. Right not to be the subject of a decision based solely on automated processing, including profiling, which has legal effects on them or similarly significantly affects them.

**HOW IS YOUR PERSONAL DATA SECURED?**

The personal data we process is secured by standard procedures and technologies that protect it from unauthorised access by third parties. The security measures taken are regularly checked and updated. For better security of your personal data, access to it is password protected. We regularly check that the systems used to process personal data do not contain weaknesses or have been subject to attack.

**FURTHER INFORMATION**

In case we process your personal data on the basis of your consent to the processing of your personal data, you have the right to withdraw this consent at any time. However, the withdrawal of consent does not affect the lawfulness of processing based on consent given before the withdrawal.

If you believe that the processing of your personal data has infringed the Regulation, you have the right to lodge a complaint with a supervisory authority, in particular in the country of your habitual residence, place of employment or place of the alleged infringement. The supervisory authority for the Czech Republic is the Office for Personal Data Protection, with registered address at: Pplk. Sochora 27, 170 00 Prague 7, Czech Republic, Business ID: 708 37 627, [www.uoou.cz](https://www.urbanhejduk.cz/www.uoou.cz).