# PRINCIPLES OF PROTECTION OF PERSONAL DATA

Randl Partners, advokátní kancelář, s.r.o., ID No.: 06681077, with its registered seat at Budějovická 1550/15a, Michle, 140 00 Praha 4 ("Attorneys at law" or "Randl Partners") would like to present you these principles of personal data protection by which we clarify what we do to ensure confidentiality and security of your personal data. The purpose of this document is to provide you with information about what personal data we collect, legal ground we have to collect it, how we treat it, which sources we collect it from, the purposes we use it for, whom we can transfer it to, where you can get information about the personal data we process, and how we keep it secure.

## **1.** Randl Partners as the personal data controller

Randl Partners is the controller of your personal data. Being a controller of personal data means that we respect the principles of personal data processing and treat your personal data solely in accordance with applicable laws, decide on the purpose and means of the processing of your personal data and ensure that your personal data is properly secured.

Attorneys who concluded a contract on cooperation with Randl Partners are also controllers of your personal data. You can find a list of these attorneys at <u>www.randls.com</u>.

We process personal data in accordance with applicable laws, mainly with the Act No. 85/1996 Coll., the Act on Advocacy, as amended, with 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) and with the Act No. 110/2019 Coll., the Act on Processing Personal Data.

## 2. To whom do these principles apply?

These principles of personal data processing apply to processing of personal data of all subjects whose personal data Randl Partners processes, mainly:

- visitors of the website <u>www.randls.com;</u>
- contact persons of Randl Partners' clients who regularly receive legal news (updates on legislature, informative bulletins, etc.), invitation to events, etc.;
- contact persons of Randl Partners and other persons in relation to providing legal services;
- contact persons of any other party with whom Randl Partners cooperates or intends to cooperate (e.g. suppliers or trading partners).

These principles of personal data processing do not necessarily apply to all cases of personal data processing which need to stay strictly confidential if a non-disclosure agreement is concluded, within the meaning of the Act No. 85/1996 Coll., the Act on Advocacy.

## 3. Which personal data do we process?

Randl Partners processes the following personal data or categories of personal data. This does not necessarily mean that we process all of the below listed data for each individual data subject.

- identification data, such as name, surname, title, phone number, e-mail address, date of birth, home address, personal identification number, passport number, identity card number, nationality, work position, employer;
- personal data obtained in relation to providing legal services;
- photographs (only with consent), CCTV recordings;
- information regarding website browsing, such as cookies, IP address or information about your device.

#### 4. Based on what grounds do we process your personal data?

Randl Partners processes personal data only on legal grounds which we mention within the examples below.

#### Compliance with legal obligation

Providing legal services is regulated by legal rules and professional ethics standards. To ensure that we comply with the obligations arising from them and that we provide our clients with proper legal service, we process some of your personal data.

#### **Fulfilment of contracts**

Any contract on providing legal services based on which we provide you with legal services, or alternatively another contract we have concluded with you, require processing of your personal data in order to be fulfilled.

#### Legitimate interest of the controller

A legitimate interest consists in Randl Partners performing entrepreneurship in the area of legal services effectively, providing legal services in accordance with legal regulations, securing own premises, documentation and devices, promoting own services and communicating with clients. For processing of personal data to be based on legitimate interest, Randl Partners assesses each case individually.

#### Consent

In rare cases and when none of the aforementioned legal reasons for processing of personal data can be utilized, Randl Partners may ask for your consent with processing of personal data. You can withdraw your consent at any time.

#### 5. Why do we process your personal data?

#### Providing legal services

Randl Partners processes personal data mainly to provide the clients with proper legal services and to duly perform its entrepreneurship.

We also process personal data when communicating with persons interested in our legal services.

#### Ensuring proper service of Randl Partners and cooperation with suppliers

Randl Partners processes personal data in order to ensure effective entrepreneurship and to keep business relations with clients and suppliers of goods and services.

#### Website

We process personal data of users of our website <u>www.randls.com</u> to be able to assess the traffic of our website and to improve the user interface of our website.

Our website uses cookies. A cookie is a simple small text file which is sent to your browser by the visited website. Our website uses Google Analytics anonymous cookies which are provided by the company Google Inc. in order to monitor the usage of our website and to analyse the website. You can set your cookie preferences in your browser.

#### Marketing communications

Your personal data is also processed for the purpose of commercial communication related to legal news or our own legal services to our current clients.

We may use personal data in the aforementioned way only if the addressee has not refused.

Everyone has the right to refuse receiving commercial communication (naturally with no penalty) by expressing their wish to do so on <u>liskova@randls.com</u> or via the link included in each piece of commercial communication.

Not every piece of communication from our side is the commercial communication. We also process your personal data for communication with you or, for instance, in order to inform you about updates to our terms and conditions or to these principles.

## 6. Where or from whom do we collect your personal data?

The main source of the personal data we collect is the data subject itself. When providing legal services, we also collect personal data from other parties (from counterparties during legal disputes, from courts, state authorities or institutions) or from publicly available sources.

#### 7. For how long do we keep your personal data?

We keep your personal data for a period of time set by legal rules or for a period of time that is necessary for the purpose for which we are processing it. We regularly evaluate the necessity of keeping your personal data. When we find your data no longer necessary for any of the purposes for which it was processed, we discard it.

#### 8. To whom do we transfer your data?

In most cases, we do not share your personal data with anyone outside Randl Partners. Personal data processed as per these principles may, however, be further provided to authorized state authorities, institutions or other entities if the conditions specified by legal regulation are met. Should it be necessary to fulfil the purpose of processing personal data, necessary for the performance of our legal obligations or obligations arising from a contract, necessary to protect our legitimate interest or should it follow from your consent, we may transfer your personal data to external suppliers who cooperate with us when providing legal services.

## 9. What are your rights?

You have the right to be fully informed about the processing of your personal data. You have the right to know whether we process your personal data, what personal data we process, and to obtain information about the purpose and nature of the processing of your personal data and the recipients of personal data. You also have the right to have the processing of your personal data restricted, to have incorrect personal data rectified and to have incomplete personal data completed. You have the right to erasure of personal data in cases when (i) the personal data is no longer necessary for the above stated purposes, (ii) you withdraw your consent and no other legal ground for processing exists, (iii) you raise objections against processing and we have no overriding legitimate grounds to further process your data, (iv) your personal data was processed unlawfully, (v) your personal data have to be erased for compliance with a legal obligation. You have the right to the portability of the data. You have the right to raise an objection to the processing of personal data directly with the controller, i.e. the company Randl Partners.

You may also address your claim, complaint or other query directly to the Office for Personal Data Protection, with its registered seat at Pplk. Sochora 27, 170 00 Prague 7, phone: +420 234 665 111, e-mail: <u>posta@uoou.cz</u>.

More information about your rights is available on the website of the Office for Personal Data Protection (<u>here</u>) or directly in <u>General Data Protection Regulation</u>.

## **10. Contact information**

Should you have any question regarding the processing of your personal data, please reach out to the authorised person Mgr. et Mgr. Irena Lišková, phone: +420 222 755 311, e-mail: <u>liskova@randls.com</u>.

## **11. Update to these principles**

These principles may be updated in order to adjust to changes which may arise from processing of your personal data.