

How do we handle personal data?

Principles of personal data protection

Personal data controller: **Frank Bold Advokáti, s.r.o.**, Company ID No. 28359640, registered office at Údolní 567/33, Brno-město, 602 00 Brno, tel: +420 545 213 975, e-mail: info@fbadvokati.cz

(hereinafter referred to as “we”)

Via these Principles of Personal Data Protection (hereinafter referred to as the “Principles”) we as the personal data controller inform the data subjects, i.e. natural persons whose personal data we process (hereinafter also referred to as “you”) about all the processing activities and principles for protecting their personal data and privacy.

1) Processed personal data

We process personal data for the following categories of persons:

1. Employment or internship applicants
2. Interns and graduate interns
3. Our goods and services suppliers
4. Clients
5. Potential clients
6. Third-parties in relation to our provided services
7. Participants at seminars, conferences and similar events organised by us
8. Persons subscribed to the newsletter and other commercial messages
9. Journalists

Personal data of these persons is processed in the scope, for the purposes and on the legal basis specified below.

Categories of data subjects	Purpose of personal data processing	Legal basis and processed personal data	Processing period
Employment or internship applicants	Assessing the applicant's adequacy during the selection process and renewed contact in the event of cancelling the employment relationship with another selected applicant during the trial period	The legal basis is the performance of the contract, respectively implementation of measures adopted before concluding the contract at your request. In particular, we process your identification and contact data, data	We process personal data for a period of 6 months from the end of the selection process.

		about education, work experience and qualifications and other information contained in your résumé.	
	Potential proving of fulfilment of the discrimination prohibition and obligation of fair treatment pursuant to the Employment Act during the selection process	The legal basis is our legitimate interest. In particular, we process the identification and contact data, data about education, work experience and qualifications of applicants.	Personal data may be processed for this purpose for a period of 3 calendar years from the year in which the selection process was conducted, and in the case of ongoing administrative, court or other proceedings, for the entire duration thereof.
	Keeping of records of selection process results	The legal basis is our legitimate interest. We process only the basic identification and contact data along with information about the result of the selection process, so as to be able to work with this information if you apply for employment again.	Personal data may be processed for this purpose for a period of 10 years.
Interns and graduate interns	Fulfilment and performance of contracts with interns	The legal basis is performance of the contract, in particular the agreement on a professional internship. We process in particular the identification, contact personal data and data about education and work experience of interns in order to perform the	Personal data may be processed for this purpose for the duration of the contractual relationship.

		contractual relationship.	
	Maintaining a community of our graduate interns and mutual linking of graduates, including sending information e-mails about our activities	The legal basis is our legitimate interest. In particular, we process the identification and contact data and data about education.	Personal data may be processed for this purpose for a period of an indefinite term (until application of the right to erasure).
Our goods and services suppliers	Performance of the contract	The legal basis is performance of the contract. We process in particular identification data, contact data, accounting data, information about provided services and information necessary to provide legal services.	Personal data may be processed for this purpose for the duration of the contractual relationship.
	Fulfilment of our obligations in accounting and taxes	The legal basis is the fulfilment of legal obligations imposed by legal regulations, such as the Accounting Act or Act on Value Added Tax. We process in particular identification data, contact data and other information provided in the tax documents.	Personal data may be processed for this purpose for a period of up to 10 years from the end of the tax period in which the transaction was performed.
	Administration of the database of partners and potential partners in areas related to our legal services	The legal basis is our legitimate interest. In particular, we process the identification and contact data.	Personal data may be processed for this purpose for a period of an indefinite term (until application of the right to erasure).

Clients	Provision of legal services and fulfilment of other contractual obligations towards partners	The legal basis is performance of the contract. We process in particular identification data, contact data, accounting data, information about provided services and information needed to provide legal services. In the scope necessary to determine, exercise or defend the legal claims of the client, special categories of personal data may also be processed (in particular data concerning health or effective convictions).	Personal data may be processed for this purpose for the duration of the contractual relationship.
	Keeping documentation about the client's case and fulfilment of other obligations arising from the Act on Legal Profession, tax regulations and guild regulations	The legal basis is fulfilment of legal obligations. We process in particular identification data, contact data, accounting data, information about provided services and information necessary to provide legal services.	Personal data may be processed for this purpose for maximally 10 years from the end of the contractual relationship.
	Administration of documentation during the safekeeping of money, securities or other property of the client or other services required by the client, consisting of the acts specified in Section 2(1)(g) of Act No.	The legal basis is fulfilment of legal obligations. We process primarily identification data including all names and surnames, personal number, date of birth, place of birth, gender,	Personal data may be processed for this purpose for a period of 10 years from the date of the transaction or end of the business relationship with the client, whereas this period starts on the

	<p>253/2008 Coll., on selected measures against legitimisation of proceeds of crime and financing of terrorism (hereinafter referred to as the "AML Act") and the fulfilment of other obligations arising for us as the obliged party pursuant to the AML Act, in particular related to the obligation to identify the client and check the client pursuant to the AML Act.</p>	<p>permanent or other residence and state citizenship, type and number of identification document, issuing country or authority and its validity period; in the case of business entities, also the commercial name, registered office and identification number of the entity; furthermore, contact data, accounting data, account numbers, information about requested services and information needed to provide the requested legal services, information about related entities, information about politically exposed persons or application of international sanctions, information about the beneficial owners of legal entities entered in the public registry and trust funds entered in the registry of trust funds, and other necessary data. For the purposes of the AML Act, we are authorised to make copies or extracts from the presented documents and process this acquired data to fulfil the</p>	<p>first day of the calendar year following the year in which the last known act in the transaction was carried out.</p>
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		purpose of the AML Act.	
	Exercise of claims from contractual relationships after terminating the contract	The legal basis is our legitimate interest. We process in particular identification data, contact data, accounting data and information about provided services. After terminating the contract, these data are needed to handle claims, recover receivables and other obligations from the contracts concluded between us and our clients.	Personal data may be processed for this purpose for a period of 3 years from the end of the contractual relationship, and if administrative or court proceedings are commenced, then for the entire duration thereof.
	Distributing information, news and other commercial messages via e-mail messages	The legal basis is our legitimate interest. We process the identification and contact personal data. Processing takes place for the purpose of distributing commercial messages in accordance with Act No. 420/2004 Coll.	Personal data may be processed for this purpose for an indefinite term until the moment when the recipient unsubscribes.
Potential clients	Communication with potential clients via telephone, e-mail and other suitable means and records of negotiation outcomes	The legal basis is our legitimate interest. In particular, we process contact and identification data and information about the outcome of negotiations with these persons.	Personal data may be processed for this purpose for a period of an indefinite term (until application of the right to erasure).
	Administration of documentation from negotiations on the safekeeping of money,	The legal basis is fulfilment of legal obligations.	Personal data may be processed for this purpose for a period of 10 years from

	<p>securities or other property of the client or other services required by the client, consisting of the acts specified in Section 2(1)(g) of Act No. 253/2008 Coll., on selected measures against legitimisation of proceeds of crime and financing of terrorism (hereinafter referred to as the "AML Act") and the fulfilment of other obligations arising for us as the obliged party pursuant to the AML Act.</p>	<p>We process primarily identification data including all names and surnames, personal number, date of birth, place of birth, gender, permanent or other residence and state citizenship, type and number of identification document, issuing country or authority and its validity period; in the case of business entities, also the commercial name, registered office and identification number of the entity; furthermore, contact data, accounting data, account numbers, information about requested services and information needed to provide the requested legal services, information about related entities, information about politically exposed persons or application of international sanctions, information about the beneficial owners of legal entities entered in the public registry and trust funds entered in the registry of trust funds, and other necessary data. For the purposes of the AML Act, we are authorised to make</p>	<p>negotiations with the client, whereas this period starts on the first day of the following calendar year.</p>
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		copies or extracts from the presented documents and process this acquired data to fulfil the purpose of the AML Act.	
Third-parties in relation to our provided services	Fulfilment of contracts concluded with our clients	<p>The legal basis is our legitimate interest and fulfilment of legal obligations arising from regulations governing the performance of legal profession and the AML Act.</p> <p>We process in particular identification data, contact data and information related to our provided services. In the scope necessary to determine, exercise or defend the legal claims of the client, special categories of personal data may also be processed (in particular data concerning health or effective convictions).</p>	<p>Personal data may be processed for this purpose for a period of 5 years from the end of the contractual relationship with the client, and in the case of custody for a period of 10 years from the end of the contractual relationship. Personal data may be processed for the purpose of fulfilling the obligations pursuant to the AML Act for a period of 10 years from the date of the transaction or end of the business relationship with the client, whereas this period starts on the first day of the calendar year following the year in which the last known act in the transaction was carried out.</p>
Participants at seminars, conferences and similar events organised by us	Fulfilment of our obligations in accounting administration and taxes	<p>The legal basis is the fulfilment of legal obligations imposed by legal regulations, such as the Accounting Act or Act on Value Added Tax.</p>	<p>Personal data may be processed for this purpose for a period of up to 10 years from the end of the tax period in which the transaction was performed.</p>

		We process in particular identification data, contact data and other information provided in the tax documents.	
	Distributing information, news and other commercial messages via e-mail messages	The legal basis is our legitimate interest. We process the identification and contact personal data. Processing takes place for the purpose of distributing commercial messages in accordance with Act No. 420/2004 Coll.	Personal data may be processed for this purpose for a period of an indefinite term (until application of the right to erasure).
Persons subscribed to the newsletter and other commercial messages	Distributing information, news and other commercial messages via e-mail messages	The legal basis is consent in this case. We process the identification and contact personal data. Processing takes place for the purpose of distributing commercial messages in accordance with Act No. 420/2004 Coll.	Personal data may be processed for this purpose for an indefinite term until the moment when the recipient unsubscribes.
Journalists	Maintenance of the journalists' platform for publicising our legal analyses	The legal basis is our legitimate interest. In particular, we process the identification and contact data.	Personal data may be processed for this purpose for a period of an indefinite term (until application of the right to erasure).

2) Recipients of personal data and provision of personal data outside of the European Union

In justified cases, we may provide your personal data to other entities (hereinafter referred to as "recipients").

Personal data may be provided to the following recipients:

- processors who process your personal data based on our instructions and relations with whom are governed pursuant to the requirements of Art. 28, GDPR: The operators of the programs we use or providers of the services we use have access to your personal data - in particular Praetor Systems s.r.o. (information system for legal profession), Ecomail (e-mail marketing instrument), Company Culture Market (company presentation portal), FONTÁNA, s.r.o. (accounting administration);
- permanently cooperating lawyers during the provision of our legal services (an overview of our permanently cooperating lawyers can be found in the database of the Czech Bar Association: <http://vyhledavac.cak.cz/>);
- public authorities and other entities, if required by valid legal regulations;

In justified cases, we may provide your personal data to other entities (hereinafter referred to as “recipients”).

3) Cookies

Our websites (fbadvokati.cz, frankbold.legal, frankbold.legal/de, frankbold.legal/fr, prekompenzace.eu, nefinancnireporting.eu, novystavebnizakon.cz, mezinarodnirozvod.cz) may contain third-party cookies, which serve to obtain anonymous statistics about traffic and typical behaviour on the individual websites. These third parties generally do not store any personal data related to the use of cookies, because they do not know the identity of the page visitor. The cookies are as follows:

- Google Analytics – we use this service to obtain statistical information, whereas Google may keep the obtained data for its own purposes in accordance with the Principles of privacy protection available at <http://www.google.com/intl/cs/policies/privacy>;
- Tag Manager – Google set cookie files to analyse traffic on this website. Information about our use of our website is shared for this purpose with Google (<https://www.google.com/analytics/tag-manager/>; <https://policies.google.com/technologies/cookies?hl=cs>)
- Facebook Pixel – Java script code which allows us to measure, optimise and compile ranges of users for our communication (<https://www.facebook.com/business/help/952192354843755>)

4) Automated individual decision-making and profiling

When processing personal data, automated individual decision-making **does not** take place, even on the basis of profiling.

Automated individual decision-making incl. profiling generally refers to any form of decision-making based on the processing of personal data, i.e. without human intervention, consisting among other of the evaluation of certain personal aspects pertaining to the data subject, in particular to analyse or estimate, respectively analyse or foresee aspects concerning their work performance, economic

situation, health condition, personal preferences, interests, reliability, behaviour, location or movements.

5) Your rights as a data subject

You have the right to request **access to the personal data concerning you** from us, under the conditions stipulated in Art. 15, GDPR.

You have the right to **withdraw your consent** to processing of personal data, which are processed by us based on consent under the conditions stipulated in Art. 17, GDPR.

You have the right to request the **rectification of personal data** under the conditions stipulated in Art. 16, GDPR, **restrict personal data processing** under the conditions stipulated in Art. 18, GDPR, or **erasure of data** under the conditions stipulated in Art. 17, GDPR.

You have the right to **object to personal data processing** which pertains to you, based on Art. 21, GDPR.

You have the right to **data portability to another controller** under the conditions stipulated in Art. 20, GDPR.

You have the right **not to be the subject of any decisions based exclusively on automated processing, including profiling**, under the conditions stipulated in Art. 22, GDPR.

You have the right to **obtain information about breach of your personal data** under the conditions stipulated in Art. 34, GDPR.

If you believe that the processing of your personal data breaches the obligations stipulated in the GDPR, you have the right to **file a complaint with the supervisory authority** under the conditions stipulated in Art. 77, GDPR.

Office for Personal Data Protection

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Detailed information about your rights is available on the Office's website:
<https://www.uouu.cz/6-prava-subjektu-udaj/d-27276>.

These Principles of personal data protection are effective from 25 May 2018.