

IDENTIFICATION OF THE CONTROLLER AND GENERAL INFORMATION

This Privacy Policy (hereinafter referred to as the "*Policy*") contains information about the processing of your personal data by the business company **ProfiDeCon Slovakia s.r.o.**, with its registered office at Vajnorská 100/B, 831 04 Bratislava - Nové Mesto, ID No.: 52 447 316, registered in the Commercial Register of the Municipal Court Bratislava I, Section: Sro, Insert No. 137688/B (hereinafter referred to as the "*Controller*"), which occurs **in the course of the provision of legal services in the Slovak Republic** and the related activities of the Controller.

The Controller is an entity performing mainly the activity of providing legal services in accordance with Act No. 586/2003 Coll. on Advocacy (hereinafter referred to as the "*Advocacy Act*") as well as the related legal regulations governing the Controller's activities in the provision of legal services.

Through this Policy, the Controller provides you with information about:

- **why your personal data is processed,**
- **on what legal basis and for what purpose they are processed; and**
- **how long the Controller keeps them.**

The Controller processes your personal data in accordance with Regulation 2016/679 of the European Parliament and of the Council of the European Union on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as the "*Regulation*"), the relevant Slovak legislation, in particular Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Additions to Certain Acts (hereinafter referred to as the "*Act*") and other regulations on the protection of personal data (*the Regulation, the Act* and other regulations on the protection of personal data are hereinafter collectively referred to as the "*Personal Data Protection Regulations*").

You can contact the Controller in matters relating to the processing and protection of personal data in the provision of legal services at **ProfiDeCon Slovakia s.r.o., Vajnorská 100/B, 831 04 Bratislava - Nové Mesto district** or by e-mail to the following email address: [**info@profidecon.com**](mailto:info@profidecon.com)

The Controller obtains your personal data directly from you if you provide it to the Controller (e.g. as a client when concluding a contract). In some cases, the Controller obtains your personal data from sources other than you, for example from public authorities, publicly available sources or from other persons, in which case the source of your personal data is this entity. In some cases, if you do not provide your personal data to the Controller, the Controller would not be able to conclude a contract with you and fulfil its other legal and contractual obligations.

If you are not a client of the Controller, the Controller obtains your personal data mostly directly from its clients, from public sources or from public authorities (e.g. if you are a counterparty in proceedings). In this case, the Controller may also obtain your personal data against your will (and on the basis of the legal authorisation and obligation to practise law and provide legal services in accordance with the Law on Advocacy). It may thus be the case that the Controller obtains personal data from a person other than you directly, which is why this document provides information to all data subjects both within the meaning of Article 13 and Article 14 of the Regulation.

For general information on the processing of personal data, please refer to Privacy Policy. In these you will find information on:

- **your rights in relation to the processing of personal data,**
- **the transfer of personal data and**
- **profiling and/or automated decision-making.**

THE PURPOSES, LEGAL BASIS FOR PROCESSING AND RETENTION PERIOD

The Controller processes your personal data exclusively **in accordance with the principle of minimisation**, which means that the Controller does not request personal data from you that are not necessary for the specific and justified purpose of the processing. The Controller processes personal data only if there is a legal basis for

processing it, and therefore it is processed in accordance with the principle of lawfulness. The specific purposes, including the legal basis and the retention period, for which the Controller processes your personal data can be found in the table below.

The retention period of personal data is determined in accordance with the relevant legal regulations and taking into account the recommended retention periods set out in the Resolution of the Presidium of the Slovak Bar Association No. 29/11/2011 on the recommended method of keeping the case file. For example, that resolution sets the recommended retention period for the register of mail received and sent at 10 years from the date of receipt or dispatch of the last item.

As the Controller is subject to the Advocacy Act and related legislation, in some cases is not possible to delete personal data even after the retention period has expired. For example, it is not possible to delete a client file directory or a client file containing original documents that have been handed over to the Controller by a client.

THE PRACTICE OF ADVOCACY	
Purpose of processing	<ul style="list-style-type: none"> • Preparation of an offer of legal services at the client's request, • concluding and executing legal services contracts with clients, • representing clients in proceedings before courts, public authorities and other entities, • criminal defence, • providing legal advice to clients, • drafting legal opinions and analyses • drafting of deeds, • communication with clients and other individuals regarding the practice of law or the contractual relationship with the client, • searching for evidence in favour of the client, • establishing the identity of the persons concerned, by means of witnesses, statements or other documentary evidence
Legal basis	Art. 6(1)(c) of the Regulation - the <i>processing of personal data is carried out in the performance of a legal obligation</i>
Categories of personal data	Ordinary personal data and special categories of personal data necessary for the exercise of the profession
Retention period	During the provision of legal services in accordance with Act No. 586/2003 Coll. on Advocacy, the Advocate's Rules of Procedure and Resolution of the SAK Bureau No. 29/11/2011 on the recommended method of maintaining the case file
Purpose of processing	<ul style="list-style-type: none"> • Records of time, actions and advice given to the client, • management of the attorney's file, including administrative activities related to the provision of legal and other services
Legal basis	Art. 6(1)(c) of the Regulation - the <i>processing of personal data is carried out in the performance of a legal obligation</i>
Categories of personal data	Common personal data
Retention period	During the provision of legal services in accordance with Act No. 586/2003 Coll. on Advocacy, the Advocate's Rules of Procedure and Resolution of the SAK Bureau No. 29/11/2011 on the recommended method of maintaining the case file
Purpose of processing	Compliance with the obligations for the registration of trainee lawyers
Legal basis	Art. 6(1)(c) of the Regulation - the <i>processing of personal data is carried out in the performance of a legal obligation</i>
Categories of personal data	Common personal data
Retention period	During the provision of legal services and in accordance with Act No. 586/2003 Coll. on Advocacy, the Advocate's Rules of Procedure and Resolution of the SAK Bureau No. 29/11/2011 on the recommended method of keeping the case file
INTERNAL AGENDA	

Purpose of processing	Registration of representatives (contact persons) of suppliers, customers and other business partners as legal persons, business communication with representatives of business partners and fulfilment of other contractual obligations in contracts concluded with legal persons
Legal basis	Art. 6(1)(f) of the Regulation - <i>the processing of personal data is carried out on the basis of the legitimate interest of the Controller, which is the interest in the performance of a contract concluded with a legal person, for whom a specific natural person always communicates and acts, without the processing of personal data of which the performance of contractual obligations towards the legal person would not be possible (including the registration of these persons and their contact details)</i>
Categories of personal data	Common personal data (first name, last name, contact details - phone number, email address, bank connection, affiliation to the company of the business partner), details of the contractual relationship - scope of services provided, etc.
Retention period	During the contractual relationship and after its termination until the expiration of the relevant limitation periods (for the purpose of enforcing legal claims arising from concluded contracts) or until the termination of the status of the natural person as an agent or contact person of the partner - legal entity
Purpose of processing	Processing of accounting documents
Legal basis	Art. 6(1)(c) of the Regulation - <i>necessary for the fulfilment of the legal obligations of the Controller.</i>
Categories of personal data	Name, surname, address, place of residence/place of business, contact details, bank details, details of purchases made and other details shown on accounting documents.
Retention period	Your personal data will be processed for this purpose for a period of 10 years following the year to which it relates
Purpose of processing	Handling of exercised rights of data subjects
Legal basis	Art. 6(1)(c) of the Regulation - <i>the processing of personal data is carried out in the performance of a legal obligation</i>
Categories of personal data	Common personal data included in the application
Retention period	Pending the settlement of the rights exercised
Purpose of processing	Records of the rights of data subjects exercised and the manner in which those rights have been exercised
Legal basis	Art. 6(1)(f) of the Regulation - <i>processing of personal data on the basis of the legitimate interest of the Data Controller, which is the need to record the exercised rights of data subjects for the purpose of demonstrating compliance with the obligations arising from the relevant legislation in the field of personal data protection</i>
Categories of personal data	Common personal data included in the application
Retention period	5 years from the date of the processing of the right exercised or other request made
Retention period	Pending the settlement of the rights exercised
Legal basis	Art. 6(1)(a) of the Regulation - the processing of personal data is carried out on the basis of the data subject's consent
Categories of personal data	Identification data of the specific legal entity within the scope of the business name, other data specified in the reference
Retention period	3 years from the date of consent or until it is revoked, whichever is the earlier

CODE FOR THE PROCESSING OF PERSONAL DATA

The Slovak Bar Association, as a professional organization of attorneys in the Slovak Republic, has developed a Code of Conduct for the processing of personal data by attorneys (hereinafter referred to as **the "Code of Conduct"**), which applies to all attorneys registered in the list of attorneys maintained by the Slovak Bar Association, and thus also to the Controller. The Code of Conduct aims, in particular, to promote the relationship between the attorney and his/her client, as well as to increase and strengthen the transparency of the Controller in the processing of personal data in the provision of legal services by the Controller. The

Controller is bound by this Code of Conduct in its entirety. The text of the Code of Conduct can be found on the website of the Slovak Bar Association: <https://www.sak.sk/web/sk/cms/document/224>.

WHO DOES THE CONTROLLER PROVIDE YOUR PERSONAL DATA TO?

Your personal data may be disclosed to recipients, in particular to public authorities that are authorised to process your personal data in their capacity as independent controllers and as third parties - in particular to the tax administrator, the Data Protection Authority, the courts, law enforcement authorities or the relevant municipality.

The Controller also provides your personal data to its **processors**, i.e. external entities that process your personal data on behalf of the Controller. The processors process personal data on the basis of a contract concluded with the Controller, in which they undertake to take appropriate technical and security measures in order to process your personal data securely. Processors of the Controller include **employees of the Controller**.

SECURITY OF PERSONAL DATA PROCESSING

In connection with the security of personal data, the Controller has adopted the relevant internal documentation specifying the appropriate security measures adopted by the Controller for the purpose of securing your personal data.

The security measures taken are in line with standard information security. At the same time, we also take measures to ensure that personal data is also secured at an organisational and personnel level, for which we have adopted internal processes and procedures.

VALIDITY

This information on the processing of your personal data contained in this document is valid and effective from 01.05.2025. As it may be required to update the information on the processing of personal data contained in this Policy in the future, the Controller is entitled to update this Policy at any time. However, in such a case, the Controller will notify you of this in an appropriate manner in advance.