

Privacy Notice

KPLI Kelemen Kinga Law Firm (Address: 1124 Budapest, Lejtő út 6.) as Data Controller (hereinafter: the „Data Controller”) acknowledges that it is bound by the provisions of this Privacy Notice in relation to the processing of data in connection with this website (the „Website”) and email inquiries, and shall act in accordance with the provisions of this Privacy Notice. Data Controller undertakes to process Personal Data in accordance with the applicable legislation, in particular the following regulations: Act LXXVIII of 2017 on Legal Practice, 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 („GDPR”) and Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

1. Definitions

The terms of this Privacy Notice have the following meaning:

- 1.1. ‘Data processing’ shall mean any operation or set of operations which is performed by a Data Processor on behalf of, or as instructed by, the Data Controller.
- 1.2. ‘Data Processor’ shall mean a natural or legal person or unincorporated organization that is engaged in processing operations within the framework of and under the conditions set out by law or binding legislation of the European Union, acting on the controller’s behalf or following the controller’s instructions.
- 1.3. ‘Processing of data’ shall mean any operation or set of operations that is performed upon data, whether or not by automatic means, especially (but not exclusively) collection, recording, organization, storage, adaptation or alteration, use, retrieval, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction, and blocking them from further use, photographing, sound and video recording, and the recording of physical attributes for identification purposes (such as fingerprints and palm prints, DNA samples and retinal images) available, alignment or combination, restriction, erasure or destruction.
- 1.4. ‘Data Controller’ shall mean the natural or legal person, or unincorporated body which alone or jointly with others determines the purposes of the processing of data within the framework of law or binding legislation of the European Union, makes decisions regarding data processing (including the means) and implements such decisions itself or engages a Data Processor to execute them (Section 3 point 9 of Info Act); (for the purposes of this Privacy Notice, the Data Controller means the Law Office, the Head of the Office and the employees of the Office).
- 1.5. ‘Data transmission’ shall mean making data available to a specific third party (Section 3 point 11 of Info Act).
- 1.6. ‘You’ / ‘Data Subject’ shall mean any natural person identified or identifiable, directly or indirectly, on the basis of specific Personal Data.
- 1.7. ‘Third party’ shall mean any natural or legal person or unincorporated organization other than You, the Data Controller, the Data Processor and persons who, under the direct authority of the Data Controller or Data Processor, are authorized to process Personal Data.

1.8. 'Personal Data breach' shall mean a breach of data security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

1.9. Consent shall mean the voluntary and explicit expression of the data subject's will, based on adequate information and giving his or her unambiguous consent to the processing of Personal Data concerning him or her, in full or in part.

1.10. Personal Data: your name, email address and phone number.

2. Basic principles of data processing

2.1 In the course of processing Personal Data, the Data Controller shall act exclusively for defined, unambiguous and lawful purposes, in the interest of exercising rights or satisfying obligations, always duly considering and observing these basic principles.

2.2. The Data Controller shall ensure that Data Processing within each of its phases will be executed in accordance with its purpose, and from the aspect of further data processing purposes will be appropriate, relevant and not exaggerated.

2.3 The Data Controller shall process only those Personal Data that are indispensable for the purpose of Data Processing and are apt for achieving the Data Processing purposes. The Data Controller processes Personal Data to the extent and for the period necessary for the achievement of the purposes. Personal Data are stored in a form that enables your identification for a period necessary for the achievement of the purposes of collecting or further processing Personal Data.

3. Purpose and legal ground of Data Processing

3.1. In the case of email inquiries initiated by You, the purpose of the processing performed by the Data Controller is the processing of data shown in your email, furthermore the execution of the eventual lawyer assignment. The Data Controller may not use Personal Data for purposes other than those stipulated in this Privacy Notice.

In the case of email inquiries, the Data Controller may process your Personal Data shown in the email until the finalisation of the case indicated in such inquiry.

3.2. On the legal ground of data processing performed by the Data Controller. Data Processing takes place on the basis of your voluntary and explicit Consent based on adequate information [GDPR Article 6 paragraph (1) point a)]. On the basis of your consent You expressly agree that Personal Data given by You or Personal Data generated about You would be utilised in the course of using the Website.

Furthermore, the Data Controller processes your Personal Data to the extent necessary for compliance with its legal obligations [GDPR Article 6 paragraph (1) point c)].

3.3. In the case of contacting the Data Controller via email or via any other ways, the processing of Personal Data given by You is based on your voluntary consent and on contractual or legal obligations.

3.4. The Data Processor will be entitled to capture your IP address when you clicked on the Website, in order to enforce the lawful interests of the Data Controller without your specific consent.

3.5. In the interest of providing tailored services, the Data Controller's Website may use anonym data subject identifiers, i.e. so-called cookies. Cookies are small blocks of data apt for individual identification and for storing profile information; they are loaded by service providers on your computer, therefore when you visit the same website again, such website may retrieve data stored in

the cookies and gain information about your further activities (e.g. your settings could be stored, etc.). These blocks of data as such are suitable only for recognising your computer but are unsuitable for individually identifying You. You are able to delete cookies from your own computer or you can set your browser to block the application of cookies. By way of blocking the application of cookies You acknowledge that in the absence of cookies the operation of the given site is not fully-fledged.

4. Duration of the Data Processing

In that case when a power of attorney comes into force your data can be processed by the Data Controller for five years counted from the expiry of the assignment, or if a deed had to be countersigned for ten years counted from the countersignature, or in the case of registering right related to the real estate property in a public register for ten years counted from the registration of such right. [Act LXXVIII of 2017 on Legal Practice, Section 53, point (3)]. In the case when a Deed would be countersigned, the Data Controller will retain the deed countersigned by it or any other deeds created in a case involving the countersignature of the deed for a period of ten years counted from the countersignature, provided that the legal rule or the agreement made between the parties does not stipulate longer retention period. [Act LXXVIII of 2017 on Legal Practice, Section 53, point (3)]

5. Possibility of Data transmission

The Data Controller will be entitled to transmit each Personal Data which were made available for and orderly retained by it, to the competent authority, courts of justice or third parties, in accordance with the provisions stipulated by the legal rules and to the extent corresponding to the purpose of data processing.

6. Your rights concerning processing of data

- **Rights ensured during processing of data:** According to applicable Hungarian and EU data protection rules, in the course of data processing You are entitled to request (i) access to your Personal Data; (ii) rectification of your Personal Data; (iii) erasure of your Personal Data; (iv) restriction of the processing of Personal Data; and (v) object to the processing of your Personal Data.
- You are entitled to receive confirmation / feedback whether or not the processing of your Personal Data is in progress and if such Data Processing is in progress you are entitled to access your Personal Data. You are entitled to get access to the following information: purpose of Data Processing, categories of the processed Personal Data, and those addressees or the categories of those addressees to whom or to which Personal Data have been or will be communicated. (GDPR Article 15).
- You are entitled to request the rectification of your inaccurate Personal Data or the supplementation of incomplete Personal Data (GDPR Article 16)
- You are entitled to request the erasure of your Personal Data and the Data Controller is obliged to erase such data (GDPR Article 17).
- You are entitled to request the restriction of the processing of your Personal Data. In such case the processing of such data could be restricted in respect of certain purposes (GDPR Article 18)
- You are entitled to object to the processing of your Personal Data; in such case the Data Controller may not process such data further on (GDPR Article 21).
- In connection with data processing you may **at any time submit comments or complaints** to the Data Controller through the contact details provided (email address info@kpli.hu, or postal address 1124 Budapest, Lejtő út 6). In addition, against the Data Processing complained You are entitled to start court proceeding at the court of your residence or stay and such proceeding is duty free and your case would be given priority. In addition to the above you

may submit your complaint to the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa u. 9-11. telephone: +36 1 391 1400)

- Your data may be stored exclusively on servers to be found within the EU. However, if data would be transferred to a third country outside the EU, which according to the decrees of the EU does not qualify as a safe third country, then such data transfer should be conditional upon your consent and comply with the legal rules.

The Data Controller implemented appropriate organisational and safety measures into its own data processing and into the transfer of data, in order to provide your data with appropriate protection against access by unauthorised persons.