

Purpose of processing	The legal basis of processing and source of data	Scope of data processed	Data retention period
<p>Handling requests and inquires received by the Law Firms</p> <p>It is highlighted that regarding the performance of the mandate contract and the steps taken at the request of the data subject prior to entering into the contract, more information can be found under the purpose “<i>Provision of legal services</i>”.</p>	<p>In case of requests and inquires sent by a natural person: Art. 6 (1) a) of the GDPR (the voluntary consent of the data subject).</p> <p>The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p> <p>In the absence of the consent of the data subject, inquiries and questions cannot be decided upon or answered.</p> <p>In case of requests and inquires sent by a legal person or other organization (concerning contact persons): in accordance with Art. 6 (1) f) of the GDPR, the legitimate interest of the Law Firms and the legal person or other organization submitting the request/inquiry. The legitimate interest: efficient handling of requests and inquiries.</p> <p>The source of data: the person submitting the request/inquiry.</p>	<p>Personal data affected by requests and inquiries submitted to the Law Firms, in case of legal persons or other organizations contacting the Law Firms, the contact details of the contact persons (in particular: name, address, e-mail address, telephone number - if provided by the data subject, position, name of the organization represented), other personal data and the action taken on the request/inquiry.</p>	<p>In case of natural persons, until the withdrawal of the data subject's consent, in the absence thereof, and in case of a legal person or other organization, 5 years calculated from the response to the request (Art. 6:22 (1) of the Hungarian Civil Code – unless the Hungarian Civil Code otherwise provides, claim expire in 5 years).</p>
<p>Identification of the clients of the Law Firms (mandatory client screening)</p>	<p>Art. 6 (1) c) of the GDPR (processing is necessary for compliance with legal obligations to which the Law Firms as data</p>	<p>In case of a natural person: surname and first name, surname and first name at birth, citizenship, place and date of</p>	<p>Pursuant to Art. 56 and 57 of the Money Laundering Act, the Law Firms are entitled to process the personal data obtained in the course of fulfilling the client due diligence</p>

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	<p>controllers are subject). With regard to the above, the provision of personal data is mandatory in accordance with the following legal obligations, without these, client identification would not be possible.</p> <p>The legal obligations: according to Art. 6 (1) of the Money Laundering Act, the Law Firms are required to conduct client identification. With regard to Art. 7 (1) of the Money Laundering Act, the Law Firms are required to identify the client, its proxy, the person entitled to make decisions, as well as its representative and to verify its identity</p> <p>Pursuant to Art. 7 (8) of the Money Laundering Act, the Law Firms shall make a copy of the documents presented with the exception of the address card's page containing the personal number.</p> <p>Pursuant to Art. 11 (1) of the Money Laundering Act, the Law Firms are required to continuously monitor the business relationship.</p> <p>Pursuant to Art. 12 (1) of the Money Laundering Act, Law Firms are required to ensure that available data and documents regarding the client and the</p>	<p>birth, mother's maiden name, address or in its absence, place of residence, type and number of identification document.</p> <p>In case of a legal person or other organization: the name and position of the persons entitled to represent the legal person/organization, the data suitable for the identification of the delivery agent of the legal person/organization.</p> <p>The Law Firms may request the following data from the personal data and address register, the driver's license register, the travel document register and the central immigration register electronically:</p> <ul style="list-style-type: none"> a) natural identity data, b) citizenship, statelessness, refugee, immigrant, established or EEA citizen status, c) address, d) portrait, e) signature, f) facts pursuant to Art. 18 (5) of the Act LXVI of 1992 on the Registration of Personal Data and Address of Citizens, g) data pursuant to Art. 24 (1) f) of Act XII of 1998 on Travelling Abroad and the expiry date of the document, h) data pursuant to Art. 8 (1) b) sub-points ba)-bb) of Act LXXXIV 	<p>obligation for 8 years from the termination of the business relationship or the execution of the transaction mandate, and to delete or destroy such data immediately after the retention period expires.</p>

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	<p>business relationship are kept up to date.</p> <p>Pursuant to Art. 32 (1) of the Act on Attorneys, the Law Firms identify the client before entering into the respective mandate contract. Pursuant to Art. 32 (2), Law Firms identify a natural person by viewing his or her personal identification document.</p> <p>Pursuant to Art. 32 (1) of the Act on Attorneys, the Law Firms may request the following data electronically from the personal data and address register, the driver's license register, the travel document register and the central immigration register in order to verify the correspondence of the natural person's data with the registered data and the validity of the documents presented by him/her:</p> <ul style="list-style-type: none"> a) natural identity data, b) citizenship, statelessness, refugee, immigrant, established or EEA citizen status, c) address, d) portrait, e) signature, f) facts pursuant to Art. 18 (5) of the Act LXVI of 1992 on the Registration of Personal Data and Address of Citizens, g) data pursuant to Art. 24 (1) f) of Act XII of 1998 on Travelling 	<p>of 1999 on Public Transport Registration,</p> <p>i) data pursuant to Art 76 d) and Art. 80 (1) b) and c) of Act I of 2007 on the Entry and Residence of Persons with the Right of Free Movement and Residence, as well as to Art. 95 (1) g), 96 (1) g) and Art. 100 (1) b) and c).</p>	

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	<p>Abroad and the expiry date of the document, h) data pursuant to Art. 8 (1) b) sub-points ba)-bb) of Act LXXXIV of 1999 on Public Transport Registration, i) data pursuant to Art 76 d) and Art. 80 (1) b) and c) of Act I of 2007 on the Entry and Residence of Persons with the Right of Free Movement and Residence, as well as to Art. 95 (1) g), 96 (1) g) and Art. 100 (1) b) and c).</p> <p>The source of data: the client and the person acting in the client's name.</p>		
<p>Verification of the identity of the clients of the Law Firms on the basis of the presentation of the documents indicated in the Money Laundering Act</p>	<p>Art. 6 (1) c) of the GDPR (processing is necessary for compliance with legal obligations to which the Law Firms as data controllers are subject). In view of this, the provision of personal data is mandatory in view of the following legal obligations, without which identity verification would not be possible.</p> <p>The legal obligations: pursuant to Art. 7 (3), (5)-(6) of the Money Laundering Act, Law Firms are required to present certain documents in order to verify the client's identity and to check their validity. In addition, the Law Firms are obliged to check the validity of the authorization in the case of a</p>	<p>In case of a natural person: in case of a Hungarian citizen, an official identity card and an official residence document certifying the address, in case of a foreign citizen, a travel document or an identity card, provided that it entitles him/her to reside in Hungary, a document certifying the right of residence or a document authorizing residence.</p> <p>In case of a legal person or other organization without a legal entity: in case of a Hungarian citizen acting in its name or on its mandate, an official identity card and an official residence document certifying the address, in case of a foreign</p>	<p>Pursuant to Art. 56 and 57 of the Money Laundering Act, the Law Firms are entitled to process the personal data obtained in the course of fulfilling the client due diligence obligation for 8 years from the termination of the business relationship or the execution of the transaction mandate, and to delete or destroy such data immediately after the retention period expires.</p>

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	<p>proxy, the right to decide of the person entitled to make the decision and the right of the representative to act.</p> <p>Pursuant to Art. 7 (8) of the Money Laundering Act, the Law Firms shall make a copy of the documents presented with the exception of the address card's page containing the personal number.</p> <p>Pursuant to Art. 11 (1) of the Money Laundering Act, the Law Firms are required to continuously monitor the business relationship.</p> <p>Pursuant to Art. 12 (1) of the Money Laundering Act, Law Firms are required to ensure that available data and documents regarding the client and the business relationship are kept up to date.</p> <p>The source of data: the client and the person acting in the client's name.</p>	<p>citizen, a travel document or an identity card, provided that it entitles him/her to reside in Hungary, a document certifying the right of residence or a document authorizing residence, in case of a proxy, the validity of the authorization, in case of a person with entitled to make the decision, such right, as well as the right of the representative to act.</p>	
<p>Identification of the beneficial owner of the client of the Law Firms as defined in the Money Laundering Act</p>	<p>Art. 6 (1) c) of the GDPR (processing is necessary for compliance with legal obligations to which the Law Firms as data controllers are subject). Bearing this in mind, the provision of personal data is mandatory in view of the following legal</p>	<p>Family name and given name, as well as family name and given name at birth of the beneficial owner, his/her nationality, place and date of birth, address or, in its absence, place of residence; motion picture and sound recording of the natural person</p>	<p>Pursuant to Art. 56 and 57 of the Money Laundering Act, the Law Firms are entitled to process the personal data obtained in the course of fulfilling the client due diligence obligation for 8 years from the termination of the business relationship or the execution of the transaction mandate, and to delete or destroy such data immediately after the</p>

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	<p>obligations, without which the identification of the beneficial owner would not be possible.</p> <p>The legal obligations: pursuant to Art. 8 (1), 13 (1) and 9 (1) of the Money Laundering Act, the Law Firms are obliged to request a statement from the natural person client or the client's representative, in case of a legal person or other organization client during the client screening (in person or by electronic means previously examined (audited) by the Law Firms) in order to review, whether such person acts in the name or in the benefit of the beneficial owner.</p> <p>Pursuant to 8 (4) and 9 (3) of the Money Laundering Act, the Law Firms require the client to make a repeated statement if there is any doubt as to the identity of the beneficial owner.</p> <p>Pursuant to 7 (8) of the Money Laundering Act, the Law Firms shall make a copy of the documents presented with the exception of the address card's page containing the personal number. In accordance with Art. 7 (10) of the Money Laundering Act, this identification may also be performed via an electronic communications network.</p>	<p>during the identification of a natural person via an electronic communications network.</p> <p>In addition to this information, the Law Firms are also obliged to ask the client to make a statement as to whether the beneficial owner qualifies as a key public figure.</p> <p>If the beneficial owner is a key public figure, the statement must include, under which point of Art. 4 (2) of the Money Laundering Act is considered as public figure (e.g. head of state, head of government, secretary of state, etc.)</p>	<p>retention period expires.</p>

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	<p>Pursuant to Art. 11 (1) of the Money Laundering Act, the Law Firms are required to continuously monitor the business relationship.</p> <p>Pursuant to Art. 12 (1) of the Money Laundering Act, Law Firms are required to ensure that available data and documents regarding the client and the business relationship are kept up to date.</p> <p>The source of data: the client and the person acting in the client's name.</p>		
<p>Provision of legal services</p> <p>Preparation (including pre-contractual steps) and fulfillment of the mandate contract with clients, fulfillment of related legal obligations, which includes contact with clients, representation of clients and invoicing to clients, as well as document processing and electronic administration; in addition, the performance of judicial tasks.</p> <p>Pursuant to Art. 42 (1) of the Act on Attorneys, the attorney may draft a document about the client's legal statement and with regard to Art. 43 (1) of the Act on Attorneys, the</p>	<p>In case of natural person clients: Art. 6 (1) b) of the GDPR (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract). In view of this, the provision of personal data is necessary for the preparation and performance of the contract for legal services, without which the contract cannot be drawn up and performed.</p> <p>In case of legal person or other organization clients: pursuant to Art. 6 (1) f) of the GDPR, the legitimate interest of the Law Firms and the clients regarded as</p>	<p>All information necessary for the performance of the given mandate and the related legal services. For example: details of founders / members and executive officers in company proceedings, details of owners and other right holders in real estate proceedings, data of defendants, plaintiffs, opposing parties and other parties of interest in legal disputes, court or official proceedings at authorities, data of employers and employees in labor law matters. Motion picture or sound recording made through electronic communications network of a natural person previously identified via an electronic</p>	<p>5 years calculated from the termination of the given business relationship or performance of the given transaction and in case when no mandate has been assigned (pre-contractual steps taken at the request of the data subjects), from the last contractual communication (Art. 6:22 (1) of the Hungarian Civil Code – unless the Hungarian Civil Code otherwise provides, claim expire in 5 years).</p> <p>The data supporting the tax documents are processed by the Law Firms for 5 years from the last day of the calendar year in which the tax should have been declared or reported, or in its absence, paid (Art. 78 (3) and 202 (1) of Act on Rules of Taxation).</p>

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<p>attorney may countersign a document edited by him/her and edited and professionally approved by another person (for example: his/her deputy) specified in the Act on Attorneys.</p> <p>Additional relevant laws: Regulation Nr. 11/2017. (XI. 20.) of the Hungarian Bar Association on electronic administration and document drafting ("Bar Association Regulation").</p>	<p>legal persons or other organizations. The legitimate interest: providing legal representation, processing personal data required for the performance of the mandate contract between the client and the Law Firms, and processing personal data provided during the negotiations prior to the conclusion of the mandate contract.</p> <p>In case of processing special categories of personal data (including health data): Art. 9 (2) f) of the GDPR (processing is necessary for the establishment, exercise or defence of legal claims), as well as the relevant legal basis under Art. 6 of the GDPR.</p> <p>With regard to the judicial tasks of the Law Firms and the acting lawyer: Art. 6 (1) e) of the GDPR (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller). This may include, for example, acting as public defendant.</p> <p>Processing of personal data relating to criminal convictions and offences: Art. 10 of the GDPR (the processing is permitted by</p>	<p>communications network in case of signing a document or acknowledging a signature as the signer's own.</p> <p>Data necessarily processed concerning information on data protection and the acknowledgement of such information (including especially and as necessary: the name, place and date of birth of the data subject, mother's maiden name, gaining information on the privacy notice, its form, as well as the acknowledgement of the information).</p> <p>If the attorney finds that there has been a change in the data, he/she must record the changed data, indicating the date of the inspection, in such a way that the data previously recorded remain accessible.</p> <p>Some specific legal provisions set out further details on the activities of attorneys in which personal data are processed.</p> <p>Including especially the following:</p> <p>Act CXXX of 2016 on the Civil Procedure ("Act on Civil Procedure").</p> <p>Act XIX of 1998 on Criminal</p>	<p>In case of accounting documents: the data retention period is 8 years (Art. 168-169 of the Accounting Act).</p> <p>Documents are further retained by the Law Firms with respect to data retention periods prescribed by the Regulation of the Hungarian Bar Association Nr. 16/2018 (XI. 26.) on the order of retaining documents concerning legal services, however, the Law Firms may specify a longer retention period in the mandate contract for legal services concluded with the principal (client). The above regulation is accessible at https://magyarugyvedikamara.hu/tart/farticle/18/73/1</p> <p>Abstract information on the retention periods included in the above regulations, unless otherwise provided by other provisions of law:</p> <p>"3.1. The last will drafted by the attorney and other document including a legal declaration concerning the hereditary legal relationship, as well as other documents managed by the exerciser of attorney's activities shall be retained for 5 years a decision for the total transfer of the deceased person's estate.</p> <p>3.2. In cases where the document is not countersigned, the document attached to the application for registration and change of data submitted by the attorney shall be kept for ten years from the submission of the application.</p> <p>3.3. From documents created or used in criminal proceedings, civil litigation, administrative or other public proceedings:</p>

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	<p>Union or Member State law providing adequate guarantees regarding the rights and freedoms of the data subject (e.g. Act on Attorneys, the previous or the new Hungarian Criminal Procedure Code)), as well as Hungarian legal provisions enabling or prescribing the processing of the relevant data pursuant to Art. 5 (2) and (7) of the Privacy Act.</p> <p>Data processing related to information provided on data processing and its acknowledgment: Art. 6 (1) c) of the GDPR (processing is necessary for compliance with legal obligations to which the Law Firms as data controllers are subject), Art. 13-14 of the GDPR. In view of this, the processing of personal data is necessary for providing information on data protection and the review of the data subject's acknowledgment.</p> <p>Compliance with other legal obligations prescribed by the Act on Attorneys: Art. 6 (1) c) of the GDPR (processing is necessary for compliance with legal obligations to which the Law Firms as data controllers are subject), pursuant to Art. 28 (3) of the Act on Attorneys, the attorney is entitled and obliged to perform all activities that involve the</p>	<p>Procedure (“Previous Act on Criminal Procedure”) and as of 1 July 2018, Act XC of 2017 on Criminal Procedure (“New Act on Criminal Procedure”).</p> <p>Act V of 2006 on Company Disclosure, Court Proceedings and Voluntary Liquidation (“Company Act”).</p>	<p>a) the decision made in the merits of the case, 5 years from the final decision or termination of the case, b) a document handled in connection with the proceedings which is not in the possession of the competent court, authority or other public authority, 5 years the final decision or termination of the case, c) document not specified by points a)-b) above, 1 year the final decision or termination of the case, 3.4. The document deposited at an attorney shall be kept until the termination of the deposit agreement. 3.5. In case of the following documents signed by the attorney: a) mandate contract – until the rights arising therefrom expire, b) the deposit contract shall be retained for 10 years after its termination. 3.6. The register kept by the legal practitioner in accordance with the relevant provision of law shall be kept until the deadline for the processing of all data forming part of the register has expired. 3.7. The document not specified under points 3.1.-3.6. – unless a longer retention period is required by law or the contract concluded with the client – 1 year calculated from its creation by the legal practitioner, as well as its receipt by the legal practitioner. 3.8. The legal practitioner may keep the document even after the retention period specified by law, the relevant regulation or an agreement concluded with the client, if the document can be used as an evidence in the relevant procedure for enforcement related to</p>

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	<p>proper performance of the case entrusted to him/her.</p> <p>In addition, pursuant to Art. 32 (1)-(4) of the Act on Attorneys, before concluding the mandate contract, the attorney identifies the client or the person acting on behalf of the client, which may be done by viewing an identification document.</p> <p>The Act on Attorneys contains further detailed rules regarding the identification of clients, for example, prior to drafting or countersigning documents and in the procedure for registration in a public register. Based on the legal basis of fulfillment of a legal obligation (Art. 44 (2) of the Act on Attorneys), the Law Firms allow the signing of a document or the recognition of a signature as the signer's own, for example, when countersigning via an electronic communications network (remote scheduling).</p> <p>In view of the above, the fulfillment of the obligations regarding the fulfillment of the above mandate and identification is essential, without them it would not be possible to accept and fulfill the mandate and to identify the principals and persons acting in their name.</p>		<p>the legal relationship serving as a basis for its retention.</p> <p>3.9. The legal practitioner can hand over/transfer the document under point 3.3. or point 3.7. before the expiry of the retention period to the person having a right to decide over attorney's confidentiality."</p>

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	<p>The source of data: the client or the person acting in the client's name, with regard to the circumstances of the case, registers available public or to attorneys, legal representatives (e.g. company register, real estate register), in the given case, other elements publicly accessible (e.g. an article published on a news portal concerning a legal dispute regarding correction of a press statement or unlawful publication of personal data).</p>		
<p>Electronic document sharing and document management through the Tresorit application</p>	<p>Pursuant to Art. 6 (1) f) of the GDPR, the legitimate interest of the Law Firms and the clients. The legitimate interest: document sharing and document management through the Tresorit application for performing the mandate contract for legal services, as well as the easier management of the concerning administration and electronic documents.</p> <p>The source of data: the client and the person acting in the client's name.</p>	<p>Personal data and relevant documents (e.g. contracts) provided by the customer (principal) through the Tresorit application.</p>	<p>The period necessitated by the performance of the relevant mandate contract.</p>
<p>Keeping a record of natural persons in order to facilitate the security of legal transactions and to enforce the restrictions</p>	<p>Art. 6 (1) c) of the GDPR (processing is necessary for compliance with legal obligations to which the Law Firms as data</p>	<p>In case of natural persons, data specified by Art. 33 (2) of the Act on Attorneys (natural identification data, address,</p>	<p>In accordance with Art. 33 (7) of the Act on Attorneys, the attorney retains the relevant data as specified by Art. 56 and 57 of the Money Laundering Act (8 years from the</p>

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<p>on the activity of the attorney</p>	<p>controllers are subject). With regard to the above, the processing of personal data is mandatory in accordance with provision of registration obligation specified below, since in its absence, the Law Firms would be unable to perform the relevant legal obligation.</p> <p>The legal obligations: in accordance with Art. 33 (2)-(4) of the Act on Attorneys, the attorney holds a record about natural persons, including data specified by Art. 33 (2) of the Act on Attorneys, in case of natural persons (e.g. natural identification data, address, type and number of identification document, etc.) and in case of legal persons the personal identification documents of the natural person acting in the legal person's name.</p> <p>The source of data: the client and the person acting in the client's name.</p>	<p>citizenship, statelessness, refugee, immigrant, established or EEA citizen status, the type and number of identification document used for identification, the identification number of the response specified by Art. 32 (3) to a data provision request (to verify the consistency of the data of the natural person with the registered data and the validity of the documents presented by him), case identifier of cases in which the identification of a natural person is mandatory, as well as the data specified by the act on the prevention and combating of money laundering and terrorist financing.</p> <p>In case of a legal person, the natural identification data of the person acting on its behalf.</p>	<p>termination of the business relationship or the execution of the transaction mandate).</p>
<p>Keeping case records, converting paper-based documents into electronic document form</p>	<p>Art. 6 (1) c) of the GDPR (processing is necessary for compliance with a legal obligation to which the Law Firms as data controllers are subject). In view of the above, the processing of the relevant personal data is essential for the fulfillment of the obligation to keep the records</p>	<p>The case identifier created by the attorney, the name of the client, the subject of the case, the date of the conclusion of the mandate contract and the court proceedings related to the case, the relevant registration number and case/procedure numbers.</p>	<p>In accordance with Art. 53 (3) of the Act on Attorneys, the attorney retains such data for 5 years after the termination of the mandate and in case of countersigning a document, 10 years from countersigning the document, whereas in cases involving the registration of rights regarding a real estate in a public register, 10 years calculated from the</p>

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	<p>specified in this part, as well as for the conversion of paper-based documents into electronic documents, otherwise the Law Firms would not be able to fulfill such legal obligation.</p> <p>The legal obligation: pursuant to Art 53 (1) of the Act on Attorneys, the attorney holds records on the cases undertaken with regard to the relevant mandate. This is necessary in order to ensure that the rules governing the provision of legal services are complied with and that the rights of clients are protected in the event of termination of the right to provide legal services.</p> <p>The source of data: the client and the person acting in the client's name.</p>		<p>registration of such right.</p> <p>In case of conversion of a paper document into an electronic document, the attorney shall keep the electronic document for 10 years from the date of such conversion, unless the parties have agreed in a longer retention period. (Art. 46 (5) of the Act on Attorneys).</p>
<p>Performing services as an advocacy lawyer in accordance with Act CLXV of 2013 on Complaints and Public Reports</p>	<p>Art. 6 (1) a) of the GDPR (the voluntary consent of the data subject).</p> <p>The declaration of consent may be withdrawn at any time, without restriction or justification, free of charge. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p> <p>In the absence of consent, Law Firms will not be able to perform advocacy.</p>	<p>The personal data of the reporting person essential for the investigation of the report (including special categories of personal data and personal data relating to criminal convictions and offences), as well as data relevant for the investigation after the submission of the report.</p>	<p>Until the withdrawal of the consent, but at latest:</p> <ul style="list-style-type: none"> a) 60 days after the end of the investigation, if the report is unfounded or if no further action is required, b) if action is taken on the basis of the investigation, until a final decision is reached in the procedures initiated after the report.

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	<p>The source of data: the reporting person.</p>		
<p>Handling of legal disputes and disputes related to Law Firms and their representatives</p> <p>The above may include data processing related to defense by the Law Firms or their representatives in judicial or official or ethical or disciplinary proceedings or related to the initiation of and participation in civil or non-litigious, criminal or infringement proceedings, or administrative, disciplinary, ethical or other similar proceedings by the Law Firms or their representatives.</p>	<p>If the data subject's personal data is processed by the Law Firms in connection with a legal dispute or dispute relating to the Law Firms (for example: legal action in the event of an infringement against a Law Firm, a representative, communication with an opposing party), the legal basis is: Article 6 (1) (f) of the GDPR, the legitimate interest of the Law Firms. Legitimate interest: Protection of the rights, reputation and financial interests of the Law Firms and their representatives.</p> <p>The source of data: the data subject or a person/entity representing it.</p>	<p>Personal data related to possible legal disputes or disputes affecting the Law Firms or their representatives, in case of persons acting for legal entities or other organizations or persons communicating with the Law Firms, the contact data of contact persons (in particular: name, address, e-mail address, telephone number - if provided by the data subject, position, name of the organization or person represented), other personal data related to the legal dispute or the disputed situation, and the steps taken in connection with the above.</p>	<p>In case of civil law disputes, 5 years calculated from the occurrence of a legal dispute, dispute or possible damage (for example: infringement of personality rights of the Law Firms or their representatives) (Art. 6:22 (1) of the Hungarian Civil Code – unless the Hungarian Civil Code otherwise provides, claim expire in 5 years), but at most until the final decision in the subsequent court proceedings or enforcement proceedings.</p> <p>In other cases, it should be emphasized that the relevant personal data may be processed until the final decision of the relevant court, authority, entity acting in the related court, authority, disciplinary, ethical or other similar proceedings or – in case of claim enforced by the Law Firms or their representatives – until the end of the related enforcement proceedings.</p>
<p>Data transfer to additional law firms, individual lawyers, European Community lawyers and other advisers cooperating with Law Firms on a case-by-case basis.</p>	<p>Pursuant to Art. 6 (1) f) of the GDPR (the legitimate interest of the Law Firms and the client, as the case may be).</p> <p>It is the legitimate interest of the Law Firms and the client (including cases where the customer is not the data subject, in particular: in the case of legal person and other organization customers, or with regard to the data of additional</p>	<p>Data related to contracts and client relationships concluded with clients, and personal contact information of client contacts and representatives (especially including: name and e-mail address), other data and documents related to the mandate (e.g. contractual documentation, the circumstances of a data breach involving a cyber-attack and the</p>	<p>5 years calculated from the from the termination of the business relationship or the execution of the transaction mandate (Art. 6:22 (1) of the Hungarian Civil Code – unless the Hungarian Civil Code otherwise provides, claim expire in 5 years).</p> <p>Documents are further retained by the Law Firms with respect to data retention periods prescribed by the Regulation of the Hungarian Bar Association Nr. 16/2018 (XI. 26.) on the order of retaining documents</p>

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	<p>persons) that they use the assistance of additional law firms, individual lawyers, a European Community lawyer or other consultant specializing in a particular case.</p> <p>Clients shall be informed of the identity and, where appropriate, their qualifications of the additional law firms, individual lawyers, European Community lawyers and advisers – taking into account the specificities of the contact –, and the Law Firms shall take into account the requests of the contractual partners as far as possible.</p> <p>The source of data: Law Firms.</p>	scope of data involved).	<p>concerning legal services.</p> <p>For data regarding data transfer, please see chapter 6.</p>
<p>Keeping attorney deposit records</p>	<p>Art. 6 (1) c) of the GDPR (processing is necessary for compliance with a legal obligation to which the Law Firms as data controllers are subject). In view of the above, the processing of the relevant personal data is essential for the fulfillment of the obligation to keep the records specified in this part, otherwise the Law Firms would not be able to fulfill such legal obligation.</p> <p>The legal obligation is prescribed by Art. 7.4 of the Regulation 7/2018 (III. 26.) of the Hungarian Bar Association on deposit</p>	<p>The record on deposits contains the following data: the subject of the deposit, the type of deposit, the date of concluding, modifying the deposit contract, the data regarding the termination of the deposit contract, in case of making the deposit at an organization safeguarding it, the name and seat of such safeguarding organization, in case of making a deposit at court, the fact of such deposit and its date, data related to the performance of the deposit, in case of receiving cash from a third party for the benefit of the client, the date of</p>	<p>The Law Firms shall keep the records on deposit for 10 years from the termination of the deposit contract in accordance with the referred to regulations of the Hungarian Bar Association.</p>

Purpose of processing	The legal basis of processing and source of data	Scope of data processed	Data retention period
	<p>management by attorneys and deposit registration.</p> <p>The source of data: the client or the person making the deposit.</p>	<p>receipt, the relevant amount and the legal title of the receipt, as well as the date of handing over the related cash to the client.</p>	
<p>Processing of contact details of other (non-client) contractual partners and / or persons involved in performance / performance monitoring for the purpose of performing the relevant contract</p> <p>This data processing applies in particular to the processing of the personal data of the contact persons and representatives of the contractual partners supporting the Law Firms (for example: accounting service providers, office supplies, other partners supporting the activities of the Law Firms).</p> <p>This includes, in particular, the processing of the contact details of the contact person and / or the persons involved in the performance / monitoring.</p> <p>The transfer of personal data is a contractual requirement; without personal data, Law Firms will not be able to enter into and enforce the relevant contract.</p>	<p>In case of natural person contractual partners: Art. 6 (1) b) of the GDPR (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract).</p> <p>In case of legal person or other organization contractual partners: Art. 6 (1) f) of the GDPR (the legitimate interest of the Law Firms, as well as their legal person or other organization contractual partners, as the case may be).</p> <p>Legitimate interest: fulfillment of contractual obligations, exercise of rights, and coordination of economic cooperation of the parties.</p> <p>It should be emphasized that the provision of personal data is necessary for the preparation and performance of the relevant contract, without which the given contract cannot be drawn up and performed (including in particular the processing of personal data of contact persons, natural person</p>	<p>Names and contact details of the contact persons of the contractual partners and the persons involved in the performance and control of the performance (including especially: e-mail address and telephone number) and any activities and communications involving personal data related to the contract (e.g. communication from the contact person or any natural person acting on the partner's side).</p> <p>Personal data will be provided to the Law Firm either by the contractual partner or by the persons concerned themselves.</p>	<p>5 years calculated from the from the termination of the contract (Art. 6:22 (1) of the Hungarian Civil Code – unless the Hungarian Civil Code otherwise provides, claim expire in 5 years).</p> <p>The data supporting the tax documents are processed by the Law Firms for 5 years from the last day of the calendar year in which the tax should have been declared or reported, or in its absence, paid (Art. 78 (3) and 202 (1) of Act on Rules of Taxation).</p> <p>In case of accounting documents: the data retention period is 8 years (Art. 168-169 of the Accounting Act).</p>

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	<p>partners). It should also be emphasized that Law Firms may contact a potential partner in the absence of a previous relationship (for example: if the partner explicitly communicates on its website that it is open to being contacted or otherwise due to circumstances, such as international organizations working with a wide number of law firms, which are constantly looking for or attracting new partners).</p> <p>The source of data: the contracting partner or, taking into account the circumstances of the given contract, records accessible publicly or by lawyers or legal representatives (e.g. company register), the website of the respective contractual partner available for business or professional purposes (e.g. business website, where the business or professional title (e.g. executive director) of the given organization's representative is specified.</p>		
Coordination of publication and presentation activities, professional cooperation, coordination of participation in events, lectures, professional interviews organized by or with	In case of natural person contractual partners: Art. 6 (1) b) of the GDPR (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at	Names and contact details of persons who come into contact with the Law Firms in connection with publishing and presentation, as well as professional activities, as well as their representatives	Coordination of publication and presentation, as well as professional activities: 5 years calculated from the from the termination of the contract (Art. 6:22 (1) of the Hungarian Civil Code – unless the Hungarian Civil Code otherwise provides,

Purpose of processing	The legal basis of processing and source of data	Scope of data processed	Data retention period
<p>the participation of Law Firms, and ensuring participation</p> <p>This includes, in particular, the data processing required by the publication and presentation activities of Law Firms (e.g. coordination with event organizers and contact persons of publishing houses), as well as coordinating and facilitating participation in events, lectures and professional interviews organized by or with the participation of Law Firms and the concerning data processing.</p>	<p>the request of the data subject prior to entering into a contract). In view of this, the provision of personal data is necessary for the preparation and performance of the relevant contract, without which the contract in question cannot be drawn up and performed (including, in particular, the processing of contact details of contact persons, such as e-mail addresses).</p> <p>In case of legal person or other organization contractual partners: Art. 6 (1) f) of the GDPR (the legitimate interest of the Law Firms, as well as their legal person or other organization contractual partners or other partners communicating with them, as the case may be).</p> <p>The legitimate interest: strengthening the publishing, presentation and professional activities of Law Firms and their lawyers, increasing the professional and business awareness and recognition of Law Firms and their associates and partners, strengthening the professional and / or business relations between Law Firms and their contractual partners or other partners communicating with them.</p>	<p>(including their e-mail address), as well as coordination concerning the relevant presentation and publication, other data as necessitated by the relevant professional relationship (e.g. viewpoints concerning the formulation of the topic and other professional viewpoints).</p> <p>In connection with participation in events, lectures, professional interviews organized or attended by Law Firms, the names, e-mail addresses of the applicants, where applicable, their position and the organization they represent, as well as other relevant information related to the event, lecture or professional interview (including in particular: discussion and cooperation concerning the relevant topics, and other professional matters).</p>	<p>claim expire in 5 years). In the absence of a contract, until the publication or until the presentation is held, or until the professional relationships necessitates so, but not later than 1 year after the last communication.</p> <p>Where the retention of data is necessary for the fulfillment of tax or accounting obligations, the following retention periods shall apply in this regard:</p> <p>The data supporting the tax documents are processed by the Law Firms for 5 years from the last day of the calendar year in which the tax should have been declared or reported, or in its absence, paid (Art. 78 (3) and 202 (1) of Act on Rules of Taxation).</p> <p>In case of accounting documents: the data retention period is 8 years (Art. 168-169 of the Accounting Act).</p> <p>Coordination and participation in events, lectures and professional interviews organized by or with the participation of the Law Firms: until the withdrawal of consent, in the case of a representative of a legal person or other organization, until the exercise of the right to object, in the absence of this, the end of the day of the given event, lecture, professional interview.</p>

Purpose of processing	The legal basis of processing and source of data	Scope of data processed	Data retention period
	<p>In other cases: Art. 6 (1) f) of the GDPR (the legitimate interest of the Law Firms, as well as their legal person or other organization contractual partners, as the case may be). The legitimate interest: strengthening the publishing and presentation, as well as professional activities of the Law Firms, increasing the professional and business awareness and recognition of the Law Firms and their associates and partners.</p> <p>In connection with the participation of individuals in events, lectures and professional interviews: Art. 6 (1) a) of the GDPR (the voluntary consent of the data subject).</p> <p>The declaration of consent may be withdrawn at any time, without restriction or justification, free of charge. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p> <p>In the absence of consent, Law Firms cannot ensure participation at the given event, lecture or professional interview.</p> <p>In connection with the participation of representatives of a legal person or other organization at events, lectures,</p>		

Purpose of processing	The legal basis of processing and source of data	Scope of data processed	Data retention period
	<p>professional interviews: Art. 6 (1) f) of the GDPR (the legitimate interest of the Law Firms and the legal person or other organization interested in the event, lecture or professional interview in question). The legitimate interest: increasing the professional and business awareness and recognition of the Law Firms and the legal person or other organization concerned, strengthening the professional and / or business relationship between the Law Firms and the legal person or other organization concerned.</p> <p>The source of data: the person or organization who contacts or maintains contact with the Law Firms in connection with the publication and presentation, as well as professional activities, and in connection with the participation of the participants or the applicants in connection with the events, lectures and professional interviews.</p>		
<p>Electronic marketing materials and invitations to events</p> <p>These include, in particular, reports, awareness-raising materials, offers sent in connection with changes in</p>	<p>Art. 6 (1) a) of the GDPR (the voluntary consent of the data subject), as well as prior, clear and express consent of the data subject concerned in accordance with Art 6 (1) of the Act XLVIII of 2008 on the Basic Conditions and Certain</p>	<p>Name and other contact details of the client and, in case of a legal person or other organization client, the contact details (including in particular: e-mail address), the order or a previous order made in the last one year, the fact of pre-</p>	<p>Data retention period: if the data subject withdraws his/her consent, the personal data must be deleted. If the data processing is based on a legitimate interest, the data processing lasts until the data subject's objection or one year from the termination of the mandate relationship (whichever is</p>

Purpose of processing	The legal basis of processing and source of data	Scope of data processed	Data retention period
<p>legislation or changes in the practice of authority, materials related to the press and media coverage, as well as the business and professional appearance of the Law Firms.</p>	<p>Restrictions of Economic Advertising.</p> <p>The declaration on consent may be withdrawn at any time, without restriction or justification, free of charge. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p> <p>Without consent, the Law Firms will not be able to send marketing materials and invitations to events.</p> <p>It should be emphasized that the Law Firms are also entitled to send the above marketing materials or invitations to events on the basis of their legitimate interest (Art 6 (1) f) of the GDPR) to such persons who have client relations with the Law Firms, or to former clients or their representatives or contact persons with whom the relevant mandate contract has been terminated in the previous (one) year, concerning the information or proposals that might seem interesting for the relevant clients.</p> <p>The legitimate interest: increasing the business and professional awareness and recognition of the Law Firms, strengthening the economic results of the Law Firms, strengthening the contractual and</p>	<p>contractual negotiations, the (possible) the subject of the order or of an order made in the previous one year. For example, marketing materials can be sent concerning changes in data protection laws or a major decision made by the data protection authority or concerning court practice, to clients who contracted the Law Firms to seek data protection advice. If, for example, a given client has requested advice in connection with its activities as an advertising company, and in particular regarding data processing for advertising purposes, the Law Firm will not send marketing materials regarding general or unrelated data protection news, which would not seem relevant for the given client.</p>	<p>earlier). If the pre-contractual negotiations with the potential client are not followed by the conclusion of a relevant contract, the Law Firm will not send him marketing materials, unless otherwise agreed or requested by the potential client.</p>

Purpose of processing	The legal basis of processing and source of data	Scope of data processed	Data retention period
	<p>professional relationship between the relevant (potential) client and the Law Firms.</p> <p>Based on the above legitimate interests, the Law Firms may also send an inquiry or invitation regarding an event to a client or his / her representative or contact person, with whom the contract has not yet been concluded, but the client has started negotiations prior to concluding a contract with the Law Firms.</p> <p>The source of data: the client or potential client or a previous client with whom the contract has been terminated within one year.</p>		
<p>Data processing concerning the SimpLEGAL Webshop (https://simplegal.hu/webshop)</p>	<p>In case of natural person clients:</p> <p>In relation to registration on the Webshop: the data subject's consent (Article 6 (1) a) of the GDPR), which he/she gives by registering on the Webshop.</p> <p>In relation to the processing of orders: Art. 6 (1) b) of the GDPR (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract). In this respect, the processing of personal data is</p>	<p>Name, address/registered seat, e-mail address of the client and of the person acting on behalf of the client. If such person also voluntarily provides his/her telephone number during the registration (based on his/her consent) (Article 6(1) a) of the GDPR), the Law Firm also processes it for the purpose of fulfilling the relevant order and contract.</p> <p>The Law Firm also processes the fact and date of registration of the registered clients' SimpLEGAL.hu accounts, as well as the respective client's username and password,</p>	<p>The data of registered SimpLEGAL.hu accounts are processed by the Law Firm until the registration is deleted.</p> <p>In relation to contracts of engagement, the Law Firm processes the data of the data subjects relating to the performance of the engagement for a period of 5 years calculated from the termination of the contractual relationship (Art. 6:22 (1) of the Hungarian Civil Code – unless the Hungarian Civil Code otherwise provides, claim expire in 5 years).</p> <p>If the retention of data relating to the execution of orders is necessary for compliance with taxation or accounting obligations, the following data retention</p>

Purpose of processing	The legal basis of processing and source of data	Scope of data processed	Data retention period
	<p>necessary for the fulfilment of the orders and the related contract (contract of engagement and GTC).</p> <p>In case of legal person or other organization clients or persons acting in the name of clients: pursuant to Art. 6 (1) f) of the GDPR, the legitimate interest of the Law Firm providing services through the Webshop and the client contracting with it. Legitimate interest: cooperation between the Law Firm and the client, protection of the client's interests, performance of the relevant contract.</p> <p>The source of data: the client.</p>	<p>the data related to the shopping cart and orders.</p>	<p>periods shall apply in this respect:</p> <p>The data supporting the tax documents are processed by the Law Firm for 5 years from the last day of the calendar year in which the tax should have been declared or reported, or in its absence, paid (Art. 78 (3) and 202 (1) of Act on Rules of Taxation).</p> <p>In case of accounting documents: the data retention period is 8 years (Art. 168-169 of the Accounting Act).</p>
<p>Data processing related to the exercise of the data protection rights of the data subjects (see paragraph 7 for more details)</p>	<p>Art. 6 (1) c) of the GDPR (processing is necessary for compliance with legal obligations to which the Law Firms as data controllers are subject). In view of this, the processing of personal data is essential in support of the enforcement of data subjects' rights, in the absence of which this legal obligation could not be fulfilled by the Law Firms.</p> <p>The legal obligation: with respect to Art. 15-22 of the GDPR, ensuring the exercise of data protection rights and documenting other steps concerning the data subject's request.</p>	<p>Personal data related to data protection related requests submitted to the Law Firms: Contact details of natural persons or contact persons of legal person or other organization clients contacting the Law Firms (especially: name, address, e-mail address) the content of the request and the steps taken in response to the request and the documents prepared in connection with the request.</p>	<p>Data retention period: 5 years calculated from the request of the data subject, unless otherwise indicated by the practice of the data protection authority, given that any data protection claims are realistically expected to be enforced at the data protection authority or at court within this period (Art. 6:22 (1) of the Hungarian Civil Code – unless the Hungarian Civil Code otherwise provides, claim expire in 5 years).</p>

Purpose of processing	The legal basis of processing and source of data	Scope of data processed	Data retention period
<p>Archiving of the data subjects' consents regarding the given data processing, as well as the possible declarations on the withdrawal of the consent and the declarations related to the exercise of the right to object</p>	<p>Art. 6 (1) c) of the GDPR (processing is necessary for compliance with legal obligations to which the Law Firms as data controllers are subject). In view of this, the processing of personal data is necessary in connection with possible declaration on consent to the relevant data processing operation, withdrawal of consent and the exercise of the right to object to the processing of personal data. In the absence of the above data processing, the Law Firms would not be able to review that the given consent was validly given, withdrawn or that the right to object was lawfully exercised.</p> <p>The legal obligations: pursuant to Art. 7 (1) of the GDPR, if the processing is based on consent, the data controller must be able to prove that the data subject consented to the processing of the personal data.</p> <p>Pursuant to Art. 7 (1) of the GDPR, the data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. The data subject must be informed of the above before consent is given. Withdrawal of</p>	<p>If any data processing by the Law Firms was based on the consent of the data subject, the Law Firms shall archive that consent. The purpose is to verify the lawfulness of the consent at any time. If the data subject withdraws his or her consent or objects to the processing, the Law Firms retain the relevant declaration (and related communication) concerning withdrawing the consent or objecting to the data processing. The purpose of this is to ensure that the Law Firms are always aware that the data subject has withdrawn his or her consent to a specific data processing or has objected to the data processing, thus, in the future, infringing data processing can be avoided and the exercise of data subjects' rights can be properly supported.</p>	<p>Data retention period: the data relating to the consent may be retained until the consent has been withdrawn, the fact that the consent has been withdrawn or objecting to the data processing has been exercised and the data necessary to identify the data subject (including, in particular, the name and e-mail address of the data subject) may be retained for 5 years calculated from the withdrawal or the objecting, taking into account that any data protection claims can realistically be expected to be enforced at the data protection authority or at the competent court within this period (Art. 6:22 (1) of the Hungarian Civil Code – unless the Hungarian Civil Code otherwise provides, claim expire in 5 years).</p>

Purpose of processing	The legal basis of processing and source of data	Scope of data processed	Data retention period
	<p>consent should be as simple as giving it. However, in order to review the withdrawal of consent, the Law Firms need to record the fact of the withdrawal, since in the absence of such recording, the Law Firms could not verify that the data subject withdrew his/her consent lawfully.</p> <p>Pursuant to Art. 21 (1) of the GDPR, data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Art. 6 (1) of the GDPR (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Law Firms, processing is necessary for the purposes of the legitimate interests pursued by the Law Firms or third party). In this case, the Law Firms shall not process the related personal data, unless they demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. In view of the above, in order to verify the exercise of the right to object, the Law Firms need to record the fact</p>		

Purpose of processing	The legal basis of processing and source of data	Scope of data processed	Data retention period
	of objecting to data processing, otherwise they would not be able to verify that the data subject has objected to the processing of his/her personal data.		
<p>Documenting data breaches (including documentation of steps taken to deal with the relevant data breach)</p>	<p>Art. 6 (1) c) of the GDPR (processing is necessary for compliance with legal obligations to which the Law Firms as data controllers are subject). In this respect, the processing of personal data is essential to document data breaches and to submit a notification or issue a communication on them, as necessary. In the absence of the above measures, the Law Firms would be unable to comply with their related legal obligations.</p> <p>The legal obligations: pursuant to Art. 33 (5) of the GDPR, the Law Firms shall document any personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken. That documentation shall enable the supervisory authority (data protection authority) to verify compliance with the GDPR.</p> <p>The source of data: persons or sources relevant with respect to the given data breach (including, in particular, the person who has detected the incident and</p>	<p>Personal data of the data subjects related to the data breach.</p>	<p>Data retention period: 5 years calculated from the data breach, taking into account that data protection claims can realistically be expected to be enforced at the data protection authority or at the competent court within this period (Art. 6:22 (1) of the Hungarian Civil Code – unless the Hungarian Civil Code otherwise provides, claim expire in 5 years).</p>

Purpose of processing	The legal basis of processing and source of data	Scope of data processed	Data retention period
	informed the Law Firms or another person who has detected the incident).		