



## **Privacy Notice**

This Privacy Notice describes how Nádasy Law Firm, the leading law firm of WTS Legal Attorneys Association as well as the individual lawyers and law firms participating in WTS Legal Attorneys Association process personal data in connection with their professional and business activities.

The protection of personal data is important to us. We only process personal data in compliance with the applicable data protection requirements, in particular the General Data Protection Regulation (GDPR) and the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Info Act).

### **A. Controller**

Your personal data set out in this Privacy Notice is processed by Nádasy Law Firm, the leading law firm of WTS Legal Attorneys Association ("**Leading Firm**"). While carrying out its activities, the Leading Firm cooperates with the individual lawyers and law firms participating in the WTS Legal Attorneys Association ("**Partner Firms**"), who are joint controllers with the Leading Firm ("**Joint Controllers**") for the purposes of data *processing related to the professional and business activities and the processing of personal data of visitors* (Sections B and E of this Privacy Notice).

For the *processing of personal data of job applicants and the processing of personal data of (potential) suppliers and their employees* (sections C and D of this Privacy Notice), the Leading Firm is considered as a separate controller.

### **I. Name and contact details of the Leading Firm as controller**

Nádasy Law Firm  
Address: 1143 Budapest, Stefánia út 101-103.  
Email: [zoltan.nadasdy@wts-legal.hu](mailto:zoltan.nadasdy@wts-legal.hu)  
Web site: [www.wts-legal.hu](http://www.wts-legal.hu)  
Phone: 0036-1-2240900

## II. Name and contact details of the Partner Firms

1. Füzi Law Firm  
Address: 1056 Budapest, Váci utca 42. 3/IV  
Email: [viktor.fuzi@protonmail.com](mailto:viktor.fuzi@protonmail.com)  
Phone: 0036-70-9404673
2. Hegedűs Eszter Réka Law Firm  
Address: 1076 Budapest, Péterfy Sándor u. 7. I/5.  
Email: [eszter.hegedus@hegeduslegal.com](mailto:eszter.hegedus@hegeduslegal.com)  
Phone: 0036-20-2466554
3. Molnár Tímea Law Firm  
Address: 2049 Diósd, Dália utca 17/1.  
Email: [timea.molnar@mtlegal.hu](mailto:timea.molnar@mtlegal.hu)  
Phone: 0036-30-4980534
4. Sieber-Fazakas Eszter individual lawyer  
Address: 1022 Budapest. Bimbó út 81-1/1.  
Email: [eszter.sieber-fazakas@avocat.hu](mailto:eszter.sieber-fazakas@avocat.hu)  
Phone: 0036-30-6880587
5. Dr. Andriská Szilvia individual lawyer  
Address: 1143 Budapest, Stefánia út 101-103.  
Email: [szilvia@drandriska.eu](mailto:szilvia@drandriska.eu)  
Phone: 0036-30-5088042
6. Czeglédy Edina Law Firm  
Address: 1055 Budapest, Honvéd u. 18. 1. em. 5  
Email: [edina.czegledy@czegledy.com](mailto:edina.czegledy@czegledy.com)  
Phone: 0036-30-382-5696
7. Dr. Szaufmann Ivett individual lawyer  
Address: 1036 Budapest, Lajos u. 93-99/B. I/5.  
Email: [ivett.szaufmann@gmail.com](mailto:ivett.szaufmann@gmail.com)  
Phone: 0036-30-4224271
8. Dr. Ablonczy Virág individual lawyer  
Address: 1143 Budapest, Stefánia út 101-103.  
Email: [virag.ablonczy@ablonczylegal.hu](mailto:virag.ablonczy@ablonczylegal.hu)

Phone: +36 30 209 4846

9. Dr. Tompa Tímea individual lawyer  
Address: 1143 Budapest, Stefánia út 101-103.  
Email: [drtompatimea@gmail.com](mailto:drtompatimea@gmail.com)  
Phone: +36 30 946 8998

10. Dr. Zambó Réka individual lawyer  
Address: 1143 Budapest, Stefánia út 101-103.  
Email: [rekazambo@zambolegal.com](mailto:rekazambo@zambolegal.com)  
Phone: +36 30 675 0319

### **III. Key terms of the joint controller agreement**

The Joint Controllers have agreed on the following in relation to the joint processing:

- The Joint Controllers are jointly obliged to provide the privacy notice set forth in Article 13 of the GDPR. The Joint Controllers comply with this obligation by providing this Privacy Notice to the data subjects.
- The Leading Firm is responsible for responding to requests from data subjects.

Please note that you can exercise your rights under the GDPR against each of the Joint Controllers. Notwithstanding this, we kindly ask you to address your questions or requests to the Leading Firm in the first instance.

### **IV. Name and contact details of the data protection officer**

With regard to Article 37 of the General Data Protection Regulation, no Data Protection Officer has been appointed either at the Leading Firm or at the Partner Firms.

### **B. Processing in connection with the professional and business activities**

In connection with their it's professional and business activities, the Joint Controllers process the personal data of the Leading Firm's (potential) clients and their employees, representatives and/or advisors of it's clients and their employees, opposing parties in legal proceedings and their employees, representatives and/or advisors of opposing parties in legal proceedings and their employees, employees of insurers, experts, notary's offices and their employees, employees of courts and/or authorities, employees and cooperating partners of the WTS company that cooperate with the Leading Firm:

- in order to be able to identify (potential) clients, their economic beneficiary, the persons acting for them and their authorisation and carry out a comparison with sanctions lists,
- for the conflict check to avoid conflicts of interests before establishing the client relationship,
- for the preparation of the client relationship and to prepare offers and cost estimates,

- in order to advise and represent our clients appropriately in connection with the engagement, including correspondence with our clients, opposing parties in legal proceedings and their representatives as well as with courts and/or authorities,
- for translations on behalf of clients in connection with engagements,
- for sending correspondence and other items on behalf of clients in connection with engagements,
- for the disbursement, acceptance and forwarding of third-party funds on behalf of clients in connection with engagements,
- for proper internal administration, including maintaining reference files and the operation of IT systems for administrative purposes,
- for proper accounting and invoicing,
- for the proper retention of documents in order to meet statutory, professional, anti-money laundering retention obligations and for evidence purposes for any establishment, exercise or defence of legal claims,
- to settle any existing liability claims and the exercise of any claims against clients,
- to cooperate with courts and/or authorities in order to comply with statutory obligations,
- to cooperate with external accountants or auditors in order to comply with statutory obligations,
- for client relationship management and the alignment of our advisory services with the needs and wishes of (potential) clients,
- for the naming of references for rankings and analyses by press publishers and analysts.

You receive more detailed information in connection of the aboves below:

#### I. Details on the personal data that are processed

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
Identification data	<p>Information received to identify (potential) clients, their economic beneficiaries, the persons acting for them and their authorisation.</p> <p>This includes name, name by birth, mother's maiden name, date and place of birth, residential address (or failing this the place of stay), nationality, stateless person, refugee, immigrant, permanent resident or citizen of the European Economic Area status, facial image; signature, document identifier of the</p>	<p>(Potential) clients,</p> <p>courts and/or authorities,</p> <p>WTS company</p>	<p>The provision of these data is required by law.</p> <p>If these data are not provided, the identification required by law may not be possible.</p>	<p>We store the data until the retention obligation under anti-money laundering law ends, i.e. for a period of eight years after the end of the calendar year in which the business relationship was ended or the engagement agreement has been fulfilled (Sec.57 of Act LII of 2017 on the Prevention of Money Laundering and Terrorist Financing (<i>Anti-Money Laundering Act</i>)).</p>

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
	<p>following documents, as well as the facts recorded in connection with the document identifier: identity card, identity number and address card, travel documents, driving licence, the document certifying right of residence, visa or the permit replacing visa and residence permit (e.g. replacement, loss, theft, destruction or finding of the document), in case of a person representing a company, the job title of the representative, data from copies of personal identity cards and address card to the legally allowed extent and data from commercial register excerpts, name and identification data of the firm represented by the data subject, video recordings of the data subject made in course of the identification, data obtained from registers to which Leading Firm is entitled to have access by law.</p>			
Contact data	<p>Information that we receive for contacting and corresponding with our contacts.</p> <p>These contacts include (potential) clients and the employees, representatives and/or advisors of our clients and their employees, opposing parties in legal proceedings and their employees, representatives and/or advisors of opposing parties in legal proceedings and their employees, employees of insurers, experts, notary's offices and their</p>	<p>(Potential) clients, representatives and/or advisors of clients,</p> <p>Opposing parties in legal proceedings, representatives and/or advisors of opposing parties in legal proceedings,</p> <p>insurers,</p> <p>experts and notary's offices</p>	<p>The provisions of these data is not required by law or contract.</p> <p>The provision of the client's contact data is required for the conclusion of an engagement agreement.</p> <p>The provision of the contact data of employees of clients, representative and/or advisors of clients and their employees, opposing parties in legal</p>	<p>We store these data for 10 years commencing at the end of the year in which our engagement has been terminated or the contact has been established.</p>

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
	<p>employees, employees of courts and/or authorities, as well as employees and cooperating partners of the cooperating WTS company, law firms, tax advisory and/or auditing firms.</p> <p>This information includes salutation, title, first name, surname, e-mail address, address, fax number, telephone number and position/function of the individual contact.</p>	<p>courts and/or authorities,</p> <p>WTS company,</p> <p>law firms cooperating with the Leading Firm, tax advisory and/or auditing firms</p>	<p>proceedings and their employees, representative and/or advisors of opposing parties in legal proceedings and their employees, employees of insurers, experts, notary's offices and their employees, employees of courts and/or authorities as well as advisors and/or employees of the WTS company or law firms cooperating with the Leading Firm, tax advisory and/or auditing firms may also be necessary in order to advise and represent clients.</p> <p>It these data are not provided, it may not be possible to process the engagement.</p>	
Client data	<p>Information that we receive from clients, representatives and/or advisors of clients, opposing parties in legal proceedings, representatives and/or advisors of opposing parties in legal proceedings, insurers, experts, notary's offices, courts and/or authorities in order to advise and represent clients in connection with the engagement.</p> <p>This in particular includes the content of documents provided to us in connection with the engagement, furthermore bank details (IBAN, BIC, bank, account holder) for the</p>	<p>Clients, representatives and/or advisors of clients,</p> <p>opposing parties in legal proceedings, representatives and/or advisors of opposing parties in legal proceedings,</p> <p>insurers,</p> <p>experts, notary's offices,</p> <p>courts and/or authorities.</p>	<p>The provision of these data is not required by law or contract.</p> <p>Provision may, however, be necessary to advise and represent clients.</p> <p>If these data are not provided, it may not be possible to process the engagement.</p>	<p>Data retention periods are generally based on statutory retention periods and depend on the type of document in which the data is incorporated:</p> <p>a) In case of a countersigning of a document, the countersigned document and other documents related to the matter of the countersigning of the document will be kept for 10 years from the date of the</p>

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
	disbursement of third-party funds.			countersigning (§ 53 (5) Act LXXVIII of 2017 on the activities of attorneys ("Attorney Act").
	<p>Information that we receive from clients, representatives and/or advisors of clients, opposing parties in legal proceedings, representatives and/or advisors of opposing parties in legal proceedings, insurers, experts, notary's offices, courts and/or authorities in order to disburse third-party funds in connection with the engagement.</p> <p>This includes bank details (IBAN, BIC, bank, account holder).</p>	<p>Clients, representatives and/or advisors of our clients,</p> <p>opposing parties in legal proceedings, representatives and/or advisors of opposing parties in legal proceedings,</p> <p>insurers,</p> <p>experts, notary's offices,</p> <p>courts and/or authorities.</p>	<p>The provision of these data is not required by law or contract.</p> <p>Provision may, however, be necessary to advise and represent clients.</p> <p>If these data are not provided, it may not be possible to disburse third-party funds.</p>	<p>b) The document being attached to the application for registration of a company or registration of a change that has not been countersigned will be kept for 10 years from the date of the submission of the application (Section 3.2 of the Chamber of Attorneys' (MÜK) Rules 16/2018 (XI.26.) on the retention of documents related to the exercise of the profession of attorneys ("MÜK Rules").</p>
	<p>Data generated in connection with correspondence with clients, representatives and/or advisors of our clients, opposing parties in legal proceedings, representatives and advisors of opposing parties in legal proceedings, insurers, experts, notary's offices, courts and/or authorities, law firms cooperating with the WTS company or the Leading Firm, tax advisory and/or auditing firms outside the Noerr companies.</p> <p>These in particular include the content of oral and written (including electronic) correspondence and protocol data generated</p>	<p>Clients, representatives and/or advisors of clients,</p> <p>opposing parties in legal proceedings, representatives and/or advisors of opposing parties in legal proceedings,</p> <p>insurers,</p> <p>experts, notary's offices,</p> <p>courts and/or authorities,</p> <p>WTS company,</p>	<p>The provision of these data is not required by law or contract.</p> <p>Provision may, however, be necessary to advise and represent clients.</p> <p>If these data are not provided, it may not be possible to process the engagement.</p>	<p>c) Documents generated or used in criminal procedures, litigation, official or other public authority proceedings:</p> <ul style="list-style-type: none"> <li>decisions and orders made on the merit of the case are stored for 5 years after they</li> </ul>

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
	for technical reasons in the case of electronic correspondence.	law firms cooperating with the Leading Firm, tax advisory and/or auditing firms.		became final or definitive (Section 3.3 (a) MÜK Rules);
	Information that we generate to advise and represent clients as part of the engagement. This in particular includes contents of notes to file, memoranda, expert opinions, pleadings and other documented results of our advice and representation as part of the engagement.	Generated in-house.	-	<ul style="list-style-type: none"> <li>• any document handled in connection with the procedure which is not held by the court, authority or other public authority in charge of the procedure will be stored for 5 years after the final or definitive closure of the procedure (Section 3.3 (b) MÜK Rules).</li> <li>d) A document escrowed by an attorney is stored until the escrow agreement is terminated (Section 3.4 MÜK Rules).</li> <li>e) The escrow agreement will be kept for 10 years after the termination of the escrow agreement (Section 3.5. b) MÜK Rules).</li> <li>f) The engagement agreement will be kept for 5 years after the termination or expiry of</li> </ul>

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
				<p>the engagement agreement (Section 3.5. a) MÜK Rules)</p> <p>g) If a paper document is converted into electronic form, the electronic document will be stored for 10 years from the date of the copying (Section 46 (5) of the Attorney Act). In the case of conversion of a countersigned paper document, the electronic document is kept for 5 years from the date of conversion (§ 46 (6) of the Attorney Act)</p> <p>h) The data contained in the case record will be retained for 5 years after the termination of the engagement. In the case of countersigning a document, the data recorded will be processed for 10 years after the countersigning. In the case of registration of a right regarding a property, the data registered will be processed for 10 years from the date of</p>

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
				<p>registration. (§ 53 (3) of the Attorney Act).</p> <p>i) Other documents and correspondence will be erased after 10 years from the end of the year in which they were generated.</p> <p>j) Notwithstanding the above, if the document in question may be used as evidence in the context of the legal relationship giving rise to its storage, we are entitled to store the document until the end of the year following the expiry of the relevant limitation period (in principle 5 years).</p>
Billing data	Data that we receive from clients for billing purposes as part of the engagement (e.g. VAT identification number).	Clients.	<p>The provision of these data is required by law.</p> <p>If these data are not provided, proper billing is not possible.</p>	We store the data based on statutory, in particular accounting law document retention obligations. Document retention requirements under accounting law can be eight years (sec. 169 (1)-(2) of Accountant Act).
	Data that we generate in-house for billing purposes as part of the engagement.	Generated in-house.	-	We store the data based on statutory, in particular accounting law document retention obligations. Document

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
	These in particular include accounts receivable numbers, invoice numbers, file numbers, content of internal time recording, activity reports, details of any expenses and data relating to payment transactions, in particular date and amounts paid.			retention requirements under accounting law can be eight years (sec. 169 (1)-(2) of Accountant Act.  In any other cases we store these data for 10 years commencing at the end of the year in which our engagement has been terminated or performed.

## II. Details on the processing of personal data

No automated decision-making is carried out in relation to the data processed.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
Identification of (potential) clients, their economic beneficiaries, the persons acting for them and their authorisation before or upon establishing the client relationship.	Identification data.	The legal basis for the identification is compliance with a legal obligation, in particular Section 32 of the Attorney Act, Section 7 of the Anti-Money Laundering Act, Section 17 of the Role Nr. 1/2017. (07. 10.) of the Hungarian Bar Association (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation) and a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is knowing who our contractual partner is and to fulfil the identification criteria set forth in Section 44 (2) of the Attorney Act and resolution Nr. 2018. ELN. 470/11/01 of the Budapest Bar Association.	-
Comparison with sanctions lists before the client relationship is established.	Contact data.	The legal basis for the comparison with sanctions lists is compliance with a legal obligation, in particular Section 3 of Act No. LII of 2017 (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation).	-

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
<p>Conflict check to avoid conflicts of interest before establishing the client relationship.</p>	<p>Contact data, Client data.</p>	<p>The legal basis for the conflict check is balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the avoidance of conflicts of interest.</p>	<p>-</p>
<p>Preparation of the client relationship, in particular pre-contractual correspondence for the preparation of offers and costs estimate.</p> <p>Depending on the engagement, coordination may also be required in the individual case with representatives and/or advisors of the client or insurers of the client for the preparation of the engagement.</p>	<p>Contact data, Client data.</p>	<p>The legal basis is taking steps at the request of the data subject prior to entering into a contract (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>If the client relationship will not be established with the data subject, the legal basis is a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the preparation of the client relationship and concluding contracts with the clients.</p>	<p>WTS company, Representatives and/or advisors of the client, Insurers.</p>
<p>Advising and representing clients appropriately in connection with engagements, in particular exercising and defending the rights of clients, including correspondence with our clients, opposing parties in legal proceedings and representatives of opposing parties in legal proceedings, insurers, experts and/or service providers, courts and/or authorities.</p>	<p>Contact data, Client data.</p>	<p>If the data subject is the client of the Leading Firm, the legal basis is the performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>If the data subject is not the client of the Leading Firm, the legal basis is a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the contract with the client.</p>	<p>WTS company, Clients, Representatives and/or advisors of clients, Opposing parties in legal proceedings, Representatives and/or advisors of opposing parties in legal proceedings, Insurers, Experts and/or other service providers,</p>

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
			Courts and/or authorities.
<p>Sending of correspondence or other items on behalf of clients in connection with engagements.</p> <p>To send correspondence and other items, we communicate the address details of the sender and the recipient to the relevant shipping/courier services provider.</p>	Contact data.	<p>If the data subject is the client of the Leading Firm, the legal basis is the performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>If the data subject is not the client of the Leading Firm, the legal basis is a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the contract with the client.</p>	Shipping/courier service providers.
Disbursement, receipt or forwarding of third-party funds on behalf of clients in connection with engagements.	Contact data, Client data.	<p>If the data subject is the client of the Leading Firm, the legal basis is the performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>If the data subject is not the client of the Leading Firm, the legal basis is a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the contract with our client.</p>	<p>Clients,</p> <p>Representatives and/or advisors of clients,</p> <p>Opposing parties in legal proceedings,</p> <p>Representatives and/or advisors of opposing parties in legal proceedings,</p> <p>Courts and/or authorities,</p> <p>Banks,</p> <p>Payment services providers.</p>
Translations for clients in connection with engagements.	Contact data, Client data.	<p>If the data subject is the client of the Leading Firm, the legal basis is the performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p> <p>If the data subject is not the client of the Leading Firm, the legal basis is a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data</p>	Permanent cooperating translators of the Leading Firm

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
		Protection Regulation). Our legitimate interest is the performance of the contract with our client.	
Proper internal law firm administration, including the maintenance of reference files and operation of IT systems for administrative purposes.	Contact data, Client data, Billing data.	The legal basis is balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is proper internal administration.	Permanent cooperating accounting partner of the Leading Firm,  Permanent cooperating IT expert of the Leading Firm,  Hosting service provider of the Leading Firm,  IT service providers.
Proper accounting and invoicing.	Contact data, Billing data.	If the data subject is the client of the Leading Firm, the legal basis is the performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).  If the data subject is not the client of the Leading Firm, the legal basis is a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the performance of the contract with our client and the proper accomplishment of accounting and invoicing tasks.	Permanent cooperating accounting partner of the Leading Firm.
Proper retention of documents in order to comply with statutory, professional, anti-money laundering, commercial and tax law retention obligations and for evidence purposes for any establishment, exercise or defence of legal claims.	Contact data, Client data, Billing data.	The legal basis is balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is to comply with statutory, in particular professional ethics, anti-money laundering, commercial and tax law retention obligations.  The legal basis of retention for evidentiary purposes is also a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the establishment, exercise or defence of legal claims.	Document archiving partner of the Leading Firm.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
Settlement of any existing liability claims and the exercise of any claims against clients.	Contact data,  Client data,  Billing data.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the establishment, exercise and defence or legal claims.	Clients,  Representatives and/or advisors of clients,  Opposing parties in legal proceedings,  Representatives and/or advisors of opposing parties in legal proceedings,  Insurers,  Courts and/or authorities,  Permanent cooperating accounting partner of the Leading Firm.
Cooperation with courts and/or authorities in order to fulfil statutory obligations.	Contact data,  Client data,  Billing data.	Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation).	Permanent cooperating accounting partner of the Leading Firm,  Courts and/or authorities.
Liaison with external accountants or auditors in order to comply with statutory obligations.	Contact data,  Client data,  Billing data.	Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation).	Permanent cooperating accounting partner of the Leading Firm,  External auditors,  External accountants.
Client relationship management and the alignment of our advisory services with the needs and wishes of (potential)	Contact data.	The legal basis is in addition a balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest	Permanent cooperating IT expert of the Leading Firm,

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
clients, including making contact to inform (potential) clients, inviting (potential) clients to WTS Legal Attorneys Association's events and maintaining the relationships with (potential) clients.		is maintaining the relationships with our (potential) clients and the alignment of our advisory services with the needs and wishes of our (potential) clients.	Hosting service provider of the Leading Firm,  IT service providers.
Naming of references for ranking and analyses by press publishers and analysts.	Contact data.	Consent (point (a) or Article 6 paragraph 1 of the General Data Protection Regulation).	Press publishers and market analysts.

### III. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

The Joint Controllers do not regularly transfer personal data to third countries. Exceptions to this are the following recipients (see below): Clients, Representatives and/or advisors, Insurers, Counterparties in legal proceedings, Representatives and/or advisors of counterparties in legal proceedings, Experts and/or other service providers. Where these recipients are located in a third country, personal data will be transferred to them only to the extent necessary for the performance of a contract with a client or for the implementation of pre-contractual measures taken at the request of the data subject (Article 49(1)(b) and (c) of the General Data Protection Regulation) and/or for the establishment, exercise or defence of legal claims (Article 49(1)(e) of the General Data Protection Regulation).

In case of a possible individual transfer of data, we will provide specific information to the data subject in accordance with the Data Protection Regulation.

Recipient	Recipient's role
Permanent cooperating accounting partner of the Leading Firm:  E-GOODWILL Kft. (3842 Halmaj, Dózsa György u. 50.; company register number: 05-09-018917)	Processor  Purpose of the data processing: performance of billing, accounting, client identification tasks.  The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the Leading Firm.

Recipient	Recipient's role
<p>Permanent cooperating translators of the Leading Firm:</p> <ul style="list-style-type: none"> <li>• Ágnes Kovács sole proprietor (1221 Budapest, Vincellér út 6.; phone: +36-70-275-4747)</li> <li>• Réka Lovász sole proprietor (2030 Érd, György u. 55.; phone: +36-30-631-6295; email: lovaszka@yahoo.de)</li> <li>• Dr. Júlia Bajorfi-Szittner (1132 Budapest, Visegrádi u. 43-45. II/8.); phone: +36-30-396-4856; email: szittner@bajorfi.hu)</li> <li>• Espell fordítás és lokalizáció Zrt (1056 Budapest, Belgrád rkp. 26. II. em. 1.)</li> <li>• Consittner Kft. (1026 Budapest, Gárdonyi Géza út 32.)</li> <li>• Országos Fordító és Fordításhitelesítő Iroda Zrt. (1062 Budapest, Bajza u. 52.; phone: +36-1-428-9600)</li> <li>• Tabula Fordítóiroda Bt. (1131 Budapest, Madarász Viktor u. 13/4.)</li> </ul>	<p>Processor</p> <p>Purpose of the data processing: translation services</p> <p>The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the Leading Firm</p>
<p>Permanent cooperating IT expert of the Leading Firm:</p> <p>Professional Information Technology Kft. (1107 Budapest, Fogadó utca 4. C épület fsz.; tel: +36 1 920 0131)</p>	<p>Processor</p> <p>Purpose of the data processing: performing system administrator and system monitoring tasks</p> <p>The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the Leading Firm.</p>
<p>Hosting service provider of the Leading Firm:</p> <p>Microware Hungary Kft. (1148 Budapest, Fogarasi út 3-5.; email: <a href="mailto:domreg@microware.hu">domreg@microware.hu</a>)</p>	<p>Processor</p> <p>Purpose of the data processing: hosting service</p>

Recipient	Recipient's role
	The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the Leading Firm.
<p>Document archiving partner of the Leading Firm:</p> <p>Iron Mountain Magyarország Kft. (1093 Budapest, Czuczor u. 10.)</p>	<p>Processor</p> <p>Purpose of the data processing: storage, archiving and deleting of documents</p> <p>The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the Leading Firm.</p>
<p>Auditor of the Leading Firm:</p> <ul style="list-style-type: none"> <li>HP-KONTÓ Kft. (1031 Budapest, Búza utca 8.)</li> </ul>	<p>Controller</p> <p>Purpose of the data processing: conduction of statutory audit</p>
<p>WTS company:</p> <p>WTS Klient Gazdasági Tanácsadó Kft. (1143 Budapest, Stefánia út 101-103., Telefon: +36 (0) 1 887 3700; Email: info@wtsklient.hu</p>	Controller
Clients	Controller
Representatives and/or advisors	Controller
Insurers	Controller
<p>Opposing parties in legal proceedings, representatives and/or advisors of opposing parties in legal proceedings</p>	Controller
Experts and/or other service providers	Controller or processor
Courts and/or authorities	Controller

Recipient	Recipient's role
External auditors	Controller
External accountants	Controller
Shipping/courier service providers	Controller
Press publishers and market analysts	Controller
Identification service providers	Processor
Accounting service providers	Processor
Billing service providers	Processor
IT service providers	Processor

**C. Information on the processing of personal data of our job applicants**

The Leading Firm processes the personal data of applicants who apply for a job.

The Leading Firm processes the data of job applicants for the purpose of conducting the application process, in particular for the purpose of assessment of the applications, contacting applicants and conducting interviews in order to assess and select suitable candidates.

The Leading Firm provides detailed information on this below:

**I. Details on the personal data that are processed**

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
Master data	Surname, first name, mother's maiden name, date of birth, nationality, place of birth, country of birth, chamber's identification number.	Applicants or recruitment agencies instructed to act on behalf of applicants.	Provision of the data is not required by law or contract. The data subject is not obliged to provide the data.  However, if the data are not provided, it may not be possible to conduct the application process and, if applicable, to hire an applicant.	If an applicant is hired, the data will be entered in the personnel file. Information on the storage duration is provided in the Privacy Notice on the processing of the personal data of the employees.  Otherwise the data will be deleted within one month after completion of the application process.
Contact data	Private address, e-mail address telephone number.	Applicants or recruitment agencies instructed to act on behalf of applicants.	The provision of the data is not required by law or contract. The data subject is not obliged to provide the data.  However, if the data are not provided, it may not be possible to conduct the application process by the Leading Firm and, if applicable, to employ the applicant.	If an applicant is hired, the data will be entered in the personnel file. Information on the storage duration is provided in the Privacy Notice on the processing of the personal data of the employees.  Otherwise the data will be deleted within one month after completion of the application process.

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
Application data	Content of application documents, in particular photograph, CV and certificates/references,  Content of the written (including electronic) correspondence relating to the application.	Applicants or recruitment agencies instructed to act on behalf of applicants.	The provision of the data is not required by law or contract. The data subject is not obliged to provide the data.  However, if the data are not provided, it may not be possible to conduct the application process by the Leading Firm and, if applicable, to employ the applicant.	If an applicant is hired, the data will be entered in the personnel file. Information on the storage duration is provided in the Privacy Notice on the processing of the personal data of the employees.  Otherwise the data will be deleted within one month after completion of the application process.
	Content of evaluation notes, perceptions from interviews, feedback and evaluations, outcome of the application process (whether or not the applicant was hired)	Generated in-house	-	

## II. Details on the processing of personal data

No automated decision-making is carried out in relation to the data processed.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
Conducting the application process, in particular reviewing applications, contacting the applicant and conducting interviews to evaluate and select suitable applicants.	Master data,  Contact data,  Application data.	Taking steps prior to entering into a contract (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).	Partner Firms,  Permanent cooperating IT expert of the Leading Firm,  Hosting service provider of the Leading Firm,

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
			IT service providers.
Establishment of the fee of the recruitment agencies	Master data, outcome of the application process, agreed salary in the case of hiring of the applicant	Taking steps prior to entering into a contract (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).	Recruitment agencies mandated by the Leading Firm

### III. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

The Leading Firm does not regularly transfer personal data to third countries. In case of a possible individual transfer of data, the Leading Firm will provide specific information to the data subject in accordance with the Data Protection Regulation.

Recipient	Recipient's role
Permanent cooperating IT expert of the Leading Firm:  Professional Information Technology Kft. (1107 Budapest, Fogadó utca 4. C épület fsz.; tel: +36 1 920 0131)	Processor.  Purpose of the data processing: performing system administrator and system monitoring tasks  The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the Leading Firm.
Hosting service provider of the Leading Firm:  Microware Hungary Kft. (1148 Budapest, Fogarasi út 3-5.; email: domreg@microware.hu)	Processor  Purpose of the data processing: provision of hosting services  The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the Leading Firm.
Recruitment agencies mandated by the Leading Firm:  • Randstad Hungary Kft.(1024 Budapest, Lövház u. 39. II. em.)	Controller

Recipient	Recipient's role
<ul style="list-style-type: none"><li data-bbox="181 240 893 304">• Arsoni Karrier (1052 Budapest, Aranykéz u. 2.; phone: +36-70-635 9818; email: benedek.molnar@arsoni.hu)</li></ul>	
IT service providers	Processor

#### D. Information on the processing of personal data of our (potential) suppliers and their employees

The Leading Firm processes personal data of (potential) suppliers and their employees.

Suppliers are all natural persons or legal entities that manufacture and/or supply goods or provide services.

The data of (potential) suppliers and their employees are processed for the following purposes:

- Taking steps prior to entering into a contract, including pre-contractual correspondence and the preparation of offers and cost estimates,
- performance of contracts with suppliers, including invoicing and payment processing,
- proper accounting and storage to comply with statutory, in particular accounting law, tax law and retention obligations, as well as for evidence purposes for the establishment, exercise or defence of possible legal claims,
- establishment, exercise or defence of legal claims, including coordination with external lawyers,
- liaison with external tax advisors and/or auditors to comply with statutory obligations,
- cooperation with courts and/or authorities to comply with statutory obligations,
- business relationship management, including making contact to inform (potential) suppliers and to maintain relationships with (potential) suppliers.

The Leading Firm gives more detailed information on this below:

#### I. Details on the personal data that are processed

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
Master data	Suppliers' name, industry of our suppliers.	Suppliers.	Provision of the data is not required by law or contract. The data subject is not obliged to provide the data.	The data being stored is based on statutory, in particular accounting law document retention obligations. The document retention requirements under accounting law can be eight years ( Sec.169 (1)-(2) of the Accountant Act).

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
			However, if the data are not provided, the conclusion of performance of a contract may not be possible.	The documents stored for evidence purposes for the possible establishment, exercise or defence of legal claims and the establishment, exercise of defence of claims against suppliers, including liaison with external lawyers, are erased after 5 years commencing at the end of the year in which the business relationship with the supplier has been terminated.
Contact data	Name, position and company contact data (address, e-mail address, telephone number, fax number) of contact person at suppliers.	Suppliers.	Provision of the data is not required by law or contract. The data subject is not obliged to provide the data.  However, if the data are not provided, the conclusion of performance of a contract may not be possible.	The data are stored based on statutory, in particular accounting law document retention obligations. The document retention requirements under accounting law can be eight years (Sec.169 (1)-(2) of the Accountant Act).  The documents stored for evidence purposes for the possible establishment, exercise or defence of legal claims and the establishment, exercise of defence of claims against suppliers, including liaison with external lawyers, are erased after 5 years commencing at the end of the year in which the business relationship with the supplier has been terminated.
Bank account data	Account holder, bank, IBAN, BIC of suppliers.	Suppliers.	The provision of the data is not required by law or contract. The data subject is not obliged to provide the data.	The data are stored based on statutory, in particular accounting law document retention obligations. The document retention requirements under accounting law can be eight years (Sec.169 (1)-(2) of the Accountant Act).

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
			However, if the data are not provided, the conclusion of performance of a contract may not be possible.	
				The documents stored for evidence purposes for the possible establishment, exercise or defence of legal claims and the establishment, exercise of defence of claims against suppliers, including liaison with external lawyers, are deleted after 5 years commencing at the end of the year in which the business relationship with the supplier has been terminated.
Communication data	Content of business communication of suppliers to the Leading Firm, in particular by post, e-mail.	Suppliers	The provision of the data is not required by law or contract. The data subject is not obliged to provide the data.  However, if the data are not provided, the conclusion of performance of a contract may not be possible.	The data are stored based on statutory, in particular accounting law document retention obligations. The document retention requirements under accounting law can be eight years (Sec.169 (1)-(2) of the Accountant Act).  The documents stored for evidence purposes for the possible establishment, exercise or defence of legal claims and the establishment, exercise of defence of claims against suppliers, including liaison with external lawyers, are deleted after 5 years commencing at the end of the year in which the business relationship with the supplier has been terminated.
	Content of business communication to suppliers, in particular by post, e-mail.	Generated in-house.		
	Circumstances of business communication with suppliers, in particular parties involved, date/time and duration.	Generated in-house.		

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
Contract data	Information that we receive from suppliers to take steps prior to entering into a contract and/or to perform contracts with suppliers.	Suppliers.	The provision of the data is not required by law or contract. The data subject is not obliged to provide the data.  However, if the data are not provided, the conclusion of performance of a contract may not be possible.	The data are stored based on statutory, in particular accounting law document retention obligations. The document retention requirements under accounting law can be eight years (Sec.169 (1)-(2) of the Accountant Act).  The documents stored for evidence purposes for the possible establishment, exercise or defence of legal claims and the establishment, exercise of defence of claims against suppliers, including liaison with external lawyers, are deleted after 5 years commencing at the end of the year in which the business relationship with the supplier has been terminated.
	Data from written (including electronic) contract documents that we receive from suppliers.	Suppliers.	The provision of the data is not required by law or contract. The data subject is not obliged to provide the data.  However, if the data are not provided, the conclusion of performance of a contract may not be possible.	
	Information that we may receive from third parties to take steps prior to entering into a contract and/or for the performance of contracts with our suppliers.	Third parties.		
	Data from written (including electronic) contract documents prepared by the Leading Firm.	Generated in-house.		
Invoice data	Data from invoices and payment reminders that we receive from suppliers, in particular data, invoice items and invoice amounts.	Suppliers	The provision of the data is not required by law or contract. The data subject is not obliged to provide the data.  However, if the data are not provided, billing may not be possible.	The data are stored based on statutory, in particular accounting law document retention obligations. The document retention requirements under accounting law can be eight years (Sec.169 (1)-(2) of the Accountant Act).

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
				<p>The documents stored for evidence purposes for the possible establishment, exercise or defence of legal claims and the establishment, exercise of defence of claims against suppliers, including liaison with external lawyers, are deleted after 5 years commencing at the end of the year in which the business relationship with the supplier has been terminated.</p>
Payment data	Data relating to payment transactions, in particular date and payment amounts.	Generated in-house.	-	<p>The data are stored is based on statutory, in particular accounting law document retention obligations. The document retention requirements under accounting law can be eight years (Sec.169 (1)-(2) of the Accountant Act).</p> <p>The documents for evidence purposes for the possible establishment, exercise or defence of legal claims and the establishment, exercise of defence of claims against suppliers, including liaison with external lawyers, are deleted after 5 years commencing at the end of the year in which the business relationship with the supplier has been terminated.</p>
Minutes data	Data from minutes relating to the business content of appointments and meetings with suppliers that the Leading Firm prepares to maintain the business relationship.	Generated in-house.	-	<p>The data are stored based on statutory, in particular accounting law document retention obligations. The document retention requirements under accounting law can be eight years (Sec.169 (1)-(2) of the Accountant Act).</p>

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
				The documents stored for evidence purposes for the possible establishment, exercise or defence of legal claims and the establishment, exercise of defence of claims against suppliers, including liaison with external lawyers, are deleted after 5 years commencing at the end of the year in which the business relationship with the supplier has been terminated.

## II. Details on the processing of personal data

No automated decision-making is carried out in relation to the data processed.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
Taking steps prior to entering into a contract, including precontractual communication.	Master data, Contact data, Communication data, Contract data.	The legal basis is taking steps at the request of the data subject prior to entering into a contract (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).	Permanent accountant partner of the Leading Firm,  Shipping/courier service providers.
Performance of contracts with suppliers, including contractual communication, exchange of services and payment processing.	Master data, Contact data, Bank account data,	The legal basis is the performance of a contract, to which the data subject is party (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).	Permanent accountant partner of the Leading Firm,  Permanent cooperating IT expert of the Leading Firm,

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
	Communication data, Contract data, Invoice data, Payment data.		Hosting service provider of the Leading Firm, Shipping/courier service providers, IT service providers.
Proper accounting and storage to comply with contractual and statutory, in particular commercial law and tax law retention obligations.	Master data, Contact data, Bank account data, Communication data, Contract data, Invoice data, Payment data.	Compliance with the legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation), in particular compliance with statutory requirements for proper accounting and statutory, in particular professional ethics, commercial and tax law retention obligations.	Permanent accountant partner of the Leading Firm, Accounting service providers, Archiving service providers.
Storage for evidence purposes for the establishment, exercise or defence of possible legal claims.	Master data, Contact data, Bank account data, Communication data, Contract data,	The legal basis is the balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interests is the establishment, exercise or defence of legal claims.	Document archiving partner of the Leading Firm, Archiving service providers.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
	Minutes data,  Invoice data,  Payment data.		
Establishment, exercise or defence of legal claims, including coordination with external lawyers.	Master data,  Bank account data  Communication data,  Contract data,  Invoice data,  Payment data.	The legal basis is the balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interests is the establishment, exercise or defence of legal claims.	Courts and/or authorities,  External lawyers.
Liaison with external tax advisors and/or auditors to comply with statutory obligations.	Master data,  Contact data,  Bank account data,  Communication data,  Contract data,  Invoice data,  Payment data.	The legal basis is the compliance with the legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation).	Permanent accountant partner of the Leading Firm,  Auditor of the Leading Firm,  External tax advisors,  External auditors.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
Cooperation with courts and/or authorities to comply with statutory obligations.	Master data, Contact data, Bank account data, Communication data, Contract data, Invoice data, Payment data.	The legal basis is the compliance with the legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation).	Courts and/or authorities.
Business relationship management, making contact to inform our suppliers and to maintain relationships with our suppliers.	Master data, Contact data, Communication data, Contract data, Minutes data.	The legal basis the balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the maintenance and strategic alignment of the relationships with our suppliers.	Partner Firms

### III. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

The Leading Firm does not regularly transfer personal data to third countries. In case of a possible individual transfer of data, we will provide specific information to the data subject in accordance with the Data Protection Regulation.

Recipient	Recipient's role
Permanent cooperating accounting partner of the Leading Firm:  E-GOODWILL Kft. (3842 Halmaj, Dózsa György u. 50.; company registration number: 05-09-018917)	Processor  Purpose of the data processing: performance of billing, accounting, client identification tasks.  The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the Leading Firm.
Permanent cooperating IT expert of the Leading Firm  Professional Information Technology Kft. (1107 Budapest, Fogadó utca 4. C épület fsz.; tel: +36 1 920 0131)	Processor  Purpose of the data processing: performing system administrator and system monitoring tasks.  The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the Leading Firm
Hosting service provider of the Leading Firm:  Microware Hungary Kft. (1148 Budapest, Fogarasi út 3-5.; email: domreg@microware.hu)	Processor  Purpose of the data processing: provision of hosting services  The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the Leading Firm.
Document archiving partner of the Leading Firm:  <ul style="list-style-type: none"> <li>Iron Mountain Magyarország Kft. (1093 Budapest, Czuczor u. 10.)</li> </ul>	Processor.  Purpose of the data processing: storage, archiving and deleting of documents.  The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the Leading Firm.
Auditor of the Leading Firm:  HP-KONTÓ Kft. (1031 Budapest, Búza utca 8.)	Controller.  Purpose of the data processing: conduction of statutory audit.
External lawyers	Controller.

Recipient	Recipient's role
External auditors	Controller.
External tax advisors	Controller.
Courts and/or authorities	Controller.
Shipping/courier service providers	Controller.
IT service providers	Processor.
Accounting service providers	Processor.
Archiving service provider	Processor.

## E. Information on the processing of personal data of visitors of the Leading Firm

The Joint Controllers process the personal data of visitors (in particular (potential) clients, (potential) suppliers and their employees) visiting the Leading Firm.

We process data of our visitors for the following purposes:

- Identification of visitors and documentation of visits in order to ensure the safety of the office, employees and members, to ensure the safety of our visitors, to protect the property or the property of suppliers,
- identification of visitors and documentation of visits in order to comply with statutory identification and documentation obligations and access restrictions,
- planning and organisation of the details of the visit,
- document retention in order to comply with statutory document retention obligations as well as for evidence purposes for the possible establishment, exercise or defence of legal claims,
- establishment, exercise or defence of legal claims, including cooperation with external lawyers,
- cooperation with courts and/or authorities to comply with statutory obligations.

You receive more detailed information on this below.

## I. Details on the personal data that are processed

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
Master data	Name, position, company industry	Visitors	Provision of the data is not required by law or contract. The data subject is not obliged to provide the data.  However, if the data are not provided, a visit may not be possible.	We delete these data within one month following the visit.

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
Contact data	Address, e-mail address, telephone number, fax number,	Visitors	Provision of the data is not required by law or contract. The data subject is not obliged to provide the data.  However, if the data are not provided, a visit may not be possible.	We delete these data within one month following the visit.
Registration data	Expected time, duration and purpose of visit, buildings or parts of buildings to be visited, arrival and departure	Visitors	Provision of the data is not required by law or contract. The data subject is not obliged to provide the data.  However, if the data are not provided, a visit may not be possible.	We delete these data within one month following the visit.
Additional data	Optional information on the visitor's special catering requirements or other technical or organisational arrangements for the visit, such as barrier-free facilities	Visitors	Provision of the data is not required by law or contract. The data subject is not obliged to provide the data.  If the data are not provided, the visitor's special requirements cannot be taken into account.	We delete these data within one month following the visit.
Visit data	Actual time and duration of visit, information on buildings or parts of buildings visited	Generated in-house	-	We delete these data within one month following the visit.
Communication data	Content of communication with visitors regarding the planning and organisation of	Visitors	Provision of the data is not required by law or contract. The data subject is not obliged to provide the data. However, if	We delete these data within one month following the visit.

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Storage duration
	visits, in particular via post, e-mail, telephone.		the data are not provided, a visit may not be possible.	
	Content of communication with visitors regarding the planning and organisation of visits, in particular via post, e-mail, telephone.	Generated in-house	-	
	Circumstances of business communication with visitors, in particular those involved, time and duration	Generated in-house	-	

## II. Details on the processing of personal data

No automated decision-making is carried out in relation to the data processed.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
Identification of our visitors and documentation of visits in order to maintain the safety of our buildings, facilities, employees and members, to ensure the safety of our visitors, to protect our property or the property of our suppliers.	Master data, Contact data, Registration data, Visit data,	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is maintaining the safety of the office, employees and members, ensuring the safety of visitors and protecting property or the property of suppliers. Our legitimate interest is also ensuring that appropriate data security measures in accordance with Article 32 of the General Data Protection Regulation have been implemented.	Hosting service provider of the Leading Firm

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
<p>Planning and organisation of the details of the visit.</p> <p>For this purpose, we may carry out advance registration of visitors prior to the visit.</p> <p>In addition, we take into account any optional information from visitors regarding special catering requirements or other technical or organisational arrangements for the visit, such as barrier-free facilities.</p>	<p>Master data,</p> <p>Contact data,</p> <p>Registration data,</p> <p>Visit data,</p> <p>Additional data,</p> <p>Communication data.</p>	<p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the planning and organisation of the details of the visit taking the special wishes and needs of the visitor into account.</p>	<p>Hosting service provider of the Leading Firm</p>
<p>Storage for evidence purposes for the possible establishment, exercise or defence of legal claims.</p>	<p>Master data,</p> <p>Contact data,</p> <p>Identification data,</p> <p>Registration data,</p> <p>Visit data,</p> <p>Additional data,</p> <p>Communication data.</p>	<p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest the establishment, exercise or defence of legal claims.</p>	<p>-</p>
<p>Establishment, exercise or defence – of legal claims.</p>	<p>Master data,</p> <p>Contact data,</p>	<p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our</p>	<p>Courts, external lawyers.</p>

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, where applicable, legitimate interests	Recipient
	Identification data, Registration data, Visit data, Additional data, Communication data.	legitimate interest the establishment, exercise or defence of legal claims.	
Cooperation with courts and/or authorities to comply with statutory obligations.	Master data, Visit data.	Compliance with the legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation).	Courts and/or authorities

### III. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

The Leading Firm does not regularly transfer personal data to third countries. In case of a possible individual transfer of data, we will provide specific information to the data subject in accordance with the Data Protection Regulation.

Recipient	Recipient's role
External lawyers	Controller
Courts and/or authorities	Controller
Hosting service provider of the Leading Firm:  Microware Hungary Kft. (1148 Budapest, Fogarasi út 3-5.; email: <a href="mailto:domreg@microware.hu">domreg@microware.hu</a> )	Processor  Purpose of the processing: provision of hosting services  The duration of the data processing: data are deleted within 2 weeks after the termination of the data processing agreement concluded with the Leading Firm.

## **F. Information on the rights of data subjects**

As a data subject, you have the following rights regarding the processing of your personal data:

- Right to access
- Right to rectification
- Right to erasure (“right to be forgotten”)
- Right to restriction of processing
- Right to data portability
- Right to object
- Right to withdraw consent
- Right to lodge a complaint with a supervisory authority

To exercise your rights, you may contact us using the contact details set out in **Part A**.

We give more detailed information on this below:

### **I. Right to access**

As a data subject, you have a right to obtain access and information under the conditions provided in Article 15 of the General Data Protection Regulation.

This means in particular that you have the right to obtain confirmation from us as to whether we are processing your personal data. If so, you also have the right to obtain access to the personal data and the information listed in Article 15 paragraph 1 of the General Data Protection Regulation. This includes information regarding the purposes of the processing, the categories of personal data that are being processed and the recipients or categories of recipients to whom the personal data have been or will be disclosed (points (a), (b) and (c) of Article 15 paragraph 1 of the General Data Protection Regulation).

### **II. Right to rectification**

As a data subject, you have the right to rectification under the conditions provided in Article 16 of the General Data Protection Regulation.

This means in particular that you have the right to receive from us without undue delay the rectification of inaccuracies in your personal data and completion of incomplete personal data.

### **III. Right to erasure (“right to be forgotten”)**

As a data subject, you have a right to erasure (“right to be forgotten”) under the conditions provided in Article 17 of the General Data Protection Regulation.

This means that you generally have the right to obtain from us the erasure of your personal data and we are obliged to erase your personal data without undue delay when one of the reasons listed in Article 17 paragraph 1 of the General Data Protection Regulation applies. This can be the case, for example, if personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed (point (a) of Article 17 paragraph 1 of the General Data Protection Regulation).

Where we have made the personal data public and are obliged to erase the personal data, we, taking account of available technology and the cost of implementation, are also obliged to take reasonable steps, including technical measures, to inform other controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data (Article 17 paragraph 2 of the General Data Protection Regulation).

The right to erasure (“right to be forgotten”) does not by exception apply if the processing is necessary for one of the reasons listed in Article 17 paragraph 3 of the General Data Protection Regulation. This can be the case, for example, if the processing is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims (points (b) and (e) of Article 17 paragraph 3 of the General Data Protection Regulation).

#### **IV. Right to restriction of processing**

As a data subject, you have a right to restriction of processing under the conditions provided in Article 18 of the General Data Protection Regulation.

This means that you have the right to obtain from us the restriction of processing if one of the conditions provided in Article 18 paragraph 1 of the General Data Protection Regulation applies. This can be the case, for example, if you contest the accuracy of the personal data. In such a case, the restriction of processing lasts for a period that enables us to verify the accuracy of the personal data (point (a) of Article 18 paragraph 1 of the General Data Protection Regulation).

Restriction means that stored personal data are marked with the goal of restricting their future processing (Article 4 paragraph 3 of the General Data Protection Regulation).

#### **V. Right to data portability**

As a data subject, you have a right to data portability under the conditions provided in Article 20 of the General Data Protection Regulation.

This means that you generally have the right to receive your personal data with which you have provided us in a structured, commonly used and machine-readable format and to transmit those data to another controller without hindrance from us if the processing is based on consent pursuant to point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation or on a contract pursuant to point (b) of Article 6 paragraph 1 of the General Data Protection Regulation and the processing is carried out by automated means (Article 20 paragraph 1 of the General Data Protection Regulation).

In exercising your right to data portability, you also generally have the right to have your personal data transmitted directly from us to another controller if technically feasible (Article 20 paragraph 2 of the General Data Protection Regulation).

## **VI. Right to object**

As a data subject, you have a right to object under the conditions provided in Article 21 of the General Data Protection Regulation. At the latest in our first communication with you, we expressly inform you of your right, as a data subject, to object.

As a data subject, you have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on point (e) or (f) of Article 6 paragraph 1, including profiling based on those provisions.

In the event of an objection relating to your particular situation, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

## **VII. Right to withdraw consent**

Where an instance of processing is based on consent pursuant to point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation, as a data subject, you have the right, pursuant to Article 7 paragraph 3 of the General Data Protection Regulation, to withdraw your consent at any time. The withdrawal of your consent does not affect the legitimacy of the processing that occurred based on your consent until the withdrawal. We inform you of this before you grant your consent.

## **VIII. Right to lodge a complaint with a supervisory authority**

As a data subject, you have a right to lodge a complaint with a supervisory authority under the conditions provided in Article 77 of the General Data Protection Regulation.

The supervisory authority responsible for us is:

Nemzeti Adatvédelmi és Információszabadság Hatóság (National Data Protection and Information Safety Authority)

1055 Budapest Falk Miksa utca 9-11.

website: [www.naih.hu](http://www.naih.hu);

email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Phone: +(36)-1-391-1400

## **IX. Judicial remedy**

In the event of violation of your rights you may bring an action before the court against us. The lawsuit belongs to the competence of the Regional Courts. You may bring the action before the Regional Court of your residence or of your temporary address at your choice.

## **G. Final provisions**

This Privacy Notice contains a consolidated version of the changes that have occurred in the meantime. This version is effective from **15 April 2026**.