



PRIVACY NOTICE BY LAKATOS KÖVES ÉS TÁRSAI ÜGYVÉDI IRODA

1. GENERAL PROVISIONS

1.1 Goals and objectives of this Policy

- 1.1.1. The objective of this Data Protection Policy (“**Policy**”) is to notify data subjects how personal data is collected, handled and stored by Lakatos, Köves és Társai Ügyvédi Iroda (the „**Data Controller**” or „**Office**”) based on those legal rules and standards which the Office considers binding for itself as data controller.
- 1.1.2. When compiling this Policy, the Data Controller took into account the General Data Protection Regulation (“**GDPR**”) and the Hungarian Act no. CXII of 2011 on information self-determination and freedom of information (“**Data Protection Act**”) as well as with other relevant legal rules.
- 1.1.3. The Data Controller is not obliged to maintain a record of data processing activities under Article 30 of the GDPR. However, considering the principle of accountability, when necessary, the Data Controller lists and continuously updates list of its processing activities. It also maintains a list of data breaches.
- 1.1.4. The data protection and data processing principles applied by the Data Controller are regulated by the Data Controller's data protection policy. The data protection policy protects data security with appropriate physical, organizational and IT measures, and sets out the measures to be taken in the event of a data breaches in accordance with the provisions of the GDPR.

1.2 List of Data Processing Activities

In addition to its employees and its Agents, the Data Controller processes the Personal Data of the following persons:

- 1.2.1. Clients, other stakeholders involved in the provision of legal services, and those with a contractual relationship.
- 1.2.2. Applicants for job advertisements (non-selected candidates).
- 1.2.3. Visitors to the Data Controller's website.
- 1.2.4. Guests entering to the premises of the Data Controller.

on the legal bases and for the purposes set out below, for the retention periods indicated below.



1.3 Interpreting provisions

Capitalized terms used in this Notice hold the following meanings:

1. **Data** or **Personal Data** means any data or information by which a natural person becomes identifiable.
2. **Data Processor** means a person which processes Personal Data on behalf of the Data Controller. The details of the Data Processors currently used by the Office are as listed in the List of Data Processors.
3. **Data Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
4. **Privacy Notice** or **Notice** is a written text whose purpose is to properly notify Data Subjects on the processing of their Personal Data, including legal bases, purpose, retention period, and the rights of Data Subjects.
5. **Data Controller** means the person, which determines the purposes and means of the processing of Personal Data. In the use of the present Policy, the Data Controller is the Office and its Agents with the basic information as follows.

Name	Lakatos, Köves és Társai Ügyvédi Iroda
Tax number	18190254-2-42
Seat	1075 Budapest, Madách Imre út 14.
Contact	Greiner Ákos
Phone number	+ 3614291300
E-mail	info@lakatoskoves.hu
Website	http://www.lakatoskoves.hu/

6. **Data Security Breach** or **Data Breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.
7. **Áfa tv.** means Act CXXVII of 2007 on value added tax.
8. **Art.** means Act CL of 2017 on tax procedure.
9. **Data Subject** means identified or identifiable natural person.
10. **GDPR** means Regulation no. 2016/679 of the Parliament and the Commission.
11. **Website** means <http://www.lakatoskoves.hu/>.
12. **Data Protection Act** means Act CXII of 2011 on personal data protection and informational self-determination.
13. **Office** means the Data Processor.
14. **Social Media Sites** mean LinkedIn, Twitter and Google+.



15. **Agents** mean those lawyers who are in agency contract with the Office, listed on the site <http://www.lakatoskoves.hu/partnerek-es-ugyvedek>.
16. **Mt.** means Act I of 2012. on the labor code.
17. **Employees** mean those natural persons who are in employment relationship with the Data Processor.
18. **NAIH** means the Hungarian Data Protection Authority.
19. **Partners** mean the persons listed on the <http://www.lakatoskoves.hu/partnerek-es-ugyvedek> website.
20. **Pmt.** means Act LIII of 2017 on money laundering and the prevention of terrorist financing.
21. **Ptk.** means Act V of 2013 on the Civil Code.
22. **Personal Protection Act** means Act CXXXIII of 2015 on the rules of the private protection of persons, property and private investigators.
23. **Szvtv.** means Act C. of 2000 on accounting.
24. **Üt.** means Act LXXVIII. of 2017 on legal services.

2. DATA PROCESSING ACTIVITIES RELATED TO CLIENTS, OTHER STAKEHOLDERS INVOLVED IN THE PROVISION OF LEGAL SERVICES AND THOSE WITH A CONTRACTUAL RELATIONSHIP Legal basis:

- (a) Processing is necessary for the purposes of the legitimate interests pursued by the School (GDPR Article 6, section 1 (f));
- (b) (c) Processing is necessary for the performance of a contract to which the Data Subject is party (GDPR Article 6, section 1 (b));
- (c) Processing is necessary for compliance with a legal obligation to which the controller is subject (GDPR Article 6, section 1 (c)), where the legal obligation is prescribed by Pmt. Section 7;

2.1.2 Types of data and purposes of processing:

TYPES OF PERSONAL DATA	PURPOSE OF DATA PROCESSING
In the case of legal persons: the name of the person authorized to represent and the name(s) of the contact person(s), their title / position, their signature, e-mail address, business address and, where appropriate, the name of the person actually qualified In case of an natural persons: name, address, tax ID, email address	Information necessary for contact and control of the proper performance of the contract (legitimate interest, in the case of a contract concluded with a private person, performance of the contract)
Principal, representative, beneficial owner: personal identification data specified in Section 7 of Pmt.	Prevention and suppression of money laundering and terrorist financing (legal obligation)



Names and addresses of witnesses, experts and other interested parties involved in the performance of the mandate Identification data of a natural person client, authorized representative of a legal person (data listed in Section 32 (3) of the Üt.)	Performance of the lawyer's mandate agreement (legitimate interest) Verification of the correspondence of the data of a natural person's client, authorized person, representative of a legal person with the registered data and the validity of the documents presented by him, customer identification (legal obligation)
Processing of contact details in connection with the register of identified legal persons and other organizations (Section 34 (4) of the Üt.)	Promoting the security of legal transactions and enforcing restrictions on the practice of law (legal obligation)
Personal identification and contact details of non-principal but contracting parties in connection with data management related to document countersignature	Informing the non-client but the contractor (legal obligation)
Processing of data on documents and title deeds in connection with the countersignature of the documents of principals, owners, right holders (Section 45, 53 of the Üt.)	Verification of data and documents (legal obligation)
Processing of data related to the conversion of paper documents into electronic documents	Conversion to electronic document (performance of contract)
Management of data on principals and third-party attorney deposits	Execution of an escrow agreement (performance of a contract in the case of a principal, legitimate interest in the case of a third party)
Registration of client data according to Section 53 of Üt. in order to keep a case register	Verifiability of compliance with the rules on the legal practice and protection of clients' rights in the event of termination of the right to practice law (legal obligation)
Data processing carried out for the purpose of fulfilling restrictive measures against the principal, the representative, and the beneficial owner in accordance with the Act LII. of 2017 (Kit.)	Implementation of financial and property restrictive measures imposed by the European Union and the UN Security Council (legal obligation)



Management of data of contracting partners other than clients	Conclusion, performance, termination of the given contract (performance of the contract)
Processing of data of customers and suppliers for the purpose of fulfilling tax and accounting obligations (pursuant to Section 169 and Section 202 of the Áfa tv., in particular: tax number, name, address, tax status, according to Section 167 of the Act, Act CXVII of 1995 according to Act: number of sole trader's card, number of primary producer's card, tax identification mark)	Fulfillment of statutory tax and accounting obligations (bookkeeping, taxation) (legal obligation)
For case submissions to Chambers, Legal 500, Emis Dealwatch, MediaLaw International, Budapest Business Journal, Portfolio, HIPA: contact details for the given client	Questions related to the professional capacities of the Office, opinion of the client (consent)

2.1.3 Retention period:

In the case of clients, contact persons and those involved in the execution of the mandate: for 5 (five) years after the termination of the given contract or matter or if the Data Subject objects the data processing and it cannot be proven that the Data Controller's legitimate interest takes precedence over the Data Subject's rights, until the date of objection;

In case of countersigning a deed, 10 (ten) years after the countersignature of the deed; in a matter concerning the registration of a real estate right ,10 (ten) years from the registration of the right in the public register;

Data processed for the prevention of terrorist financing and money laundering and for the implementation of financial and property restrictive measures ordered by the European Union and the UN Security Council: 8 (eight) years from the termination of the business relationship or the execution of the transaction order, in cases under Sections 56-57 of the Pmt. and 10 (ten) years in the case of an official request specified in Section 58 of the Pmt.;

In the case of data processing related to an escrow: 10 (ten) years after the termination of the escrow agreement.

Data of customers and suppliers: 8 (eight) years (Section 169 of the Sztv.)

In case of converting documents into electronic form, the lawyer is obliged to keep the original paper-based document (a certified copy) as a non-disposable document, and to



transfer it to the bar archives of the Hungarian Bar Association upon termination of membership of the Bar Association under Bar Association Regulation 2/2007 (XI. 19.), points 9.1. and 9.2.

Data Subjects are notified via the publication and reference to the present Notice.

- 2.1.4 In the case of opposing parties, the provision of information and the rights of data subjects would impose a disproportionate burden on the Data Controller. The Data Controller processes the personal data of the opposing parties necessary for their identification and possibly for the enforcement of legal claims to the extent necessary for the performance of the given mandate agreement, in compliance with the rules of legal professional secrecy, on the basis of a legitimate interest.
- 2.1.5 The personal data listed in this section are considered legal secrets, and the Data Controller applies enhanced security measures to protect them. Lakatos, Köves és Társai Ügyvédi Iroda may use Agent or Agents as an additional data controllers in the course of the legal services provided to the Clients. in accordance with the provisions of the Ütv. The Agent shall process the personal data of the Clients, other contractual partners, counterparties and persons involved in the performance of legal activities in accordance with this prospectus, applying the provisions applicable to the Data Controller.
- 2.1.6 During the provision of legal services, the Data Controller shall transfer personal data only to the extent and to the extent necessary for the provision of the given legal services in accordance with the client's request, interest and the nature of the case. Such addressees may include, in particular: an authority, a court, an opposing party, a notary public, a translation agency providing notarised translation.

3. **APPLICANTS OF JOB ADVERTISEMENT (NON-SELECTED CANDIDATES)**

3.1.1 Legal basis:

- (a) Data Subjects have given their consent to the processing of their Personal Data for one or more specific purposes (GDPR Article 6, section 1 (a));



3.1.2 Types of data and purposes of processing:

TYPES OF PERSONAL DATA	PURPOSE OF DATA PROCESSING
Name, contact details (e-mail address, telephone number), curriculum vitae (CV) and information contained therein	Informing the data subject about future job offers (consent)

3.1.3 Data Subjects are notified via the publication and reference to the present Notice.

3.1.4 Retention period: until the withdrawal of the consent in accordance with Section 3.1.5. The consent can be revoked by sending a written request to the Data Controller's e-mail (info@lakatoskoves.hu) or postal address (1075 Budapest, Madách Imre út 14).

3.1.5 If the Data Subject has not given or withdrawn his or her consent, the Data Controller shall comply with Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities. for the period of claim enforcement provided for in Section 17 of the Act, ie for three years from the communication of the notice of non-employment, the Data Subject's data shall be treated confidentially for the purpose and for the purpose of any proceedings related to the enforcement of the claim.

4. PROCESSING THE DATA OF THE VISITORS OF THE DATA CONTROLLER'S WEBSITE, USING COOKIES, USING SOCIAL MEDIA SITES

4.1.1 By visiting our website, you consent to the placement of cookies on your computer (or other device) that help the operation of our website and provide information about the behavior of users on the website. We use this information to improve our website.

4.1.2 The cookies we use only provide us anonymized and aggregated technical information. This is primarily to ensure easy navigation on the website, to identify which parts are of particular interest to visitors, and to improve the site and our services in general. Based on the information collected in this way, you cannot be uniquely identified. We do not wish to uniquely identify visitors unless they voluntarily provide their information through the Website in some way. Under certain circumstances, based on our records, we identify organizations that visit our site and may use this information in our dealings with them, such as to improve the services offered to them.

4.1.3 In the case of the use of cookies: the data carried by the cookies may be processed as long as you do not disable their use in the browser's settings, but at the latest as long as the Data Processing is necessary for the technical operation of the website.



4.1.4 The processing of data obtained through the presence on the Social Media Sites is carried out on the Social Media Sites, so the duration and method of data processing, as well as the possibilities of deleting and modifying the data are also regulated by the given social site. The Office shall not transfer user content published on the Social Media Sites to databases enabling personal data processing, except in cases where a user is interested in the Office's job advertisement, in which case the Office's data processing shall comply with the rules on personal data of job advertisers.

5. NOTIFICATION ON CAMERA SURVEILLANCE, PROCESSING THE DATA OF GUESTS ENTERING THE PREMISES OF THE DATA CONTROLLER

5.1.1. The Data Controller's premises is an area monitored by security cameras. Processing of Personal Data recorded via camera are processed pursuant to Article 6 (1) (f) of the GDPR for the purposes in the section below and on the basis of the legitimate economic interests of the Data Controller, in relation of the data of clients, other stakeholders involved in the provision of legal services and contractual relationships.

5.1.2. The purpose of data processing is the protection of the safety of persons and property, as well as the confidentiality of client files, as well as the protection of the personal data of other stakeholders and persons involved in the provision of legal services.

5.1.3. For this purpose, the Data Controller operates a closed-circuit camera system consisting of 3 cameras (hereinafter: the System), to which it draws the attention of those entering its premises. During the operation of the System, an image of the persons entering the territory of the Office will be recorded (the Recording), which is Personal Data. The System monitors the following areas and properties:

	Position of camera	Purpose of the use of camera	Area seen by the camera	Retention period
1.	<i>Entrance</i>	<i>Protecting entrance</i>	<i>Entrance door (glass door)</i>	<i>30 days</i>
2.	<i>Entrance</i>	<i>Protecting entrance</i>	<i>Entrance door</i>	<i>30 days</i>
3.	<i>Entrance</i>	<i>Protecting entrance</i>	<i>Entrance door</i>	<i>30 days</i>



- 5.1.4. The System captures digital images and is equipped with a motion tracking system and records when motion is detected. The System records the movements, day, time and location detected in the monitored area. The cameras operate 24 hours a day, 7 days a week
- 5.1.5. The cameras are operated by Lakatos, Köves és Társai Ügyvédi Iroda. Camera recordings are stored for 30 (thirty) days.
- 5.1.6. Personal Data recorded may be processed until the expiry of the period specified in point 5.1.5., unless the use of the Personal Data as evidence in court or other official proceedings becomes justified due to the damage or threat of damage to an interest to be protected.
- 5.1.7. The Office shall perform the tasks related to technical assistance with regard to the System (e.g. operation and maintenance) by itself. Recordings shall be accessible only to two authorized employees, excluding proceedings instituted for infringement or threatened infringement of the interest to be protected.
- 5.2.1. The Data Controller processes the following data of the guests entering its premises: the name of the guest and the name of the person or organization he/she represents, the exact date of arrival and departure, the name of the hosting lawyer, the registration number of the car used to enter the office building.
- 5.2.2. Since the guest visit is a legal fact on which the accounting document is based, therefore the data recorded in the guest book for the purpose of fulfilling the legal obligation of the Data Controller (Article 6 (1) (c) GDPR) which is based on Section 169 of the Sztv. Additionally, the data of the arriving guests is processed for the purpose and the legal bases as described in points 5.1.1. and 5.1.2. and for the purpose of the quality organization of the customer reception activity.
- 5.2.3. The data of the arriving guests are processed based on Section 169 of the Sztv. for eight years from the compilation of the accounting document created on the basis of the data.

6. RIGHTS OF DATA SUBJECTS AND EXERCISING THEIR RIGHTS

- 6.1 The Data Subjects may exercise their rights listed below by contacting the Data Controller via e-mail (info@lakatoskoves.hu) or registered postal mail (1075 Budapest, Madách Imre út 14.). Queries sent in postal mails are regarded authentic if the sender can clearly be identified. Queries in e-mails are regarded authentic only if they are sent from the e-mail address of the Data Subject, which does not preclude other identifications of the Data Subject by the Data Controller.



- 6.2 The Data Controller examines the queries of the Data Subjects and makes decisions on such requests communicated in writing towards the affected Data Subject without undue delay.
- 6.3 The Data Subject has the right to obtain from the Data Controller confirmation as to whether or not Personal Data concerning him or her are being processed, and, where that is the case, access to the Personal Data and the following information without undue delay:
- (i) the purposes of the processing;
 - (ii) the categories of Personal Data concerned;
 - (iii) the recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in Third (non EU) Countries;
 - (iv) where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period;
 - (v) the existence of the right to request from the Data Controller rectification or erasure of Personal Data or restriction of processing of Personal Data concerning the data subject or to object to such processing;
 - (vi) the right to lodge a complaint with the NAIH;

Where Personal Data are transferred to a Third Country, the Data Subject has the right to be informed of the appropriate safeguards relating to the transfer.

The Data Controller provides a copy of the Personal Data undergoing processing. For any further copies requested by the Data Subject, the Data Controller charges a reasonable fee based on administrative costs and fulfills the request after the payment of the fee. Where the Data Subject makes the request by electronic means, and unless otherwise requested by the Data Subject, the information shall be provided in a commonly used electronic form.

The right to obtain a copy may not affect the rights and freedoms of others adversely.

- 6.4 The Data Subject has the right to obtain from the Data Controller without undue delay the rectification of inaccurate Personal Data concerning him or her. Taking into account the purposes of the processing, the Data Subject has the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.
- 6.5 The Data Subjects have the right to ask for the erasure of his or her Personal Data without undue delay. The Data Controller has the obligation to erase Personal Data without undue delay where one of the following applies:
- (i) the Personal Data are no longer necessary for the purposes for which they were collected or processed;



- (ii) the Data Subject withdraws consent on which the processing is based, and there is no other legal ground for the processing;
- (iii) the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing;
- (iv) the Personal Data have been unlawfully processed;
- (v) the Personal Data have to be erased for compliance with a legal obligation in European Union or Hungarian law.

Where the Data Controller has made the Personal Data public and is obliged to erase the Personal Data, the Data Controller takes reasonable steps, including technical measures, to inform 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.

- 6.6 The Data Subject has the right to object at any time against the processing of his or her Personal Data, if such processing is necessary for the purposes of the legitimate interests of the Data Controller, including profiling. In case the Data Subject objects, the Data Controller can no longer process the Personal Data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of legal claims.

At the latest at the time of the first communication with the Data Subject, the right to object is explicitly brought to the attention of the Data Subject, presented clearly and separately from any other information.

- 6.7 The Data Subjects have the right to obtain from the Data Controller restriction of processing where one of the following applies:
- (i) the accuracy of the Personal Data is contested by the Data Subject, for a period enabling the Data Controller to verify the accuracy of the Personal Data;
 - (ii) the Data Processing is unlawful and the Data Subject opposes the erasure of the Personal Data and requests the restriction of their use instead;
 - (iii) the Data Controller no longer needs the Personal Data for the purposes of the Data Processing, but they are required by the Data Subject for the establishment, exercise or defense of legal claims;
 - (iv) the Data Subject has objected to the Data Processing, pending the verification whether the legitimate grounds of the Data Controller override those of the Data Subject.



Where processing has been restricted, such Personal Data, with the exception of storage, is only processed with the Data Subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of Hungary.

A Data Subject who has obtained restriction of the Data Processing is informed by the Data Controller before the restriction of Data Processing is lifted.

7. LEGAL REMEDIES

7.1 Any Data Processing related queries can be sent to the following e-mail address of the Data Controller: info@lakatoskoves.hu.

7.2 In case the Data Subject has the opinion that their complaints were not handled properly, or they believe that their rights were abused in any way, they have the right to search for remedies at the NAIH. The contact information of the NAIH:

Name	in	Nemzeti Adatvédelmi és Információszabadság Hatóság
Hungarian		
Address		1125 Budapest, Szilágyi Erzsébet fasor 22/c.
Mailing address		1530 Budapest, Pf. 5
Telephone		+36 1 391 1400
Telefax		+36 1 391 1410
E-mail		ugyfelszolgalat@naih.hu
Website		www.naih.hu

7.3 If Data Subjects believe that their rights were abused, they can initiate a court procedure in front of the regional court. Such procedure can be commenced in front of the regional court according to the address or the temporary residence of the Data Subject according to his choice. Upon request, the School notifies the Data Subject on the possibility of legal remedies.



8. REGULARLY USED DATA PROCESSORS

Function	Medical on -call and expert activities
Name	Swiss Medical Services Kft.
Registration number	01-09-561648
Seat	1092 Budapest, Kinizsi u. 22. fszt. 4.
E-mail, phone number	info@swissclinic.hu, +36 1 225 0566
Type of data processing activity	Processing of patient identification data (name, position, social security number, address, date of birth) and data related to their condition (complaints, treatments, medications, previous health history)

Function	Payroll service
Name	NEXON Kft.
Registration number	01-09-062647
Seat	1138 Budapest, Váci út 185.
E-mail, phone number	nexon@nexon.hu, 061/465-5100
Type of data processing activity	Processing of data required for payroll accounting (Employee's name, tax ID, social security number, date of birth, salary, names and dates of birth of children)

Function	File storage and destruction
Name	Iron Mountain Kft.
Registration number	01-09-364901
Seat	1093 Budapest, Czuczor utca 10. IV. és V
E-mail, phone number	+36 1 815 3600
Type of data processing activity	Processing of documents created during the work of the Office

Function	Postal mail forwarding
Name	Magyar Posta Zrt.
Registration number	01-10-042463
Seat	1138 Budapest, Dunavirág utca 2-6.
E-mail, phone number	+36 1 767 8272
Type of data processing activity	Postal delivery of documents generated during the work of the Office

Function	Forwarding postal packages
Name	FedEx Express Hungary Kft.



Registration number 13-09-194327
Seat 2220 Vecsés, Lőrinci út 59. C. ép. 5.
E-mail, phone number +36 80 980 980
Type of data processing activity Delivery of documents generated during the work of the Office by courier service

Function Forwarding postal packages
Name DHL Express Magyarország Kft.
Registration number 01-09-060665
Seat 1185 Budapest, BUD Nemzetközi Repülőtér repülőtér 302. ép.
E-mail, phone number +36 1 245 4545
Type of data processing activity Delivery of documents generated during the work of the Office by courier service

Function Translation
Name Fortax Kft. - iTolmács
Registration number 01-09-716383
Seat 1138 Budapest, Tátra u. 28. fszt. 4.
E-mail, phone number +36 20 933 4746
Type of data processing activity Performing authentic translation role in the course of the Office's work

Function Translation
Name OFFI
Registration number 01-01-003265
Seat 1062 Budapest, Bajza utca 52.
E-mail, phone number +36 1 428 9600
Type of data processing activity Performing authentic translation role activities in the course of the Office's work