

## **PRIVACY POLICY**

(Last updated: February 28, 2023)

Dr. Varga M. Péter Law Office (hereinafter "we," "us," or the "Office") hereby informs you about how we process the personal data of users, visitors to our website (hereinafter the "Website"), and natural persons using the services provided through the Website (hereinafter the "Data Subjects").

Please read this Privacy Policy together with our website's Terms of Use and Cookie Policy.

We may modify this Privacy Policy at any time by updating this page and may require you to accept the changes if necessary. The date of the last update is indicated at the top of this Privacy Policy.

### 1. WHO IS THE DATA CONTROLLER?

The data controller is the Office. The Office processes your personal data in accordance with the General Data Protection Regulation ("GDPR") of the European Parliament and Council and applicable laws regarding the Website.

### 2. WHAT IS THE PURPOSE OF DATA PROCESSING?

Why do we process your personal data?

We process your personal data for the following reasons:

- a) To provide legal services on a contractual basis to you or your employee, principal, or the person to whom you provide services, as our client (together "you"), including providing legal advice and related services, organizing client conferences and events, managing client relationships and assignments, and conflict checks, which are our legitimate interests.
- b) To keep you informed about events, services, and news that may interest you, and to send you information in this regard, which is our legitimate interest.
- c) Legal requirements oblige us to verify the identity of new customers, prevent money laundering and fraud, fulfill tax obligations, and comply with registration obligations arising from legal representation;
- d) We fulfill your requests submitted through our website, respond to your questions or inquiries;
- e) We manage job applications submitted for job postings on our website.

### 3. WHAT DATA DO WE HANDLE?

Personal data can come directly from the customer, customer contact person, or other public sources (such as company registries). Such personal data can be classified into the following broader categories:

**Personal identification data**, such as name; representative's name, place, and date of birth; passport, tax identification, and personal identification document number and copy;

**Contact details**, such as address, email address, and telephone number(s);  
Activity-related data, such as previous employment history, job title, and job description;

**Contractual data**, such as the subject of the assignment and the description of the business event; Bank data, such as bank account number and payment data;  
Communication data, such as the content of emails, business letters, contract content, and other business documents;

**Special data**: exceptionally, we may also process health-related personal data or personal data related to criminal liability determination and criminal offenses.

If you do not provide this information, it may prevent us from fulfilling our assignment, providing services to you, or complying with applicable laws.

#### 4. WHAT IS THE LEGAL BASIS FOR DATA PROCESSING?

We rely on the following legal bases with regard to the processing of your personal data:

**Consent**: if you contact us through the Website or any of the contact information listed on it, the legal basis for the processing of your contact and request data is your voluntary consent pursuant to Article 6(1)(a) of the GDPR. Please note that if you do not consent to the processing of your data, we will not be able to respond to your inquiry.

**Performance of a contract**: if you are a private individual customer, the legal basis for the processing of your personal data is usually Article 6(1)(b) of the GDPR, as it is necessary for the steps necessary to enter into the legal services agreement and supplementary agreements to be concluded with us at your request, or for the performance of such agreements. The provision of personal data is voluntary, but if you fail to provide it, we may not be able to create or perform the relevant legal services engagement.

**Legitimate interests of the data controller**: if you are not our customer personally, we have a legitimate interest in maintaining continuous contact with you (as a person employed by our customer, as a contractor or service provider for our customer) in order to promote and monitor our customer relationship (pursuant to Article 6(1)(f) of the GDPR); accordingly, we process the business contact details of our contacts. The additional legitimate interests are listed under the following heading.

**Compliance with legal obligations**: it may be mandatory to process your data for tax, accounting, or attorney registration purposes, or to prevent money laundering

and fraud, or to prevent financing of terrorism (pursuant to Article 6(1)(c) and (e) of the GDPR).

**The processing of special categories of data** is based on your express consent (pursuant to Article 9(2)(a) of the GDPR) or, in cases where it is necessary for the establishment, exercise or defence of legal claims, or where it is necessary for reasons of substantial public interest (pursuant to Article 9(2)(f) of the GDPR), to the extent necessary for that purpose.

If you are **our corporate customer**, by providing personal data, including contact personal data, you warrant that (i) you have the authority to provide us with the personal data provided; (ii) you have informed the contact person about the content of this privacy policy; (iii) and you keep the provided personal data up to date.

## 5. DO WE USE COOKIES?

We use cookies on our website to distinguish you from other users of our website. This helps you to browse our website more easily, and the cookies also help us to improve our website.

A cookie is a small file consisting of letters and numbers that we store in your browser or on your computer's hard drive if you agree to this. Cookies contain information that is transmitted to your computer's hard drive.

For more information about the cookies used on our website, please read our separate Cookie Policy here ([https://lighthouselegal.hu/docs/en/Cookie\\_policy.pdf](https://lighthouselegal.hu/docs/en/Cookie_policy.pdf)).

## 6. WHERE DO WE STORE INFORMATION AND WHO CAN SEE IT?

Your data is accessible within our office by our partners, lawyers, trainee lawyers, and cooperating lawyers, as well as IT personnel, to the extent necessary.

A list of our cooperating lawyers is available on our website. We may transfer your personal data to them for the purpose of managing lawyer-client relationships, invoicing, archiving, joint performance of tasks, and conflict of interest checking.

IT service providers: In order to meet the IT needs of our office, we use IT systems and services provided by third parties as follows:

Hosting provider: Microsoft Ireland Limited (South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland).

Web hosting provider: BlazeArts Kft. (Registered office: 1096 Budapest, Thaly Kálmán street 39., mailing address: 6090 Kunszentmiklós, Szent Erzsébet tér 11.)

IT support:

- István Boldizsár (Registered office: 1015 Budapest, Csalogány street 6-10. 1st floor 18. ; Tax number:59432432-1-4; Registration number: 57464318 )
- LANMEN INFORMATIKA Ltd. (Registered office: 1161 Budapest, Csömöri road 94.; Tax number: 26639730-2-42; Company registration number: 01-09-336625)

## 7. HOW LONG DO WE STORE PERSONAL DATA?

We may keep the data of your request received through the website for a varying period of time depending on the content of the request, as follows:

Data related to job applications will be kept for 3 years.

Your personal data will be kept for the duration of the existing mandate with you (or your employee, client, or the person for whom you provide services) and thereafter for up to 10 years, based on the provisions of the law on legal practice.

In the case of civil law claims, the retention period for the statute of limitations (i.e. 5 years under Section 6:22(1) of the Civil Code), and for relevant documents related to tax assessments, we keep them for up to 5 years from the last day of the calendar year during which the tax return should have been submitted, based on Section 78(3) and Section 202(1) of the Act on Taxation Procedure.

For accounting documents (including personal data stored in contracts, communication, and business letters), the retention period is 8 years from the end of the fiscal year, in accordance with Section 169 of the Accounting Act. After this period, we will delete your personal data from our systems and records and/or take the necessary steps to anonymize them appropriately.

## 8. WHAT INTERNATIONAL DATA TRANSFERS OCCUR?

Unless we inform you otherwise in this Privacy Policy or any other communication, we do not transfer your personal data to a country or territory outside of the European Economic Area.

We will inform you if your personal data may be transferred outside of the European Economic Area, and in such cases, the Office will ensure that your personal data is protected at an adequate level by accepting safeguards and applying them to ensure that your personal data is protected under legal and contractual obligations, in order to provide protection similar to the level of protection provided in the European Union.

## 9. WHAT ARE YOUR RIGHTS AND REMEDIES?

You have the right to withdraw your consent to data processing. Please note that withdrawing your consent does not affect the lawfulness of the processing before such withdrawal.

You have the right to request the deletion, correction, marking or blocking of incomplete, inaccurate, outdated or irrelevant data.

If you believe that the personal data we hold about you is incomplete, inaccurate or outdated, please contact us so that we can make the necessary corrections within one month. We take all reasonable and necessary steps to ensure the accuracy of the personal data we process. Any personal data that you dispute as inaccurate or outdated, but cannot substantiate with certainty, will be marked accordingly.

You have the right to request access to the personal data we hold about you. We will respond to such requests as soon as possible and no later than one month from the date of the request. We may request additional information to verify your identity.

You also have the right to object to the processing of your personal data if the processing or transfer of the data is solely necessary for the performance of a contractual obligation, our legitimate interests, the interests of the recipient of the data or any other third party (except where the processing is mandatory); or if permitted by law. We will investigate any objection within one month of receipt. If you disagree with our decision regarding the objection, you have the right to initiate legal proceedings against the decision.

If you believe that your data protection rights have been infringed, you can contact the competent supervisory authority for data protection, the National Authority for Data Protection and Freedom of Information, whose contact details are as follows:

Headquarters: 1055 Budapest, Falk Miksa street 9-11.,

Mailing address: 1363 Budapest, Pf.: 9.,

Email address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu),

Website: <https://www.naih.hu>.

## 10. HOW CAN YOU CONTACT US WITH QUESTIONS REGARDING THE CURRENT PRIVACY POLICY?

If you require further information on data protection or wish to exercise your rights as a data subject, please contact us using one of the contact methods listed on the Office website.