

NOTICE ON PROCESSING OF PERSONAL DATA OF CLIENTS OF THE LAW FIRM KOVAČEVIĆ PRPIĆ SIMEUNOVIĆ d.o.o.

This Notice on Processing of Personal Data (the “**Notice**”) applies to the processing of personal data of the clients conducted by the law firm Kovačević Prpić Simeunović d.o.o. with its registered office in Zagreb, Trg žrtava fašizma 6, PIN 00476134480 (“**KPS**”). In this Notice, the term „**client**“ means all natural persons, crafts and representatives of legal persons to whom KPS provides legal representation and/or legal counselling services. The Notice does not apply to data on legal persons or data related to the operations of parties which are legal entities.

In this Notice we describe who we are, what categories of your personal data we process, how and for what purpose we process them, how we protect personal data and what rights the data subject have in relation to our processing of their personal data.

We emphasize that according to the provision of Article 13 of the Law on Attorneys, all attorneys at law and other persons employed by KPS are obliged to keep as attorney-client privilege everything that the client entrusts to them or that they have learned in another way in representing the client, both during the employment with KPS and after its termination.

1. WHICH CATEGORIES OF CLIENTS’ PERSONAL DATA DOES KPS COLLECT AND PROCESS?

KPS collects the following categories of personal data of clients, depending on the nature of relationship with a particular client:

Identification information	Name, surname, PIN, domicile/residence information, signature, etc.
Contact information	Domicile/residence information, phone number, mobile phone number, email address, etc.
Payment information	IBAN and bank account, description of legal services, etc.
Other information voluntarily provided by the client	Personal data provided during oral and written communication, especially data related to the provision of a specific legal service.

Personal data collected by KPS may include certain special categories of personal data of clients and/or their representatives, if and to the extent necessary to provide legal services to the client.

When providing legal services to the clients, it is possible that KPS will collect and process certain personal data of other persons, such as counterparty and/or its representative (including attorney), potential witness in court or other proceeding, data on civil servants (e.g. judges and court advisers), experts, witnesses, recorders, notaries and their employees, etc. In doing so, KPS processes primarily the identification data of the counterparty, but also other personal data, depending on the circumstances of the case, for example data on bank accounts and/or general financial condition of the counterparty who is a natural person, in accordance with the interests and instructions of the client

of KPS. In such case, KPS will treat personal data of other persons in a same way as the personal data of the clients.

2. FOR WHAT PURPOSES DOES KPS PROCESS PERSONAL DATA OF CLIENTS?

KPS processes personal data of the clients for the following purposes:

a. to provide legal services

KPS processes personal data of its clients in order to enforce a contract with a party and to provide legal services efficiently, which includes providing legal advice and drafting legal opinions, drafting documents (e.g. contracts, lawsuits, other submissions) and representing parties before the court and other competent bodies.

For example, KPS will collect and further process information related to a specific transaction, dispute or other circumstances in connection to which a legal service is provided to the clients, and such information may include certain personal data relating to the clients, their employees, representatives, agents, shareholders, etc.

For this purpose, KPS shall process identification data, contact data and other data provided by the client or obtained by KPS upon instruction of the client.

In such case, KPS processes the said personal data because such processing is necessary for the conclusion and execution of the contract for the provision of legal services concluded with the client and in order for KPS to be able to take appropriate action at the request of the client before the conclusion of the contract. Such processing is also necessary in order to comply with the legal obligations of KPS, such as obligation arising from the Law on the Legal Profession, the Statute of the Bar Council of Croatia and the Attorney's Code of Ethics, or the obligations arising from decision of the competent body on legal aid.

b. for accountancy and administrative purposes

KPS processes personal data of parties, i.e. their employees and representatives for accountancy and administrative purposes, for example to communicate with the client and to send invoices and description of legal services, as well as to keep appropriate accounting records.

It is possible that KPS will use personal information of the parties and their representatives to communicate with them prior to the conclusion of the contract and for the duration of the contractual relationship in order to answer questions and requests from their clients.

For such purpose, KPS processes identification and contact details of the client and their representatives as well as the payment details.

In this case, KPS processes the said personal data because such processing is necessary for the conclusion and execution of the contract that KPS concludes with its clients and in order for KPS to take appropriate action at their request prior to the conclusion of the contract.

c. for the purpose of informing the competent authorities and retaining data in accordance with the regulations in the field of prevention of money laundering

KPS processes personal data of clients in order to fulfil the obligations of notifying the competent authorities (e.g. the Anti-Money Laundering Office) and collecting and storing data in accordance with the regulations in the field of anti-money laundering (e.g. keeping appropriate records of the clients).

In doing so, KPS is required to establish the identity of its clients, and in certain cases KPS shall be required to conduct a more detailed checks of its clients.

Within the scope of processing, identification data and contact data of parties who are natural persons may be processed, and in case of parties who are legal persons data on their beneficial owners and shareholders of the company, members of the management board, supervisory board, board of directors and other management bodies, etc.

For this purpose, KPS will be obliged to obtain additional documentation containing personal data, such as a copy of the identification document of the said persons, evidence of the source of funds, etc.

In this case, KPS processes personal data of clients because such processing is necessary in order to comply with the legal obligations of KPS regarding the prevention of money laundering.

d. in order for KPS to comply with other regulations

In certain cases, KPS will process personal data of its clients in order to comply with laws and other regulations, i.e. to comply with legal obligations of KPS as data controller. This applies in particular to tax and other charges.

It is possible that KPS will be required by law and other regulations to provide personal data of clients to public authorities or supervisory bodies.

For this purpose, KPS may process identification data of the client, payment information and other information provided by the client to KPS during the term of the contractual relationship.

In this case, KPS processes personal data of clients because such processing is necessary in order to comply with its legal obligations.

3. HOW DOES KPS COLLECT PERSONAL DATA OF CLIENTS?

KPS collects personal data from data subjects (clients) themselves or from documents received from clients, other participants in proceedings before the court or other competent authority, from courts and other competent authorities, and other persons in any way related to the subject matter of legal assistance.

Some of the personal data KPS collects from publicly available sources, and it is also possible that KPS receives personal data of clients in business communication with third parties.

4. HOW LONG DOES KPS RETAIN PERSONAL DATA OF CLIENTS?

KPS retains personal data for the period necessary for accomplishment of abovementioned purposes, within the time limits prescribed by law and other regulations, and in certain cases as reasonable and advisable in the context of the applicable limitation period.

For example, KPS shall retain client's personal data for at least 10 years after the final conclusion of the proceeding in which the client was represented by KPS. In case of enforcement proceedings under a final and enforceable judgement, settlement or decision, in the case of extraordinary legal remedies before the Constitutional Court of the Republic of Croatia and/or European Court of Human Rights and other competent institutions, the data of clients shall be kept until all legal remedies with the aim to protect client's rights and interests are exhausted.

There is a possibility that KPS will be required to retain some personal data of clients, as provided for in internal acts of KPS and applicable regulations.

The retention period of personal data of clients and other rules of retention of personal data are set out in KPS Personal Data Retention Policy.

KPS shall keep personal data of data subjects accurate and up to date, based on information provided to it by client, or data collected by KPS while providing its legal services.

Upon expiration of the time required and prescribed for processing of personal data, KPS shall securely delete or destroy personal data of clients.

5. WHO HAS ACCESS TO PERSONAL DATA OF CLIENTS?

Access to personal data of clients and their representatives may be granted to employees of KPS who have limited rights to access and process personal data for the purposes of performing their work tasks, especially members of management, office manager, employees, lawyers and legal trainees working on a particular case related to the client.

Employees of KPS authorized to access or otherwise process personal data of clients are obliged to keep personal data confidential and act in accordance with privacy notices, policies, procedures and other internal regulations, as well as contractual obligations of KPS.

To the extent in which it is necessary and allowed under applicable law, in order to accomplish purposes for which personal data have been collected and/or processed, KPS may disclose it to third parties such as:

- a. service providers, which provide certain services to KPS based on contract, which may also include processing of personal data of KPS clients, (e.g. accounting or IT service provides),
- b. competent state bodies (e.g. courts),
- c. other legal advisers, lawyers and legal trainees who provide us with replacement services in accordance with the Law on the Legal Profession, notaries, court interpreters and translators, court experts, counterparties and their representatives, to the extent necessary to provide our services,
- d. other state and public authorities, legal persons with public authority or privately owned legal persons, when KPS is required to provide personal data of clients on the basis of legal obligation (e.g. Office for Money Laundering Prevention) or when it is necessary for KPS to protect its rights and interests (for example in case of undertaking activities to collect our claims).

Where necessary, we have entered into contract with the aforementioned third parties to ensure appropriate technical and organizational measures for the protection of your personal data.

In some cases, personal data may be transferred to countries which are not members of the European Union and European Economic Area, which may have different and potentially lower standards of personal data protection than those prescribed in the Republic of Croatia. In such case KPS shall undertake appropriate protective measures in order to ensure an adequate protection of your personal data. Such measures include conclusion of the agreements in accordance with forms which have been adopted by the European Commission for such purpose (using so-called standard contractual clauses for transfer of personal data abroad).

6. HOW ARE PERSONAL DATA OF THE CLIENTS PROTECTED?

In order to protect personal data of data subjects, KPS undertakes appropriate protective measures which are in accordance with applicable regulations on protection of privacy and personal data.

This also includes request towards KPS service providers to take appropriate measures in order to protect the confidentiality and safety of personal data of data subject.

In its business KPS has implemented technical, physical and organizational measures for protection of clients' personal data from accidental or illegal destruction, accidental loss, damage, alteration, unauthorized disclosure or access and all other forms of illegal and/or excessive processing.

7. WHAT ARE THE RIGHTS OF THE CLIENTS AND HOW CAN THEY BE EXERCISED?

In the context of personal data protection, clients have the following rights:

- a. right to access their personal data, i.e. the right to obtain from the controller confirmation as to whether or not personal data concerning them are being processed, right to request access to personal data and information on processing as well as a copy of personal data being processed;
- b. right to rectification of inaccurate personal data and right to have incomplete personal data completed;
- c. right to erasure of personal data, especially if such data are no longer necessary in relation to purposes for which they were collected or otherwise processed, if the personal data have been unlawfully processed, if the personal data have to be erased to comply with a legal obligation or if the consent has been withdrawn;
- d. right to restriction of processing;
- e. right to object to data processing;
- f. right to lodge a complaint with the Croatian Personal Data Protection Agency.

KPS shall undertake all measures to enable its clients to exercise the abovementioned rights, however in certain cases the exercise of these rights can be limited or excluded.

8. TO WHOM CAN YOU REFER QUESTIONS ON PERSONAL DATA PROTECTION?

For any additional information, feel free to contact KPS by sending an email to the following email address: info@kps-law.com, in person at the KPS business premises or by sending a letter to the following address: Kovačević Prpić Simeunović d.o.o., Trg žrtava fašizma 6, 10000 Zagreb.

9. AMENDMENTS TO THE NOTICE AND CONSOLIDATED VERSION

This Notice shall apply as of 25 May 2018 and is subject to occasional amendments.

The last version of this Notice, which shall always be relevant for processing of personal data of clients of KPS, is available on the following website: www.kps-law.com.