



The purpose of this document is, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the General Data Protection Regulation, the “**Regulation**” or “**GDPR**”), and in accordance with Act No. 110/2019 Coll., on the Processing of Personal Data, as amended (the “**Personal Data Processing Act**”), to inform how KŠB processes the personal data of individuals in connection with its activities.

This information applies to current, prospective and former clients who are individuals, as well as to representatives and employees of clients and other data subjects concerned. All such persons are collectively referred to as “**clients**”.

1. PRINCIPLES GOVERNING THE PROCESSING OF PERSONAL DATA

1.1 When processing clients' personal data, KŠB complies with the relevant provisions of applicable law, in particular the Regulation and Act No. 85/1996 Coll., on the Legal Profession, as well as professional regulations, and is guided in particular by the following principles:

- (a) personal data is processed lawfully, fairly and in a transparent manner;
- (b) personal data is collected only for specified, explicit and legitimate purposes and is not processed in a manner incompatible with those purposes;
- (c) the scope of personal data processed is adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- (d) all reasonable steps are taken to ensure that only accurate and up-to-date personal data is processed and that inaccurate personal data is erased or rectified without delay, to the extent permitted by mandatory law;
- (e) personal data is kept for no longer than is necessary for the purposes for which it is processed and for the period required by applicable law;
- (f) personal data is processed in a manner that ensures appropriate security of the personal data, including protection by suitable technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage.

2. IDENTITY AND CONTACT DETAILS OF THE CONTROLLER AND THE DATA PROTECTION OFFICER

2.1 Controller of personal data

The controller of personal data is Kocián Šolc Balaščík, advokátní kancelář, s.r.o., with its registered office at Praha 1, Jungmannova 745/24, postcode 110 00, company ID (IČO): 267 39 291, registered in the Commercial Register maintained by the Municipal Court in Prague, file no. C 181837.

As controller, KŠB determines the purposes and means of the processing of personal data described in this document. Any queries or requests regarding the processing of clients' personal data may be addressed to a director or holder of a commercial power of attorney (prokurista) of KŠB, either at KŠB's registered office or by e-mail at: ksb@ksb.cz

3. PURPOSES AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

The processing of personal data to the extent required for the purposes set out below is generally linked to the performance of an agreement for the provision of legal or tax services, or to KŠB's legal obligations and legitimate interests, and is therefore possible even without the client's consent.

3.1 On the basis of performance of a contract [Article 6(1)(b) GDPR] and compliance with a legal obligation [Article 6(1)(c) GDPR], KŠB processes clients' personal data for the purpose of:

- (a) negotiating the provision of legal or tax services and entering into or amending an agreement for such services;
- (b) providing legal or tax services under the agreement between the client and KŠB;
- (c) ensuring the functioning of KŠB as a business corporation;
- (d) complying with KŠB's statutory obligations, in particular in the area of accounting and compliance with the regulations governing the practice of law and tax advisory services, in particular Act No. 85/1996 Coll., on the Legal Profession, and Act No. 523/1992 Coll., on Tax Advisory Services and the Chamber of Tax Advisers of the Czech Republic.

Providing the personal data for the above purposes is a statutory and contractual requirement; without it, an agreement for the provision of legal or tax services cannot be entered into or performed.

3.2 On the basis of the legitimate interests of KŠB or third parties [Article 6(1)(f) GDPR], KŠB processes clients' personal data for the purpose of:

- (a) informing clients of developments in the legal and tax environment in the Czech Republic and abroad that are relevant to their affairs;
- (b) inclusion on a list prepared for presentation to prospective clients or for the purposes of presenting KŠB;
- (c) providing the client's contact details to independent organisers of national and international legal services rankings;
- (d) organising social and other events for clients.

3.3 On the basis of the client's consent [Article 6(1)(a) GDPR]:

Clients' identification and contact details will also be processed by KŠB for the purpose of sending informational materials and invitations to events organised by KŠB's subsidiary, KŠB Institut, s.r.o., with its registered office at Praha 1, Jungmannova 745/24, postcode 110 00,

company ID (IČO): 242 74 569 ("KŠB Institut"), but only on the basis of the client's prior consent.

4. SCOPE OF PERSONAL DATA PROCESSED

- 4.1 KŠB processes the personal data of clients and other individuals only to the extent necessary to fulfil the purposes of processing set out above.
- 4.2 The scope of clients' personal data which is processed may vary in specific cases and depends on the nature of the service requested by the client.
- 4.3 Clients' personal data is physically stored at KŠB's registered office at Jungmannova 745/24, Praha 1, postcode 110 00, and at KŠB's branch offices at Závodní 391/96C, Karlovy Vary, postcode 360 06, and Českobratrská 2227/7, Ostrava, postcode 702 00.

5. PERIOD FOR WHICH PERSONAL DATA IS PROCESSED

- 5.1 Personal data of clients and other individuals processed without the data subject's consent is processed for the period laid down by the applicable legal and professional regulations, or for as long as the legitimate interests of KŠB for which the personal data is processed continue. This period generally does not exceed 10 years. Upon expiry of the retention period, the personal data is erased.
- 5.2 Personal data processed on the basis of the data subject's consent is processed for a period of five (5) years from the date it was provided, unless the data subject withdraws their consent earlier.

6. MANNER OF PROCESSING PERSONAL DATA

- 6.1 Personal data is processed both manually and by automated means by KŠB's partners, attorneys or tax advisers who permanently cooperate with KŠB, and by KŠB's employees, all of whom are bound by a duty of confidentiality in accordance with the regulations governing the practice of law, including, where applicable, through the use of third-party systems under contract and subject to the conditions laid down by law.
- 6.2 Clients' personal data is processed primarily within the territory of the Czech Republic and other member states of the European Union or the European Economic Area. In connection with the performance of an agreement for the provision of legal or tax services, personal data may, in justified cases, be transferred to recipients abroad (for example, foreign law firms, courts or the opposing party), on the basis of Article 6(1)(b) or (c) GDPR, or subject to compliance with the conditions set out in Article 44 et seq. GDPR for transfers to third countries. In making any such transfer, KŠB ensures that the personal data is afforded an adequate level of protection.

7. PERSONS TO WHOM PERSONAL DATA MAY BE DISCLOSED

- 7.1 KŠB strictly observes attorney–client privilege and the duty of confidentiality. An attorney is required to maintain confidentiality in respect of all matters they become aware of in connection with the provision of legal services.
- 7.2 Personal data is disclosed to other persons where such disclosure arises from the nature of the service requested by the client.

- 7.3 In other cases, KŠB may disclose clients' personal data to its professional body, the Czech Bar Association, or to public authorities (courts, law enforcement authorities, tax authorities, etc.) only where required to do so by law.
- 7.4 With the client's prior consent, the client's identification and contact details may also be provided to KŠB's subsidiary, KŠB Institut, s.r.o., for the purpose of informing the client about its services and events. Further information on the processing of personal data by KŠB Institut is set out in the Information Memorandum on the Handling of Clients' Personal Data of KŠB Institut, s.r.o.
- 7.5 In certain cases, personal data may also be processed by third parties that are subcontractors or external collaborators of KŠB (for example, providers of translation services or IT solution providers). Any such party's access to personal data processing will always be governed by a data processing agreement entered into pursuant to Article 28 GDPR and subject to the conditions laid down by the GDPR and other applicable law.

8. CLIENTS' RIGHTS IN CONNECTION WITH THE PROCESSING OF PERSONAL DATA

- 8.1 In connection with KŠB's processing of personal data, clients have, in particular, the rights described below. All rights relating to the protection and processing of personal data may be exercised only to the extent and in the manner provided for by applicable law, in particular the Act on the Legal Profession and professional regulations.
- (a) Right of access [Article 15 GDPR]. The client has the right to obtain confirmation from KŠB as to whether personal data concerning them is being processed and, if so, to access that personal data and other specified information. In such a case, KŠB will also provide the client with a copy of the personal data being processed, unless doing so would adversely affect the rights of others.
 - (b) Right to rectification [Article 16 GDPR]. The client has the right to have KŠB rectify, without undue delay, any inaccurate personal data concerning them. Taking into account the purposes of the processing, the client has the right to have incomplete personal data completed, including by means of providing a supplementary statement.
 - (c) Right to erasure – the “right to be forgotten” [Article 17 GDPR]. The client has the right to have KŠB erase, without undue delay, personal data concerning them, and KŠB is obliged to erase such personal data without undue delay where one of the grounds set out in the Regulation applies and KŠB has no other basis for retaining the data.
 - (d) Right to restriction of processing [Article 18 GDPR]. The client has the right to have KŠB restrict the processing of their personal data, in particular where the client contests the accuracy of the personal data, has objected to the processing, or in other cases provided for by the Regulation.
 - (e) Right to data portability [Article 20 GDPR]. The client has the right to receive the personal data concerning them that they have provided to KŠB in a structured, commonly used and machine-readable format, and the right to transmit that data to another controller, where the processing is based on consent or is carried out pursuant to a contract and by automated means.
 - (f) Right not to be subject to automated individual decision-making [Article 22 GDPR]. The client has the right not to be subject to a decision based solely on automated

processing, including profiling, which produces legal effects concerning them or similarly significantly affects them. KŠB does not currently carry out automated decision-making within the meaning of Article 22 GDPR that would produce legal effects of this kind for clients.

9. RIGHT TO OBJECT AND RIGHT TO WITHDRAW CONSENT

9.1 Without prejudice to the rights set out in Article 8 above, KŠB also draws attention to the following rights:

- (a) Right to withdraw consent [Article 7(3) GDPR]. Where the processing of a client's personal data is based on consent, the client is not obliged to give consent. If the client does give consent, they are entitled to withdraw it at any time, without affecting the lawfulness of the processing carried out before the consent was withdrawn. A client wishing to withdraw their consent may contact the contact person named in Article 2 of this memorandum. Withdrawal of consent does not affect the processing of the client's personal data for purposes for which consent is not required.
- (b) Right to object [Article 21 GDPR]. Where a client's personal data is processed for the purpose of protecting the legitimate interests of KŠB or third parties, the client is entitled to object to such processing. In that case, KŠB must, subject to the conditions laid down by the Regulation, demonstrate compelling legitimate grounds for continuing the processing which override the interests, rights and freedoms of the client, failing which it will cease processing the personal data.

10. RIGHT TO LODGE A COMPLAINT

10.1 If a client believes that KŠB's processing of their personal data infringes applicable law, in particular the GDPR or the Personal Data Processing Act, they may lodge a complaint with the supervisory authority:

Office for Personal Data Protection (*Úřad pro ochranu osobních údajů*), Pplk. Sochora 27, 170 00 Praha 7. Tel.: +420 234 665 111. E-mail: posta@uoou.gov.cz. Web: <https://www.uoou.gov.cz/>

The client also has the right to seek judicial protection of their rights [Article 79 GDPR].

11. FINAL PROVISIONS

11.1 This Information Memorandum is valid and effective as of 1 September 2026. The current version is available on request from a director or a person authorized to act *per procuram* (prokurista) of KŠB, as well as on KŠB's website.

11.2 KŠB reserves the right to update this memorandum in the future, in particular where there are changes to applicable law or to the manner in which personal data is processed. KŠB will inform clients about any material changes.