

Data Processing Policy
in the subject-matter of personal data processing concerning the attorney's activity and related services, concluding contracts, legal representation

[BOLEVÁ CZ AND VÖRÖS LAW OFFICE]

This Policy has been issued by **Bolevác z és Vörös Ügyvédi Iroda [Bolevác z and Vörös Law Office]** as controller (hereinafter referred to as **Controller**) with a view to provide the most important information to the Data Subject about the data processing concerning the legal services provided by the Law Office, 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 (General Data Protection Regulation) (hereinafter referred to as **GDPR**)

The Controller

Bolevác z és Vörös Ügyvédi Iroda [Bolevác z and Vörös Law Office]
 1053 Budapest, Veres Pálné u. 9. I/2.

Dr. Vörös Veronika ügyvéd / attorney
 Cím / address: 1053 Budapest, Veres Pálné u. 9. I/2.
 E-mail: veronika.voros@bvpartners.hu
 Telefon / Telephone: +36-1-354-0733
 Fax: +36-1-354-0732

I. THE DATA SUBJECT

Any specified natural person who is identified or can be identified, directly or indirectly, on the basis of personal data. With regard to the data processing processes of the law firm as Data Controller, the data subject is not exclusively, **but typically: the client or customer of the law firm** (client or other data subject hereinafter referred to as the **Data Subject**).

II. SUBJECT MATTER, PURPOSE, LEGAL BASIS AND TERM OF DATA PROCESSING

	Envisaged purpose of data processing	Data concerned by data processing	Legal basis	Expected period of data storage
1.	To respond to a request for a quote, in person, by phone or email, or via the website.	The name, telephone number, email address, IP address, questions asked, messages sent, other personal data contained in the request, of a natural person, individual entrepreneur or representative of a non-natural person.	Point (a) of Article 6 (1) of GDPR, i.e. the consent of the Data Subject	Personal data shall be processed until consent is withdrawn, but for a maximum period of 1 (one) year from the date of providing the data, unless a contractual relationship is established between the data subject and the Data Controller.
2.	Customer identification, customer due diligence	Name and surname of natural person, self-employed client or natural person acting on behalf of the client; surname and given name at birth; nationality, place and date of birth; mother's name at birth; address (or, in the absence of this, place of residence); type and number of identification document; copy of identification document and address card (except the page of the official identity card certifying the address) (Pmt. 7.§ (8)); personal data concerning the status of a prominent public figure (Pmt. 8, 9/A §). In connection with the declaration on the actual owner, the actual owner: name and surname; surname and first name at birth; nationality; place and date of birth; address (or, in the absence thereof, place of residence); nature and extent of the ownership interest; data of the natural person (actual owner) as defined in Pmt. 3.§ 38., personal data relating to the status of a prominent public figure (Pmt. 9.§).	Processing is necessary for compliance with a legal obligation to which the controller is subject (Point (c) of Article 6 (1) of GDPR) Pmt. 6.-7.§, 8.-9.§, 9/A.§	Personal data obtained in the course of customer identification and customer due diligence may be processed for 8 years from the termination of the business relationship or the execution of the assignment. (Section 56.§ (2) of Pmt.)

3.	<p>Carrying out identification pursuant to Section 32 of Act LXXVIII of 2017 on Attorney's Activity (Üttv.)</p>	<p>Client's natural identification data (surname and given name; surname and given name at birth; place and date of birth; mother's surname and given name at birth; citizenship; statelessness; status, address, photo, signature of refugee, immigrant, established/residential or EEA national;</p> <p>data pursuant to point (f) of Section 24 (1) of Act XII of 1998 on travelling abroad (data relating to change, finding, giving back, handing it to the office, taking away and invalidity of travel document), expiration of document;</p> <p>data pursuant to subpoint (ba)-(bb) of point (b) of Section 8 (1) of Act LXXXIV of 1999 on Road Transport (data relating to driving licences)</p> <p>point (d) of Section 76 and point (b) and (c) of Section 80 (1) of Act I of 2007 on the entry of the persons having the right of free movement and residence</p> <p>data pursuant to point (b) and (c) of Section 100 (1), point (g) of Section 96 (1), point (g) of Section 95 (1) of Act II of 2007 on entry and residence of third-country nationals (data on documents granting authorisation to stay)</p>	<p>Processing is necessary for compliance with a legal obligation to which the controller is subject (Point (c) of Article 6 (1) of GDPR)</p>	<p>Data obtained during identification may be processed for 5 (five) years.</p>
4.	<p>Keeping a register pursuant to Section 33 of Üttv.</p>	<p>In connection with the identifications and checkings pursuant to the foregoing point 2. and 3., all data of the foregoing point 2. and furthermore, out of the data collected on the ground of the foregoing point 3., natural identification data; address; citizenship; statelessness; status, address, photo, signature of refugee, immigrant, established/residential or EEA national; type and number of the identification document used for identification, ID of the reply received in course of data request from authorities and finally, case ID numbers of the cases in which identification of natural persons is compulsory.</p>	<p>Compliance with a legal obligation to which the Controller is subject (Point (c) of Article 6 (1) of GDPR)</p>	<p>8 years of the termination of the business relationship or of the performance of contractual assignment (Section 57 (1)-(3) of Pmt. with regard to Section 33 (7) of Üttv.</p>

5.	Performing assignments falling within the scope of attorney's activity.	Client's natural identification data (surname and given name; surname and given name at birth; place and date of birth; mother's surname and given name at birth) citizenship, tax number, address. email address, phone number. All personal data that is process during performance of the assignment.	Preparation, performance of a contract to be concluded with the Client (Point (b) of Article 6 (1) of GDPR) The legal basis for the processing of personal data following the termination of the contract of assignment for any reason is Article 6(1)(f) of the GDPR, i.e. the legitimate interest of the Data Controller. Legitimate interest of the Data Controller: to prove the validity/unjustifiability of claims arising from a potential dispute, to maintain the necessary contacts in order to resolve the dispute. The data subject may object to the latter processing at any time!	Until the expiry of the general limitation period of 5 (five) years following the termination of the assignment; in case of documents and data countersigned and in case of e-documents, until ten (10) years except for the case where an agreement between the Controller and the Client provides for longer period (Section 46 and 53 of Üttv.)
6.	Identification of third persons concerned by the performance of attorney's assignments; contact, and communication with these persons, preparation and conclusion of agreements.	Natural identification data (surname and given name; surname and given name at birth; place and date of birth; mother's surname and given name at birth) citizenship, tax number, address. email address, phone number of those natural persons who are concerned by the performance of the assignment given by the Client.	Preparation and performance of contracts (point (b) of Article 6 (1) of GDPR) with regard to the party's concern The legal basis for the processing of personal data following the termination of the contract of assignment for any reason is Article 6(1)(f) of the GDPR, i.e. the legitimate interest of the Data Controller. Legitimate interest of the Data Controller: to prove the validity/unjustifiability of claims arising from a potential dispute, to maintain the necessary contacts in order to resolve the dispute. The data subject may object to the latter processing at any time!	Until the expiry of the general limitation period of 5 (five) years following the termination of the assignment; in case of documents and data countersigned and in case of e-documents, until ten (10) years except for the case where an agreement between the Controller and the Client provides for longer period (Section 46 and 53 of Üttv.)
7.	Commission fees, accounting of costs, invoicing, issuing and handling the accounting documents connected with this, sending notices in this regard.	Client's natural identification data (surname and given name; surname and given name at birth; place and date of birth; mother's surname and given name at birth) citizenship, tax number, address. email address, phone number.	Preparation and performance of contracts (point (b) of Article 6 (1) of GDPR) with regard to the party's concern and compliance with a legal obligation to which the Controller is subject (Point (c) of Article 6 (1) of GDPR).	Pursuant to Act C of 2000 on Accounting, (Act on Accounting), the term of data processing is eight years following the termination of the contract regarding the data processed with a view to issue and preserve accounting documents.

				Processing and preserving accounting documents: until the lapse of right to charge tax, which means 5 years after the end of the year of the tax declaration based on the given accounting document.
8.	Enforcement of claims arising from any of the legal relationships between the data controller and the client based on the provision of legal services (management of receivables, recovery, enforcement of other claims), management of litigation situations.	Name, telephone number, email address of the natural person, self-employed client or representative of the non-natural person. Postal address of the natural person, self-employed client. Data content of the documents in the case under dispute.	Point (b) of Article 6 (1) of GDPR, i.e. processing is lawful if it is necessary for the conclusion or performance of the contract Point (f) of Article 6 (1) of GDPR, i.e. the legitimate interest of the data controller The legitimate interest of the Data Controller is the enforcement or recovery of its lawfully acquired claims or the presentation of a defence on the merits of a claim against it. To this end, it is entitled to initiate the enforcement procedure it considers most effective in order to settle the dispute. This requires contacting and maintaining contact with the data subject, for which purpose the personal data of the data subject must be recorded, given that without their processing the management of the claim would not achieve its purpose. The data subject may reasonably expect such claims and the related processing. The data subject may object to the latter processing at any time!	The termination of the contract/legal transaction or, if a claim has been asserted by or against the Data Controller in relation to the Data Subject, the expiry of the general limitation period of 5 (five) years (Civil Code. 6:22.§ (1)).
9.	Keeping of case-registration pursuant to Section 53 of Uttv.	Case ID number created by the Controller, Client's name, subject-matter of the case, date of the assignment contract, court application number of the court proceedings connected to the case, reference number of other proceedings.	Compliance with a legal obligation to which the Controller is subject (Point (c) of Article 6 (1) of GDPR).	Until 5 (five) years following the termination of the assignment; in case of countersigning of a document, 10 (ten) years following the countersignature; in cases where rights relating to a real estate shall be registered into an authentic public register, until 10 (ten) years following the registration of such right.
10.	To respond to enquiries, questions and contacts made as a new customer via the contact details on the Contact Us section of the Data Controller's website or via the email addresses under the Colleagues section.	The name, telephone number, email address, IP address of the natural person, self-employed person or representative of the non-natural person; any additional personal data provided in the	Point (a) of Article 6 (1) of GDPR, i.e. the consent of the Data Subject	Until the consent is withdrawn, but not later than 1 (one) year after the date of the last contact.

		request or question asked.		
11.	Processing for marketing purposes (such as sending newsletters, updates, etc.)	Name, email address of the natural person, self-employed person or representative of the non-natural person.	Point (a) of Article 6 (1) of GDPR, i.e. the consent of the Data Subject	Until the consent is withdrawn, but not later than 3 (years) year after the date of the last contact.

The Controller informs You that the transfer and processing is the **pre-condition of the performance** of the attorney's assignment contract between the Controller and the Client, also of **the legal transactions** being the purpose and subject matter thereof (where this is indicated); it is necessary for the performance of these contractual obligations; these legal transactions may not be performed without it.

In view of the foregoing, in cases of **data processing based on obligation described by law**, the data processing is necessary to comply with a legal obligation to which the Controller is subject; in case of failure of providing data the Controller cannot act for the performance of the case concerned and it will refuse its contribution therein.

The Controller shall process special categories of personal data pursuant to Section (2) (a) of Article 9 of GDPR, within the scope of performance of assignment, exclusively for a concrete purpose, with the prior expressed consent of the data subject. Derogation thereof is only possible in cases defined in Section (2) of Article 9 of GDPR, or by an expressed authorization by law.

III. PLACE AND METHOD OF PROCESSING DATA

The Data Controller stores the documents containing personal data in paper form at its headquarters at 9 Veres Pálné utca I/2, 1053 Budapest, Hungary, or at the headquarters of its data processor providing data and document storage in lockable cabinets, while in digital form on its own server, separately in client folders and occasionally in email inboxes.

The Data Controller and its processors shall implement appropriate technical and organisational measures to ensure a level of data security appropriate to the scale of the risk, taking into account the state of the art and the cost of implementation, the nature, scope, context and purposes of the processing, and the varying degrees of probability and severity of the risk to the rights and freedoms of natural persons.

The employees and agents of the Controller shall process personal data of data subjects only to the extent and for the duration strictly necessary for the performance of their tasks.

IV. DATA PROCESSING AND FORWARDING

The Data Controller informs the data subjects that, with regard to data processing, it employs data processors who carry out the processing tasks on behalf of the Data Controller. The Controller shall inform the data subjects that only personal data which are indispensable for the performance of the tasks of the processor shall be transferred for processing.

The Data Controller has contracted the following processors to carry out processing tasks:

- Processor used in connection with the IT administrator's activities

Data Processor: IT ProfesSimple Kft
Headquarters: 2030 Érd, Favágó utca 29.
e-mail: info@professimple.hu

- Data processor providing accounting and payroll software

Data processor: MÉHÉSZ TAX CONSULT Kft.
Headquarters: 1113 Budapest, Karolina út 16. 2. em.
e-mail: mehesz@t-online.hu

- Data processor providing data and document storage

Data processor: REISSWOLF Budapest Adat- és dokumentumkezelő Kft.
Headquarters: 1097 Budapest, Illatos út 6.
e-mail: info@reisswolf.hu

Data Controller shall update this information in any case of a change in the identity of the data processor. The data processor may use an additional data processor.

The Data Controller does not intend to transfer the Data Subjects' personal data to foreign third countries or international organisations (outside the European Union, non-EEA countries) and will only transfer it with the explicit consent of the customer.

V. AUTOMATED DECISION-MAKING, PROFILING, DATA PROTECTION OFFICER, DATA PROTECTION IMPACT ASSESSMENT

We inform you, that the Controller **shall not make decisions based solely on automated processing, related to you.**

The Controller **shall not make profiling** concerning your personal data it has.

No **data protection officer** has been appointed at the Controller.

VI. YOUR RIGHTS

The data subject may request information on the processing of his or her personal data; access to personal data concerning him or her, rectification of personal data; erasure of personal data at the email address of the Data Controller; restriction of processing. The Data Controller shall notify the Data Subject of its decision on all these matters within 30 (thirty) days of receipt of the request.

Right of access

The Data Subject shall have the right to obtain from the Controller, upon request, information as to whether or not his or her personal data are being processed and, if such processing is ongoing, the right to access the personal data.

Right to rectification

The data subject shall have the right to obtain the rectification or integration of the data processed concerning him or her.

Right to erasure (the "right to be forgotten")

The Data Subject has the right to request the erasure of his or her personal data processed, provided that this right may be limited by law.

Right to restriction

The Data Subject has the right to request the restriction of the processing of his or her data (by clearly indicating the limited nature of the processing and ensuring that it is kept separate from other data). The restriction will last as long as the reason indicated by the Data Subject makes it necessary.

Right to object

The Data Subject has the right to object, and therefore has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data by the Controller or a third party for the purposes of the legitimate interests pursued by the Controller or a third party.

Right to withdraw consent

Where the processing is based on the data subject's consent, the data subject may withdraw his or her consent to the processing at any time by sending a written statement to the Controller, without prejudice to the lawfulness of the processing carried out on the basis of the consent prior to the withdrawal and of the processing carried out on other legal grounds.

Complaints and remedies

The data subject shall have the right to lodge a complaint with a supervisory authority or to have recourse to judicial remedies if he or she considers that a breach of his or her rights has occurred in relation to the processing of his or her data or in relation to the exercise of his or her rights in connection with the processing.

Contact details of the supervisory authority:

Nemzeti Adatvédelmi és Információszabadság Hatóság
(National Authority for Data Protection and Freedom of Information)

Address: 1055 Budapest, Falk Miksa utca 9-11.

Address for correspondence: 1363 Budapest, PO Box 9.

email address: ugyfelszolgalat@naih.hu

In the event of a judicial remedy, the competent court is the court of the seat of the Data Controller, but the action may also be brought, at the option of the person concerned, before the court of the place of residence or domicile of the person concerned.

While respecting the above rights, Data Subjects are requested to contact the representative of the Data Controller at one of the following contact details before lodging a complaint with a supervisory authority or a court in order to consult and resolve the problem as soon as possible:

name: **dr. Vörös Veronika attorney**
e-mail: veronika.voros@bvpartners.hu
phone: 06-1-354-0733
