PRIVACY NOTICE ON DATA PROCESSING

Dr. Kaszás Dániel Law Office (Dr. Kaszás Dániel Ügyvédi Iroda) *(Member of the DKKR Partners Association of Attorneys / DKKR Partners Ügyvédi Társulás)*

Effective Date: 28 October 2026
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1. INTRODUCTION AND CONTROLLER IDENTIFICATION

The purpose of this Privacy Notice (hereinafter: **"Notice"**) is to provide clear, transparent, and comprehensive information regarding the personal data processing activities conducted by **Dr. Kaszás Dániel Law Office**, the purposes and legal bases of processing, data retention periods, data security measures implemented, as well as data subjects' statutory rights and available legal remedies.

Dr. Kaszás Dániel Law Office is firmly committed to ensuring that its professional operations fully comply with the data protection regulations of the European Union and Hungary, paying utmost regard to the strict rules governing the legal profession, particularly statutory attorney-client privilege and professional secrecy.

1.1. Details of the Data Controller:

1. **Official Name:** Dr. Kaszás Dániel Ügyvédi Iroda (hereinafter: **"Data Controller"** or **"Law Office"**)
2. **Registered Seat:** 1013 Budapest, Pauler utca 11., Hungary
3. **Competent Supervisory Bar Association:** Budapest Bar Association (Budapesti Ügyvédi Kamara)
4. **Bar Registration Number (KASZ):** 1363
5. **Association Membership:** Member of the DKKR Partners Association of Attorneys (DKKR Partners Ügyvédi Társulás)
6. **Managing Partner / Authorized Representative:** Dr. Dániel Kaszás, Attorney-at-Law, Managing Partner
7. **Telephone:** +36 1 700 4752
8. **Central E-mail:** office@dkkrpartners.com
9. **Official Website:** dkkrpartners.com

1.2. Data Protection Officer (DPO)

The Law Office does not qualify as a public authority or body, its core activities do not consist of processing operations that require regular and systematic monitoring of data subjects on a large scale, nor does it process special categories of data or criminal conviction data on a large scale. Consequently, pursuant to Article 37 of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), the Law Office is **not obligated to designate a Data Protection Officer**. Any inquiries or requests regarding data protection and this Notice may be directed to the Data Controller at the contact details provided above.

2. APPLICABLE LEGAL FRAMEWORK AND CORE PRINCIPLES

2.1. Relevant Legal Sources:

The personal data processing operations of the Data Controller strictly comply with the applicable European Union and Hungarian statutory provisions, in particular:

10. **GDPR:** 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);
11. **Infotv.:** Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information;
12. **Üttv.:** Act LXXVIII of 2017 on the Legal Profession;
13. **Pmt.:** Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing;
14. **Civil Code:** Act V of 2013 on the Civil Code of Hungary;
15. **Accounting Act:** Act C of 2000 on Accounting;
16. **E-Commerce Act:** Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services.

2.2. Professional Secrecy and Attorney-Client Privilege

Pursuant to Section 9 of Act LXXVIII of 2017 on the Legal Profession, attorneys, law offices, and their staff are bound by strict **attorney-client privilege (professional secrecy)** regarding all facts, data, and information of which they

become aware in the course of practising law. Attorney-client privilege is unlimited in time and continues to apply without restriction even after the legal mandate has terminated.

Accordingly, the Data Controller processes all personal data obtained within the framework of a legal retainer with heightened confidentiality in secured and isolated environments. The exercise of data subject rights under data protection laws cannot prejudice statutory professional secrecy obligations or adversely affect the fundamental rights and freedoms of third parties.

3. SPECIFIC DATA PROCESSING ACTIVITIES

3.1. Preparation, Execution, and Performance of Legal Retainer Agreements

17. **Purpose of Processing:** Conclusion and execution of client legal service agreements, delivering legal counsel, drafting contracts and legal instruments, legal representation before courts, arbitral tribunals, authorities, and adverse parties, and fulfilling professional statutory duties.
18. **Categories of Personal Data:**

    Natural person clients: full name, birth name, place and date of birth, mother's maiden name, residential address, habitual residence, nationality, tax identification number, type and number of identity document, official address card number, telephone number, e-mail address, bank account details, and any case-specific personal data and records necessary to provide adequate legal services.

    Corporate or institutional clients: full name, job title, corporate e-mail address, and telephone number of representatives, signatories, and contact persons.
19. **Legal Bases for Processing:**

    In respect of natural person clients: Article 6(1)(b) GDPR (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract).

    In respect of corporate client representatives and designated contact persons: Article 6(1)(f) GDPR (legitimate interests pursued by the Data Controller and the corporate client to ensure seamless commercial and professional communication and contract execution).
20. **Data Retention Period:**

    As a general rule, under Section 53(3) of Act LXXVIII of 2017 on the Legal Profession, case files and related data shall be retained for **5 years** from the date the mandate is terminated.

    In case of countersigning deeds, real estate registry procedures, or safe custody of wills, under Section 53(5) of Act LXXVIII of 2017 on the Legal Profession, records shall be retained for **10 years** from the countersigning of the deed or the completion of the mandate.

    If a longer statutory limitation period applies under the Civil Code, or in the event of an ongoing dispute, data shall be retained until the final, non-appealable resolution of the dispute or the expiry of the applicable limitation period pursuant to Article 6(1)(f) GDPR.

3.2. Customer Due Diligence under Anti-Money Laundering Regulations (AML/CFT)

21. **Purpose of Processing:** Fulfillment of statutory customer due diligence, identification, verification, record-keeping, and reporting obligations imposed on legal practitioners to prevent money laundering and terrorist financing.
22. **Categories of Personal Data:** Full name, birth name, nationality, date and place of birth, mother's maiden name, residential address (or temporary address), type and number of identity document, number of address verification card, high-resolution copy of identity documents, politically exposed person (PEP) declarations, ultimate beneficial owner (UBO) details, and tax identification code.
23. **Legal Basis for Processing:** Article 6(1)(c) GDPR (compliance with a legal obligation to which the Data Controller is subject), pursuant to Sections 7–13 of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing, in conjunction with the Act on the Legal Profession.
24. **Data Retention Period:** Pursuant to Sections 56 and 57 of Act LIII of 2017, customer due diligence records must be retained for **8 years** following the termination of the business relationship or completion of the transaction. Upon request of the supervisory authority, this period may be extended by up to 2 additional years (up to a total of 10 years).

3.3. Invoicing, Billing, and Statutory Accounting Compliance

25. **Purpose of Processing:** Issuance of invoices and payment receipts for legal fees and disbursements, fulfillment of statutory bookkeeping, tax filing, and financial accounting duties.
26. **Categories of Personal Data:** Client's name, billing address, tax identification number / VAT number, fee amount, payment method, bank details, and invoice transaction details.

27. **Legal Basis for Processing:** Article 6(1)(c) GDPR (compliance with a legal obligation), pursuant to Sections 166 and 169 of Act C of 2000 on Accounting, and the provisions of the Value Added Tax Act.
28. **Data Retention Period:** In accordance with Section 169(2) of Act C of 2000 on Accounting, all accounting vouchers directly or indirectly supporting the books must be retained for at least **8 years**.

3.4. Inquiries, Proposals, and General Communications (Website, E-mail, Telephone)

29. **Purpose of Processing:** Receiving, handling, and responding to incoming inquiries, consultation requests, fee quote requests, and communications submitted via dkkrpartners.com, sent to office@dkkrpartners.com, or received by phone at +36 1 700 4752.
30. **Categories of Personal Data:** Name, e-mail address, telephone number, subject matter and text of the inquiry, and any personal information voluntarily provided by the inquirer.
31. **Legal Bases for Processing:**

    Where the inquiry is made with a view to entering into a retainer: Article 6(1)(b) GDPR (pre-contractual steps taken at the request of the data subject).

    In respect of general inquiries: Article 6(1)(a) GDPR (explicit consent provided upon submitting the inquiry) and Article 6(1)(f) GDPR (legitimate interest of both the sender and the Law Office in ensuring efficient professional communication).
32. **Data Retention Period:** Where a legal engagement is established, data is processed according to Section 3.1. Where no client relationship is formed, personal data is erased within **1 year** following the final conclusion of the communication, or upon withdrawal of consent.

3.5. Personal Data of Adverse Parties, Witnesses, Experts, and Other Proceedings Participants

33. **Purpose of Processing:** Lawful and effective execution of legal representation, clarification of factual circumstances, preparation of court submissions, evidence gathering, contract negotiations, and enforcement or defense of legal claims.
34. **Categories of Personal Data:** Name, address, procedural status, statements, witness accounts, expert opinions, procedural filings, and details of claims.
35. **Legal Bases for Processing:** Article 6(1)(f) GDPR (legitimate interests pursued by the client and the Law Office in exercising the fundamental right to legal counsel, judicial protection, and claim enforcement). Where special categories of data are processed, the legal basis is Article 9(2)(f) GDPR (processing is necessary for the establishment, exercise, or defense of legal claims).
36. **Data Retention Period:** Aligned with the retention period of the underlying client case file (5 or 10 years pursuant to the Act on the Legal Profession).

3.6. Professional Cooperation within the DKKR Partners Association of Attorneys

Dr. Kaszás Dániel Law Office is an active member of the **DKKR Partners Association of Attorneys (DKKR Partners Ügyvédi Társulás)**. Under Section 22 of Act LXXVIII of 2017 on the Legal Profession, an association of attorneys is established for joint practice, shared infrastructure, and mutual substitution. Data sharing between member law offices occurs strictly within the limits permitted by law, subject to client consent or statutory substitution rules, and strictly bound by professional secrecy. The legal basis is Article 6(1)(b) GDPR (contract performance) and Article 6(1)(f) GDPR (legitimate interest in professional cooperation and client service continuity).

3.7. Website Operations and Cookies (dkkrpartners.com)

When accessing dkkrpartners.com, the hosting server automatically logs technical connection data (IP address, date/time, browser type, visited subpages).

37. **Strictly Necessary Cookies:** Essential for technical operation, page navigation, and web security. Legal basis: Article 6(1)(f) GDPR (legitimate interest in secure web operations).
38. **Analytical and Marketing Cookies:** Employed solely where the visitor has provided prior, unambiguous, and voluntary consent. Legal basis: Article 6(1)(a) GDPR. Consent may be modified or revoked at any time via cookie settings.

4. DATA PROCESSORS AND THIRD-PARTY RECIPIENTS

In performing its operations, the Data Controller engages reliable data processors who provide high-level organizational, infrastructural, and technical guarantees:

4.1. Cloud Infrastructure and Web Hosting Provider:

39. **Processor Name:** Microsoft Ireland Operations Limited

40. **Registered Address:** One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland
41. **Service Provided:** Enterprise cloud hosting (Microsoft SharePoint, OneDrive for Business), office productivity suite, and secure corporate electronic mailing systems (Microsoft 365).
42. **Data Protection Safeguards:** All customer data is stored within data centers located inside the European Economic Area (EEA). Microsoft adheres to the EU General Data Protection Regulation requirements through its Data Protection Addendum (DPA) and Standard Contractual Clauses (SCCs), ensuring robust encryption at rest and in transit.

4.2. Accountancy and Bookkeeping Provider:

43. **Processor Name:** Globálprofit Kft.
44. **Service Provided:** Certified accounting, payroll administration, tax compliance, and processing of incoming and outgoing financial invoices.
45. **Data Protection Safeguards:** Globálprofit Kft. operates pursuant to a formal Data Processing Agreement and is bound by confidentiality and non-disclosure obligations in compliance with GDPR standards.

4.3. Independent Third-Party Controllers and Public Authorities:

In discharging its mandate and statutory obligations, the Law Office transmits personal data to competent external entities, including:

46. Hungarian courts of law, arbitral courts, prosecution services, and investigative authorities;
47. Administrative authorities (e.g., Land Registry Offices, National Tax and Customs Administration - NAV, Government Offices);
48. Hungarian Chamber of Civil Law Notaries and acting individual notaries public;
49. Budapest Bar Association (in the exercise of administrative oversight or disciplinary procedures);
50. Independent judicial enforcement officers (bailiffs).

5. TECHNICAL AND ORGANIZATIONAL DATA SECURITY MEASURES

Taking into account the state of the art, the costs of implementation, and the nature, scope, context, and purposes of processing, the Law Office implements robust technical and organizational safeguards:

1. **Physical Security:** The Law Office premises at 1013 Budapest, Pauler utca 11. are equipped with restricted-access security systems. Paper-based documents and client files are stored in locked, fireproof archiving cabinets accessible solely to authorized personnel.
2. **IT & Cybersecurity:**

   All end-user computing devices (workstations, laptops, smartphones) are password-protected, equipped with biometric authentication, and secured with BitLocker full-disk hardware encryption.

   Access to cloud repositories (Microsoft SharePoint) and corporate e-mail accounts is safeguarded by mandatory Multi-Factor Authentication (MFA / 2FA).

   Network communications utilize secure encrypted protocols (TLS/SSL).

   Systems are defended by up-to-date endpoint protection, automated firewalls, and regular automated off-site backups.
3. **Organizational Protocols:** All attorneys, associate lawyers, trainees, and contracted partners sign strict non-disclosure and professional secrecy undertakings prior to accessing client data.

6. DATA SUBJECT RIGHTS AND MODALITIES OF EXERCISE

Pursuant to Articles 12–22 of the GDPR, data subjects may exercise the following statutory rights:

6.1. Right of Access (Article 15 GDPR)

Data subjects have the right to obtain confirmation as to whether their personal data is being processed, and, where that is the case, access to the personal data and detailed information regarding purposes, categories, recipients, and retention periods. *Professional Secrecy Restriction:* In accordance with Section 9 of Act LXXVIII of 2017 on the Legal Profession, access requests by third parties (such as adverse parties or witnesses) cannot extend to privileged attorney-client work product, legal strategy, or confidential client records.

6.2. Right to Rectification (Article 16 GDPR)

Data subjects have the right to obtain without undue delay the rectification of inaccurate personal data and to have incomplete personal data completed.

6.3. Right to Erasure ("Right to be Forgotten", Article 17 GDPR)

Data subjects may request the deletion of their personal data if the data is no longer necessary in relation to the purposes for which it was collected, or if consent is withdrawn and there is no other legal ground. *Statutory Exception:* Deletion cannot be granted where processing is necessary for compliance with a legal obligation (such as the mandatory 8-year retention under the AML Act, 8-year retention under the Accounting Act, or 5/10-year archiving under the Act on the Legal Profession), or for the establishment, exercise, or defense of legal claims.

6.4. Right to Restriction of Processing (Article 18 GDPR)

Data subjects may obtain restriction of processing where the accuracy of the data is contested, the processing is unlawful but erasure is opposed, the Controller no longer needs the data but the subject requires it for legal claims, or an objection is pending verification.

6.5. Right to Data Portability (Article 20 GDPR)

Where processing is based on consent or a contract and carried out by automated means, data subjects have the right to receive their personal data in a structured, commonly used, and machine-readable format.

6.6. Right to Object (Article 21 GDPR)

Data subjects have the right to object, on grounds relating to their particular situation, at any time to processing based on legitimate interests (Article 6(1)(f) GDPR). In such case, processing must cease unless the Controller demonstrates compelling legitimate grounds which override the interests, rights, and freedoms of the data subject or for legal claims.

6.7. Exercise of Rights:

Requests may be submitted to the Law Office via:

4. **Postal Mail:** Dr. Kaszás Dániel Ügyvédi Iroda, 1013 Budapest, Pauler utca 11., Hungary
5. **E-mail:** office@dkkrpartners.com

The Data Controller shall provide information on action taken without undue delay and in any event **within one month** of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of requests.

7. REMEDIES AND COMPLAINTS

Should any data subject consider that the processing of their personal data infringes applicable data protection legislation, the following avenues of redress are available:

7.1. Direct Amicable Resolution with the Controller:

Data subjects are encouraged to address concerns directly to **office@dkkrpartners.com** to enable prompt and constructive resolution.

7.2. Supervisory Authority Complaint (NAIH):

Data subjects may lodge an official complaint with the Hungarian data protection supervisory authority:

6. **Authority Name:** Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)
7. **Official Address:** 1055 Budapest, Falk Miksa utca 9-11., Hungary
8. **Mailing Address:** 1363 Budapest, Pf. 9., Hungary
9. **Telephone:** +36 1 391 1400
10. **E-mail:** ugyfelszolgalat@naih.hu
11. **Official Website:** https://naih.hu

7.3. Judicial Remedy (Right to an Effective Judicial Remedy):

Data subjects may initiate legal proceedings against the Data Controller before the competent regional court (*Törvényszék*). Proceedings fall under the jurisdiction of the Budapest Regional Court (*Fővárosi Törvényszék*), or, at the data subject's option, before the regional court of their domicile or habitual residence in Hungary.

8. FINAL PROVISIONS

The Data Controller reserves the right to amend this Notice in response to legislative modifications, bar association guidance, or internal operational enhancements. The prevailing version is available at the Law Office seat and on its official website (dkkrpartners.com).

Done in Budapest, 1 November 2026.

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Dr. Kaszás Dániel Law Office
represented by: Dr. Dániel Kaszás
Managing Partner, Attorney-at-Law