

CLVPARTNERS© CSABAI AND PAPP LAW FIRM

WWW.CLVPARTNERS.COM

PRIVACY POLICY REGARDING THE USE OF THE WEBSITE

(hereinafter: "**Policy**")

In force: 1 January 2025

1. Name and contact details of the Data Controller

Csabai & Papp Law Firm (registered seat: HU-1133 Budapest, Váci út 76, 3rd floor, registration number: 3470, hereinafter: "**Law Firm**" or "**Data Controller**") is a data controller of personal data in accordance with the General Data Protection Regulation¹ and the Privacy Act², in connection with the use of the website www.clvpartners.com (hereinafter: "**Website**") by visitors.

The Law Firm does not appoint a data protection officer, however, the Head of the Law Firm is specialized in data protection, whose main duties include monitoring and supervising the implementation of personal data legislation and internal regulations, changes in data protection legislation and practice, facilitating the exercise of data subjects' rights, investigating complaints concerning personal data and taking the necessary steps to remedy the complaint, and liaising with the National Authority for Data Protection and Freedom of Information.

Contact details:

Address: 1133 Budapest, Váci út 76, 3rd floor (by appointment, between 8-15 hours on working days)

E-mail: anna.papp@clvpartners.com

2. The importance of the data processing of personal data by the Data Controller

It is extremely important for the Data Controller to provide its services to its clients in accordance with the needs and requirements of the modern age. This Policy contains detailed information regarding data processing while using the Website.

The use of the Law Firm's services and the provision of personal data in connection therewith is voluntary for anyone.

Natural persons have Personal Data. Any information relating to a particular natural person - "data subject" in the sense of data protection legislation - may be Personal Data if it identifies a natural person. Examples of Personal Data are name, telephone number, email address, IP address.

¹ 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

² Act CXII of 2011 on Informational Self-Determination and Freedom of Information

3. Data processing in connection with the use of the Website

3.1. Contact, request for quotation

You can contact us through the Website to request a price quote or for other business purposes using the contact form provided for this purpose. In this context, your personal data will be processed as described below:

Scope of data processed	a) name b) e-mail address c) telephone number d) company name e) subject of the request f) message
Purpose of data processing	The purpose of data processing is to enable you to contact the Law Firm in connection with our services and to request an offer.
Legal basis for data processing	Legitimate interest of the Data Controller in connection with the provision of its services (Article 6(1)(f) of the General Data Protection Regulation); consent in case of interested private persons (Article 6(1)(a) of the General Data Protection Regulation).
Data recipients, contractual partners, data processors	The processed Personal Data will not be transferred to any other data controller The Law Firm uses data processor for the operation, maintenance and development of its IT systems. The processor has access to certain Personal Data but does not perform any operations on them. In case of any specific request to this effect by a data subject, the Law Firm will provide information on the data processors and the operations carried out by them in relation to the processing in question.
Duration of data processing	The Law Firm processes Personal Data for the time necessary to achieve the purpose of the processing.

3.2. Cookie-related data processing

The Law Firm uses cookies in order to facilitate the use of its Website. A cookie is a small packet of data that is stored in the browser by Internet services. A cookie is a technology that is essential for the operation of an online service that provides an efficient and modern user experience.

You can find out about the current cookies in the pop-up window on the Website and set your preferences when you use the Website.

3.3. Newsletter

The Law Firm will send the client newsletter if the client subscribes to it. The purpose of the newsletter is to draw attention to changes in legislation or case law that may be of interest to the client, and to provide information on the operation of the Law Firm and any changes that may occur in this respect.

Scope of data processed	a) name b) e-mail address c) company name
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Purpose of data processing	The purpose of data processing is to inform the client subscribed to the newsletter about changes in legislation, jurisprudence, circumstances and possible changes related to the operation of our Law Firm.
Legal basis for data processing	Consent of the data subject subscribing to the newsletter (Article 6(1)(a) of the General Data Protection Regulation).
Data recipients, contractual partners, data processors	The processed Personal Data will not be transferred to any other data controller The Law Firm uses data processor for the operation, maintenance and development of its IT systems. The processor has access to certain Personal Data but does not perform any operations on them. In case of any specific request to this effect by a data subject, the Law Firm will provide information on the data processors and the operations carried out by them in relation to the processing in question.
Duration of data processing	The Law Firm processes the personal data for the period necessary to achieve the purpose of the processing (until the implementation of the Law Firm's newsletter sending practice) or until the withdrawal of the data subject's consent (unsubscribing from the newsletter).

4. Rights of the Data Subject

The Data Controller attaches the utmost importance to ensuring that the rights of Data Subjects with regard to data processing are adequately protected at all times when processing Personal Data of natural persons. In this context, the following rights shall apply. In the event of any request by a Data Subject in relation to the processing of Personal Data, the Data Controller will ensure the exercise of the data subject's right within the shortest possible time from the receipt of the request, but not later than 1 month or, if it needs further information to ensure the exercise of the right, will contact the Data Subject without undue delay by e-mail or telephone (preferably using the same way of communication as the Data Subject used) to deal with the request.

4.1. Right to information and access

The Data Subject shall have the right to receive feedback from the Data Controller at any of the contact details indicated in this Policy as to whether or not his or her Personal Data are being processed and, where that is the case, access to the Personal Data and the following information:

- a) the purposes of the processing;
- b) the categories of Personal Data concerned;
- c) the recipients or categories of recipients to whom or with whom the Personal Data have been or will be disclosed, including in particular recipients in third countries or international organizations;
- d) the envisaged period for which the Personal Data will be stored or, if this is not possible, the criteria used to determine that duration;
- e) the existence of the right to request from the Data Controller rectification or erasure of Personal Data or restriction of processing of Personal Data concerning the Data Subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the Personal Data are not collected from the Data Subject, any available.

4.2. Right to rectification and completion

The Data Subject shall have the right to obtain from the Data Controller the rectification of his or her Personal Data processed by the Data Controller if he or she considers that they are not correct or inaccurate. The Data Subject shall have the right to obtain from the Data Controller the completion of the Personal Data processed by the Data Controller if he or she considers them to be incomplete.

4.3. Right to restriction

The Data Subject shall have the right - unless otherwise provided by law - to obtain from the Data Controller restriction of processing where following applies:

- a) the accuracy of the Personal Data is contested by the Data Subject, for a period enabling the Data Controller to verify the accuracy of the Personal Data;
- b) the processing is unlawful and the Data Subject opposes the erasure of the Personal Data and requests the restriction of their use instead;
- c) the Data Controller no longer needs the Personal Data for the purposes of processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims; or
- d) the Data Subject has objected to the processing pending the verification whether the legitimate grounds of the Data Controller override those of the Data Subject.

4.4. Withdraw consent, right to object

Where the data processing by the Data Controller is based on the explicit request and consent of the Data Subject, the Data Subject shall have the right to withdraw his or her consent at any time. In this case, the Data Controller shall delete the Personal Data relating to the Data Subject without undue delay.

Where the data processing by the Law Firm is carried out for the protection of its own or third parties' legitimate interests or for commercial purposes, the Data Subject shall have the right to object to the processing of his or her data.

4.5. Access to data, Right to data portability

The Data Subject has the right to request the erasure of his or her personal data processed by the Controller if:

- > considers that the processing of personal data is no longer necessary;
- > considers that his/her personal data are unlawfully processed by the Controller;
- > does not consent to further processing of his/her personal data, and
- > he/she explicitly objects to the processing of his/her personal data.

4.6. Right to erasure

The Data Subject has the right to request the erasure of his or her personal data processed by the Controller if he or she:

- a) considers that the processing of Personal Data for the original purpose is no longer necessary;
- b) does not consent to further processing of his/her Personal Data - if the processing is based on consent;

- c) considers that his/her Personal Data is unlawfully processed by the Controller;
- d) explicitly objects to the processing his/her Personal Data - if the legal basis for the processing is the protection of the legitimate interests of the Law Firm or a third party.

4.7. Remedies

If the Data Subject believes that the Data Controller is unlawfully processing his or her data, he or she has the right to submit a complaint with the Data Controller in order to terminate the processing. If this is unsuccessful, he or she has the right to apply to the National Authority for Data Protection and Freedom of Information or to the courts.

- > Complaints can be submitted to the National Authority for Data Protection and Freedom of Information at the following contact details: National Authority for Data Protection and Freedom of Information (postal address: 1363 Budapest, Pf.: 9.; address: 1055 Budapest, Falk Miksa utca 9-11.; telephone: +36-1-391-1400, +36 (30) 683-5969, +36 (30) 549-6838; fax: +36-1-391-1410; e-mail: ugyfelszolgalat@naih.hu; website: <http://www.naih.hu>)
- > In the case of a judicial enforcement, the competent Regional Court has the jurisdiction to hear the case. Upon the Data Subject's option, the lawsuit may also be brought before the court of the place of residence or domicile. If the court grants the request, the Data Controller shall delete the personal data of the Data Subject within 3 days of the notification of the final judgment.

4.8. Exercise the rights of a Data Subject

The Data Subject may exercise the above rights against the Data Controller. Requests under this point may be sent to or made at the Data Controller.