

PRIVACY POLICY

hvlegal.hu

Hagya Law Firm & Dr. Miklós Vida Law Firm

Joint Data Controllers

Budapest, 6 January 2025

1. INTRODUCTION

Please read this Privacy Policy carefully in order to understand how we process your personal data and to become familiar with your rights regarding data processing.

Hagya Law Firm and Dr Miklós Vida Law Firm (hereinafter jointly referred to as the Joint Data Controllers or the Law Firms) qualify as joint data controllers pursuant to Article 26 of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR). In the course of their activities, the Joint Data Controllers necessarily process personal data; however, they place particular emphasis on the protection of personal data, compliance with applicable legal requirements, and ensuring secure and fair data processing.

As joint data controllers within the meaning of Article 26 of the GDPR, the Joint Data Controllers allocate between themselves the responsibilities for fulfilling the obligations arising under the GDPR, in particular those relating to the exercise of Data Subject rights and the information obligations set out in Articles 13 and 14. Data Subjects may contact either Law Firm in connection with requests concerning the exercise of their rights, and both Law Firms are obliged to respond to such requests.

The Joint Data Controllers inform natural persons about the principles, processes, and safeguards of personal data processing and acknowledge the right of individuals to exercise control over their own personal data. At the same time, they emphasise that the right to the protection of personal data is not an absolute right; it must be considered and balanced against other fundamental rights in accordance with the principle of proportionality.

Detailed information regarding the individual data processing activities is provided in Section 8 of this Privacy Policy.

Should you require any further information regarding this Privacy Policy, please contact either Law Firm using the contact details provided below.

2. DETAILS OF THE JOINT DATA CONTROLLERS

Pursuant to Article 26 of the GDPR, the Joint Data Controllers determine, in a transparent manner and through an agreement concluded between them, the allocation of responsibilities for fulfilling the obligations arising under the Regulation. The essence of this agreement shall be made available to the data subject. Regardless of the terms of this agreement, the data subject may exercise their rights under the GDPR in relation to and against both data controllers.

Based on the internal agreement between the Joint Data Controllers, the allocation of certain data processing responsibilities is as follows:

- (i) requests relating to the exercise of data subject rights may be received by either Law Firm, and both Law Firms are responsible for responding to such requests;
- (ii) both Law Firms are jointly responsible for handling personal data breaches;
- (iii) responsibility for implementing data security measures related to individual data processing activities lies with the Law Firm actually carrying out the relevant data processing activity.

The essence of the joint controllership agreement is available to the data subject upon request.

The Joint Data Controllers designate the following contact point for data subjects: for data protection-related matters, data subjects may primarily contact the Law Firms via office@hvlegal.hu. Acting on behalf of either Law Firm, the Law Firms are obliged to respond to the data subject's request. Regardless of the terms of the joint controllership agreement, data subjects may directly enforce their rights under the GDPR against either Law Firm.

Hagya Law Firm

Full Legal Name	Hagya Law Firm
Registered Office	1068 Budapest, Benczúr utca 41, Ground Floor, Door 3
Email	office@hvlegal.hu
Telephone	+36 20 313 6088

Website	hvlegal.hu
Tax number	19287812-1-42
Company Gateway ID (Hungarian official electronic mailbox):	19287812
Managing Attorney	dr. Szabolcs Tibor Hagya
Bar Association Registration Number	36080283
Supervisory Authority	Budapest Bar Association

Dr. Miklós Vida Law Firm

Full Legal Name	Dr. Miklós Vida Law Firm
Registered Office	1068 Budapest, Benczúr utca 41, Ground Floor, Door 3
Email	office@hvlegal.hu
Telephone	+36 20 313 6088
Website	hvlegal.hu
Tax Number	19311487-2-42
Company Gateway ID (Hungarian official electronic mailbox)	19311487
Managing Attorney	dr. Vida Miklós
Bar Association Registration Number	36071357
Supervisory Authority	Budapest Bar Association

2. CONCEPTS, PRINCIPLES OF DATA PROCESSING, AND RELEVANT LEGISLATION

a) Definitions

The terms used in this Privacy Policy are primarily defined based on the 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 – hereinafter referred to as the Regulation) and Act LXXVIII of 2017 on the Professional Activities of Attorneys-at-Law (hereinafter referred to as the Attorneys-at-Law Act):

Term	Definition
Data Subject	Any natural person who is or can be identified, directly or indirectly, by reference to personal data, and in relation to whom the Law Firms carry out data processing

	activities. Data Subjects may include, for example, clients, prospective clients, opposing parties, or third parties. [Article 4(1) of the Regulation]
Client	A natural person or legal entity that has entered into an engagement agreement with the Law Firms, or, without entering into an engagement agreement, any natural person or legal entity that uses the services provided by the Law Firms.
Personal Data	Any data or information relating to the Data Subject that can be associated with the Data Subject or that makes the Data Subject identifiable (e.g. name, telephone number, online identifier, location data, photograph, voice, etc.). Personal data retains its nature as such for as long as the link between the data and the Data Subject can be restored using the information and technical means available to the Data Controllers. [Article 4(1) of the Regulation]
Processing of Personal Data	Any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, storage, retrieval, use, disclosure, or erasure. [Article 4(2) of the Regulation]
Data Controller	A natural person or legal entity that, alone or jointly with others, determines the purposes and means of the processing of personal data. [Article 4(7) of the Regulation]
Joint Data Controllers	Where two or more Data Controllers jointly determine the purposes and means of processing, they shall be considered Joint Data Controllers. Hagya Law Firm and Dr Miklós Vida Law Firm qualify as Joint Data Controllers in relation to the processing activities carried out in connection with the hvlegal.hu website. [Article 26 of the Regulation]
Data Processor	A natural person or legal entity that processes personal data on behalf of and under the authority of the Data Controllers. [Article 4(8) of the Regulation] The provisions of this Privacy Policy shall also apply to the Data Processors.
Data Protection	The set of principles, rules, procedures, data processing tools, and methods that ensure the lawful processing of personal data and the protection of Data Subjects.
Personal Data Breach	A breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to personal data transmitted, stored, or otherwise processed. [Article 4(12) of the Regulation]
Third Party	A natural person or legal entity other than the Data Subject, the Data Controllers, the Data Processor, the Joint Data Controllers, or persons who, under the direct authority of the Data Processor or the Data Controllers, are authorised to process personal data. [Article 4(10) of the Regulation]
Consent of the Data Subject	A voluntary, specific, informed, and unambiguous indication of the Data Subject's wishes by which the Data Subject, through a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to them. [Article 4(11) of the Regulation]
Supervisory Authority	National Authority for Data Protection and Freedom of Information (<i>Nemzeti Adatvédelmi és Információszabadság Hatóság</i> – NAIH)

b) Principles

The Law Firms process personal data in accordance with the following data protection principles:

- Lawfulness, fairness and transparency – Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject.
- Purpose limitation – Personal data shall be collected for specified, explicit and legitimate purposes and shall not be further processed in a manner that is incompatible with those purposes.
- Data minimisation – Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accuracy – Personal data shall be accurate and, where necessary, kept up to date.

- Storage limitation – Personal data shall be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Integrity and confidentiality – Appropriate technical and organisational measures shall be implemented to ensure the security of personal data.
- Accountability – The Data Controllers are responsible for, and must be able to demonstrate compliance with, these principles.
- Privacy by Design and Privacy by Default – Data protection principles shall be integrated into the design of processing activities and applied by default.

Further information on the principles governing the processing of personal data can be found in Article 5 of the Regulation and in Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (the "Infotv.").

c) Applicable Legislation

The Law Firms process all personal data under their control in compliance with the applicable Hungarian and European legislation, as well as the fundamental principles of Data Protection. The Law Firms also implement the technical and organisational safeguards necessary to ensure the secure processing of personal data.

The Law Firms' data processing activities have been designed in accordance with, among others, the following legislation:

- 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 – GDPR or the "Regulation");
- The Fundamental Law of Hungary (Magyarország Alaptörvénye);
- Act V of 2013 on the Civil Code (Ptk.);
- Act LXXVIII of 2017 on the Legal Profession (Üttv.);
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.);
- Act C of 2000 on Accounting (Számviteli tv.);
- Act XX of 1996 on Identification Methods Replacing Personal Identification Numbers and the Use of Identification Codes;
- Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (Pmt.).

d) Lawfulness of Processing

The Law Firms continuously process personal data in the course of their relationships with their clients, colleagues and partners in compliance with the applicable legal requirements.

Pursuant to Article 6 of the Regulation, the processing of personal data is lawful only where it is based on one of the legal bases exhaustively listed therein. Accordingly, processing is lawful where one of the following legal bases applies:

- Consent: the Data Subject has given their consent to the processing of their personal data after having been duly informed [Article 6(1)(a) of the Regulation];
- Performance of a contract: 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 [Article 6(1)(b) of the Regulation];
- Legal obligation: processing is necessary for compliance with a legal obligation to which the Data Controllers are subject [Article 6(1)(c) of the Regulation];
- Vital interests: processing is necessary in order to protect the vital interests of the Data Subject or of another natural person [Article 6(1)(d) of the Regulation];
- Public interest: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controllers [Article 6(1)(e) of the Regulation];
- Legitimate interests: processing is necessary for the purposes of the legitimate interests pursued by the Data Controllers or by a Third Party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject [Article 6(1)(f) of the Regulation].

4. Your Rights

You may contact the Law Firms directly using any of the contact details provided in Section 2 with any requests, questions, complaints or comments concerning the processing of your personal data or the conduct of the Data Controllers.

The Law Firms will respond to any request submitted through their contact channels without undue delay and, in any event, within one month of receipt.

You may exercise your rights as set out below:

Right	Description
Right to be Informed and Right of Access [Articles 13–15 of the Regulation]	You have the right to obtain confirmation as to whether your personal data are being processed. Upon your request, the Law Firms will provide you with a copy of the personal data they process concerning you and will also provide the information required under Article 15 of the Regulation, including, among other things, the purposes of the processing, the categories of personal data concerned, the categories of recipients to whom the personal data have been or will be disclosed, and the applicable retention period.
Right to Rectification [Article 16 of the Regulation]	Upon the Data Subject's request, the Law Firms shall, without undue delay, rectify any inaccurate personal data concerning the Data Subject that they process. Taking into account the purposes of the processing, the Data Subject also has the right to have incomplete personal data completed.
Right to Erasure ("Right to be Forgotten") [Article 17 of the Regulation]	In the cases specified in Article 17 of the Regulation, the Law Firms shall, upon the Data Subject's request or, where required, on their own initiative, erase the Data Subject's personal data without undue delay. Where the Data Subject requests the erasure of personal data that the Law Firms have made public, the Law Firms shall take reasonable steps, taking account of available technology and the cost of implementation, to inform other Data Controllers processing those personal data that the Data Subject has requested the erasure of any links to, or copies or replications of, those personal data.
Right to Restriction of Processing [Article 18 of the Regulation]	Upon the Data Subject's request, the Law Firms shall restrict the processing of personal data in the circumstances set out in Article 18 of the Regulation. Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defence of legal claims, for the protection of the rights of another natural or legal person, or for reasons of important public interest.
Right to Data Portability [Article 20 of the Regulation]	Where processing is carried out by automated means and is based on the Data Subject's consent or on a contract, the Law Firms shall, upon the Data Subject's request, provide the personal data concerning the Data Subject that they have previously provided to the Law Firms in a structured, commonly used and machine-readable format. At the Data Subject's request, and where technically feasible, the Law Firms shall transmit those personal data directly to another Data Controller.
Right to Object [Article 21 of the Regulation]	Where the Law Firms process personal data on the basis of their legitimate interests, the Data Subject has the right to object, on grounds relating to their particular situation, at any time to such processing. In such a case, the Law Firms shall no longer process the personal data unless they demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject, or unless the processing is necessary for the establishment, exercise or defence of legal claims.
Notification Obligation Regarding the Rectification or Erasure of Personal Data or Restriction of Processing [Article 19 of the Regulation]	The Law Firms shall inform each recipient to whom the personal data have been disclosed of any rectification, erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort.

Communication of a Personal Data Breach to the Data Subject [Article 34 of the Regulation]	Where the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Law Firms shall inform the Data Subject of the personal data breach without undue delay.
Right to Lodge a Complaint	You have the right to lodge a complaint in relation to the processing of your personal data primarily with the Law Firms and, secondly, with the competent supervisory authority of the Member State of your habitual residence, place of employment, or the place of the alleged infringement. Contact details of the Hungarian supervisory authority: Name: Hungarian National Authority for Data Protection and Freedom of Information Address: 1055 Budapest, Falk Miksa utca 9–11. (1055 Budapest, Falk Miksa Street 9–11, Hungary) Postal address: 1374 Budapest, Pf. 603. (P.O. Box 603, Budapest 1374, Hungary) Telephone: +36 (1) 391-1400 E-mail: ugyfelszolgalat@naih.hu Website: http://naih.hu
Right to an Effective Judicial Remedy [Articles 78–79 of the Regulation]	The Data Subject has the right to seek judicial remedy against a legally binding decision of the supervisory authority concerning them, or where the supervisory authority has not handled their complaint or has failed to inform them within three months of the progress or outcome of the complaint. The Data Subject may exercise this right before the competent court. Furthermore, the Data Subject has the right to an effective judicial remedy against the Law Firms where they consider that their personal data have not been processed in accordance with the provisions of the Regulation.

Please contact us, where possible, in electronic form. The Law Firms will respond to data protection requests, where possible, in electronic form, unless the Data Subject expressly requests another method of communication or the Law Firms do not have knowledge of the Data Subject's electronic contact details.

Please note that if fulfilling a request for the provision of personal data would result in disproportionate additional costs for the Law Firms (for example, due to the requested format or the number of copies requested), the Law Firms shall be entitled to charge the Data Subject for the administrative costs related to providing such data. The Law Firms will inform the Data Subject in advance of any costs that may arise.

Please note that, in the case of persons under the age of 18, their legal representative is entitled to act on their behalf.

5. DATA SECURITY

The Law Firms aim to minimise the processing of personal data in order to reduce risks associated with data processing activities. The Law Firms process personal data in a transparent and auditable manner in order to ensure the prompt detection of any personal data breaches.

As part of their data security responsibilities, the Law Firms:

- ensure the password protection and, where necessary, the encryption of electronically stored personal data;
- ensure the physical protection of paper-based personal data to prevent unauthorized access (e.g., protecting the office with locks and alarm systems);
- ensure the physical protection of data storage media in the case of electronically processed data (e.g., keeping office computers in locked offices);
- ensure that access to data is permitted only to authorized persons (e.g., password protection, two-factor authentication);
- arrange for regular backups of electronic data;
- ensure compliance with data protection and professional secrecy laws, with particular regard to the rules of Act LXXVIII of 2017 on the Professional Activities of Attorneys (Attorney Act);

- ensure the protection of electronic data by using antivirus software;
- enter into data processing agreements with data processors that guarantee compliance with the Regulation;
- regularly assess the adequacy of the data security measures applied and review them as necessary;
- where a type of processing, taking into account its nature, scope, context and purposes, is likely to result in a high risk to the rights and freedoms of natural persons, conduct a data protection impact assessment pursuant to Article 35 of the Regulation prior to the processing.

6. RECIPIENTS OF PERSONAL DATA

Your personal data may be accessed by the Law Firms' attorneys and employees (e.g. trainee attorneys, legal assistants), as well as by cooperating or substitute attorneys approved by you in the engagement agreement or power of attorney.

Personal data may be transferred for data processing purposes to the Law Firms' archiving, accounting and IT service providers. Billing information may be shared with the company responsible for the Law Firms' accounting. Depending on the purpose of the engagement and the processing activity, personal data may be disclosed to competent authorities, courts, opposing parties or other third parties.

Where the Law Firms perform their engagement with the involvement of another attorney or law firm, personal data may be transferred to such cooperating attorney or law firm. Personal data may also be disclosed to other persons involved in the performance of the legal engagement (e.g. experts), or to other service providers engaged in connection with the performance of the engagement, whose involvement has been approved by the client.

Where the regional bar association appoints an office administrator (*irodagondnok*) pursuant to Section 85 of Act LXXVIII of 2017 on the Professional Activities of Attorneys (Attorney Act), such office administrator shall be entitled to represent the attorney and access the relevant documents.

Your personal data may be disclosed in judicial or administrative proceedings to the competent authorities (e.g. investigative authorities, data protection supervisory authorities, courts) and to opposing parties.

Where required by law, the Law Firms are obliged to transfer the personal data processed by them, as specified by the applicable legislation, to the institutions, authorities, bodies or organisations designated by law. The Law Firms will inform the Data Subjects of such data transfers unless notification is prohibited by law.

When transferring personal data, the Law Firms act strictly in accordance with the provisions of Act LXXVIII of 2017 on the Professional Activities of Attorneys (Attorney Act), the ethical rules applicable to attorneys, and the relevant procedural laws.

Data Processors

The Law Firms only engage Data Processors that provide sufficient guarantees to implement appropriate technical and organisational measures ensuring compliance with the requirements of the Regulation and the protection of the personal data of Data Subjects. The Law Firms enter into written data processing agreements with their Data Processors.

Hosting Services

The Law Firms use a Data Processor to ensure the operation of their website (including hosting services and data input through the website), with whom the Law Firms have entered into a data processing agreement. The categories of data processed by the Data Processor include: data uploaded to the website and data provided to the Law Firms through the website.

Details of the Hosting Service Provider

The Law Firms have entered into a data processing agreement with the hosting service provider, under which the provider is entitled to process data solely in accordance with the Law Firms' instructions and for the purposes specified in the data processing agreement. Upon the Data Subject's request, the Law Firms will provide information regarding the Data Processor's details (company name, registered office and contact details).

Transfers of Personal Data to Third Countries /

As a general rule, the Law Firms do not transfer personal data to third countries. Where such transfers take place on an occasional basis, the Law Firms will only transfer personal data to a third country that ensures an adequate level of protection based on a European Commission adequacy decision. Where no adequacy decision is available, the Law Firms will only transfer personal data to a third country if the conditions set out in Articles 46 or 49 of the Regulation are met.

7. PERSONAL DATA BREACH

A personal data breach means a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to personal data transmitted, stored or otherwise processed [Article 4(12) of the Regulation].

Please notify any of the Law Firms' offices without undue delay through the contact details provided in this Privacy Notice if you become aware of a personal data breach or a risk of such breach in connection with any of our data processing activities.

In the event of a personal data breach, the Law Firms shall notify the Supervisory Authority without undue delay and, where feasible, not later than 72 hours after becoming aware of the breach, unless the assessment indicates that the breach is unlikely to result in a risk to the rights and freedoms of natural persons.

Where the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Law Firms shall inform the Data Subject without undue delay.

The Law Firms investigate every personal data breach and take appropriate measures to prevent similar incidents from occurring in the future.

The Law Firms maintain a register of personal data breaches containing all relevant circumstances of each incident. This register enables the data protection Supervisory Authority to verify compliance with the requirements of the Regulation.

8. DATA PROCESSING ACTIVITIES

Information regarding the individual data processing activities is provided below:

a) Processing of Personal Data in Connection with Legal Engagements and Client Identification

The Law Firms process personal data in the course of legal services provided pursuant to Section 27 of Act LXXVIII of 2017 on the Professional Activities of Attorneys (Attorney Act). The scope of processed personal data may be determined by applicable legislation (e.g. mandatory elements of contracts) or by requests of authorities in administrative or judicial proceedings.

Section 32(1) of the Attorney Act: Except for engagements relating to legal advice, before concluding an engagement agreement, the attorney shall identify the client and any person acting on behalf of the client. Üttv. 32. §
Section 32(2) of the Attorney Act: The attorney shall identify any natural person whom they do not personally know, or whose identity is uncertain, by reviewing an identification document suitable for verifying identity.

For the purpose of verifying that the personal data of a natural person correspond to the data recorded in the relevant official registers and that the documents presented by such person are valid, the attorney may request data from the personal data and address register, the driving licence register and the travel document register. The attorney shall make such a data request where doubts arise regarding the validity or authenticity of the data or documents provided.

Categories of Personal Data Processed	Purpose of Processing	Legal Basis for Processing
Client's name, mailing and/or residential address	Conclusion of the engagement agreement	Article 6(1)(b) of the Regulation – performance of the legal engagement agreement
Client's name, mailing and/or residential address	Billing	Article 6(1)(c) of the Regulation – compliance with a legal obligation (Section 169 of the VAT Act, Sections 167 and 169 of the Accounting Act)
Client's name, telephone number, e-mail address	Communication	Article 6(1)(b) of the Regulation – performance of the legal engagement agreement

Client's data pursuant to Section 32(3) of the Attorney Act (in case of doubt)	Verification of the data collected during client identification against official registers	Article 6(1)(c) of the Regulation – compliance with a legal obligation (Section 32(2) and (3) of the Attorney Act)
Further data necessary for the performance of the legal engagement (where the data subject is the client)	Proper representation of the client's interests, performance of the services	Article 6(1)(b) of the Regulation – performance of the legal engagement agreement, and the cooperation obligation arising from the contract

 **Duration of Data Processing:** 8 years from the termination of the agreement; in the event of a legal dispute, if the dispute is resolved at a later date, 5 years following the conclusion of the dispute.

b) Case Register

Pursuant to Section 53 of Act LXXVIII of 2017 on the Professional Activities of Attorneys (Attorney Act), the Law Firms maintain a case register in order to ensure the verifiability of compliance with the rules applicable to legal activities and to protect the rights of clients in the event that the entitlement to provide legal services ceases.

Section 53(2) of the Attorney Act: The case register shall contain the following information: a) the case identification number assigned by the attorney; b) the name of the client; c) the subject matter of the case; d) the date of conclusion of the engagement agreement; and e) the registration number of court proceedings related to the case or the reference number of other proceedings.

Categories of Personal Data Processed	Purpose of Processing	Legal Basis for Processing
Data specified in Section 53(2) of the Attorney Act (case identification number, client's name, subject matter of the case, date of engagement, registration numbers of proceedings)	Compliance with the statutory obligation to maintain a case register	Article 6(1)(c) of the Regulation – compliance with a legal obligation (Section 53(1) and (2) of the Attorney Act)

 **Duration of Data Processing:** 5 years following the termination of the engagement; in the case of countersigning a document, 10 years following the countersigning of the document; in cases concerning the registration of a right relating to real estate in an official public register, 10 years from the registration of such right.

c) Case Register for Matters Requiring Mandatory Legal Representation

Pursuant to Section 33(1) of Act LXXVIII of 2017 on the Professional Activities of Attorneys (Attorney Act), the Law Firms maintain a register of cases in which legal representation is mandatory.

Section 33(1) of the Attorney Act: In cases where legal representation is mandatory, the attorney shall maintain a register of identified natural persons, legal entities and other organisations for the purpose of promoting the security of legal transactions and ensuring compliance with the limitations applicable to legal activities.

Section 33(2) of the Attorney Act: The register maintained in relation to identified natural persons shall contain the following data: a) personal identification data of the natural person; b) residential address; c) citizenship, stateless status, refugee status, immigrant status, settled status or EEA citizen status; d) type and number of the identification document used for identification; e) the identifier of the response received in connection with the data request specified in Section 32(3); f) the case identification number of matters in which the identification of the natural person is mandatory; g) the data specified in the Act on the Prevention and Combating of Money Laundering and Terrorist Financing.

Categories of Personal Data Processed	Purpose of Processing	Legal Basis for Processing
Data specified in Section 33(2) of the Attorney Act (personal identification data, residential address, citizenship, type and number of identification document, etc.)	Compliance with the statutory obligation to maintain a case register	Article 6(1)(c) of the Regulation – compliance with a legal obligation (Section 33(1) and (2) of the Attorney Act)

 **Duration of Data Processing:** 8 years from the termination of the agreement.

d) Processing of Contact Data of Clients and Contractual Partners

In the course of their relationships with contractual partners and clients, the Law Firms process the contact and representative details of such partners and clients. Due to the nature of the data involved, the processing of personal data (such as name, email address and telephone number) may be necessary. The Law Firms inform their contractual partners and clients that they are responsible for informing the contact persons and representatives provided by them about the processing of their personal data.

Categories of Personal Data Processed	Purpose of Processing	Legal Basis for Processing
Name, contact details (telephone number, email address) and position of the contact person or representative	Ensuring effective cooperation with contractual partners and clients; maintaining data necessary for business communication	Article 6(1)(f) of the Regulation – the Law Firms' legitimate interest in ensuring the continuity and smooth operation of its business relationships

 **Duration of Data Processing:** Until 30 June of the calendar year following the termination of the contractual relationship or, in the case of continuous cooperation, following the end of such cooperation (document destruction date). Where the data is included in the engagement agreement, the retention period applicable to the engagement agreement shall apply, i.e. 8 years from the termination of the agreement.

e) Processing of Personal Data Related to Countersigning Documents Serving as the Basis for Registration in Official Public Registers

The Law Firms are required to identify their clients when countersigning documents that serve as the basis for registration in official public registers. The method of identification and the scope of processed data are determined by Section 32 of the Attorney Act.

Section 32(7) of the Attorney Act: Prior to countersigning a document serving as the basis for registration in an official public register, the attorney shall, by applying paragraphs (2)–(4) and (6), identify the persons and organisations making the legal declarations, as well as the persons acting on their behalf. The attorney may request the following data electronically: a) personal identification data; b) citizenship; c) residential address; d) facial image; e) signature; and f) other data specified by law.

Categories of Personal Data Processed	Purpose of Processing	Legal Basis for Processing
Client's data specified in Section 32(3) of the Attorney Act: personal identification data, citizenship, residential address, facial image, signature, and document validity data	Identification of the client prior to registration in an official public register	Article 6(1)(c) of the Regulation – compliance with a legal obligation (Section 32(7) of the Attorney Act)

Section 53(5) of the Attorney Act: In the case of countersigning a document, the attorney shall retain the countersigned document and any other documents generated in connection with the matter involving the countersigning of such document for a period of ten years from the date of countersigning, unless a longer retention period is prescribed by law or the parties have agreed on a longer retention period.

 **Duration of Data Processing:** 10 years from the termination of the agreement (10 years from the date of countersigning the document).

f) Client Due Diligence Pursuant to the AML Act

Pursuant to Section 6(1) of the Act on the Prevention and Combating of Money Laundering and Terrorist Financing (AML Act), the Law Firms are required to carry out client due diligence in the following cases:

- upon establishing a business relationship;
- when performing a transaction involving an amount equal to or exceeding HUF 4,500,000;
- when performing a transaction involving a money transfer exceeding HUF 300,000;

- where information, facts or circumstances indicating money laundering or terrorist financing arise, provided that client due diligence has not previously been carried out;
- where doubts arise regarding the accuracy or adequacy of previously recorded client identification data;
- where changes to client identification data are recorded and, based on a risk-sensitive approach, carrying out client due diligence again is necessary;
- in the case of currency exchange transactions involving an amount equal to or exceeding HUF 300,000.

Pursuant to Section 7(2) of the AML Act, the following data must be recorded during identification:

- In the case of a natural person: aa) family name and given name(s); ab) birth family name and given name(s); ac) nationality; ad) place and date of birth; ae) mother's birth name; af) residential address; ag) type and number of identification document;
- In the case of a legal person or an organisation without legal personality: ba) name and abbreviated name; bb) registered office; bc) principal activity; bd) name and position of persons authorised to represent the entity; bf) company registration number or registration number; bg) tax identification number.

Categories of Personal Data Processed	Purpose of Processing	Legal Basis for Processing
Client's data specified in Section 7(2) of the AML Act (for natural persons: name, birth details, nationality, residential address, identification document details; for legal persons: company name, registered office, company registration number, tax identification number, representative's details)	Carrying out client due diligence and ensuring compliance with statutory obligations	Article 6(1)(c) of the Regulation – compliance with a legal obligation (Sections 6(1), 7(1) and 7(2) of the AML Act)

Section 57(1)–(2) of the AML Act: The service provider shall retain the data and documents generated during client due diligence for a period of eight years from the termination of the business relationship or from the completion of the transaction.

 **Duration of Data Processing:** 8 years from the termination of the business relationship or from the completion of the transaction (Section 57 of the AML Act).

g) Data of Other Data Subjects

The Data Subjects affected by processing may include: other participants in the proceedings, opposing parties, legal representatives of opposing parties, and third parties not participating in the proceedings (e.g. data relating to a client's family members).

Where personal data are obtained from the client, the client is required to declare that they are authorised to process and transfer such data to the Law Firms, that they have an appropriate legal basis for the transfer of personal data, and that they have fulfilled their obligation to provide the required information to the Data Subjects.

Pursuant to Article 14(5)(a) of the Regulation, taking into account that the client has fulfilled the obligation to provide information, the Law Firms do not provide separate information to the relevant Data Subjects.

The Law Firms are not subject to an obligation to provide information where the processed personal data are covered by attorney-client privilege (Article 14(5) of the Regulation).

Categories of Personal Data Processed	Purpose of Processing	Legal Basis for Processing
Data necessary for the performance of the engagement, where the Data Subject is a third party (e.g.	Representation of the client's interests and performance of legal services	Article 6(1)(f) of the Regulation – the legitimate interests of the Law Firms and the client in ensuring successful cooperation in relation to the subject

opposing party, third party, etc.)		matter of the engagement and the effective performance of legal services
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 **Duration of Data Processing:** The retention period of personal data is determined by the statutory obligations applicable to attorneys in relation to the specific types of cases. The Law Firms retain personal data only for the period required by law (as a general rule: 10 years from the date of countersigning a document; in the case of electronic documents, 10 years from the date of creating the copy).

h) Attorney Escrow Registry

Pursuant to Section 7.4 of Regulation No. 7/2018 (III.26.) of the Hungarian Bar Association on attorney escrow management and the escrow register, the Law Firms maintain a register of attorney escrow arrangements.

Categories of Personal Data Processed	Purpose of Processing	Legal Basis for Processing
Subject matter of the escrow; type of escrow; date of conclusion and amendment of the escrow agreement; details of termination of the escrow agreement; name and registered office of the custodian organisation; fact and date of placement into judicial escrow, where applicable; data relating to the performance of the escrow; amount of money received from a third party on behalf of the client, date of receipt and legal basis	Compliance with the statutory obligation to maintain an escrow register	Article 6(1)(c) of the Regulation – compliance with a legal obligation (Section 158 of the Attorney Act; Section 7.4 of HBA Regulation No. 7/2018 (III.26.))

 **Duration of Data Processing:** 10 years from the termination of the escrow agreement.

i) Transfer of Personal Data to Cooperating Law Firms, Engaged Attorneys and Substitute Attorneys

It is in the legitimate interest of the Law Firms and the client (including cases where the client is not the Data Subject, in particular in the case of clients that are legal entities or other organisations, and in relation to personal data of persons other than the client) to engage additional law firms, individual attorneys, European Community lawyers or other advisors specialising in the relevant field of law in order to ensure the successful handling of a particular matter.

Clients shall be informed of the identity and, where necessary, professional qualifications of such additional law firms, individual attorneys, European Community lawyers and advisors. Taking into account the specific circumstances of cooperation, the Law Firms shall consider the clients' requests regarding the selection of such persons to the extent possible.

The categories of personal data transferred depend on the nature of the specific engagement. Legal Basis for the Transfer: Article 6(1)(f) of the Regulation – the legitimate interest of the Law Firms and the client in the successful performance of the engagement and in involving the necessary specialists.

j) Processing of Personal Data Related to Data Subject Requests

The Law Firms are required to maintain a register of data protection requests and the personal data processed in connection with the exercise of Data Subject rights.

Categories of Personal Data Processed	Purpose of Processing	Legal Basis for Processing
Personal data related to data protection requests: contact details necessary for communication of natural	Compliance with the statutory obligation to maintain a register of requests, based on the principle of accountability; enabling the	Article 6(1)(c) of the Regulation – compliance with a legal obligation

persons or contact persons of legal entities (name, address, email address), content of the request, actions taken in relation to the request, and documents prepared in connection with the request	exercise of Data Subject rights provided for in Articles 15–22 of the Regulation; and documenting other actions taken in connection with the request	
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 **Duration of Data Processing:** Unless otherwise provided by data protection authority guidance, 5 years from the date of the request (Section 6:22(1) of the Civil Code – general limitation period).

k) Processing of Personal Data Related to Personal Data Breaches

The Law Firms are required to maintain a register of personal data breaches. This register enables the data protection supervisory authority to verify compliance with the requirements of the Regulation.

Categories of Personal Data Processed	Purpose of Processing	Legal Basis for Processing
Facts relating to the personal data breach, its effects and the measures taken to remedy the breach	Compliance with the statutory obligation to maintain a register of personal data breaches in accordance with the principle of accountability	Article 6(1)(c) of the Regulation – compliance with a legal obligation (Article 33(5) of the Regulation)

 **Duration of Data Processing:** Unless otherwise required by guidance issued by the data protection supervisory authority, 5 years from the date on which the Law Firms became aware of the personal data breach (Section 6:22(1) of the Civil Code).

l) Processing of Personal Data Through the Website – Cookies

The hvlegal.hu website uses cookies to enhance the user experience and ensure the proper functioning of the website. A cookie is a small data file sent by the website to the Data Subject's browser, allowing the browser to store certain information so that the website can restore the original settings during subsequent visits.

When visiting the website, the Data Subject is informed about the cookies used on the website. By continuing to use the website after receiving this information, the Data Subject acknowledges the use of cookies in accordance with the applicable cookie settings.

Cookies are used to improve the user experience while browsing the website and to provide the Law Firms with information necessary to monitor and maintain the proper operation of the website.

The cookies used by the Law Firms are not capable of identifying the Data Subject. Refusing the use of cookies does not result in any disadvantage to the Data Subject.

The Data Subject may delete cookies from their device at any time or disable their use through their browser settings. Depending on the browser used, these settings are generally available under the Settings or Privacy menu. The Law Firms provide a cookie notice when users access the website.

Further information on cookie settings is available for the following browsers:

- Google Chrome: <https://support.google.com/accounts/answer/61416?hl=hu>
- Firefox: <https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>
- Microsoft Edge: <http://windows.microsoft.com/hu-hu/windows-10/edge-privacy-faq>
- Safari: <https://support.apple.com/hu-hu/HT201265>

m) Contact Form and Online Enquiries

Visitors to the hvlegal.hu website may contact the Law Firms through the website's contact form.

When using the contact form, the enquirer is required to provide their name, email address and the legal question forming the subject of the enquiry.

The Law Firms use the personal data submitted through the contact form solely for responding to the legal enquiry and for communicating with the enquirer.

Categories of Personal Data Processed	Purpose of Processing	Legal Basis for Processing
Name, email address, and the content of the legal enquiry	Responding to the contact request and communicating with the enquirer	Article 6(1)(b) of the Regulation – processing is necessary in order to take steps at the request of the data subject prior to entering into a contract

 **Duration of Data Processing:** Personal data are retained for 1 year from the date of the initial contact, unless the enquirer enters into an attorney-client relationship with the Law Firms. In such case, the retention period applicable to client engagements shall apply, namely 8 years from the termination of the engagement.

9. ATTORNEY-CLIENT CONFIDENTIALITY

The activities of the Law Firms are subject to strict professional confidentiality obligations under the Hungarian Act on the Legal Profession. Attorney-client privileged information includes all facts, information and personal data that come to the attorney's knowledge in the course of providing legal services.

Section 9(1) of the Act on the Legal Profession: An attorney is bound by a duty of confidentiality with respect to all facts, data and circumstances that come to their knowledge in the course of practising the legal profession. This duty continues to apply even after the attorney has ceased practising law.

Attorney-client confidentiality extends to, in particular:

- all information and facts disclosed by the client in connection with the engagement;
- the content of all communications between the attorney and the client;
- the client's personal and financial circumstances;
- all information relating to the client's legal matters;
- personal data relating to third parties that come to the attorney's knowledge in the course of providing legal services.

An attorney may only be released from the duty of confidentiality with the client's express prior written consent, except in cases expressly provided for by law (for example, where there is a statutory reporting obligation in relation to suspected money laundering).

10. DATA PROTECTION SUPERVISORY AUTHORITY

If you wish to lodge a complaint regarding the processing of your personal data, you may contact the Hungarian National Authority for Data Protection and Freedom of Information (NAIH):

Name	Hungarian National Authority for Data Protection and Freedom of Information (NAIH)
Postal Address	H-1374 Budapest, P.O. Box 603, Hungary
Address	1055 Budapest, Falk Miksa utca 9–11, Hungary
Telephone	+36 (1) 391-1400
Fax	+36 (1) 391-1410
E-mail	ugyfelszolgalat@naih.hu
Website	http://naih.hu

Budapest, January 6, 2025

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