PRIVACY STATEMENT

1. General information and details of the controller

The law firm Gjurgjan&Šribar Radić, with its registered office in Zagreb, Dalmatinska 10, OIB (Personal Identification Number): 78342040305 (hereinafter: *the Firm or the Controller*), provides legal assistance and legal representation services in accordance with the Constitution of the Republic of Croatia, the Legal Profession Act, the Code of Ethics for Attorneys and other applicable regulations.

The Firm acts as an independent controller with respect to the personal data it collects and processes in the course of its activities.

This Privacy Statement has been drawn up 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 (General Data Protection Regulation – GDPR) and the Act on the Implementation of the General Data Protection Regulation (Official Gazette No. 42/18).

The purpose of this Statement is to provide clients, prospective clients, their legal representatives and attorneys-in-fact, opposing parties and other participants in proceedings with transparent and comprehensive information on how the Firm collects, processes, protects and stores their personal data, as well as on the rights they are entitled to.

For all questions and requests relating to the processing and protection of personal data, you may contact us using the following details:

- **Registered office address:** Dalmatinska 10, 10000 Zagreb, Republic of Croatia
- **E-mail:** gsr@gsr.hr
- **Telephone:** 6666-393

The Firm reserves the right to amend this Privacy Statement from time to time in order to align it with legislative changes or changes in business practice. The current version is always published on our website.

2. Processing principles and professional secrecy

Professional secrecy and confidentiality

In accordance with Article 13 of the Legal Profession Act and the Code of Ethics for Attorneys, an attorney is obliged to keep as a professional secret everything that a client has entrusted to them or that they have learned in any other way while representing the client. The duty of professional secrecy binds the attorneys, trainee attorneys and all employees and associates of the Firm, continues indefinitely, and does not cease upon termination of the representation, of the employment relationship or upon the Firm being struck off the register of the Croatian Bar Association.

All personal data entrusted to the Firm enjoy the highest level of protection prescribed by the special regulations governing the legal profession and by the General Data Protection Regulation.

Fundamental processing principles

When processing personal data, the Firm consistently applies the principles set out in Article 5 of the GDPR:

- Lawfulness, fairness and transparency: We process data exclusively on the basis of valid legal grounds, respecting the rights of data subjects while observing the rules on professional secrecy.
- Purpose limitation: Data are collected only for specified, explicit and legitimate purposes and may not be further processed in a manner incompatible with those purposes.
- Data minimisation: Only data that are necessary, adequate and relevant for providing legal assistance and fulfilling legal obligations are collected.
- Accuracy: We take reasonable steps to ensure that data are accurate and kept up to date.
- Storage limitation: Data are kept only for as long as is necessary to achieve the purpose or as required by archiving regulations and limitation periods.
- Integrity and confidentiality: Data are protected by appropriate technical and organisational measures against unauthorised processing, loss, damage or destruction.

3. Categories of personal data we process

Depending on the nature of the legal matter and the scope of legal assistance, the Firm may process the following categories of personal data:

1. Basic identification data: Name and surname, OIB (Personal Identification Number), date, year and place of birth, citizenship, identity card or passport number, issuing authority, position or title, signature.
2. Contact data: Address of permanent/temporary residence, address for service of documents, e-mail address, landline and mobile telephone number.
3. Data for conflict-of-interest checks: Names and identification data of clients, opposing parties, legal and natural persons related to them, their founders and beneficial owners, management board members and legal representatives.
4. Data under the Anti-Money Laundering and Terrorist Financing Act (ZSPNFT): Data collected as part of customer due diligence measures, copies of identification documents, information on the source of funds, politically exposed person (PEP) status, information on the beneficial ownership of legal entities (UBO).

5. Case and procedural data: Data contained in case files, factual descriptions, submissions, evidentiary motions, contracts, documents, correspondence with competent authorities and participants in proceedings, ownership and land registry documentation, information on immovable and movable property.
6. Financial and accounting data: Bank account numbers (IBAN), bank name, information on payments made, advances, fees and costs calculated under the Attorneys' Tariff, tax status.
7. Data on other persons in proceedings: Personal data of opposing parties, witnesses, expert witnesses, court interpreters, co-contracting parties and third parties, to the extent necessary for the proper handling of the case.
8. Special categories of personal data and data relating to criminal convictions (Articles 9 and 10 GDPR): Data concerning health (e.g. in employment disputes, damages claims or family matters), trade union membership, as well as data on suspicions, charges, criminal and misdemeanour proceedings and judgments, solely where necessary for the defence, representation or exercise of the client's legal claims.

4. How personal data are collected

We collect personal data:

- Directly from you: At first contact, when signing a power of attorney or a contract for the provision of legal assistance, when handing over documentation, or through oral and written communication (e-mail, letters, meetings).
- From third parties and institutions: From courts, notaries public, administrative bodies, expert witnesses, employers, opposing parties or their attorneys in the course of proceedings.
- From publicly available registers and sources: From the court register, land registers, the Register of Real Estate and Movable Property, the cadastre, the register of beneficial owners, public notices in bankruptcy and enforcement proceedings, websites and official gazettes.

Exemption from the duty to inform when collecting data from third parties

Where we do not collect personal data about third parties (e.g. the opposing party, witnesses, the client's employees) directly from the data subject, the Firm is not obliged, pursuant to Article 14(5)(d) GDPR, to inform those persons of the processing, since such data are subject to the attorney's obligation of professional secrecy regulated by the legislation of the Republic of Croatia.

5. Purposes and legal bases for processing personal data

The Firm processes your data exclusively on the lawful bases provided for by the General Data Protection Regulation:

Purpose of processing	Categories of data	Legal basis under the GDPR
Provision of legal assistance and representation (drafting contracts, preparing submissions, legal advice, representation before courts and public authorities)	Identification, contact, case and procedural data	Article 6(1)(b) (performance of a contract / steps taken at the request of the data subject prior to entering into a contract)
Conflict-of-interest check before and during the engagement	Identification data of clients, opposing parties and related persons	Article 6(1)(c) (legal obligation under the Legal Profession Act) and (f) (legitimate interest in preserving the integrity of the legal profession)
Prevention of money laundering and terrorist financing (ZSPNFT) (due diligence, identification of the beneficial owner, risk assessment)	Identification data, copies of documents, information on the origin of assets, PEP status	Article 6(1)(c) (legal obligation under the ZSPNFT)
Processing of special categories of data (health data, trade union membership, etc.)	Special categories of data relevant to the case	Article 9(2)(f) (processing necessary for the establishment, exercise or defence of legal claims)
Processing of data relating to criminal convictions and offences	Data from criminal and misdemeanour case files	Article 10 GDPR in conjunction with the applicable procedural regulations (Criminal Procedure Act, Misdemeanour Act) and the Legal Profession Act
Financial, tax and accounting operations (invoicing, bookkeeping, payment of court and administrative fees)	Identification, contact and financial data	Article 6(1)(c) (legal obligation under the Accounting Act and the General Tax Act)
Legal risk management and defence against claims (liability for damages, disciplinary proceedings, debt collection)	Case files, correspondence, financial data	Article 6(1)(f) (legitimate interest of the Firm in defending its legal interests and demonstrating proper conduct)
Communication and responding to general enquiries via the website or e-mail	Contact data and content of the enquiry	Article 6(1)(f) (legitimate interest in establishing communication) or (a) (consent)

6. Recipients of personal data and transfers to third parties

In order to fulfil its contractual obligations and legal duties, the Firm may share data with the following recipients, always having regard to the duty of professional secrecy:

1. **Judicial and public-law bodies:** Courts, notaries public, the State Attorney's Office, administrative bodies, the Tax Administration, FINA, land registry departments, chambers and registers.

2. **Other attorneys and substitutes:** Attorneys acting as (co-)attorneys-in-fact whom you have also authorised to represent you, trainee attorneys and substitute attorneys providing substitution services in accordance with the Legal Profession Act.
3. **Professional associates in proceedings:** Court-appointed expert witnesses, appraisers, translators, court interpreters, notaries public and advisers engaged in the case.
4. **Opposing parties and their legal representatives:** Solely to the extent necessary in the course of proceedings or negotiations for the amicable settlement of a dispute.
5. **Processors (external service providers):** IT support providers (IT maintenance, secure cloud storage, e-mail servers), bookkeeping and accounting services, document archiving and destruction service providers. Data processing agreements in accordance with Article 28 GDPR, guaranteeing confidentiality and technical protection measures, have been concluded with all processors.
6. **Competent supervisory authorities:** The Anti-Money Laundering Office, the Croatian Bar Association or other competent authorities where there is a legal obligation to provide data.

Transfer of personal data to third countries (outside the EU/EEA)

As a rule, we process personal data within the European Union and the European Economic Area (EEA). A transfer to third countries may take place only:

- where necessary for the performance of a legal representation contract in a foreign matter (Article 49(1)(b) or (e) GDPR),
- where the European Commission has adopted an adequacy decision for the country concerned (Article 45 GDPR), or
- subject to appropriate safeguards, such as the European Commission's Standard Contractual Clauses (SCC) (Article 46 GDPR).

7. Personal data retention period

We retain personal data for as long as is necessary to fulfil the purpose for which they were collected, or in accordance with statutory regulations and the rules of the legal profession:

1. Case files and legal documentation:
    - Retained for at least 10 years from the date of the final conclusion of the proceedings or the termination of representation, in accordance with the regulations of the Croatian Bar Association and general limitation periods.
    - In matters continued through extraordinary legal remedies (Constitutional Court of the Republic of Croatia, European Court of Human Rights), enforcement proceedings or where there are long-term legal consequences, files are retained until the final conclusion of all related proceedings.

2. Originals entrusted for safekeeping (documents, wills, contracts):
    - Retained until the client or their legal successor collects them in person, or until the legal conditions for ending safekeeping are met.
3. Documentation collected under the ZSPNFT:
    - Retained for 10 years from the termination of the business relationship or the execution of the transaction, in accordance with Article 79 of the Anti-Money Laundering and Terrorist Financing Act.
4. Bookkeeping and financial documentation (invoices, bank statements):
    - Retained for 11 years from the end of the year in which the invoice was issued, in accordance with the Accounting Act and the General Tax Act.
5. Data in the conflict-of-interest records:
    - Basic identification data on clients and opposing parties are retained permanently, since the obligation to avoid conflicts of interest and the protection of professional ethics are not limited in time.
6. General enquiries and correspondence not resulting in an engagement:
    - Retained for a maximum of 1 year from the date of the reply, after which they are deleted, unless there is a need for protection against legal claims.

Upon expiry of the prescribed periods, documentation is securely destroyed or permanently anonymised.

8. Technical and organisational security measures

The Firm applies high standards of technical and organisational protection in order to ensure the integrity, availability and confidentiality of data:

- Control of physical access to the Firm's premises and archive;
- Encryption of hard drives, workstations and portable media;
- Data backup on encrypted servers;
- Use of firewalls, advanced anti-virus solutions and two-factor authentication (2FA);
- Restriction of access to data on a need-to-know basis;
- Binding all employees and associates to permanent confidentiality and regular training on data security;
- Secure physical destruction of documentation through specialised authorised partners, with a certificate of destruction issued.

9. Rights of data subjects and legal limitations

As a data subject, you have the following rights under the GDPR, which you may exercise at any time:

1. **Right of access (Article 15 GDPR):** You have the right to obtain confirmation as to whether we process your data, as well as access to that data and information on the purpose, recipients and retention periods.
2. **Right to rectification (Article 16 GDPR):** You have the right to request, without undue delay, the rectification of inaccurate or the completion of incomplete personal data.
3. **Right to erasure ("right to be forgotten", Article 17 GDPR):** You have the right to request the erasure of data if they are no longer necessary for the purposes for which they were collected or if the processing was unlawful.
4. **Right to restriction of processing (Article 18 GDPR):** You have the right to request restriction of processing if you contest the accuracy of the data, if the processing is unlawful and you oppose erasure, or if the Firm no longer needs the data but you require them for the establishment, exercise or defence of legal claims.
5. **Right to data portability (Article 20 GDPR):** You have the right to receive the data you have provided to us in a structured, commonly used and machine-readable format, where the processing is based on consent or a contract and is carried out by automated means.
6. **Right to object (Article 21 GDPR):** You have the right to object to processing based on the legitimate interest of the Firm.
7. **Right to withdraw consent:** Where processing is based on consent, you may withdraw your consent at any time, without affecting the lawfulness of processing carried out before the withdrawal.

Important limitations on data subjects' rights in legal practice

Pursuant to Article 23 GDPR and the Legal Profession Act:

- The rights of data subjects (in particular the rights of access, erasure and objection) cannot be exercised in a manner that would result in a breach of professional secrecy, the disclosure of confidential communications between attorney and client, or jeopardise the legal interests of other clients represented by the Firm.
- The right to erasure does not apply to the extent that processing is necessary for the establishment, exercise or defence of legal claims of the Firm or its clients, or for compliance with legal obligations to retain documentation (Article 17(3)(b) and (e) GDPR).

How to submit a request and response time

Requests to exercise your rights must be submitted in writing to the Firm's registered office address or by e-mail to: gsr@gsr.hr. In order to protect confidentiality, the Firm may request confirmation of the identity of the person submitting the request. We will respond to your request within one month of receipt of a complete request, with the possibility of extending this period by a further two months where the request is complex, of which you will be informed.

Right to lodge a complaint with a supervisory authority

If you believe that the processing of your personal data does not comply with the regulations, you have the right to lodge a complaint with the competent supervisory authority – the Croatian Personal Data Protection Agency (AZOP), Zagreb, Ulica Metela Ožegovića 16.

10. Profiling and automated decision-making

In its operations, the Firm does not carry out profiling, nor does it make decisions based solely on automated processing of data within the meaning of Article 22 of the General Data Protection Regulation.

11. Cookie policy on the website

When you visit the website www.gsr.hr, the Firm may store cookies on the user's device:

Strictly necessary (technical) cookies: These cookies are essential for the technical functioning of the website and for ensuring basic functionality (e.g. the session cookie ASP.NET_SessionId). Their use does not require the user's consent and they cannot be switched off in our systems. They do not store data that directly identify an individual.

You can manage cookie settings or disable cookies entirely through your web browser settings. If strictly necessary cookies are disabled, certain parts of the website may not function properly.