

DATA PRIVACY POLICY FOR CMS COURSES

Version from: October 2022

This Data Privacy Policy describes how CMS REICH-ROHRWIG HAINZ Attorneys-at-law – Slovenian Branch, Bleiweisova cesta 30, 1000 Ljubljana (“**CMS**” or “**we**”) collects and processes as well as discloses your personal data when you apply for our educational courses. Additionally, we will inform you about your rights regarding your personal data and how you can contact us.

1. Who is responsible for data processing and who can I contact?

The data controller is:

CMS REICH-ROHRWIG HAINZ Attorneys-at-law – Slovenian Branch

Bleiweisova cesta 30

1000 Ljubljana

You can contact us at:

Tel: +386 1 620 5210

Email: ljubljana.office@cms-rrh.com

2. What personal data do we use?

Personal data means any information related to an identified or identifiable natural person. This can also include information on personal or material circumstances, such as name, postal address, email address, telephone number, date of birth, age, gender, social security number, video recordings, photos, personal voice recordings, as well as biometrical data such as fingerprints. Special categories of data such as health data, or data related to criminal proceedings may also be covered.

We collect information from you when you choose to provide it to us. For example, we collect your information when you submit a webform applying for one of our course offers (each, a “**Course**”), or otherwise contact us or provide information to us through email.

The information we collect may include personal information – such as your name, email address, telephone number, years of study, the reason why you applied and the content of any communications that we exchange.

If you fail to provide the necessary personal data, we will not be able to provide you access to the Course or, at least not in a sufficient manner. You should ensure that any personal

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CMS offices and associated offices: Aberdeen, Algiers, Amsterdam, Antwerp, Barcelona, Beijing, Beirut, Belgrade, Berlin, Bogotá, Bratislava, Bristol, Brussels, Bucharest, Budapest, Casablanca, Cologne, Dubai, Duesseldorf, Edinburgh, Frankfurt, Funchal, Geneva, Glasgow, Hamburg, Hong Kong, Istanbul, Kyiv, Leipzig, Lima, Lisbon, Ljubljana, London, Luxembourg, Lyon, Madrid, Manchester, Medellín, Mexico City, Milan, Moscow, Munich, Muscat, Paris, Podgorica, Prague, Reading, Rio de Janeiro, Rome, Santiago de Chile, Sarajevo, Seville, Shanghai, Sheffield, Singapore, Sofia, Strasbourg, Stuttgart, Tehran, Tirana, Utrecht, Vienna, Warsaw, Zagreb and Zurich.

CMS Reich-Rohrwig Hainz Rechtsanwälte GmbH, Vienna, Austria | Registration No.: FN 271452w | Court Registry at Vienna Commercial Court

CMS Reich-Rohrwig Hainz Attorneys-at-law – Slovenian Branch | VAT ID: SI40843149 | Registration No.: 6820611000 | Court Registry in Ljubljana | Entity No.: 2015/14647 | Bank account: Nova KBM d.d. | No.: 0430-20002484348 | IBAN SI56043020002484348 | BIC: KBMASI2X

information submitted to us is accurate and up-to-date. For example, we need a current email address to communicate with you about any Course you choose to enrol on.

In some cases, we require personal information in order to perform a contract or to comply with a legal obligation.

3. For what purpose and on what legal basis do we process your personal data?

We can collect, process and use the data as defined under point no. 2 on the following bases:

3.1 the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract (Art 6(1)(b) GDPR)

The processing of the personal data is necessary in order to provide the Course to you, including verifying your identity, sending the Course working materials (e.g. PPTs to be used) and communicating with you.

3.2 the processing is necessary for the purposes of the legitimate interests pursued by us as the data controller (Art 6(1)(f) GDPR)

To the extent necessary, we will process your personal data in order to protect our own legitimate interests, in the following cases in particular:

- using your information to provide products and services you have requested and responding to any comments or complaints you may send us;
- using your information to identify and improve effectiveness of our Courses;
- conducting customer satisfaction surveys;
- using personal information in connection with legal claims, compliance, regulatory and investigative purposes as necessary, including disclosure of such information in connection with legal process or litigation.

3.3 statutory regulations (Art 6(1)(c)GDPR)

Moreover, law firms are subject to various legal obligations (e.g. Attorney's Act and Bar Regulations, etc.).

3.4 because you have given your consent (Art 9(2)(a) GDPR)

When processing personal data requires your consent (e.g. name, email address for the purpose of sending you direct marketing or other occasions where we ask you for consent, using the data for the purpose which we explain at that time, etc.), we ensure that your personal data is shared or otherwise processed for such purposes only if you provided your prior consent for each such specific purpose.

4. How can I withdraw my consent?

Whenever the processing of your personal data is based on consent, you may withdraw your consent, at any time, by sending an email to ljubljana.office@cms-rrh.com.

Withdrawal of consent will only have an effect in the future and does not affect the legitimacy of data processed up to that date.

5. Who will receive my personal data?

We share your information with third parties that provide business, professional, or technical support functions for us. In particular, we use third-party providers for website hosting, maintenance, and marketing services. These providers are only given access to your information to the extent necessary to process your information and/or provide services to us and they are prohibited from using or sharing your information for any other purposes.

Some of the above-mentioned recipients of your personal data may be located outside the European Union. The data protection level in other countries may not have the same standards as Slovenia. However, in case data is transferred to a third country, we will either transfer your personal data to countries having an adequate level of data protection according to the EU Commission's decision or we will guarantee that the recipients maintain a sufficient level of data protection by having them agree to the Standard Contractual Clauses (SCC). You can contact us to get more information about such transfers, if applicable.

6. For how long will my personal data be stored?

We process and store your personal data as long as it is required to meet the purposes as set out under point 3. If the personal data are no longer necessary due to our legitimate interest (e.g. processing for the purposes of defence in liability cases), the personal data will be deleted. The same applies if data are prepared based on consent and such consent is withdrawn. The data we process based on statutory obligations, we keep for the period provided by law. The data processed for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract will be kept for the period required for the performance of the contract and for the entire duration of the statutory limitation period for claims from such a contract, except in the event of a dispute regarding a contractual relationship.

7. What data protection rights do I have?

You have the right of access of your personal data, including information on the source, recipients and purpose of the data processing; as well as the right to rectification, the right to data portability, the right to objection, the right to restriction of processing and erasure of personal data that has been processed unlawfully or that is incorrect.

If your personal data changes, we kindly request that you inform us.

If you believe our processing of your personal data violates the data protection laws currently in force or your data protection rights in any other way, you have the right to appeal to a competent data protection supervisory authority. For Slovenia, the competent supervisory

authority is the Information Commissioner (*Informacijski pooblaščenec*), Dunajska cesta 22,
1000 Ljubljana, Slovenia (<https://www.ip-rs.si/>).