

## PERSONAL DATA PROCESSING



### Contents:

1. [The Rödl & Partner Group and personal data processing](#)
2. [Contact details](#)
3. [Processing the personal data of clients](#)
4. [Processing the personal data of job-seekers](#)
5. [Processing the personal data of suppliers](#)
6. [Commercial communications](#)
7. [Events organised by Rödl & Partner](#)
8. [Security camera system](#)
9. [Personal data and our website. Cookies](#)
  - a) [Collection of personal data from visitors to our website](#)
  - b) [Contact form](#)
  - c) [COOKIES and MATOMO](#)
  - d) [The Rödl & Partner LinkedIn page](#)
10. [What are your rights as a data subject?](#)

## 1. The Rödl & Partner Group and personal data processing

Rödl & Partner Czech Republic (“Rödl & Partner”) consists of the following companies:

- Rödl & Partner, advokáti, s.r.o. (Id. No.: 25064690)
- Rödl & Partner Audit, s.r.o. (Id. No.: 26190486)
- Rödl & Partner Tax, k.s. (Id. No.: 61246115)
- Rödl & Partner, k.s. (Id. No.: 64572072)
- Rödl & Partner Optimus Consult a.s. (Id. No.: 43004571)
- Rödl & Partner Consulting & Valuation, s.r.o. (Id. No.: 25724231)

All these companies have their registered office at Platněřská 2, 110 00 Prague 1 - Staré Město.

# Rödl & Partner

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The members of the Rödl & Partner Group (with the exceptions set out below) are, by virtue of their predominant activity, in the position of an independent data controller, even if you provide us not only with your personal data but also with the personal data of other persons (e.g. your customers, debtors, etc.).

Some personal data is processed jointly for the entire Group in shared information systems or applications. This includes, in particular (i) our clients' basic identification and contact data, (ii) accounting data, (iii) data from the security camera system, (iv) data for sending newsletters, the organisation of client events and the handling of enquiries from the contact form on our website, (v) other data processed via the website, (vi) the data of job-seekers wishing to work for any one of the members of the Rödl & Partner Group. Here the members of the Rödl & Partner Group are the joint controllers of such data.

**Rödl & Partner, k.s.** is a data processor in relation to its clients when processing personal data in the context of the provision of **accounting services, including payroll accounting**. Clients who provide the personal data of third parties (e.g. employees, customers, etc.) to Rödl & Partner, k.s. for processing are then the data controllers of such personal data.

**Rödl & Partner Consulting & Valuation, s.r.o.**, as an independent intermediary in the processing of personal data in the context of **insurance** consultancy in the capacity of insurance broker or insurance agent, may also be the processor of personal data in connection with the contractual relationship with the relevant insurance company. The controller of such data is then the relevant insurance company, against which you can exercise your data subject rights directly. We will always inform you about the processing of your personal data in connection with these services when providing the service in question.

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Your personal data is processed on the basis of and in accordance with the relevant legislation, in particular 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) - the GDPR, hereinafter also referred to as the "Regulation", Act 110/2019 Sb., on the processing of personal data, as amended, as well as other legislation.

## 2. Contact details

Should you have any questions or requirements concerning your personal data or should you wish to exercise your rights as a data subject, please contact us:

- In writing by sending us a letter or notification, or in person at our registered office: Platněřská 2, 110 00 Prague 1;
- Electronically by sending us an email to [data-protection@roedl.com](mailto:data-protection@roedl.com);
- By telephone, by calling: +420 236 163 111.

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If you are a client of ours, you can also always contact the contact person with whom you work.

## 3. Processing the personal data of clients

### Legal basis and purposes of processing

**Performance of the contract and its negotiation:** The basic legal title for processing your personal data as our client is the consulting agreement concluded between one of our companies and you. The purpose is generally to provide services and perform other obligations under the agreement. According to the consultancy agreement, we may also process the personal data of third parties that you provide to us as a client (e.g. debtors, employees, business partners, etc.), where we generally do so to protect the legitimate interests of the client as the controller of such third party data. We may also provide other services to you under a consulting agreement, e.g. educational training, workshops, etc.

**Compliance with legal obligations:** We process your personal data to fulfil legal obligations under the relevant legislation governing accounting and taxation (including communication and transmission of data to the relevant authorities) and, depending on the service provided, also under the regulations applicable to the relevant area of consulting, e.g. for the practice of advocacy (Act 85/1996 Sb., on Advocacy), audits (Act 93/2009 Sb., on Auditors), tax consultancy (Act 523/1992 Sb., on Tax Consultancy), insurance mediation (Act 170/2018 Sb., on Insurance Mediation and Reinsurance), and anti-money laundering measures pursuant to Act 253/2008 Sb., on Certain Measures against the Legalization of the Proceeds from Crime and the Financing of Terrorism.

**Legitimate interest:** Given our legitimate interests, we may contact you and offer our other services to you (so-called direct marketing). We may also send you our commercial communications, like a newsletter or an invitation to an event organised by us (See Sections 6 and 7 below.). We also have a legitimate interest in processing personal data for the purpose of protecting persons, property and data on our premises, for which reason we may process your personal data through a security camera system (See Section 8 below.) or through IT systems put in place to protect the network, our IT infrastructure and website (See Section 9 below.). Last but not least, we may process your data for the purpose of defending our legal interests, e.g. in the event of litigation or under individual sectoral laws pertaining to advocacy, tax advisory, auditing and insurance mediation.

### Scope of processing

For the purposes of contract performance, we generally require name, surname, e-mail address, telephone number, job title, registered office, residence, or other contact address, identification number, VAT number, and other personal data depending on the service requested. In what regards the contact persons of clients - legal entities, we usually process their name, surname, email address, telephone number, and job position. We may also process other data that you provide to us, always depending on the service in question.

In fulfilling legal obligations under Act 253/2008 Sb., on Certain Measures against the Legalization of the Proceeds from Crime and the Financing of Terrorism, we may also require other data necessary for identification and control (birth number, date of birth, nationality, information on the origin and source of assets, information from identity cards, data on beneficial owners and politically exposed persons, etc.).

### Recipients and processors

We process your personal data manually and automatically in information systems and applications, some of which are common to the entire Rödl & Partner Group. Other processors are the providers and administrators of these systems, including Rödl Global Digital Services GmbH, Nuremberg, Germany, which provides the Group with all IT infrastructure and manages it for our entire Group. Accounting is processed by Rödl & Partner, k.s.

We may further transfer your personal data to third parties if we provide events, contracts or similar services jointly with external partners (e.g. notaries, translators), but only always to the

extent necessary to fulfil the respective processing purpose and the respective legal title for processing such personal data. In this case, you will be informed.

The recipients of your personal data may also be government authorities, our advisors and consultants (tax, legal, auditors), couriers and messengers, and the Czech Post Office.

The processing of your personal data for marketing purposes is carried out by our joint PR Department. For more information, please see Section 6 below.

## Processing time

We retain your personal data for the duration of the consultancy agreement, after which it is retained for the limitation period for the defence of our legal claims and, to the extent necessary for the performance of our legal obligations under the legal regulations (e.g. accounting, tax, advocacy, audit and tax advisory or anti-money laundering regulations) for the period specified in these regulations (i.e. up to ten years).

## 4. Processing the personal data of job-seekers

If you are interested in becoming our employee or co-worker and would like to know how we process your personal data in the selection process, please click the [link](#) for complete information.

For information on the processing of personal data regarding candidates who apply for the selection procedures carried out for our clients as potential employers by Rödl & Partner Consulting & Valuation, s.r.o., please click the [link](#).

## 5. Processing the personal data of suppliers

### Legal basis and purposes of processing

**Performance of the contract and its negotiation:** The legal basis for processing your personal data as our supplier is the contract concluded between one of our companies and you as a supplier. The purpose is generally to provide services and perform other obligations under the contract.

**Compliance with legal obligations:** We also process your personal data to comply with legal obligations under the relevant tax and accounting legislation.

**Legitimate interest:** Given our legitimate interest in protecting persons, property and data on our premises, we may process your personal data through the use of a security camera system (See Section 8 below.) or through IT systems put in place to protect our network, our IT infrastructure and our website (See Section 9 below.). Finally, we may process your data to defend our legal interests, e.g. in the event of litigation.

### Scope of processing

For the purposes of contract performance, we generally require name, surname, email address, telephone number, job title, registered office, contact address, identification number, VAT number, but also other personal data depending on the requirements of the contract. In what regards the contact persons of suppliers - legal entities, we usually process their name, surname, email address, telephone number and job title.

### Recipients and processors

We process your personal information in information and accounting systems common to the entire Rödl & Partner Group. Other processors are the providers and administrators of these systems, including Rödl Global Digital Services GmbH, Nuremberg, Germany, which provides the Group with all IT infrastructure and manages it for our entire Group. Accounting is processed by Rödl & Partner, k.s.

The recipients of your personal data may also be government authorities, our advisors and consultants (tax, legal, auditors), couriers and messengers, and the Czech Post Office.

## Processing time

We retain your personal data for the duration of the contract, after which it is retained for the limitation period for the defence of our legal claims and, to the extent necessary for the performance of our legal obligations under tax and accounting regulations for the period specified in these regulations (i.e. up to ten years).

## 6. Commercial communications

Rödl a Partner may send you various commercial communications. These include, for example, client newsletters, invitations to educational events organised by us (workshops, roundtables, conferences, etc.) and other social or sporting events, various relevant news and information. These data are processed by the members of the Rödl & Partner Group as joint controllers.

### Legal basis and purposes of processing

We may process your personal data for the purpose of sending you commercial communications if:

- you have given us your explicit **consent**, e.g. via our website, or
- you already are a client of ours from whom we have obtained an email address in connection with us providing you with consultancy services, in which case we may send you commercial communications relating to these or similar services even without your prior request or consent, in accordance with Act 480/2004 Sb., on certain information society services (so-called direct marketing based on legitimate interest).

Subscription to commercial communications is voluntary and you can cancel your subscription at any time or withdraw your original consent by clicking on the link in the commercial communication confirming that you no longer wish to receive such communications (so-called opt-out principle), or you can also contact us directly (see Section 2 above). In this case, we will exclude you from our commercial communications database.

### Scope of processing

As a rule, your e-mail address, which may include your name, surname and/or company name, is all we really need to send you electronic commercial communications. Alternatively, you can also send us your name, surname, title, position, company name (including company details) and telephone number; this will allow us to address you directly.

### Recipients and processors

Rödl Global Digital Services GmbH, Nuremberg, Germany, which manages our website and commercial communications in general, assists us in preparing and sending commercial communications.

### Processing time

We retain your personal data for a period of 5 years, unless you cancel your subscription before that. Should you no longer be our client and should you not confirm at our request that you are still interested in receiving commercial communications, we will remove your e-mail from our database.

## 7. Events organised by Rödl & Partner

We organise various types of educational, social and marketing events, such as conferences, round tables, workshops, client and sporting events. To register for professional events, please use the web form which may be found at the following [link](#). Data are processed by the members of the Rödl & Partner Group as joint controllers.

### Legal basis and purposes of processing

**Performance of the contract and its negotiation:** We need your personal data to properly register you for the respective event (conclusion of contract) and to organise it.

**Compliance with legal obligations:** If the event is a paid one, we need your data also for tax and accounting purposes.

**Legitimate interest:** After the event, we may send you an e-mail thanking you for your participation. We may also kindly ask you to use the online questionnaire to give us feedback or ask us questions. We may also send you an invitation to another similar event in the form of a commercial communication in accordance with Section 6 above (so-called direct marketing).

### Scope of processing

To register for an event, we generally require your name, surname, e-mail and, for paid events, the name of your company, its registration number, VAT number and registered office address. You can also provide a telephone number and your position, as this will also help us with the organisation.

If you use the online questionnaire form for your questions or feedback, your name, surname and email will suffice, but you can also use it anonymously and fill in the relevant fields with any name/pseudonym and email.

### Recipients and processors

We process personal data for these purposes only internally as lists in paper or electronic form and also through our information and accounting system. Other processors may therefore be the providers and administrators of these systems, including Rödl Global Digital Services GmbH, Nuremberg, Germany, as well as the administrator and IT solution provider of our website.

### Processing time

We process your personal data for a maximum of 5 years after the event has ended (i.e. for the purpose of sending you another invitation as a commercial communication) and for the duration of the obligations arising from tax and accounting legislation for paid events (i.e. up to 10 years).

If you provide us with your personal data via the online questionnaire form, we will process it for the purpose of and until your questions and comments have been dealt with.

## 8. Security camera system

The members of the Rödl & Partner Group operate, as joint controllers, CCTV systems in the premises of the branches at Platněřská 2, 110 00 Prague 1 and Květná 178/34, 603 00 Brno, as systems equipped with video recording function.

The CCTV system is operated under the following conditions:

- Purpose of processing: Protection of property and security of persons and stored information;
- Legal ground(s): The controller's legitimate interests;
- Data subjects concerned: Employees, contractors, external collaborators, clients, job-seekers and other visitors;
- Categories of personal data: Descriptive - images (faces, figures);
- Place of storage of records: Directly at the relevant branch;
- Processing/storage period: Two days from the date of the record;
- Personal data are processed only by the joint controllers; if a crime may have been committed, the data may be transmitted to the competent law enforcement authorities.

## 9. Personal data and our website. Cookies

### a) Collection of personal data from visitors to our website

If you visit our website only to obtain information, i.e. if you do not subscribe to commercial communications, participate in an event organised by us or provide us with your information in any other way, we only collect personal data that your browser provides to our server. When you visit our website, we collect data that are **technically necessary** to make our website accessible and to ensure the necessary stability and security of access (the legal basis is our legitimate interest):

- IP address;
- Date and time of the query;
- Time zone (GMT);
- The content of the query (the exact web page you have accessed);
- HTTP access status/status code;
- The amount of data transferred in each case;
- The web page that generated the query;
- Browser;
- The operating system and its interface;
- Language and browser version.

We store these data for security reasons (e.g. to investigate misuse or prevent fraud) for a maximum of seven days, after which it is automatically deleted. Data that needs to be kept for longer periods of time as evidence will only be deleted after the incident in question has been clarified with final validity.

Our website may contain links to other websites. Please note that we have no control over the cookies and other technologies used by these other websites and this document does not apply to them.

### b) Contact form

You can contact us any time via our web contact form, which may be found at the following [link](#). Contacting us in this way does not in any way bind you and in no way implies the conclusion of a contract. We will contact you based on the information you provide (in particular your e-mail address; you may also add further information such as your name, surname, company details, telephone/fax number) to find the best possible solution for you. Should we end up not providing you with any services, your data will be deleted and we will not process it any further. We also ask that you do not enter any sensitive personal data or information in the contact form.

# Rödl & Partner

## c) COOKIES and MATOMO

### TECHNICAL COOKIES

Our website uses technical cookies and MATOMO platform.

Cookies are small blocks of data placed on the users' computer by their web browser. Cookies obtain information about your browser and your device that are relevant for the set up and operation of a website.

Our website currently only uses essential technical cookies (the legal basis of our legitimate interest) that are necessary to ensure the basic functions of our site:

Essential technical cookie	Function	Expiration	Provider
cookiebar	Information about the user's consent with the keeping of statistics	60 days	Rödl & Partner (www.roedl.com)
MATOMO_SESSID	Temporary short-term cookie that assigns a random number to a user device that helps prevent CSRF security problems when the users logout from the session.	14 days	Matomo (www.matomo.org)
piwik_ignore	Blocks collection of anonymous statistical data	13 months or until manual erasure of cookies in your web browser	Matomo (www.matomo.org)

### MATOMO

We use the MATOMO platform for our web analytics and statistics. We collect the data solely to improve the quality of our website and the user experience. MATOMO platform runs locally on our own servers and we do not share your data with third parties. The platform also does not employ traditional cookies and only collects anonymous data about your device and browser.

You can decide whether we can use your data for web analytics and for keeping website statistics or you can opt out through settings in the cookie bar. If you disagree with the collection of statistics via the MATOMO platform, we will not collect any data during your visit of our site. The legal basis for the processing of the users' personal data is Article 6(1)(a) GDPR, i.e. the users' consent. The consent is voluntary and may be withdrawn at any time.

**You can adjust your statistics settings or opt out** through the following link: <https://matomo.roedlcloud.com/index.php?module=CoreAdminHome&action=optOut&language=en>

If you deactivate our web analytics option, our web server will place a persistent technical cookie in your device, provided your browser settings allow it. This cookie is used to indicate to MATOMO platform that it may not collect and process the information about your browser and device.



# Rödl & Partner

Please note that the MATOMO deactivation cookie will be erased if you decide to erase the cookies placed in your device by your web browser (please refer below).

For more information about the privacy protection technologies and privacy settings of MATOMO platform, please visit the following link: <https://matomo.org/docs/privacy/>.

## Setting/deleting cookies using your browser

You can delete cookies any time through the security settings of your browser. You can configure your browser settings at your own discretion. In particular, you can refuse to accept third-party cookies or even all cookies. Please note, however, that in this case you will most likely not be able to use certain functions on our website. Instructions for the most commonly used web browsers can be found here:

[Chrome](#)

[Internet Explorer](#)

[Android](#)

[Safari \(Apple\)](#)

## Information on cookies on the roedl.jobs.cz website

The operation of the roedl.jobs.cz website and related services are provided for the members of the Rödl & Partner Group by LMC s.r.o., including the use of cookies. For more information about individual cookies, please see the cookie bar that appears when you visit this page and at the following [link](#).

## d) The Rödl & Partner LinkedIn page

Rödl & Partner operates its own page (**Rödl & Partner Czech Republic**) on the social network run by LinkedIn Corporation, 2029 Stierlin Court, Mountain View, California 94043, USA. If you visit this page, your personal data will be processed by LinkedIn in accordance with its privacy policy (go to [link](#)). We may, in particular, process your LinkedIn user name as well as other information necessary for us to communicate with you via this page. As LinkedIn also offers Page Insight analytics services (these are anonymised statistics regarding traffic to our page, the range of posts, general geographical information about visitors to the page, etc.), LinkedIn and Rödl & Partner are considered joint controllers of the personal data processed in this way (go to [link](#)). The main responsibility for this processing lies with LinkedIn and you can contact LinkedIn directly. Otherwise, Rödl & Partner has no influence on the processing of personal data on LinkedIn. When transferring data to third countries, LinkedIn uses the standard EU contractual clauses.

## 10. What are your rights as a data subject?

If we process your personal data, you have the following rights against us within the meaning of Articles 15 to 22 of the Regulation:

- **The right of access to personal data**, i.e. the right to request confirmation as to whether or not your personal data is being processed and, if it is being processed, the right to obtain access to that personal data and information about its processing;
- **The right to rectification of personal data** if the data is inaccurate or incorrect;
- **The right to erasure** of personal data, where we will erase your personal data if they are no longer necessary for the purposes for which they were collected or otherwise processed, or if you discover that they have been processed unlawfully, or if you raise a legitimate objection, unless there are other lawful grounds for processing the data;

# Rödl & Partner

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- **The right to restrict the processing of personal data**, which means that we may temporarily make your data inaccessible, delete it or otherwise restrict its processing;
- **The right to data portability**, where we provide your personal data that are being processed under a contract or on the basis of consent to a third party, provided that this is permitted by law and is technically feasible;
- **The right to raise against us an objection against the processing** of personal data being processed in support of our legitimate interests, after which objection the processing of your personal data will be terminated unless it is demonstrated that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or if the personal data is being processed for the establishment, exercise or defence of legal claims. You may also object at any time if your personal data is processed for direct marketing purposes (including profiling). In this case, your personal data will no longer be processed for these purposes. If you raise an objection to the processing of your personal data, please provide reasons why we should not process your personal data in the manner in which we currently process the data.
- In addition to the above, you have **the right to lodge a complaint** with the supervisory authority, which is the **Úřad pro ochranu osobních údajů (Office for Personal Data Protection)**, address: Pplk. Sochora 27, 170 00 Prague 7, e-mail: [posta@uoou.cz](mailto:posta@uoou.cz).

If required by law, the above rights may be restricted (e.g. due to the legal obligation of confidentiality of lawyers, tax advisors, auditors or as a result of anti-money laundering measures).

Rödl & Partner reserves the right to amend this information.

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