

Privacy Policy

Version as of May 2018

1. General

Your privacy has highest priority for us and we handle your personal data with the utmost diligence. iuro Attorneys at law by Dr. Andreas Mätzler ("**IURO**"). complies therefore with the applicable provisions on the protection, processing and confidentiality of personal data as well as data security, in particular the Austrian Data Protection Act ("**DPA**"), the EU General Data Protection Regulation ("**GDPR**") and the Austrian Telecommunications Act ("**TCA**").

Subject of this Privacy Policy is to inform you:

- On the data controllers
- Which personal information is collected and processed
- How we obtain your personal information
- How your personal information is used
- On what basis we use your personal information
- For how long do we keep your personal information
- With whom we share your personal information
- How your personal information is protected
- To which countries is your personal information transferred
- Your rights regarding your personal information

We kindly ask you to read carefully through this Privacy Policy and its updates.

2. Data Controller

IURO is responsible for collecting and processing your personal information as a controller (i) when providing you with legal services and in this context will decide which personal information is collected, the means of processing and the purposes for which the information is used and (ii) when you visit our website. If you contact us in our capacity as representative of a company located outside the EU under the trademark GDPR-Rep, we are processor of your personal data for the company you like to contact.

IURO also has DPO, that (i) monitors the compliance of information processing with applicable standards, (ii) is a point of connection with the data subject for clarification of issues concerning the processing of their information, (iii) collaborates with the supervisory authority, (iv) provides information and advises the processor or subcontractor of its obligations regarding privacy and data protection.

The DPO can be contacted through the following e-mail address: dpo@iuro.at.

3. Which personal information is collected and how we obtain it

3.1. Legal Services

Your personal information may be collected during the provision of our legal services, by contacting or requesting information about IURO or as a result of the contacts you may have with any of our employees or clients.

Personal information processed by IURO includes:

- Primary information such as your name, birthday, title, business, position or your connection to legal or individual persons;
- Contact details, such as postal address, e-mail address and telephone numbers;
- Financial information, such as payment-related information, especially for running a KYC check;
- Information you provide for meeting scheduling or presence at events, including access and dietary requirements;
- Background information provided by you or gathered as part of the client acceptance process;
- Personal information provided by SRS or on behalf of our clients or generated by SRS in the course of, or while providing services to our clients, including special categories of information;
- Any other information that you may give us.

We collect information from you as part of the procedure of mandating us with legal services and through other means and sources, such as keeping the contact details we already hold for you accurate and up to date using publicly available sources.

3.2. Log files through use of our Website

Through your use of the Website, we gather, collect and store the following data:

- IP Address and IP location
- Referring (exit pages and URLs)
- Number, duration and time of visits (your interaction with the Website)
- Search engines, keyphrases and keywords used to find our site
- Browser type, type of device, screen size, internet service provider and operating system

We collect these log files automatically by using cookies (for further details please see below). The log files collected are only used for statistical evaluations in an aggregated form for the purpose of operation, security and optimization of the Website.

3.3. Active contact to IURO

When you actively establish contact via the contact form, e-mail, phone or telefax to IURO or to GDPR-Rep to submit a request to a company outside the EU which appointed IURO as representative according to Art 27 GDPR (“**Non-EU Controller**”), we use the provided personal data (e-mail, name, telephone number, telefax number as well as your request and attached documents) for the purpose of processing the request and answering it. Please note that for the purpose of processing and answering your request to Non-EU Controllers we need to transfer your data to the Non-EU Controller.

We obtain your personal information when you provide it, or interact directly with us e.g. by contacting one of our employees;

4. How and on what legal basis we use your personal information

Iuro gathers and processes your personal information in a number of ways, including through our website and our services. We use your information to:

- provide and improve the services we provide, which may include the processing of personal information of third parties on behalf of our clients;
- to promote our services, by sending news and publications, newsletters and details of events;
- orient and direct our relationship with you and our clients;
- in pursuit of our legal, regulatory and risk management obligations, including in the exercise of rights or in defense of legal proceedings;
- provide and improve our website, including by auditing and monitoring its use;
- to process your request and provide information requested by you;
- for recruitment purposes

We use your personal information on the following grounds:

- in the stadium prior to entering a contract or negotiations and due to contractual obligation, especially by providing legal services we are mandated with;
- with your specific consent, especially to process your requests;
- to comply with regulatory and legal obligations especially regarding data protection;
- due to overriding legitimate interest in case of the log files through your use of our website.

5. For how long we keep personal information

We store your personal data just for as long as we need it for the fulfilment of the abovementioned purposes and our contractual and legal obligations. When we no longer need your personal data, we erase it from our systems and records or anonymise it so that you cannot be identified anymore.

6. With whom we share your personal information

We may share your personal information with third parties in accordance with contractual rights and obligations, including:

- our professional consultants and auditors;

- suppliers with whom IURO contracts for certain support services, such as, translations, copies, document reviews;
- IT-providers, providers of other tools, software solutions and marketing tools as well as further providers with similar services;
- third parties involved in the services we provide, such as lawyers, enforcement agents, local consultants and others;
- Entities involved in the organization of events or seminars or co-hosts thereof;

All our Processors process your data solely on our behalf and on the basis of our instructions for the purposes as described above.

If, in the future, we reorganize or transfer all or part of our business, we may need to transfer your personal information to new entities linked to IURO or iuro or to third parties through which IURO's services will be provided.

In case you submit a request to us as representative of a Non-EU Controller via the communication means provided by us, we need to share this information with the Non-EU Controller the request is addressed to. Furthermore, we may share your information regarding your request with regulatory authorities, courts, and official entities where necessary to comply with legal or regulatory requirements or with your request.

IURO does not commercially sell, rent or dispose of personal information to any third party.

7. Use of Cookies

Cookies are small text files that are temporarily stored on your device and saved by your browser. Due to that the use of IURO Website is made more comfortable.

As most websites IURO uses cookies, provided that you have granted your consent, to improve the use of the Website with your help. If you do not grant your consent, we will gather only anonymous data about your visit to IURO Website to, for example, be able to determine the total quantity of users of the Website.

Google Analytics

Provided that you have consented to the use of cookies, the website uses Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses cookies to enable analysis of the use of the website. The information created by cookies about the use of this website by the users is ordinarily transmitted to a Google server in the USA or a different state outside of the EU and saved there.

The following data is collected by Google Analytics: IP address, browser, device type, device model, state, service provider, screen resolution, length of stay on the Website, language, operating system, and visited pages on the Website. Google will use this information to evaluate your use of the Website and create reports about the Website activities for us.

You can also prevent the placement of cookies through the settings of your browser or by downloading and installing the browser plug-in available at the following link:

<http://tools.google.com/dlpage/gaoptout?hl=de>.

8. How your personal information is protected

We use a variety of technical and organizational measures to help protect your personal information from unauthorized access, disclosure, modification, loss or destruction in accordance with applicable data protection laws.

9. What rights do you have?

GDPR and other applicable data protection laws protect certain rights for data subjects. In particular:

Right of Access - right to obtain confirmation of which of your personal information is processed and information about it, for instance, which are the purposes of the processing, what are the conservation periods, among others.

Right of Rectification - right to request modification of your personal information that is inaccurate or request incomplete personal information, such as the address, VAT, email, telephone contacts, or others.

Right to Erasure or "right to be forgotten" - right to erase your personal information, provided that there are no valid grounds for its retention, for example in cases where IURO has to keep the data to comply with legal obligation or because a court case is in progress.

Right to Data Portability - right to receive the data you have provided us in a digital format of current use and automatic reading or to request the direct transmission of your data to another entity that becomes the new responsible for your personal information, however only if technically possible.

Right to Withdraw Consent or Right of Opposition - right to object or withdraw consent at any time to data processing, for example in the case of data processing for marketing purposes, provided that no legitimate interests exist prevailing over your interests, rights and freedoms, such as defending a right in a judicial process.

Right of Limitation - right to request the limitation of the processing of your personal information, in the form of: (i) suspension of processing or (ii) limitation of the scope of processing to certain categories of data or purposes of processing.

Right to object and automated individual decision-making - When the processing of personal information, including the processing for the definition of profiles, is exclusively automatic (without human intervention) and may have effects in your legal sphere or significantly affect it, the Client shall have the right not to remain subject to any decision based on such automatic processing, except as otherwise provided by law and shall have the right that IURO take appropriate measures to safeguard its rights and freedoms and legitimate interests, including the right to have human intervention in decision making by IURO, the right to express its point of view or contest the decision taken on the basis of automated individual information processing.

Right to complain - right to complain to the supervisory authority, in addition to IURO.

The exercise of rights is free of charge, except in the case of a manifestly unfounded or excessive request, in which case a reasonable fee may be charged regarding its costs.

The information must be provided in writing but may be given orally if requested. In this case, IURO should verify your identity by means other than oral.

The response to requests should be provided within a maximum of 30 days, unless it is a particularly complex request.

IURO

by Dr. Andreas Mätzler attorney at law

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Only for requests regarding the processing of data by IURO as a Controller and not as a processor for Non-EU companies: dpo@iuro.at