

PRIVACY NOTICE

– concerning the processing of personal data in connection with legal practice and related services, entering into contracts and legal representation –

Effective from 9 October 2026

This notice is issued by dr. Alex Kemény, attorney-at-law practising as a sole practitioner, as controller (hereinafter: the **Controller**), to provide data subjects with the key information on the processing of personal data in connection with the legal services he provides, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council 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; hereinafter: the **GDPR**).

I. THE CONTROLLER

Name:	DR. ALEX KEMÉNY, SOLE PRACTITIONER ATTORNEY-AT-LAW
Registered office:	1118 Budapest, Budaörsi út 4-18/B. III/20.
Contact details:	E-mail: alex@kemenylegal.hu Telephone: +36-30-552-8533

II. THE DATA SUBJECT

Any natural person identified or identifiable, directly or indirectly, by reference to personal data. In the processing operations of the attorney-at-law acting as Controller, data subjects include, without limitation, **typically the attorney's clients and persons instructing him** (a client or other person concerned is hereinafter referred to as the **Data Subject**).

III. SUBJECT MATTER, PURPOSE, LEGAL BASIS AND DURATION OF PROCESSING

	Intended purpose of processing	Personal data processed	Legal basis	Expected data retention period
1.	Responding to requests for a quotation made in person, by telephone, by email or through the website.	Name, telephone number and email address of the natural person, sole trader or representative of an entity other than a natural person; IP address; question asked; message sent; other personal data contained in the enquiry.	Article 6(1)(a) GDPR, i.e. the Data Subject's freely given consent	Personal data are processed until consent is withdrawn, but for no longer than 1 (one) year from their provision if no contractual relationship is established between the Data Subject and the Controller.
2.	Client identification and customer due diligence	<p>Surname and given name of a natural person or sole trader client, or of a natural person acting on behalf of or representing the client; surname and given name at birth; nationality; place and date of birth; mother's name at birth; permanent address (or, failing that, place of residence); type and number of identification document; copies of the identification document and address card (excluding the side of the official address card bearing the personal identification number) (Section 7(8) Pmt.); personal data on politically exposed person status (Sections 8 and 9/A Pmt.).</p> <p>For the beneficial ownership declaration, the beneficial owner's surname and given name; surname and given name at birth; nationality; place and date of birth; permanent address (or, failing that, place of residence); nature and extent of the ownership interest; data of the natural person (beneficial owner) falling within Section 3, point 38 Pmt.; personal data on politically exposed person status (Section 9 Pmt.).</p>	<p>Article 6(1)(c) GDPR, i.e. compliance with a legal obligation</p> <p>Pursuant to Sections 6–7, 8–9 and 9/A Pmt.</p>	Personal data obtained during client identification and customer due diligence may be processed for 8 (eight) years from the termination of the business relationship or completion of the transaction mandate. (Section 56(2) Pmt.)
3.	Identification under Section 32 of Act LXXVIII of 2017 on the Professional Activities of Attorneys-at-Law (Üttv.).	The client's natural person identification data (surname and given name, surname and given name at birth, place and date of birth, and mother's surname and given name at birth), nationality, statelessness, refugee, immigrant, settled or EEA national status, address, facial image, signature, and the facts specified in Section 18(5) of Act LXVI of 1992 on the Registration of Citizens' Personal Data and Addresses (official provision of data on documents), data under Section 24(1)(f) of Act XII of 1998 on Travelling Abroad (data on	Compliance with a legal obligation to which the Controller is subject (Article 6(1)(c) GDPR).	Personal data generated during identification may be processed for 5 (five) years.

		replacement, finding, return, surrender, withdrawal and invalidity of travel documents), and the document's validity period; data under Section 8(1)(b)(ba)–(bb) of Act LXXXIV of 1999 on the Road Traffic Register (driving licence data); data under Sections 76(d) and 80(1)(b) and (c) of Act I of 2007 on the Admission and Residence of Persons with the Right of Free Movement and Residence, and Sections 95(1)(g), 96(1)(g) and 100(1)(b) and (c) of Act II of 2007 on the Admission and Right of Residence of Third-Country Nationals (data on documents authorising residence).		
4.	Keeping the register under Section 33 Üttv.	For the identification and checks under items 2 and 3 above, the Controller records <i>all data</i> under item 2 above and, of the data collected under item 3 above, the verified person's natural person identification data, address, nationality, statelessness, refugee, immigrant, settled or EEA national status, the type and number of the identification document used, the identifier of the response received to the official data request, and the identifiers of matters in which identification of the natural person is mandatory.	Compliance with a legal obligation to which the Controller is subject (Article 6(1)(c) GDPR).	8 years from termination of the business relationship or completion of the transaction mandate (Section 57(1)–(3) Pmt., having regard to Section 33(7) Üttv.).
5.	Performing engagements within the scope of legal practice.	The client's natural person identification data (surname and given name, surname and given name at birth, place and date of birth, and mother's surname and given name at birth), nationality, tax identification number, address, email address and telephone number. Any personal data that become known in the course of performing the engagement.	Preparation and performance of the contract to be concluded with the client (Article 6(1)(b) GDPR). Following termination of the engagement agreement for any reason, the legal basis for processing personal data is Article 6(1)(f) GDPR, i.e. the Controller's legitimate interest. The Controller's legitimate interest: establishing whether claims arising from any dispute are well-founded or unfounded, and maintaining contact as necessary to resolve the dispute. The Data Subject may object to this latter processing at any time!	For the general limitation period of five (5) years after termination of the engagement; for documents and data relating to the countersigning of an instrument, and for electronic instruments, ten (10) years, unless a longer period is agreed between the Controller and the client (Sections 46 and 53 Üttv.).
6.	Identifying third parties concerned by the performance of legal engagements, contacting and communicating with them, and preparing/concluding agreements.	Identification data of natural persons concerned by performance of the client's engagement (surname and given name, surname and given name at birth, place and date of birth, and mother's surname and given name at birth), nationality, tax identification number, address, email address and telephone number.	Preparation and performance of a contract (Article 6(1)(b) GDPR), having regard to the party's involvement. Following termination of the engagement agreement for any reason, the legal basis for processing personal data is Article 6(1)(f) GDPR, i.e. the Controller's legitimate interest. The Controller's legitimate interest: establishing whether claims arising from any	For the general limitation period of five (5) years after termination of the engagement; for documents and data relating to the countersigning of an instrument, and for electronic instruments, ten (10) years, unless a longer period is agreed between the Controller and the client (Sections 46 and 53 Üttv.).

			<p>dispute are well-founded or unfounded, and maintaining contact as necessary to resolve the dispute.</p> <p>The Data Subject may object to this latter processing at any time!</p>	
7.	Accounting for fees and expenses, invoicing, issuing and processing the related accounting documents, and related communications.	The client's natural person identification data (surname and given name, surname and given name at birth, place and date of birth, and mother's surname and given name at birth), nationality, tax identification number, address, email address and telephone number.	Preparation and performance of a contract (Article 6(1)(b) GDPR), having regard to the party's involvement, and compliance with a legal obligation to which the Controller is subject (Article 6(1)(c) GDPR).	<p>For data processed to issue and retain accounting documents under Act C of 2000 on Accounting (Accounting Act), the processing period is eight years after termination of the contract (Section 169(2) of the Accounting Act).</p> <p>Processing and retaining accounting documents until expiry of the limitation period for the right to assess tax, i.e. for 5 years from the end of the year of the tax return based on the document concerned (Sections 47(1) and 164(1) Art.).</p>
8.	Enforcing claims arising from any legal relationship between the Controller and the client based on the provision of legal services (managing and recovering receivables, enforcing other claims), and handling disputes.	<p>Name, telephone number and email address of the natural person, sole trader or representative of an entity other than a natural person.</p> <p>Postal address of the natural person or sole trader.</p> <p>Data contained in the documents relating to the matter in dispute.</p>	<p>Article 6(1)(b) GDPR, i.e. processing is lawful where necessary for entering into or performing a contract.</p> <p>Article 6(1)(f) GDPR, i.e. the Controller's legitimate interest.</p> <p>The Controller has a legitimate interest in enforcing and recovering lawfully acquired claims, or in presenting a defence on the merits against claims asserted against him. To this end, he may initiate the proceedings he considers most effective for enforcing his rights and resolving the dispute. This requires establishing and maintaining contact with the Data Subject and keeping records of the Data Subjects' personal data, as claims management could not achieve its purpose without processing those data. The Data Subject may reasonably expect such enforcement and the related processing of personal data.</p> <p>The Data Subject may object to this latter processing at any time!</p>	Until expiry of the general limitation period of 5 (five) years following termination of the contract/transaction or, if a claim concerning the Data Subject has been pursued by or against the Controller, following its final adjudication (Section 6:22(1) Ptk.).
9.	Keeping the register of matters under Section 53 Uttv.	The matter identifier assigned by the Controller, the client's name, the subject matter, the date of conclusion of the engagement agreement, and the case numbers of related court proceedings or reference numbers of other proceedings.	Compliance with a legal obligation to which the Controller is subject (Article 6(1)(c) GDPR).	5 (five) years after termination of the engagement; where an instrument is countersigned, 10 (ten) years after countersigning; in matters concerning registration of a right relating to immovable property in an authentic public register, 10 (ten) years from registration of the right.
10.	Responding to enquiries and questions from prospective clients using the contact details published on the Controller's website, and maintaining contact.	Name, telephone number and email address of the natural person, sole trader or representative of an entity other than a natural person; IP address; any further personal data provided in the enquiry or question.	Article 6(1)(a) GDPR, i.e. the Data Subject's freely given consent.	Until consent is withdrawn, but for no longer than 1 (one) year after the last contact.

The Controller informs you that the provision and processing of personal data are a ***prerequisite for performance*** of the legal engagement agreement between the Controller and the client and of the further legal transactions forming its purpose and subject matter (where so indicated above). They are necessary to fulfil these contractual obligations; without them, the legal transactions cannot be performed.

As indicated above, where processing is ***based on a statutory obligation***, it is necessary for compliance with the Controller's statutory obligation. If the data are not provided, the Controller cannot act in the performance of the transaction concerned and will refuse to participate in it.

In performing a legal engagement, the Controller processes ***special categories of personal data*** under Article 9(2)(a) GDPR only for a specific purpose and with the Data Subject's prior explicit consent. Departure from this rule is permitted only in the other cases specified in Article 9(2) GDPR or under express statutory authorisation.

IV. LOCATION AND MANNER OF PROCESSING

The Controller stores hard-copy documents containing personal data in secured, lockable cabinets at his registered office or at the registered office of the processor providing data and document storage. Digital documents are stored on the server of the processor providing hosting services, in separate client folders and, occasionally, in an email mailbox.

Taking into account the state of the art, the costs of implementation, the nature, scope, context and purposes of processing, and the risk of varying likelihood and severity to the rights and freedoms of natural persons, the Controller and his processors implement appropriate technical and organisational measures to ensure a level of data security appropriate to the risk.

The Controller and those assisting him process Data Subjects' personal data only to the extent and for as long as strictly necessary to carry out their work.

V. PROCESSING ON BEHALF OF THE CONTROLLER AND DATA TRANSFERS

The Controller informs Data Subjects that he engages processors to carry out processing tasks on his behalf. Only those personal data that are strictly necessary for the processor to perform its tasks are disclosed for such processing.

The Controller has engaged the following processors to perform processing tasks as set out in their respective contracts:

- **Processor engaged for IT system administration**
Processor: IT ProfesSimple Kft.
Registered office: 2030 Érd, Favágó utca 29.
e-mail: info@professimple.hu
- **Processor providing accounting and payroll software**
Processor: PROAB Korlátolt Felelősségű Társaság
Registered office: 7628 Pécs, Katona József utca 10.
e-mail: tmsbyggab@gmail.com
- **Processor providing data and document storage**
Processor: REISSWOLF Budapest Adat- és dokumentumkezelő Kft.
Registered office: 1097 Budapest, Illatos út 6.
e-mail: info@reisswolf.hu
- **Processor operating the email system:**
Processor: Microsoft Ireland Operations Ltd.
Registered office: Dublin 2, 70 SIR John Rogerson'S Quay, Dublin D02 R296, Ireland
Contact: <https://www.microsoft.com/hu-hu/privacy/privacystatement#mainwherewestoreandprocessdatamodule>
- **Processor operating cloud services:**
Processor: Google Ireland Limited
Registered office: Gordon House, Barrow Street Dublin 4, Ireland
Contact: <https://policies.google.com/privacy?hl=hu>
- **Processor providing hosting services (website operation and hosting of the matter and client management system):**
Processor: DotRoll Kft.
Registered office: 1148 Budapest, Fogarasi út 3-5.
Contact: support@dotroll.com, dpo@dotroll.com

The Controller will update this notice whenever a processor changes. A processor may engage another processor.

In the course of his legal practice, the Controller may engage cooperating substitute attorneys to assist him. The Data Subject may accept their involvement in the attorney's memorandum of facts and/or the legal engagement agreement and/or by granting a power of attorney. On that basis, the Controller may disclose personal data to cooperating substitute attorneys only to the extent strictly necessary for them to perform their tasks.

The Controller does not intend to transfer Data Subjects' personal data to a third country or international organisation (outside the European Union, to a non-EEA state), and will make such transfers only with the client's explicit consent.

VI. AUTOMATED DECISION-MAKING, PROFILING AND DATA PROTECTION OFFICER

Please note that the Controller does not make decisions concerning you based solely on automated processing.

The Controller does not carry out profiling using your personal data held by him.

The Controller has not appointed, and does not appoint, a data protection officer.

VII. YOUR RIGHTS

The Data Subject may request information about the processing of their personal data, access to their personal data, rectification, erasure by contacting the Controller's email address, and restriction of processing. The Controller must notify the Data Subject of his decision on such requests within 1 (one) month of receipt.

Right of access

The Data Subject is entitled to obtain, on request, confirmation from the Controller as to whether their personal data are being processed and, where that is the case, access to those personal data.

Right to rectification

The Data Subject has the right to request the rectification or completion of personal data concerning them.

Right to erasure (the 'right to be forgotten')

The Data Subject has the right to request erasure of their personal data, subject to any statutory restrictions on that right.

Right to restriction of processing

The Data Subject may request restriction of the processing of their data (by clearly marking the restriction and ensuring that the data are processed separately from other data). The restriction remains in place for as long as required by the grounds stated by the Data Subject.

Right to object

The Data Subject has the right to object at any time, on grounds relating to their particular situation, to the processing of their personal data for the purposes of the legitimate interests pursued by the Controller or a third party.

Right to data portability

The Data Subject has the right to receive the personal data they have provided, which are processed by automated means on the basis of consent or a contract, in a structured, commonly used and machine-readable format, and to transmit those data to another controller.

Right to withdraw consent

Where processing is based on the Data Subject's consent, the Data Subject may withdraw that consent at any time by a written statement sent to the Controller. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal or of processing carried out on another legal basis.

Complaints and remedies

The Data Subject has the right to lodge a complaint with a supervisory authority or initiate proceedings before it, and to seek a judicial remedy, if they consider that their rights have been infringed in connection with the processing of their data or the exercise of their rights relating to such processing.

Contact details of the supervisory authority:

Hungarian National Authority for Data Protection and Freedom of Information

Address: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, P.O. Box 9.

Email address: ugyfelszolgalat@naih.hu

For judicial remedies, the court for the place of the Controller's registered office has territorial jurisdiction. At the Data Subject's option, proceedings may also be brought before the court for the place of the Data Subject's permanent address or place of residence.

Without prejudice to the above rights, Data Subjects are requested to contact the Controller before bringing their complaints before the supervisory authority or a court, so that the matter can be discussed and the problem resolved as promptly as possible.