

PRIVACY POLICY

KPMM Legal Urbańska, Jużków, Skwarek Oczkowicz Sp. J.

www.kpmm.legal

Implementation Date: **11.04.2024**

Last update Date: **13.07.2026**

In the event of any discrepancy between the language versions, the Polish version shall prevail.

1. General information

This Privacy Policy describes how KPM Legal Urbańska, Jużków, Skwarek Oczkowicz Sp. J., with its registered office at ul. Klonowa 32, 40-168 Katowice, Poland (the “Law Firm”, the “Controller” or “we”), processes personal data.

This Policy applies in particular to personal data processed in connection with:

1. the use of the website www.kpmm.legal;
2. contacting the Law Firm through the contact form, by email, telephone or other communication channels;
3. taking steps before entering into a legal services agreement, including conducting conflict-of-interest checks;
4. the provision of legal services and client support;
5. relationships with contractors and suppliers;
6. recruitment for employment, professional cooperation, internships or legal traineeships;
7. the operation of the Law Firm’s LinkedIn page;
8. the security of the website and the Law Firm’s information systems.

For particular services or processes, the Law Firm may provide supplementary privacy information, including in client engagement agreements, recruitment documentation or forms.

2. Controller and contact details

The Controller of personal data is:

KPM Legal Urbańska, Jużków, Skwarek Oczkowicz Sp. J.
ul. Klonowa 32
40-168 Katowice
Poland
email: office@kpmm.legal
website: www.kpmm.legal

The Law Firm has not appointed a Data Protection Officer.

For all matters concerning the processing of personal data, the exercise of data protection rights and reports of suspected personal data breaches, please contact office@kpmm.legal. We recommend using “Data protection” as the subject line.

Notice

The address office@kpmm.legal is the Controller’s contact point. Notification of a personal data breach to the President of the Polish Personal Data Protection Office is a separate obligation of the Law Firm and is made through the appropriate official channel.

3. Categories of data subjects

- website visitors;
- persons submitting enquiries, prospective clients and existing clients;
- persons contacting the Law Firm on behalf of clients, businesses or other organisations;
- representatives, employees and associates of contractors and suppliers;
- applicants for employment, professional cooperation, internships or legal traineeships;
- visitors to and persons interacting with the Law Firm’s LinkedIn page;
- other persons whose data is contained in correspondence, documents or materials provided to the Law Firm.

4. Categories of personal data

Depending on the circumstances, we may process:

- identification data, in particular first name and surname;
- contact details, such as an email address, telephone number and correspondence address;
- professional information concerning employment, position, qualifications or business activity;
- information concerning the business or organisation on whose behalf a person acts;
- the contents of enquiries, messages and correspondence, and information concerning a prospective or current matter;
- data contained in documents and attachments provided to the Law Firm;
- information required to conduct a conflict-of-interest check;
- recruitment data, including information about education, experience and qualifications;
- IP addresses, online identifiers, device, browser and operating-system information, and technical logs;
- information concerning interactions with the Law Firm's LinkedIn page;
- other information voluntarily provided.

The contact form requires a first name, surname, email address and the contents of the message. Providing a telephone number is optional.

5. Purposes, legal bases and retention periods

5.1. Enquiries and correspondence

We process personal data to receive and handle an enquiry, provide a response, conduct further correspondence, make an initial assessment of the nature of a matter and provide information about the Law Firm's services.

The legal basis is Article 6(1)(b) GDPR where the communication is intended to lead to a contract, or Article 6(1)(f) GDPR, namely the Law Firm's legitimate interest in handling correspondence and enquiries and organising its activities.

Personal data concerning enquiries which do not result in an engagement is generally retained for 12 months after the correspondence has ended. It may be retained for longer where this is necessary to establish, exercise or defend legal claims or to document material circumstances of the communication.

5.2. Conflict-of-interest checks

Before accepting a matter, the Law Firm may process information required to identify the parties, related entities, the subject matter and any other circumstances relevant to a conflict-of-interest assessment.

The legal basis is Article 6(1)(b) GDPR where the check is carried out at the request of the person before entering into a contract, and Article 6(1)(f) GDPR, namely the Law Firm's legitimate interest in avoiding conflicts of interest, protecting clients and ensuring the proper practice of the legal profession. In appropriate cases, Article 6(1)(c) GDPR may also apply where processing is necessary to comply with a legal obligation.

Where the Law Firm declines to accept a matter, it may retain a minimal record required to document the check and prevent future conflicts. Such information is generally retained for six years after the matter is declined. This period may be extended where justified by the nature of the matter, professional obligations or the protection of the rights of clients or the Law Firm.

5.3. Entering into and performing a legal services agreement

We process personal data to enter into and perform an engagement agreement, provide legal services, conduct the matter, communicate with the client, process payments, comply with legal and professional obligations, retain relevant records, and establish, exercise or defend legal claims.

The legal basis is Article 6(1)(b), (c) and (f) GDPR, depending on the data and the relevant activity. Where special categories of data are processed, a condition under Article 9(2) GDPR may apply, in particular where processing is necessary for the establishment, exercise or defence of legal claims.

Personal data is retained for the duration of the engagement and subsequently for periods resulting from applicable law, professional rules, the engagement agreement, tax, accounting or anti-money-laundering obligations, and for the period required to establish, exercise or defend claims. Client documents are returned or retained in accordance with the engagement agreement, applicable law and professional rules.

5.4. Representatives of clients, contractors and suppliers

We process the data of persons acting on behalf of other entities in order to establish and manage a contractual or professional relationship, maintain contacts, verify authority to act, process orders and payments, and protect against claims.

The legal basis is Article 6(1)(f) GDPR, namely the legitimate interests of the Law Firm and the represented entity in properly managing the relationship. The data is retained for the duration of the relationship and thereafter for periods resulting from applicable law and limitation periods.

5.5. Recruitment

We process applicant data in order to conduct recruitment for employment, professional cooperation, internships or legal traineeships.

The legal basis may be Article 6(1)(c) GDPR in conjunction with Polish employment law, Article 6(1)(b) GDPR in the case of professional cooperation other than employment, Article 6(1)(a) GDPR as regards additional information provided voluntarily, and Article 6(1)(f) GDPR to the extent necessary to organise recruitment and defend against potential claims.

Data relating to a current recruitment process is processed for the duration of that process. After its completion, a necessary and restricted set of data may be retained for up to three years for the defence of claims. Data for future recruitment processes is retained on the basis of separate voluntary consent for 12 months, unless the consent is withdrawn earlier.

CVs and other application documents may be submitted to office@kpmml.legal. Applicants should state whether their application relates only to a particular recruitment process or also to future recruitment processes.

5.6. Marketing of the Law Firm's services

Personal data may be processed to present the Law Firm's activities and services, maintain professional relationships, provide information about publications, events or services, and operate the Law Firm's LinkedIn page.

The general promotion of the Law Firm, the operation of the website and the operation of a social-media page are based on Article 6(1)(f) GDPR. Commercial communications or direct marketing sent by email, telephone or other electronic communications services will only be undertaken where the additional requirements of electronic communications law are satisfied, including any applicable requirement for prior consent.

Data used for direct marketing is retained until consent is withdrawn, an objection is made or the purpose ceases to exist, but no longer than three years following the recipient's last active interaction. The Law Firm does not currently operate a newsletter. Before any newsletter is introduced, this Policy will be updated; subscriber data will then be processed until consent is withdrawn or the service ends, while a limited record of consent may be retained for the period required to protect against claims.

5.7. Website and information-system security

Technical information, including IP addresses and logs, may be processed to ensure that the website and systems operate securely, detect errors, abuse and unauthorised-access attempts, maintain backups, and protect against claims.

The legal basis is Article 6(1)(f) GDPR, namely the Law Firm's legitimate interest in maintaining security and business continuity. Standard technical logs are generally retained for 90 days. Information connected with an incident may be retained for longer, for the period required to investigate and remedy the incident, comply with legal obligations or defend against claims.

5.8. Statistics and analytics

Information concerning the use of the website may be processed to compile statistics, assess how the website operates and improve it. Details concerning cookies, analytics tools, consents and retention periods are provided in the separate Cookie Policy.

5.9. Establishment, exercise and defence of legal claims

Where necessary, personal data may be processed to establish, exercise or defend legal claims. The legal basis is Article 6(1)(f) GDPR and, in relation to special categories of data, Article 9(2)(f) GDPR. Personal data is retained until the relevant limitation periods expire and, where proceedings have commenced, until they have been finally concluded and the decision has been enforced, subject to applicable record-retention requirements.

6. Special categories of data and criminal-offence data

An enquiry or submitted documents may contain special categories of personal data, including information concerning health, opinions, beliefs, trade-union membership, sex life or sexual orientation, as well as information concerning criminal convictions, alleged offences or criminal proceedings.

Please do not provide such information through the contact form unless it is genuinely necessary to describe the matter. Special-category data may be processed in particular where this is necessary for the establishment, exercise or defence of legal claims, where explicit consent has been given, or where another condition under Article 9(2) GDPR applies. Criminal-conviction and offence data is processed only where permitted under Article 10 GDPR and applicable law.

7. Sources of personal data

We obtain personal data primarily from the data subject. We may also receive it from clients and persons acting on their behalf, contractors and suppliers, persons involved in a matter, documents provided to the Law Firm, public registers and professional sources, LinkedIn, courts, public authorities or other authorised entities.

Where data has not been obtained directly from the data subject, the information provided to that person may be restricted by applicable law, legal professional privilege, defence counsel privilege or the rights of other persons.

8. Recipients of personal data

Personal data may be disclosed or entrusted to the following categories of recipients:

- partners, employees and associates of the Law Firm who are authorised to process personal data;
- the website-hosting provider;
- the email and office-software provider;
- the website-maintenance, IT-support and security provider;
- the backup or data-storage provider;
- analytics and cookie-consent-management providers;
- providers of accounting, tax, audit, insurance, postal and courier services;
- other advocates, legal advisers, consultants, experts, translators and entities involved in performing an engagement;
- courts, administrative authorities, law-enforcement authorities, professional bodies and other entities authorised by law;

- parties, participants in proceedings and their representatives, to the extent necessary to conduct a matter;
- LinkedIn Ireland Unlimited Company in connection with the operation of the Law Firm's LinkedIn page.

Providers acting as processors receive data under appropriate contractual arrangements and only to the extent necessary to perform their tasks. Certain recipients act as separate controllers. Any disclosure of personal data is subject to applicable legal professional privilege and defence counsel privilege.

9. Transfers outside the EEA

The Law Firm intends to use providers which process personal data within the European Economic Area. Some providers of IT, analytics or social-media services may, however, also process data outside the EEA, in particular due to the global nature of their infrastructure or technical support.

In such cases, a transfer will take place on the basis of a mechanism permitted under Chapter V GDPR, in particular an adequacy decision issued by the European Commission, standard contractual clauses or another appropriate safeguard. Information concerning the safeguards used may be obtained by contacting the Law Firm.

10. The Law Firm's LinkedIn page

The Law Firm operates a company page on LinkedIn under the name: "KPMG Legal Urbańska, Jużków, Skwarek, Oczkowicz Spółka Jawna".

Data relating to the page may be processed to administer the page, publish information about the Law Firm, respond to messages and comments, maintain professional relationships, compile statistics, and protect against abuse and claims. The Law Firm relies on Article 6(1)(f) GDPR and, where a communication is intended to lead to a contract, also Article 6(1)(b) GDPR.

LinkedIn Ireland Unlimited Company processes LinkedIn users' data in accordance with its own privacy documentation. In relation to data used to produce Page Insights, the Law Firm and LinkedIn may act as joint controllers under LinkedIn's applicable terms. Further information about processing, the exercise of rights and international transfers is available in LinkedIn's privacy documentation.

11. Requirement to provide personal data

The provision of personal data is voluntary. However, failure to provide required information may make it impossible to submit the contact form, respond to an enquiry, conduct a conflict-of-interest check, provide a proposal, enter into or perform an agreement, or participate in recruitment. Providing a telephone number through the contact form is optional.

12. Data-subject rights

Subject to the conditions set out in the GDPR, a data subject may have the right to:

- access their personal data and receive a copy;
- rectify inaccurate personal data;
- request erasure;
- request restriction of processing;
- data portability;
- object to processing based on Article 6(1)(f) GDPR, including an objection to direct marketing;
- withdraw consent at any time where processing is based on consent;
- lodge a complaint with the President of the Polish Personal Data Protection Office.

Withdrawal of consent does not affect the lawfulness of processing carried out before consent was withdrawn. The scope of individual rights depends on the legal basis and circumstances of processing. Rights may be

restricted in the cases and to the extent permitted by law, in particular due to professional secrecy, the rights of other persons or the need to establish, exercise or defend legal claims.

Requests may be sent to office@kpmm.legal. The Law Firm may request information required to verify the identity of the person making the request.

13. Automated decision-making

The Law Firm does not make decisions concerning individuals which are based solely on automated processing, including profiling, and which produce legal effects or similarly significantly affect those individuals.

14. Security and professional confidentiality

The Law Firm uses appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. Access is limited to persons who require it for their duties and are bound by confidentiality obligations.

Information obtained by advocates in connection with the provision of legal services is protected in accordance with legal professional privilege and, where applicable, defence counsel privilege.

Submitting an enquiry does not automatically mean that the Law Firm has accepted the matter or entered into an engagement. Until acceptance is confirmed, please do not provide original documents or information which goes beyond what is necessary for an initial assessment and conflict-of-interest check.

15. Cookies

The website uses cookies and similar technologies. Detailed information concerning their types, purposes, providers, lifetimes and consent-management options is contained in the separate Cookie Policy.

16. Changes to this Policy

This Policy may be updated in particular where applicable law changes, the website's functions change, new providers or tools are introduced, new communication or marketing channels are launched, or the scope of the Law Firm's activities changes. The current version will be published on the website together with the date on which it was last updated.

17. Language versions

This Policy has been prepared in Polish and English. Both versions are intended to provide users with full information. In the event of any discrepancy or difference in interpretation, the Polish version shall prevail.