

PRIVACY STATEMENT

1. Introduction

As a law firm, RPCK Rastegar Panchal, RA Dr. Keyvan Rastegar, LL.M. (Harvard) (**RPCK, we or us**), gives highest priority to the protection of your personal data. Due to our professional duty of confidentiality, we are committed to the utmost secrecy in all of our dealings. When using your personal data, we therefore naturally observe all data protection regulations, including but not limited to the provisions of the EU General Data Protection Regulation (**GDPR**). In this statement we set out which of your personal data will be processed by us, disclose the purposes for which data is processed and how you can exercise your rights under the GDPR

2. Personal Data and Data Processing Purposes

We collect, process and use your personal data only with your consent or in reliance on our engagement or in reliance on the agreed upon purpose or in reliance on any other legal basis in accordance with the GDPR and in compliance with data protection and civil law provisions.

We collect only personal data, which is necessary in order to carry out and execute our legal services, or data which you have provided to us on a voluntary basis.

Personal data means any information containing details of personal or material circumstances such as name, address, e-mail address, phone number, date of birth, age, sex, social security number, video recordings, photos, voice recordings of individuals, and biometric data such as fingerprints. Personal data can also include special categories of data such as health data or data relating to criminal proceedings

Please note that under certain circumstances, we might abstain from accepting an engagement if you fail to provide, or provide incomplete personal data which is necessary to execute and implement our legal services

We will process your contact details (your name, phone number, email address, your company name and your position) also to optimize our contact management (Client Relationship Management, **CRM**).

Of course, you are entitled to object to any further processing of your data for the optimization of our contact management at any time. If you exercise your right to object, we ask you to give us the reasons for doing so. If you send us a reasoned notice of objection, we will examine the facts and either cease or adjust the processing operations or inform you of compelling and legitimate reasons why it is necessary to continue the data processing operations.

3. Your Rights In Connection With Your Personal Data

As a client or generally as a data subject according to GDPR, and subject to the attorney-client privilege, you have the *right to information* on your stored personal data, on their origin and recipients, the duration of storage, and the purpose of data processing.

If we process inaccurate or incomplete personal data, you have the right to rectification or completion of such data.

You may also request us to erase data, which have been processed unlawfully. Please note that you may exercise this right only in respect of inaccurate, incomplete or unlawfully processed data.

If it is unclear whether your personal data is inaccurate, incomplete, or unlawfully processed, you may request us to limit the processing of your data until this issue has been resolved.

you have the right to object to the processing of your personal data if we have a legitimate interest in such data processing. If you exercise your right to object, we ask you to give the reasons for doing so. Please note that these rights complement each other; you can therefore request us only to either rectify or complete, or erase your data. In certain cases, you also have the right to receive your personal data processed by us in a machine-readable format of our choice, or to instruct us to transmit such data directly to a third party of your choice; in this context, data portability must not be precluded by unreasonable efforts or legal or other obligations or requirements of confidentiality.

We ask you to address all inquiries in connection with the processing of your personal data to our Data Protection Officer, along with an electronic copy of an identity document to verify your identity. Our contact details can be found in Section 12 of this Data Privacy Statement.

We ask that you notify us of any change in your personal data.

Despite our best efforts to guarantee the protection and integrity of your data, we cannot fully rule out that disagreements will arise on the nature of the use of your data. If you consider that we are unlawfully using your data, you may lodge a complaint with the Austrian Data Protection Authority. However, we hope that you will contact us first and we can address and dispel any doubts you may have.

4. Website

4.1. General

You may use our website and access its public content generally without having to disclose your personal data. We only record information provided by your internet provider, including but not limited to your IP address, the date and the duration and time of your visit, as well as the name and version of your web-browser.

This information is saved during the time of your visit and analyzed solely for statistical purposes under strict protection of anonymity (for details see our cookie policy), as well as to detect, prevent and investigate potential attacks on our website.

For these purposes we may share your personal with our IT consultants.

We also collect your personal data, if you disclose such data voluntarily or explicitly when you visit our website in connection with using the services offered on the website. We only use this information for the specific purpose of the individual service and in compliance with applicable laws

We take utmost care when using external links, however, we exclude any liability for external web sites to or from which links may be provided.

4.2. Cookies

This website uses "cookies" to ensure that our services are user-friendly and more effective for our clients.

A "cookie" is a tiny text file that is downloaded by our web server on the hard drive of your computer via your browser and allows our website to recognize you as a user if a connection is made between our web server and your browser. Cookies help us to establish the frequency of use and the number of users who visit our website.

The content of the cookies we use is confined to an identification number and does not allow us to personally identify a user. The main purpose of cookies is to recognize the user of a website.

Our website uses two types of cookies:

- Session cookies: These are transient cookies stored in temporary memory, which are automatically erased when you close your browser.
- Permanent cookies: Cookies are stored on your hard drive to enhance user friendliness and allow us to recognize you when you visit our website again.

You can adjust the settings on your browser (i) to activate functionality which notifies you on the setting of cookies and to allow cookies only in a particular case, (ii) you may disable cookies for certain cases or in general, and (iii) you can also activate functionality which will automatically delete cookies when you close your browser. Disabling cookies may result in disabling certain functionality and features of this site.

4.3. Server-Log-Files

For optimized system performance, user friendliness and the provision of useful information on our services, the website provider automatically collects and stores so-called server log files, which your browser automatically transmits to us. This information includes your IP address, browser and language settings, operating system, referrer URL, your internet service provider, and the date/time of your visit.

This data is not pooled with sources of personal data. We reserve the right to examine this data later on if there is solid evidence, which suggests unlawful use.

5. Career Applications

We are looking forward to receiving your application. In order to assess if we can offer you a position, we require specific personal data from you. By submitting your application you consent that we collect, process and use your personal data. We only process such personal data that you provide us with such as: academic degree, name, contact details, CV, motivational letter, letters of reference and any other information or documents you submit. We will only use your personal data for the purpose of assessing your application.

6. Data Security

We have taken appropriate organizational and technical measures to ensure the protection of your personal data in particular against unauthorized, unlawful or accidental access, processing, loss, use and tampering.

In spite of our efforts of ensuring an appropriately high standard of diligence requirements at all times, it cannot be ruled out that information you have provided via the internet will be accessed or used by other persons.

Please note that we can therefore not assume any liability whatsoever for the disclosure of information due to errors in the data transfer and/or unauthorized access by third parties not caused by us (e.g. hacking of e-mail accounts, telephone, or interception of fax messages).

7. Use of Data

We will not process data made available for purposes other than those covered by your consent or otherwise by a provision in accordance with GDPR, except for the use for statistical purposes, provided that data made available was anonymized.

When concluding a client-attorney relationship or a contractual relationship with us, you will disclose your (or your relatives', co-workers' or other third parties') personal data and business or trade secrets. In all these cases, we generally assume that you are authorized to disclose this data. We use your data and data of third parties

nominated by you, only to the extent this is necessary for the proper establishment and processing of our mandate or contractual relationship with you.

8. Transfer of Data to Third Parties

The execution of your mandate may require us to transfer your data to third parties (e.g. to your opponent, to substitute lawyers, to insurance companies and service providers we may use and to which we provide data, etc.), and to courts or authorities. Also, an international issue arising in connection with a mandate may require us to exchange data within the Schoenherr offices. Data will be transferred only in reliance on data protection laws and in particular to execute your mandate or based on your prior consent.

Furthermore, we would like to inform you that information relating to the specific circumstances of your case may regularly be sourced from third parties (e.g. search engines, social networks, your company website) in connection with our legal services. We may also have to disclose your personal data to courts or authorities on request. However, in all these cases, we will always ensure that we comply with legal regulations and protect your data.

Some of the above recipients of your personal data are located abroad or outside the EU/EEA and process your personal data there. The level of data protection in other countries may not be exactly equal to the level of protection in Austria. We will ensure that the European level of data protection and the European data security standards are maintained. For this reason, we will transfer your personal data only to countries which the EU Commission decided have an appropriate level of data protection, or we will take measures to ensure that all recipients maintain an appropriate level of data protection; for this purpose we will conclude standard contractual clauses (2010/87/EC and/or 2004/915/EC).

9. Notification of Data Incidents

We aim to ensure that data incidents are detected at an early stage and immediately reported to you or to the competent supervisory authority, including the respective data categories concerned.

10. Storage of Data

We will store data no longer than is necessary to fulfil our contractual or legal obligations and to defend liability claims, if any.

11. Legal Basis

11.1. Attorney-Client Relationship

Our mandate as a law firm requires us to represent your interests zealously, faithfully and conscientiously. We are therefore legally required in our clients' interest to collect any personal data about our clients needed for conscientious representation of our clients. Furthermore, we process your personal information based on the engagement contract, your consent or any other purposes covered by data protection laws. We use your personal data for statistical purpose only when anonymized.

11.2. Website

The legal basis to collect and process personal data is the necessity for the purpose of our legitimate interests (Art 6 Abs 1 lit f EU General Data Protection Regulation), to achieve the purposes set out in section 4.

11.3. Client Relationship Management (CRM)

If you have contacted us, we will be in possession of your contact details. It is in our legitimate interest to process your contact details. However, you may certainly object at any time to any further processing of your data for the optimization of our contact management.

12. Kontakt Daten

Controller of all your personal data is:

RPCK Rastegar Panchal
RA Dr. Keyvan Rastegar, LL.M (Harvard)
Börsegasse 11, 49-54
A-1010 Vienna

Tel +43 1 532 02 50

Fax +43 1 532 02 51

office@rpck.com

Please contact us in case of any queries or if you wish to send us a notice of withdrawal.