

General Data Protection Policy

The following policy describes how GSK STOCKMANN Rechtsanwälte Steuerberater Partnerschaftsgesellschaft mbB, with registered office in Munich, Munich Local Court, No. 533 (hereinafter also referred to as “GSK STOCKMANN”, “we”, “us”) processes your (and possibly third parties’) personal data within the scope of our relationship with you as a client or otherwise as regards processing your case.

We take the confidentiality and protection of your personal data very seriously. For this reason, we process your personal data exclusively insofar as this is legally admissible, in particular on the basis of the EU General Data Protection Regulation (“GDPR”) and the German Federal Data Protection Act (“BDSG”).

The following gives you an overview of which personal data we process specifically, how we use this data, who we potentially pass your data on to and what data protection rights you are entitled to.

1. Who is responsible for processing your data?

This data protection policy applies to data processing carried out by us (GSK STOCKMANN) as the data controller within the meaning of the GDPR.

If you have any questions, suggestions or complaints regarding data protection at GSK STOCKMANN, you can reach us via the following contact details: GSK STOCKMANN Rechtsanwälte Steuerberater Partnerschaftsgesellschaft mbB, Karl-Scharnagl-Ring 8, 80539 Munich, Germany, e-mail: kontakt@gsk.de.

If you have engaged one of our lawyers in Berlin or Frankfurt in their capacity as a notary, the notary in question is then the data controller within the meaning of the GDPR. The relevant data protection policy concerning data processing carried out by our notary’s offices can be found here: [Privacy statement \(gsk.de\)](https://www.gsk.de/privacy-statement).

You can also contact our Data Protection Officer directly at any time via the contact details for GSK STOCKMANN provided above as well as at christian.szidzek@thales-datenschutz.de.

2. Clients

2.1. What personal data do we process?

We process certain data received from you or from third parties commissioned by you in connection with our relationship with you as a client or otherwise as regards processing your case. This includes in particular the following data:



- name, address and other contact details, such as telephone or fax number and e-mail address, as well as name and contact details of the relevant contact person (if applicable);
- identification data (e.g. ID card or passport information);
- bank account or payment information;
- if applicable, your tax identification number (“tax ID”);
- if applicable, details of your personal and/or financial circumstances and any other information communicated to us insofar as this is necessary to represent, assert and defend your rights within the scope of the engagement;
- in certain cases, data regarding your legal relationships to third parties, such as file numbers, loan or bank account numbers at your bank.

2.2. What are the purposes and the legal bases for the data processing?

GSK processes the aforementioned personal data

- in order to identify you as our client;
- in order to advise and represent you appropriately;
- in order to correspond with you;
- for invoicing and other billing purposes;
- in order to fulfil the client relationship with you and/or assert potential claims against you.

We process your data at your request and in accordance with Art. 6 para. 1 sentence 1 lit. b) GDPR for the purposes stated above, namely for the appropriate handling of the engagement and the mutual fulfilment of obligations arising from the engagement letter (performance of contract or precontractual measures). If you have not engaged us as your lawyers, your data will be processed based on Art. 6 para. 1 sentence 1 lit. f) GDPR (legitimate interest, with the legitimate interest falling within the scope of necessity for the aforementioned purposes).

In some cases we are required by law to process certain data (Art. 6 para. 1 lit. c) GDPR), e.g. due to the German Money Laundering Act (“GwG”), which requires us to identify our clients (Sec. 11 para. 1 sentence 1 GwG). Furthermore, according to Sec. 50 of the German Federal Lawyer’s Act (“BRAO”) and Sec. 66 of the German Tax Consultancy Act (“StBerG”), professional law prescribes that we keep legal reference files (if necessary also electronically).



3. Business partners

In addition, GSK STOCKMANN processes personal data within the scope of cooperation with contracted service providers or suppliers as well as other business partners (“business partners”).

3.1. What personal data do we process?

When working with our business partners, we process the following categories of personal data, among others:

- name, address and other contact details, such as title, address, telephone and e-mail address,
- if applicable, details regarding your professional activity,
- bank account details.

3.2. What are the purposes and legal bases for the data processing?

The processing of the above-mentioned personal data under Section 3.1 is necessary to establish, execute and handle the contractual relationship with the respective business partner. We process this data based on Art. 6 para. 1 lit. b) GDPR.

4. Transmitting information

We occasionally process your personal data in order to send you client information that is relevant for your professional activity (e.g. GSK Updates on recent legal developments) or inform you about GSK STOCKMANN events that may be of interest to you.

4.1. What personal data do we process?

In this context, we process the following categories of personal data:

- first and last name,
- title,
- business address and position,
- e-mail address



4.2. What are the purposes and legal bases for the data processing?

The legal basis for the data processing is essentially Art. 6 para. 1 lit. f) GDPR (legitimate interest). Our legitimate interest is based on the aforementioned purpose of providing you with relevant client information and informing you about upcoming events.

If there is no legitimate interest, we will only send you our client information and event announcements if you have given us your consent (Art. 6 para. 1 lit. a) GDPR). You can revoke this consent at any time with effect for the future. In this case, we will not send you any further information and delete your contact details unless we are entitled or obligated to retain these for other reasons.

5. Do we disclose your personal data to third parties?

Your personal data will not be transferred to third parties for purposes other than those listed below.

Your personal data will be passed on to third parties insofar as this is necessary as per Art. 6 para. 1 sentence 1 lit. b) GDPR to properly process the client relationship with you or as per Art. 6 para. 1 sentence 1 lit. f) GDPR to otherwise properly handle your case. This includes, in particular, disclosing data to an opposing party and its representatives (in particular its lawyers) as well as the courts and other public authorities for the purpose of corresponding as well as asserting and defending legal claims. In individual cases it may also be necessary for us to disclose your data to third parties for the purpose of conducting a credit assessment.

In addition, processors commissioned by us (in particular IT service providers) receive your data insofar as this is necessary for them to perform their services owed to us. These processors process the data exclusively on our behalf and in accordance with our instructions. Above all, processors are not permitted to use your personal data for their own purposes. The legal basis for such data processing is Art. 28 GDPR (commissioned data processing) and Art. 6 para. 1 sentence 1 lit. b) GDPR (performance of contract or precontractual measures).

The third party must use the disclosed data exclusively for the aforementioned purposes. Attorney-client privilege remains unaffected.

6. Do we transfer data to third countries?

We will only transfer your personal data to third countries (outside the European Economic Area – EEA), if and as far as this is necessary to perform the service requested, if it is legally required or if a stakeholder involved is based in a third country or if you have given your consent and, in particular, if Art. 44 et seqq. GDPR are observed.



7. How long do we store your personal data?

We process and store your personal data according to the statutory storage obligations.

In particular, according to Sec. 50 para. 1 BRAO, lawyers must keep reference files for a period of six years (ten years in the case of tax advisers in accordance with Sec. 66 StBerG) after the end of the calendar year in which the engagement or other legal activity ended. Your personal data will be deleted after this legal obligation for lawyers to retain them expires and taking into account a processing time of no more than one year, unless we are obligated to retain the data for a longer period of time in accordance with Art. 6 para. 1 sentence 1 lit. c) GDPR due to storage and documentation obligations under tax or commercial law (as per the German Commercial Code, Criminal Code, Money Laundering Act or the Tax Code).

Otherwise, we will delete your personal data after the purpose for which it was collected has been fulfilled or no longer applies (e.g. after termination of the client or other business relationship), unless we are entitled or obligated to retain it for longer. In these cases, we will not use your data anymore and limit the processing of the data in this respect.

8. Which rights do you have?

You have the right to request information from us at any time regarding your personal data being processed by us. The lawyer-client confidentiality obligation remains unaffected. If the legal requirements are met, you have the right to demand that we correct, delete or restrict the processing of your personal data and the right to object to the processing of your personal data by us. Additionally, you also have the right to receive an overview of the relevant personal data you made available to us in a structured, commonly used, and machine-readable format or request that we transfer this data to another controller.

If you have given your consent to the use of your personal data, you can revoke this consent at any time for the future. You can assert these rights by contacting us or our Data Protection Officer using the contact information provided under Section 1 above.

You have the right to file a complaint about the processing of your personal data with a data protection supervisory authority.

