

## Privacy Policy in relation to the business consultation and adult training services provided by dr. Szijártó István as sole proprietor

### 1. Purpose of the Privacy Policy

1.1. The purpose of this Privacy Policy is to describe the data protection and data processing principles applied by the Data Controller, dr. Szijártó István, sole proprietor (hereinafter referred to as the Data Controller), which apply to the processing of personal data of the Client and/or the Client's representative(s), the contact person(s) designated by the Client and the person(s) entitled to certify the performance (hereinafter collectively referred to as the Data Subjects) in the context of the business consultation and adult training services provided by the Data Controller to the Client.

1.2. The Data Controller is committed to adhering to the requirements of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (henceforth: General Data Protection Regulation), Act CXII of 2011 on information self-determination and freedom of information, other legal regulations, the legal practice of the Hungarian National Authority for Data Protection and Freedom of Information and the relevant case-law of the Court of Justice of the European Union and Hungarian courts in the context of its data processing activities.

1.3. In accordance with the above-mentioned considerations the Data Controller issues the following Privacy Policy in connection with its data processing activities relating to its business consultation and adult training services.

### 2. Name and information of the data Controller

2.1.

Name:	<b>Dr. Szijártó István sole proprietor</b>
Seat	7200 Dombóvár Krúdy Gyula utca 28.
Registration No.	58109672
E-mail address	info@dataprotectionsolutions.hu
Phone number	+36-20/257-7317

2.2. The Data Controller has no appointed data protection officer.

### 3. Scope of processed personal data

3.1. The scope of the processed personal data includes all personal data provided by the Data Subjects to the Data Controller in the course of the business consultation and adult training services, as well as all data that the Data Subjects send to the Data Controller in any form. If any changes or modifications are made to the data processed during the processing period, the Data Subjects must notify the Data Controller without undue delay.

3.2. The source of all personal data is the Data Subject, with the exception of the personal data listed in section 4.3. In this case, when this Privacy Policy mentions the conduct of the "Data Subject", that also reflects that conduct of the Client. An exception is also made for the personal data specified in points a) and e) of section 4.5.1, which originate from the Data Controller

3.3. The precise scope of processed personal data is defined in conjunction with the purpose, legal basis and duration of the data processing in part 4.

#### 4. The purpose, legal basis and duration of the data processing

The Privacy Policy deals with the different categories of processed personal data based on the purpose of the data processing.

In case the Data Subject grants the Data Controller access to personal data, which does not adhere to the data processing purposes defined in the Privacy Policy, the Data Controller shall delete these personal data without undue delay, but within no more than 72 hours.

The Data Controller publishes the extract of its data processing activities in the form of a chart in Annex No 1.

#### 4.1. Conclusion and performance of the contract

4.1.1. On the basis of Article 6(1)(b) of the General Data Protection Regulation, i.e. for the purpose of taking the steps necessary for the conclusion of a contract between the Data Subject and the Data Controller (concerning the provision of business consultation and adult training services, the Data Controller shall process the following personal data of the Data Subjects for the performance of the contract

- a) the name (first and last name) of the Data Subject,
- b) the address or seat of the Data Subject,
- c) the e-mail address of the Data Subject,
- d) the phone number of the Data Subject,
- e) the signature of the Data Subject,
- f) in the case of adult training services, the course chosen by the Data Subject,
- g) in the case of adult training services, the training level of the course chosen by the Data Subject, and
- h) in the case of adult training services, the training form of the course chosen by the Data Subject.

4.1.2. The processing of data as defined in section 4.1.1. is carried out for the purpose of the conclusion and the performance of the contract between the Data Controller and the Data Subject. The precise purposes of each of the data categories are illustrated in the table below.

Personal data category	Purpose of personal data processing
the name (first and last name) of the Data Subject	identification
the address or seat of the Data Subject	identification and contact
the e-mail address of the Data Subject	contact
the phone number of the Data Subject	contact
the signature of the Data Subject	identification
in the case of adult training services, the course chosen by the Data Subject	providing adequate services
in the case of adult training services, the training level of the course chosen by the Data Subject	providing adequate services

in the case of adult training services, the training form of the course chosen by the Data Subject	providing adequate services
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4.1.3. The Data Controller processes the Data Subject’s personal data defined in section 4.1.1. until the termination of the contractual relationship between the Parties. This limitation does not restrict the Data Controller to process the same personal data based on another legal basis and for another purpose in accordance with the provisions of this Privacy Policy.

## 4.2. Billing

4.2.1. The Data Controller processes the Data Subject’s following personal data, which are necessary for complying with a legal obligation to which the Data Controller is subject in accordance with article 6 paragraph (1) point c) of the General Data Protection Regulation:

- a) the Data Subject’s billing name (first and last name),
- b) the Data Subject’s tax identification number and
- c) the Data Subject’s billing address.

4.2.2. The Data Controller processes the personal data of the Data Subject defined in section 4.2.1. with the purpose of adhering to its legal obligation on billing. The exact purpose of each processed personal data category is defined in the table below.

Personal data category	Purpose of personal data processing
the Data Subject’s billing name (first and last name)	adhering to the legal requirements of an invoice and identification
the Data Subject’s tax identification number	adhering to the legal requirements of an invoice and identification
the Data Subject’s billing address	adhering to the legal requirements of an invoice and contact

4.2.3. The legal obligations, for which the processing of personal data is necessary are Act CL of 2017 on the Rules of Taxation 78. § para. (3) and Act CXXVII of 2007 on Value Added Tax 169. § points d)-e).

4.2.4. According to Act CL of 2017 on Rules of Taxation 78. § para. (3), taxpayers shall retain all documents until the limitation period of the right of tax assessment or, in respect of deferred taxes, for five years from the last day of the calendar year in which the deferred tax is due, therefore, the data processing lasts until this point in time. This does not affect the processing of the same data on other legal bases and for other purposes in accordance with the Privacy Policy.

## 4.3. Contact with the contractual contact person and identification of the representative and person responsible for the proof of performance

4.3.1. The Data Controller processes the following personal data of the contractual contact person indicated in the contract between the Data Controller and the Client, as well as of the representative and the person providing proof of performance of the Client, on the basis of Article 6(1)(f) of the General Data Protection Regulation, i.e. on the basis of its legitimate interest of the Data Controller:

- a) the name of the contact person (first and last name),
- b) the postal address of the contact person,
- c) the e-mail address of the contact person,

- d) the phone number of the contact person,
- e) content of the correspondence between the Data Controller and the contact person,
- f) the name (first and last name) of the representative of the legal person Client,
- g) signature of the representative of the legal person Client,
- h) the name (first and last name) of the person responsible for the proof of performance from the legal person Client and
- i) signature of the person responsible for the proof of performance from the legal person Client.

4.3.2. The processing of data as set out in section 4.3.1 shall be for the purposes of contacting the contractual contact person and identifying the representative and/or the person responsible for the certification of performance of the legal person Client. The exact purposes of each of the data categories are illustrated in the table below.

Personal data category	Purpose of personal data processing
the name of the contact person (first and last name)	identification
the postal address of the contact person	contact
the e-mail address of the contact person	contact
the phone number of the contact person	contact
content of the correspondence between the Data Controller and the contact person	proper performance of the contract
the name (first and last name) of the representative of the legal person Client	identification
signature of the representative of the legal person Client	identification
the name (first and last name) of the person responsible for the proof of performance from the legal person Client	identification
signature of the person responsible for the proof of performance from the legal person Client	identification

4.3.3. The Data Controller's legitimate interest in processing the data specified in this point is to maintain contact with its Client in order to ensure the proper performance of the contract and to identify the person authorized to represent its Client and the person entitled to certify the performance of the contract from the Client.

4.3.4. The processing of the data categorizes set out in this section shall be carried out on the legal basis and for the purposes set out herein until the performance of the contract. This does not affect the processing of the same data on other legal bases and for other purposes in accordance with the Privacy Policy.

#### 4.4. Legal claims and successful defense in litigation or administrative proceedings

4.4.1. The Data Controller processes the personal data specified in sections 4.1.-4.3. and 4.5. on the basis of its own legitimate interest pursuant to Article 6(1)(f) of the General Data Protection Regulation.

4.4.2. The purpose of the processing of the data set out in section 4.4.1 is the establishment and exercise of legal claims and the successful defense in legal proceedings or proceedings before public

authorities, in particular with regard to possible disputes relating to contractual relations and the proof of the fulfillment of obligations relating to data protection.

4.4.3. The Data Controller has a legitimate interest in the processing of the data set out in this section in order to assert legal claims and to successfully defend itself in any dispute or legal proceedings that may be brought by the Data Subjects or a third party.

4.4.4. The duration of the processing of the data as set out in this section shall be 5 years from the termination of the contract between the Data Controller and the Client, i.e. the general statute of limitations in civil law [Act V of 2013 on the Civil Code, § 6:22 para. (1)], unless the Contracting Parties agree on a different limitation period. An additional exception is the case where the Data Subjects or a third party have initiated legal or administrative proceedings in connection with which the processing of personal data requires an additional, longer period of time. In such cases, the period of processing will be until the proceedings in question have been finally and conclusively completed and the legitimate interest has been pursued by other means (e.g. the conclusion of an out-of-court settlement).

#### 4.5. Fulfillment of Data Provision Obligation for Adult Training

4.5.1. Based on point (c) of Article 6(1) of the General Data Protection Regulation, i.e., for the purpose of fulfilling a legal obligation, the Data Controller processes the following personal data of the Data Subject using the adult training services:

- a) data related to the name, nature, location, number of hours, first training day, and – except for training conducted within a closed system of electronic distance learning – the planned completion date of the education or training,
- b) personal identification data,
- c) electronic mailing address,
- d) highest level of education,
- e) training fee, and
- f) the bearer of the training cost.

4.5.2. The data processing specified in point 4.5.1 is carried out to fulfill the legal obligations related to adult training providers. The specific purposes of each data category are illustrated in the table below:

Personal data category	Purpose of personal data processing
data related to the name, nature, location, number of hours, first training day, and – except for training conducted within a closed system of electronic distance learning – the planned completion date of the education or training	fulfillment of the data provision legal obligation to the adult training administrative body (Pest Vármegyei Kormányhivatal)
personal identification data	
electronic mailing address	
highest level of education	
training fee	
the bearer of the training cost	

4.5.3. The specific legal obligation that necessitates the data processing: the obligations specified in Section 15(1) of Act LXXVII of 2013 on Adult Education.

4.5.4. The Data Controller processes the data specified in this section from the time of data collection until the fulfillment of the data provision obligation. This does not affect the processing of the same data on other legal grounds and for other purposes in accordance with the Privacy Policy.

**5. Method of data processing**

**5.1. Data Processors**

5.1.1. The Data Controller employs Data Processors for all data processing enshrined in part 4. The data processing is regulated by the contract concluded by the Data Controller and the Data Processors. Further data processing activities conducted by the Data Processors are regulated by their own Privacy Policies.

Processors	Seat of processors	Contact information of processors	Privacy Policy of processors	Personal data affected	Data processing task
Google Ireland Limited	Gordon House, Barrow Street Dublin 4 Ireland	<a href="#">Contact</a>	<a href="#">Privacy Policy</a>	Personal data listed in part 4.	Provision of cloud services to the Data Controller
Apple Distribution International Ltd.	Hollyhill Industrial Estate, Hollyhill, Cork, Ireland	<a href="#">Privacy Policy</a>	<a href="#">Privacy Policy</a>	Personal data listed in part 4.	Provision of email and cloud services to the Data Controller
Rackforeszt Zrt.	1132 Budapest, Victor Hugo u. 11. 5. em. B05001.	<a href="#">Contact</a>	<a href="#">Privacy Policy</a>	Personal data listed in part 4.	Provision of hosting and e-mail services to the Data Controller

The Data Controller transfers the data specified below to the following independent data controller recipients for the purposes listed below:

Independent Controller	Seat of Independent Controller	Contact Information	Privacy Policy	Personal data affected	Purpose of data transfer
PECB Group Inc.	6683 Jean Talon East, Suite 336, Montreal, QC, H1S 0A5, CANADA	<a href="#">Contact</a>	<a href="#">Privacy Policy</a>	name and e-mail address of the Data Subject	Provision of adult education materials and issuance of PECB certificates in case of successful completion.

**5.2. Data Security**

5.2.1. Besides the Data Processors listed above, and the Data Controller, no one has access to the personal data.

5.2.2. The Data Controller processes the personal data electronically as well as on paper.

5.2.3. The Data Controller aims to mitigate the risks of the processing of personal data by implementing data security measures. The data security measures implemented by the Data Controller are illustrated in the table below.

Data security measure	Description of the data security measure
Hardware security	The Data Controller guarantees that the hardware used by it is only accessible for itself.
Requirements for processors	The Data Controller aspires to enter into contract with such processors who pay close attention to the protection of personal data
Maintenance	The Data Controller continuously maintains its computers and information systems
Filtering out malware	The Data Controller uses AVG Antivirus to filter out malwares.
Minimization of personal data	The Data Controller aspires to process only those personal data, which are absolutely necessary and for the shortest possible time
Archiving	The Data Controller archives the personal data collected on paper after the termination of the contract and it does not perform active data processing activities on them besides storing them.

5.2.4. The Data Controller in addition to the measures enshrined in 5.2.3.

- a) guarantees the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- b) introduces a process for testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing and implements it annually;
- c) guarantees the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident.

5.2.5. In case of transferring personal data to Data Processors the data security measures implemented by the Data Processors apply, which are listed in the privacy policies provided by the Data Processors.

5.2.6. The Google Ireland Limited Data Processor transfers personal data outside of the territory of the European Union (to the United States of America). You can read more about the data processing activities of the Data Processor [here](#).

5.2.7. The Apple Distribution International Ltd Data Processor transfers personal data outside of the territory of the European Union (to the United States of America). You can read more about the data processing activities of the Data Processor [here](#).

5.2.8. The data transfer to the independent data processor PECB Group Inc. is based on an adequacy decision adopted by the European Commission. [Consolidated text](#): Commission Decision of 20 December 2001 pursuant to Directive 95/46/EC of the European Parliament and

of the Council on the adequate protection of personal data provided by the Canadian Personal Information Protection and Electronic Documents Act (notified under document number C(2001) 4539) (2002/2/EC)

## 6. Rights of the Data Subject

### 6.1. Rights of the Data Subject in General

6.1.1 The Data Controller shall refuse to comply with the Data Subject's request to exercise his/her rights defined in part 6. in case the Data Controller demonstrates that it is not in a position to identify the Data Subject. In the context of complying with the Data Subject's exercise of its rights as outlined in part 6., the Data Controller provides information to the Data Subject in a concise, transparent, comprehensible, and easily accessible form, using clear and plain language, in writing or otherwise (including electronic means). At the request of the Data Subject, the information will be given orally, provided that the identity of the Data Subject is proven by other means.

6.1.2. The Data Controller informs the Data Subject on the actions taken based on the Data Subject's request without undue delay, but no later than one month after receipt of the request, unless a shorter time limit is provided in part 6. for the exercise of certain rights. If necessary, this period can be extended by two months, taking into consideration the complexity and number of requests. The Data Controller shall inform the Data Subject of the extension within one month of receipt, together with the reasons for the delay. In case the Data Subject has submitted his/her request by electronic means, the information must be provided by electronic means as well, unless the Data Subject requests otherwise.

6.1.3. The Data Controller provides the information and fulfills the requests of Data Subjects based on the rights defined in part 6. free of charge. Where requests from a Data Subject are manifestly ill-founded or excessive, particularly because of their repetitive character, the Data Controller is entitled to either charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested, or the Data Controller is entitled to refuse to act on the request.

6.1.4. When the Data Controller has reasonable doubts concerning the identity of the natural person making the request to exercise the rights set out in this part, the Data Controller is entitled to request the provision of additional information necessary to confirm the identity of the Data Subject.

6.1.5. The Data Controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with the rights set out in part 6. to each recipient to whom the personal data have been disclosed, unless this proves to be impossible or involves disproportionate effort. The Data Controller shall inform the Data Subject about those recipients based on the Data Subject's request.

### 6.2. Right of access by the Data Subject

6.2.1 The Data Subject shall have the right to access to the information specified in Article 15 of the General Data Protection Regulation from the Data Controller, in particular the following information:

- a) the categories of personal data concerned,
- b) the purpose and the legal basis of the processing,
- c) source of personal information,



- d) the envisaged period for which the personal data will be stored,
- e) whether automated decision-making takes places, including profiling, and the available information concerning this topic,
- f) to whom, when, based on what legal basis, to which categories of personal data did the Data Controller provide access to or whether the Data Controller transferred the data to someone,
- g) what rights and remedies does the Data Subject have during the data processing.

6.2.2. The Data Controller shall provide a copy of the personal data undergoing processing in one copy. For any further copies requested by the Data Subject, the Data Controller is entitled to charge a reasonable fee based on administrative costs.

6.2.3. If the Data Subject submits her/his request electronically, the Data Controller will provide a copy of the personal data in a commonly used electronic form (unless the Data Subject requests otherwise).

6.2.4. The personal data are not transferred to a third country or to an international organization. In case personal data were transferred, the Data Subject would have the right to be informed of the appropriate safeguards relating to the transfer.

### 6.3. Right to rectification

6.3.1. Pursuant to Article 16 of the General Data Protection Regulation, the Data Subject shall have the right to obtain from the Data Controller without undue delay the rectification of inaccurate personal data concerning him or her.

6.3.2. The Data Subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### 6.4. Right to withdraw consent

6.4.1 The Data Subject shall have the right to withdraw his or her consent in case of consent-based data processing at any time without giving reasons pursuant to Article 7 (3) of the General Data Protection Regulation. This right is irrelevant for the present data processing activities.

### 6.5. Right to erasure

6.5.1 The Data Subject shall have the right to obtain from the Data Controller the erasure of personal data concerning him or her pursuant to Article 17 of General Data Protection Regulation if

- a) the personal data are no longer required for the purpose for which they were originally processed by the Data Controller;
- b) in case of consent-based data processing, the Data Subject has withdrawn his or her consent and there is no other legal basis for the data processing;
- c) the Data Subject successfully objects to the processing of his or her personal data and there is no legitimate reason with priority for the processing of the data;
- d) the Data Subject successfully objects to the processing of his or her personal data for the purpose of direct business acquisition;
- e) the personal data have been unlawfully processed;
- f) the personal data have to be erased for compliance with an EU or Member State law to obligation which the Data Controller is subject;

- g) the Data Controller has processed the personal data in relation to information society services offered directly to children.

6.5.2. The Data Subject is not entitled to exercise his or her right to erasure, in case the data processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by EU or Member State law to which the Data Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;
- c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to in section 6.5. is likely to render impossible or seriously impair the achievement of the objectives of that processing, or
- d) for the establishment, exercise or defense of legal claims.

6.5.3. During the data processing, the Data Controller does not disclose the personal data of the Data Subject. When the Data Controller has made the personal data public and is obliged to erase the personal data, the Data Controller, taking into account the available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the Data Subject, the he/she has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

## 6.6. Right to restriction of processing

6.6.1 The Data Subject shall have the right to request restriction of processing of his/her personal data pursuant to Article 18 of General Data Protection Regulation in case:

- a) the accuracy of the personal data is contested by the Data Subject, for a period enabling the Data Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Data Controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defense of legal claims; or
- d) the Data Subject has successfully objected to the data processing; in this case, the restriction shall apply for as long as it is established whether the legitimate grounds of the Data Controller override those of the Data Subject.

6.6.2. In case the processing of personal data has been restricted pursuant to section 6.6.1., such personal data shall—with the exception of storage—only be processed with the Data Subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the EU or of a Member State.

6.6.3. If the Data Subject has successfully restricted the processing of personal data, the Data Controller shall inform the Data Subject in advance of the lifting of the restrictions.

## 6.7. Right to data portability

6.7.1. Pursuant to Article 20 of the General Data Protection Regulation, the Data Subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Data Controller, in a commonly used electronic format.

6.7.2. The Data Subject has the right to transmit those data to another controller without hindrance from the Data Controller to which the personal data have been provided, when:

- a) the processing is based on the Data Subject's consent or explicit consent or is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the Data Subject's request prior to entering into a contract, and
- b) the processing is carried out by automated means.

6.7.3. The Data Subject shall have the right to have the personal data transmitted directly from one Data Controller to another, where technically feasible.

6.7.4. The exercise of the right referred to in sections 6.7.1. and 6.7.2. shall be without prejudice to the right to erasure. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller.

6.7.5. The right to data portability shall not adversely affect the rights and freedoms of others.

## 6.8. Right to object

6.8.1. Pursuant to Article 21 of the General Data Protection Regulation, the Data Subject shall have the right to object on grounds relating to his or her particular situation, at any time to the processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1).

6.8.2. In case of objection, the Data Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of legal claims.

6.8.3. During data processing, the data is not processed for the purpose of direct marketing. Where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to the processing of personal data concerning him or her for such purposes, which includes profiling to the extent that it is related to such direct marketing. Therefore, in case of data processing for direct marketing purposes, the Data Subject can object to the data processing unconditionally, and in such case, the personal data would no longer be processable for these purposes.

6.8.4. Data processing is not related to the use of information society services. Where this arises, the Data Subject could also exercise her or his right to object by automated means based on technical specifications.

6.8.5. Personal data are not processed for scientific or historical research or statistical purposes. If this would arise, the Data Subject, on grounds relating to his or her particular situation, would have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

## 6.9. Rights concerning automated decision-making

6.9.1 The Data Controller does not make decisions based on automated processing, nor profiling.

6.9.2. The Data Subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

6.9.3. In the event of the Data Subject's objection, the Data Controller can no longer process the personal data, except if

- a) it is necessary for entering into, or performance of, a contract between the Data Subject and the Data Controller,
- b) it is based on the Data Subject's explicit consent,
- c) it is authorized by EU or Member State law to which the Data Controller is subject and which also lays down suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests.

6.9.4. In the cases referred to in points 6.9.3. a) and b), the Data Controller shall implement suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the Data Controller, to express his or her point of view and to contest the decision.

6.9.5. The exceptions which are set out in section 6.9.3. can not be based on special categories of personal data except, where the Data Subject has explicitly consented to the data processing or the processing is necessary in the overriding public interest and suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests are in place.

## 7. Exercise of the Data Subject's rights

7.1. The Data Subject is entitled to raise a complaint about the data processing via the contact e-mail defined in section 2.1. The Data Subject is also entitled to raise a complaint relating to the data processing via mail addressed to the person and sent to the Data Controller's address defined in section 2.1.

7.2. The Data Subject is entitled to turn to the Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority) (mailing address: 1363 Budapest, Pf. 9., phone: +36 (1) 391-1400, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [www.naih.hu](http://www.naih.hu)) if he or she feels, that he or she has been harmed or is in imminent danger regarding the processing of his or her personal data.

7.3. The Data Subject can go before court if the competent supervisory authority (Hungarian National Authority) fails to deal with his/her complaint or to inform him/her within three months of any procedural developments or the outcome of the complaint. In case the Data Subject believes that there a violation of his/her rights has taken place, he or she can bring an action before the competent court based on his/her place of residence.

## 8. Definitions

**Controller:** the person defined in section 2.1;

**Data Processor:** a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the Data Controller;

**Processing:** any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**Recipient:** a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with EU or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

**Data Subject:** You, for whom the Data Controller handles any information that qualifies as personal data; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier (e.g. IP address) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**Special categories of personal data:** racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation;

**Personal data:** any information about You as a Data Subject;

The Privacy Policy is effective from 21 May 2024.

The Data Controller is entitled to amend the Privacy Policy at any time by uploading it to the Website ([dataprotectionsolutions.hu](http://dataprotectionsolutions.hu)).

Dated 21 May 2024

Dr. Szijártó István sole proprietor  
Data Controller  
Registration Number: 58109672