

Privacy Policy

Privacy Policy

This Privacy Policy is available at the following webpage:

www.sparqlet.com

Any modifications to this notice shall become effective upon publication at the above address.

Data Controller and Contact Information:

Name: Dr. Szabó Zita Noémi e.v.

Address: 1132 Budapest, Visegrádi utca 17. 4th floor, door 3A

E-mail: sparqlet@gmail.com

Definitions

- **"Personal data"** means any information relating to an identified or identifiable natural person ("data subject"); 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, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **"Processing"** means 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;
- **"Controller"** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- **"Processor"** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- **"Recipient"** means 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 Union 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 may have access to personal data, they shall not be considered recipients; the processing of such data by these public authorities must comply with the applicable data protection rules and must be in line with the purposes of the data processing.
 - **"Consent of the data subject"** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
 - **"Data protection incident"** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Principles Relating to the Processing of Personal Data

Personal data shall be:

- a) processed lawfully, fairly, and in a transparent manner in relation to the data subject ("lawfulness, fairness, and transparency");
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered incompatible with the initial purposes ("purpose limitation");
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ("data minimization");
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ("accuracy");
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organizational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ("storage limitation");
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ("integrity and confidentiality").

g) According to Article 9(2)(h) of the GDPR, health data may be processed when necessary for "the purposes of medical diagnosis" based on Union or Member State law or a contract with a health professional. All health data are treated confidentially.

The controller shall be responsible for, and be able to demonstrate compliance with, the above principles ("accountability").

Data Processing Activities

Data processing related to the operation of the website

Personal Data Purpose of Processing

Name	Required for making contact, requesting a quote, and issuing a legal invoice.
E-mail address	Communication, sending newsletters.
Telephone number	Communication, sending notifications, more efficient coordination of treatment appointments.
Postal address	Sending notifications by post.
Time of registration	Performing technical operations.
IP address at registration	Performing technical operations.

The email address does not need to contain personal data.

Scope of data subjects: All individuals requesting a quote or subscribing to the newsletter via the website.

Duration of processing and deadline for deletion: Immediate upon cancellation of registration. The controller shall notify the data subject electronically of the deletion of any personal data provided by them, in accordance with Article 19 of the GDPR. If the data subject's deletion request includes their email address, the controller shall delete the email address after such notification—except for accounting documents, which must be retained for 8 years under Section 169 (2) of Act C of 2000 on Accounting.

Accounting documents (including general ledger accounts, analytical or detailed records) that directly or indirectly support accounting records must be retained in a readable form and retrievable by reference for at least 8 years.

Authorized persons and data recipients: The sales and marketing staff of the controller may process personal data, respecting the principles listed above.

Data subject rights:

The data subject may:

- Request access to personal data concerning them;
- Request correction, deletion, or restriction of processing;
- Object to the processing of such data;
- Exercise the right to data portability;
- Withdraw consent at any time.

Data subjects may exercise these rights:

- By mail: 1132 Budapest, Visegrádi utca 17. 4th floor, 3A
- By email: sparqlet@gmail.com

Legal basis for processing:

7.1. Article 6 (1) point (b) of the GDPR – processing necessary for the performance of a contract;

7.2. Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Elker tv.):

The service provider may process personal data technically essential for providing the service. The provider must select and operate tools used during service provision in such a way that data processing only occurs when strictly necessary for service delivery and other legally defined purposes, and only to the extent and duration required.

7.3. Article 6 (1) point (c) of the GDPR – issuing invoices compliant with accounting legislation;

7.4. Section 6:21 of the Civil Code (Act V of 2013) – enforcing contractual claims (statute of limitations is 5 years).

Section 6:22 of the Civil Code (Statute of limitations):

1. Claims expire after five years unless otherwise stated by law.
2. The limitation period starts when the claim becomes due.
3. Agreements to modify the limitation period must be in writing.
4. Agreements excluding limitation are void.

Please note:

- Data processing is necessary for fulfilling the contract.
- You are required to provide personal data so that we can fulfill your order.
- If you do not provide the required data, we cannot process your order

Processors Used

Web Hosting Provider

Activity performed by the data processor: Web hosting service

Name and contact details of the data processor:

Company name: BlazeArts Kft.

Registered address: H-1096 Budapest, Thaly Kálmán utca 39.

Company registration number: 01-09-389087

Email: admin@forpsi.hu

Phone: +36 1 6105506

Mailing address: 6090 Kunszentmiklós, Szent Erzsébet tér 11.

Tax number: 12539833-2-43

Official website: www.forpsi.hu

Fact of data processing and scope of processed data: All personal data provided by the data subject.

Scope of data subjects: All individuals using the website.

Purpose of data processing: Making the website accessible and ensuring its proper functioning.

Duration of data processing and deadline for deletion: Until the termination of the agreement between the data controller and the hosting provider, or until the data subject submits a deletion request to the hosting provider.

Legal basis for data processing: Article 6 (1) points (c) and (f) of the GDPR, as well as Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.

Cookie Management

Cookies typical of websites include so-called "security cookies," which do not require prior consent from the data subjects for their use.

Fact of data processing and scope of processed data: Unique identifier, dates, timestamps

Scope of data subjects: All visitors of the website

Purpose of data processing: Identifying users and tracking visitors

Duration of data processing and deletion deadline:

Type of CookieLegal Basis of ProcessingDuration of ProcessingData Processed

Session cookies	Section 13/A (3) of Act CVIII of 2001 on electronic commerce services and information society services (Elkertv.)	Until the end of the respective user session	connect.sid
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Authorized persons who may access the data: The controller does not process personal data using cookies.

Data subjects' rights related to data processing: Data subjects can delete cookies in the Tools/Settings menu of their browsers, typically under the Privacy settings section.

Legal basis for data processing: Consent from the data subject is not required if the sole purpose of using cookies is to transmit

communication over an electronic communications network or if the use of cookies is strictly necessary for the service provider to deliver an information society service explicitly requested by the subscriber or user.

Use of Google AdWords Conversion Tracking

The data controller uses the online advertising program "Google AdWords" and within its framework, utilizes Google's conversion tracking service. Google Conversion Tracking is an analytics service provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").

When a user accesses the website via a Google advertisement, a cookie required for conversion tracking is placed on their device. These cookies have a limited validity and do not contain any personal data, thus the user cannot be identified by them.

When a user visits certain pages of the website and the cookie has not expired, both Google and the data controller can see that the user clicked on the advertisement.

Each Google AdWords customer receives a different cookie. Therefore, cookies cannot be tracked across the websites of AdWords clients.

The information collected through the use of conversion tracking cookies is used to generate conversion statistics for AdWords customers who opt for conversion tracking. These customers are informed about the number of users who clicked on their ad and were redirected to a page tagged with a conversion tracking label. However, they do not receive any information that could be used to personally identify users.

If you do not wish to participate in conversion tracking, you can opt out by disabling the installation of cookies via your browser settings. In this case, you will not be included in conversion tracking statistics.

Further information and Google's privacy policy can be found at: www.google.de/policies/privacy

Use of Google Analytics

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses so-called "cookies", which are text files stored on your computer to help analyze how users use the website.

The information generated by the cookies regarding your use of the website is usually transmitted to and stored on a Google server in the USA. By activating IP anonymization on this website, Google will shorten the user's IP address within member states of the European Union or in other states party to the Agreement on the European Economic Area beforehand.

Only in exceptional cases is the full IP address sent to and shortened on a Google server in the USA. On behalf of the website operator, Google will use this information to evaluate your use of the website, compile reports on website activity, and provide other services related to website and internet usage to the website operator.

The IP address transmitted by the user's browser within the scope of Google Analytics is not merged with other Google data. You can prevent cookies from being stored by selecting the appropriate settings in your browser. However, please note that in this case, you may not be able to use all functions of this website to their full extent.

Additionally, you can prevent Google from collecting and processing data related to your website use (including your IP address) generated by cookies by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=hu>

Facebook Pixel

The Facebook Pixel is a piece of code that allows the website to generate reports on conversions, build custom audiences, and provide the website owner with detailed analytical data about visitors' use of the website.

Using the Facebook remarketing pixel tracking code, personalized offers and advertisements can be shown to website visitors on the Facebook platform. The Facebook remarketing list does not enable personal identification.

For more information about the Facebook Pixel, please visit: <https://www.facebook.com/business/help/651294705016616>

Newsletter and Direct Marketing (DM) Activity

According to Section 6 of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities, the user may give prior and explicit consent for the service provider to contact them with advertising offers and other correspondence at the contact details provided during registration.

Furthermore, the customer may consent, in accordance with this Privacy Policy, to the service provider processing their personal data necessary for sending advertising offers.

The service provider does not send unsolicited advertising messages, and the user may unsubscribe from offers at any time without any restrictions, justification, and free of charge. In such cases, the service provider will delete all personal data necessary for sending advertising messages from its records and will no longer contact the user with further promotional offers. Users can unsubscribe from advertisements by clicking the link in the message.

Data Collected, Scope of Processed Data, and Purpose of Processing:

Personal Data Purpose of Data Processing

Name, email address	Identification, enabling newsletter subscription
Subscription date	Execution of a technical operation
IP address at time of subscription	Execution of a technical operation
Postal code	Statistical analysis

Data Subjects: All individuals who have subscribed to the newsletter.

Purpose of Data Processing: Sending electronic messages containing advertisements (emails, SMS, push notifications) to the data subject, providing information about current news, products, promotions, new features, etc.

Duration of Data Processing, Deadline for Deletion of Data: Data processing continues until the consent is withdrawn, i.e., until unsubscription.

Persons Authorized to Access the Data, Recipients of Personal Data: The personal data may be processed by the data controller's sales and marketing staff, in accordance with the above principles.

Rights of Data Subjects Regarding Data Processing:

- The data subject may request access, rectification, deletion, or restriction of processing of their personal data from the data

controller;

- They may object to the processing of such personal data;
- The data subject has the right to data portability and to withdraw their consent at any time.

Ways to Exercise These Rights:

- By post: 1132 Budapest, Visegrádi utca 17. 4th floor, 3A;
- By email: sparqlet@gmail.com

The data subject may unsubscribe from the newsletter at any time, free of charge.

Data Processor Used During Data Processing:

beehiiv Inc.

228 Park Avenue #2329976

New York, New York 10003

Email: privacy@beehiiv.com

Legal Basis of Data Processing: The data subject's consent under Article 6(1)(a) and (f) of the GDPR, and Section 6(5) of Act XLVIII of 2008:

The advertiser, the advertising service provider, and the publisher of the advertisement must maintain a record of individuals who have given their consent. Data in this record concerning the recipient of the advertisement may only be processed in accordance with the consent provided and until its withdrawal, and may only be disclosed to third parties with the prior consent of the individual concerned.

Please note that:

- Data processing is based on your consent.
- You are required to provide personal data if you wish to receive our newsletter.
- Failure to provide the data will result in our inability to send you the newsletter.

Complaint Handling

Data Collected, Scope of Processed Data, and Purpose of Processing:

Personal Data Purpose of Data Processing

Name	Identification, communication.
Email	Communication.
Phone number	Communication.

Billing name and address Identification, managing quality complaints, questions, and issues related to ordered services.

Data Subjects: All customers who submit a complaint regarding quality issues through the website, by phone, or in person.

Duration of Data Processing, Deadline for Deletion of Data: Copies of the recorded complaint, transcript, and the response must be retained for **5 years** according to Section 17/A (7) of Act CLV of 1997 on Consumer Protection.

Persons Authorized to Access the Data, Recipients of Personal Data: The personal data may be processed by the data controller's sales and marketing staff, in accordance with the above principles.

Rights of Data Subjects Regarding Data Processing:

- The data subject may request access, rectification, deletion, or restriction of processing of their personal data from the data controller;
- They may object to the processing of such personal data;
- The data subject has the right to data portability and to withdraw their consent at any time.

Ways to Exercise These Rights:

- By post: 1132 Budapest, Visegrádi utca 17. 4th floor, 3A;
- By email: minnaemosolyekszer@gmail.com

Legal Basis of Data Processing: Article 6(1)(c) of the GDPR and Section 17/A (7) of Act CLV of 1997 on Consumer Protection.

Please note that:

- Providing personal data is a **contractual obligation**.
- Data processing is a **precondition for the conclusion of the contract**.
- You are required to provide personal data so that we can handle your complaint.
- Failure to provide data will result in our inability to process your complaint.

Social Media Pages

Data Collected and Scope of Processed Data: Name registered on social media platforms (e.g., Facebook/Google+/Twitter/Pinterest/YouTube/Instagram, etc.) and the user's public profile picture.

Data Subjects: All individuals who have registered on the above-mentioned social media platforms and have "liked" the website.

Purpose of Data Collection: To share, like, and promote specific content elements, products, promotions, or the website itself on social media platforms.

Duration of Data Processing, Deadline for Data Deletion, Persons Authorized to Access Data, and Data Subjects' Rights Regarding Data Processing: Information about the source of data, their processing, method of transfer, and legal basis can be found on the respective social media platforms. Since the data processing takes place on these platforms, the regulations of the given social media provider apply concerning the duration, method of processing, and possibilities for deletion and modification of data.

Legal Basis for Data Processing: The **voluntary consent** of the data subject for the processing of personal data on social media platforms.

Customer Relations and Other Data Processing

If any questions or issues arise while using the services of the data controller, the data subject may contact the controller through the contact options provided on the website (telephone, email, social media platforms, etc.).

The data controller will delete any received emails, messages, and data provided via phone, Facebook, etc., along with the name and email address of the inquirer and any other voluntarily provided personal data, no later than two years after the data was received.

For any data processing not listed in this privacy policy, we provide information at the time of data collection.

In the case of exceptional official requests or requests from other authorities authorized by law, the Service Provider is obliged to provide information, disclose data, transfer data, or make documents available.

In such cases, the Service Provider will only release personal data to the requester to the extent necessary and proportionate to the purpose of the request, provided that the specific purpose and the scope of the data have been clearly indicated.

Data of Job Applicants

Purpose of data processing: The recruitment of applicants and the conclusion of employment contracts with hired individuals. Data of rejected applicants will be stored for a maximum of 3 years.

Legal basis for processing: Consent of the data subject.

Scope of processed data: Name, date of birth, mother's name, address, educational information, photo.

Duration of data processing: For rejected applicants, data will be retained for 3 years from the date of rejection.

Rights of the Data Subjects

Right of Access

You have the right to obtain confirmation from the controller as to whether or not your personal data is being processed, and if so, access to the personal data and information listed in the Regulation.

Right to Rectification

You have the right to obtain from the controller the rectification of inaccurate personal data concerning you without undue delay. Considering the purposes of the processing, you have the right to have incomplete personal data completed, including by means of a supplementary statement.

Right to Erasure

You have the right to request the erasure of personal data concerning you, and the controller shall erase your personal data without undue delay under certain conditions.

Right to Be Forgotten

If the controller has made personal data public and is obliged to erase it, it shall, taking account of available technology and the cost of implementation, take reasonable steps to inform other controllers processing the data that you have requested the deletion of any links to or copies of the personal data.

Right to Restriction of Processing

You have the right to request restriction of processing where one of the following applies:

- You contest the accuracy of the data, for a period enabling the controller to verify it;
- The processing is unlawful, and you oppose erasure and request restriction instead;
- The controller no longer needs the data, but you require it for legal claims;
- You have objected to processing, pending verification of whether the controller's legitimate grounds override yours.

Right to Data Portability

You have the right to receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller.

Right to Object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, including profiling.

Objection to Direct Marketing

If your personal data is processed for direct marketing purposes, you have the right to object at any time to such processing, including profiling to the extent that it is related to such marketing. Once you object, your data shall no longer be processed for this purpose.

Automated Individual Decision-Making, Including Profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects you.

This shall not apply if the decision:

- Is necessary for entering into or performing a contract between you and the controller;
- Is authorized by Union or Member State law with suitable safeguards;
- Is based on your explicit consent.

Response Time

The data controller shall provide information on actions taken on your request without undue delay and in any event within one month of receipt of the request.

This period may be extended by two further months if necessary. The controller shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

If the controller does not take action on your request, they shall inform you without delay and at the latest within one month of receipt of the request, of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking judicial remedy.

Data Security

Data Security

The data controller and the data processor implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, taking into account the state of the art, the cost of implementation, the nature, scope, context, and purposes of the processing, as well as the varying likelihood and severity of risks to the rights and freedoms of natural persons. These measures include, as appropriate:

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

Informing the Data Subject of a Data Breach

If the data breach is likely to result in a high risk to the rights and freedoms of natural persons, the data controller shall inform the data subject of the personal data breach without undue delay.

The notification to the data subject shall describe in clear and plain language the nature of the personal data breach and shall at least contain the following information:

- The name and contact details of the data protection officer or other contact point where more information can be obtained;
- The likely consequences of the data breach;
- The measures taken or proposed by the data controller to address the data breach, including measures to mitigate its possible adverse effects.

The data subject does not need to be informed if any of the following conditions are met:

- The controller has implemented appropriate technical and organizational protection measures, and those measures were applied to the personal data affected by the personal data breach — in particular those that render the personal data unintelligible to any person who is not authorized to access it, such as encryption;
- The controller has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialize;
- It would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

If the controller has not yet notified the data subject of the personal data breach, the supervisory authority, after considering the likelihood of the personal data breach resulting in a high risk, may require the controller to do so.

Reporting a Data Breach to the Authority

The data controller shall notify the competent supervisory authority of the personal data breach without undue delay and, where feasible, not later than 72 hours after having become aware of it, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

If the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

Contact Information of the Data Protection Officer

Dr. Szabó Zita Noémi

Mailing Address: 1132 Budapest, Visegrádi Street 17., 4th floor, Apartment 3A

Email: sparqlet@gmail.com

Closing Statement

During the preparation of this Privacy Policy, the following legislation was taken into account:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation – GDPR) 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
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.)
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (especially Section 13/A)
- Act XLVII of 2008 on the Prohibition of Unfair Commercial Practices against Consumers
- Act XLVIII of 2008 on the Basic Conditions and Certain Limitations of Economic Advertising Activities (especially Section 6)
- Act XC of 2005 on the Freedom of Electronic Information
- Act C of 2003 on Electronic Communications (especially Section 155)
- Opinion No. 16/2011 on the EASA/IAB Best Practice Recommendation on Online Behavioural Advertising
- Recommendation of the Hungarian National Authority for Data Protection and Freedom of Information on the Data Protection Requirements of Prior Information
- Regulation (EU) 2016/679 of the European Parliament and of the Council (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