

## **Privacy Policy**

**Dr. Barbara Csala, Sole Proprietor**

### **1. Purpose and Scope of the Policy**

This Privacy Policy (hereinafter referred to as the "Policy") aims to define the lawful framework for the use of records/databases maintained by Dr. Barbara Csala (hereinafter referred to as the "Data Controller"), ensuring the enforcement of constitutional principles of data protection, the right to informational self-determination, and data security requirements. It also ensures that individuals have control over their personal data within the legal framework, are informed about the conditions of data processing, and prevents unauthorized access, alteration, or disclosure of data. Additionally, this Policy provides information to data subjects about the Data Controller's data processing practices.

The scope of this Policy extends to the use of the website [www.drctalabarbara.com/en](http://www.drctalabarbara.com/en) and [www.drctalabarbara.com](http://www.drctalabarbara.com) (hereinafter referred to as "Website"), including data processing related to newsletter subscriptions and service usage.

The scope of this Policy covers the processing of personal and special category data across all organizational units of the Data Controller.

### **2. Applicable Laws and Regulations**

- Regulation (EU) 2016/679 of the European Parliament and the Council (General Data Protection Regulation, GDPR)
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (Infotv.)
- Act V of 2013 on the Civil Code (Ptk.)
- Act CXXX of 2016 on Civil Procedure (Pp.)
- Act CVIII of 2001 on Electronic Commerce Services and Certain Aspects of Information Society Services (Eker. tv.)

- Act XLVIII of 2008 on the Fundamental Conditions and Certain Restrictions of Commercial Advertising (Grt.)

### **3. Data Controller Information**

#### **Current Data of the Data Controller**

- **Name:** Dr. Barbara Csala, Sole Proprietor
- **Registered Address:** 1117 Budapest, Bölcső Street 11. 2./2.
- **Phone Number:** +36 70 372 9236
- **Email Address:** barbaracsala9@gmail.com
- **Tax Number:** 54902875-1-43
- **Registration Number:** 55001513
- **Statistical Number:** 54902875869923101

#### **Web Hosting Provider:**

- **Company Name:** NetMasters Europe Kft.
- **Registered Address:** 4200 Hajdúszoboszló, Díoszegi Sámuel u. 5.
- **Email:** szia@netmasters.hu
- **Website:** www.netmasters.hu
- **Mailing Address:** 1105 Budapest, Cserkesz u. 32.
- **Phone Number:** +36 30 923 4646

The hosting provider stores data exclusively for hosting purposes and does not have access to the personal data managed by the Data Controller.

### **4. Scope of Processed Personal Data, Purpose, Duration, and Legal Basis of Processing**

The Data Controller processes personal data based on voluntary consent or legal authorization. In cases of voluntary consent, the data subject may request information about the scope and usage of the processed data and may withdraw consent at any time, except where data processing continues due to legal obligations.

Data subjects must provide accurate information to the best of their knowledge. If the data provider submits personal data of another individual, they must obtain the data subject's consent.

The Data Controller maintains a record of any data transferred to third parties, including the recipient, method, date, and scope of transferred data.

## **Data processing relating to certain activities of the Data Controller**

### **Personal Consultation and Education**

#### **a) Application and Evaluation**

- **Legal Basis:** Consent of the data subject
- **Processed Data:** Email address, name, phone number, and health data voluntarily provided or consented to by the applicant
- **Purpose of processing:** To coordinate and confirm the possibility of personal consultation; phone numbers may be required for scheduling and data verification purposes
- **Health data:** Health data are processed solely on the explicit, voluntary consent of the data subject, as they are classified as special categories of personal data under the GDPR. These include any voluntarily provided information about psychological, psychiatric, or physical conditions, diagnoses, and treatments. Data are stored only during the cooperation period and are deleted thereafter. No data are shared with third parties.
- **Data Controller:** Dr. Barbara Csala
- **Data Processor** (for email sign-ups): Google Ireland Ltd. (Gmail email service), which processes personal data in accordance with its own privacy policy. Data are stored on the provider's servers and accessed exclusively by the Data Controller.
- **Retention Period:** If the application is successful, data will be further processed as per section b below; if rejected, data will be deleted immediately.
- **Consequences of Not Providing Data:** Inability to proceed with selection and personal consultation.

#### **b) Personal Consultation Following Successful Application**

- **Legal Basis:** Consent of the data subject, performance of a contract or service agreement
- **Processed Data:** Email address, name, phone number, address, and health data voluntarily provided or consented to by the applicant
- **Purpose of processing:** Fulfilment of contractual obligations, invoice issuance for **personal consultation**
- **Health data:** Processed solely on explicit, voluntary consent of the data subject. Includes voluntarily provided psychological, psychiatric, or physical health information. Data are stored only during the cooperation period and are deleted afterwards. Exception: if the data subject explicitly consents to retain data for future collaboration. No data are shared with third parties.
- **Data Transfer: To the National Tax and Customs Administration (NAV)** via <https://onlineszamla.nav.gov.hu/> for billing (further details regarding invoicing are provided below)
- **Legal Basis for Data Transfer:** Fulfilment of contractual obligations
- **Data Controller:** Dr. Barbara Csala
- **Data Processor** (for email sign-ups): Google Ireland Ltd. (Gmail email service), which processes personal data in accordance with its own privacy policy. Data are stored on the provider's servers and accessed exclusively by the Data Controller.
- **Retention Period:** Data are stored for the duration of the cooperation. Phone numbers are deleted no later than 3 months after cooperation ends. Health data are deleted immediately upon completion or upon request. Exceptions apply only if explicit consent is given for recurring cooperation.
- **Consequences of Not Providing Data:** Personal consultation cannot be conducted.

### **Lectures/Training/Workshops/Courses**

- **Legal basis for data processing:** Consent of the data subject, performance of a contract or service agreement
- **Scope of processed data:** Email address, name, phone number, gender, age, previous experience, and health data

- **Purpose of processing:** Establishing the possibility of cooperation/participation, fulfilling contractual obligations, phone number may be required for scheduling and data verification; health data to ensure safe handling of health risks.
- **Health data:** Processed solely on explicit, voluntary consent of the data subject. Includes voluntarily provided psychological, psychiatric, or physical health information. Data are stored only during the cooperation period and are deleted afterwards. Exception: if the data subject explicitly consents to retain data for future collaboration. No data are shared with third parties.
- **Data Controller: Dr. Barbara Csala**
- **Data Processor** (for email or Google Forms sign-ups): Google Ireland Ltd. (Gmail and Google Forms services), which processes personal data in accordance with its own privacy policy. Data are stored on the provider's servers and accessed exclusively by the Data Controller.
- **Data retention period:** Data are stored during cooperation. Phone numbers are deleted no later than 3 months after cooperation ends. Health data are deleted immediately upon completion or upon request. Exception: explicit consent for recurring cooperation. Data are deleted immediately if cooperation does not occur.
- **Possible consequences of not providing data:** Inability to participate in or organize the session, workshop, or course safely, or inability to participate in the session safely

### **Subscription to Free Downloadable Materials**

- **Legal basis for data processing:** Consent of the data subject
- **Scope of processed data:** Name, email address
- **Purpose of data processing:** Sending digital materials via email
- **Data Controller:** Dr. Barbara Csala
- **Data Processor** (for email sign-ups): Google Ireland Ltd. (Gmail email service), which processes personal data in accordance with its own privacy policy. Data are stored on the provider's servers and accessed exclusively by the Data Controller.
- **Data retention period:** 1 year after downloading the material

- **Possible consequences of not providing data:** Inability to download the free material.

## Newsletter Subscription

- **Legal basis for data processing:** Consent of the data subject
- **Scope of processed data:** Name, email address
- **Purpose of data processing:** Sending digital materials and offers via email
- **Data Controller:** Dr. Barbara Csala
- **Data Processor:** MailerLite Limited (email marketing service), which processes personal data in accordance with its own privacy policy. Data are stored on the provider's servers and accessed exclusively by the Data Controller.
- **Data retention period:** Until withdrawal of consent
- **Possible consequences of not providing data:** Inability to receive newsletters, free content, offers, or blog updates

## Billing

- **Legal basis for data processing:** Compliance with legal obligations
- **Scope of processed data:** Name, address
- **Data processing platform:** Electronic
- **Purpose of data processing:** Compliance with legal obligations
- **Data Controller:** Dr. Barbara Csala
- **Data processor:**
  - Electronic invoicing is carried out using the Online Invoice system operated by the National Tax and Customs Administration (NAV) of Hungary.
  - Processing and storage of invoicing data are managed by NAV in accordance with the applicable Hungarian tax laws.

## NAV Contact Information:

- **Operator name:** National Tax and Customs Administration (NAV)
- **Address:** 1054 Budapest, Széchenyi Street 2.
- **Website:** <https://www.nav.gov.hu>

- **Legal basis for data transfer:** Legitimate interest of the Data Controller, Compliance with legal obligations
- **Data retention period:** 9 years from the date of invoice issuance
- **Possible consequences of not providing data:** Data provision cannot be refused due to legal obligation.

## Facebook Page

- **Legal basis for data processing:** Consent Consent of the data subject by implied action
- **Notice to users:**
  - The Data Controller has no control over data processing by Facebook Inc., except for storing and deleting messages sent via the page.
  - Users can find Facebook Inc.'s privacy policy at: <https://www.facebook.com/policies/cookies/>
  - If users wish to restrict or delete their data, they must contact Facebook Inc. directly.

### Important Notice:

- Some cookies used by Facebook may be placed on users' devices even if they do not have a Facebook account but access Facebook page content (e.g., through search engine results).
- **Possible consequences of refusing data processing:** Users may not be able to access content shared on the Data Controller's Facebook page.

## Use of Cookies on the Website

The Data Controller's website uses cookies to enhance user experience.

### Types of cookies used:

- **Functional cookies:** Ensure the basic functionality of the website.
- **Analytical cookies:** Help analyze website traffic and usage.
- **Marketing cookies:** Display advertisements tailored to users' interests.

Users can manage their cookie preferences using the consent bar available on the website, including accepting or rejecting cookies. Browser settings also allow for further control over cookies.

## **5. Rights of Data Subjects and Legal Remedies**

### **Right to Information:**

Data subjects can request written information from the Data Controller at any time regarding how their personal data is being processed. They may also request deletion or modification of their data and withdraw their previously given consent through the contact details provided in Section 3.

The right to deletion cannot be exercised in cases where data processing is required by law.

The right to information includes the following: Upon request, the Data Controller shall provide the data subject with concise and comprehensible information regarding the processing of their personal data, as set out in Articles 13 and 14 of the GDPR, and the notifications specified in Articles 15-22 and 34.

### **Right of Access:**

Upon request, the Data Controller must confirm whether personal data related to the data subject is being processed. If such processing is ongoing, the data subject has the right to access the following:

- Their personal data
- Purpose(s) of data processing
- Categories of personal data concerned
- Recipients or categories of recipients to whom data has been or will be disclosed
- The period for which data will be stored
- Rights to rectification, erasure, and restriction of processing
- Right to appeal to a court or supervisory authority
- Source of the data, if not collected from the data subject



- Profiling and/or automated decision-making, including relevant details and potential impacts
- Transfer of processed data to third countries or international organizations

Upon request, the Data Controller will provide a copy of the requested data. Additional copies can be requested electronically, subject to an administration fee of 500 HUF per page.

**Deadline for data release:** Within 30 days of receiving the request.

**Right to Data Rectification:**

The data subject has the right to request the correction of inaccurate personal data held by the Data Controller.

**Right to Erasure (Right to be Forgotten):**

The Data Controller shall delete the data subject's personal data as soon as possible, but no later than five working days, if any of the following conditions apply:

- Data processing was unlawful (e.g., without legal authorization or personal consent).
- Data is no longer necessary for the original purpose of collection.
- The data subject withdraws their consent, and there is no other legal basis for processing.
- Data was collected in connection with offering information society services.
- Data must be deleted to comply with a legal obligation imposed on the Data Controller.

However, data deletion cannot be performed if further processing is necessary for:

- Compliance with legal obligations applicable to the Data Controller.
- Exercising the right to freedom of expression and information.
- Public interest.
- Archiving, scientific research, or statistical purposes.
- Establishing, exercising, or defending legal claims.

**Right to Restriction of Processing:**

The Data Controller shall restrict data processing upon request if:

- The data subject contests the accuracy of their data, in which case restriction applies until the accuracy is verified.
- Processing is unlawful, but the data subject opposes erasure and requests restriction instead.
- The data is no longer needed for processing, but the data subject requires it for legal claims.

During the period of restriction, data may only be processed under the following conditions:

- The data subject has provided consent.
- Processing is necessary for legal claims.
- Processing is necessary to protect the rights of another person.
- Processing is required in the public interest.

**Right to Withdraw Consent:**

The data subject has the right to withdraw their consent at any time in writing. Upon withdrawal, the Data Controller shall immediately and permanently delete all personal data related to the data subject unless retention is required by law or necessary for legitimate interests. Withdrawal does not affect the lawfulness of data processing carried out before withdrawal.

**Right to Data Portability:**

The data subject has the right to request the transfer of their personal data to another controller in a commonly used, machine-readable format. The Data Controller shall fulfill this request as soon as possible, but no later than 30 days.

**Automated Decision-Making and Profiling:**

The data subject has the right not to be subject to decisions based solely on automated processing (including profiling) that produce legal effects concerning them or similarly significantly affect them.

This right does not apply if:

- The processing is necessary for entering into or performing a contract between the data subject and the Data Controller.
- The data subject has given explicit consent.
- Automated decision-making is permitted by law.
- Processing is necessary for establishing, exercising, or defending legal claims.

## **6. Automated Decision-Making and Profiling**

The Data Controller declares that it does not use automated decision-making or profiling concerning the personal data of data subjects.

## **7. International Data Transfers**

The Data Controller does not transfer personal data of data subjects to third countries or international organizations.

## **8. Contacting the Data Controller**

When contacting the Data Controller, any received emails and their content (including, but not limited to, the sender's name, address, date, and attachments) will be stored by the Data Controller for 5 years before deletion.

## **9. Data Storage and Security**

The Data Controller stores personal data on paper in their own custody, and electronically on a password-protected computer and in a secure, GDPR-compliant cloud service (Google services). The computer is portable and is always protected by password and encryption.

**Exceptions:** Data stored by data processors engaged by the Data Controller, which are kept at the respective data processors' premises.

The Data Controller uses an IT system that ensures:

- **Data integrity:** The authenticity of stored data can be verified.
- **Authenticity:** Data processing is conducted with integrity.
- **Availability:** Data is accessible to authorized persons.
- **Confidentiality:** Protection against unauthorized access.

The protection of data particularly applies to:

- Unauthorized access
- Modification
- Transfer
- Deletion
- Public disclosure
- Accidental damage
- Accidental destruction
- Inaccessibility due to technological changes

For the protection of electronically processed data, the Data Controller applies security measures in line with the current state of technology. Risk assessment plays a crucial role in determining security measures. The IT protection system ensures that stored data cannot be directly linked to or associated with data subjects unless required by law.

The Data Controller ensures that:

- Authorized personnel can access data when needed.
- Only authorized individuals can access information.
- The accuracy and completeness of information and processing methods are protected.

The Data Controller and its data processors provide protection against IT threats such as fraud, espionage, viruses, hacking, vandalism, and natural disasters. Protective measures include:

- **Password-protected access** to IT systems
- **Regular data backups**

- **TLS-encrypted HTTPS protocol** for secure data transmission between the website and users
- **Antivirus and firewall protection** for data security

Messages sent via the internet—regardless of format—are particularly vulnerable to cyber threats, including unauthorized access, data modification, or illegal activities. The Data Controller takes all reasonable measures to mitigate such risks, using monitoring systems to detect security deviations, gather evidence on security incidents, and evaluate preventive measures' effectiveness.

## **10. Procedural Rules**

If the Data Controller receives a request under Articles 15-22 of the GDPR, it will provide written information to the data subject as soon as possible, but no later than **30 days**, regarding the measures taken based on the request.

If the complexity of the request or other objective circumstances justify it, this deadline may be extended **once** by a maximum of **60 days**. The Data Controller will notify the data subject in writing of the extension, providing a justification.

The Data Controller provides the requested information **free of charge**, except in the following cases:

- The request is repeated without any substantial changes in content.
- The request is clearly unfounded.
- The request is excessive.

In these cases, the Data Controller has the right to:

- **Reject the request.**
- **Charge a reasonable fee** for fulfilling the request.

The data subject has the right to obtain a copy of the personal data processed by the Data Controller. The first copy is provided free of charge; for any additional copies, the controller may charge a reasonable administrative fee. By default, the copy will be

provided electronically, but in exceptional cases it may also be made available in paper format.

The Data Controller notifies all recipients with whom the personal data was previously shared about **corrections, deletions, or restrictions**, unless this proves impossible or requires disproportionate effort.

If the data subject requests, the Data Controller shall provide information about the recipients to whom their data has been transferred.

The response to a request will be provided in **electronic form**, unless:

- The data subject **specifically requests a different format**, and it does not result in unreasonable additional costs for the Data Controller.
- The Data Controller **does not have the data subject's electronic contact details**.

## **11. Exercising the Right of Access**

Data subjects can submit requests for access, rectification, or deletion of their data through the following contact details:

- **Email:** barbaracsala9@gmail.com
- **Postal Address:** 1117 Budapest, Bölcső utca 11. 2./2.

The Data Controller will respond to such requests within **30 days** and ensure compliance with the relevant legal provisions.

## **12. Internal Complaint Procedure**

Data subjects can submit complaints directly to the Data Controller via the following contact details:

- **Email:** barbaracsala9@gmail.com
- **Postal Address:** 1117 Budapest, Bölcső utca 11. 2./2.

The Data Controller will investigate all complaints and respond as quickly as possible, but no later than **30 days**.

### 13. Compensation

If a data subject suffers material or non-material damage due to a violation of data protection laws, they have the right to claim **compensation** from the **Data Controller and/or the data processor**.

If both the **Data Controller and data processor(s)** are involved in the violation, they are **jointly liable** for the resulting damages.

The **data processor is only liable** if it has violated **specific data protection regulations applicable to processors** or if the damage occurred due to **failure to comply with the Data Controller's instructions**.

The Data Controller and data processors are only liable if they cannot **prove** that they were **not responsible** for the event or circumstances that caused the damage.

### 14. Rights of Data Subjects

If a data subject wishes to lodge a complaint regarding data processing, they can do so at the **National Authority for Data Protection and Freedom of Information (NAIH)**:

- **Address:** 1055 Budapest, Falk Miksa utca 9-11.
- **Website:** [www.naih.hu](http://www.naih.hu)
- **Phone:** +36 1 391 1400
- **Email:** [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

### 15. Cooperation with Authorities

If the Data Controller receives an **official request** from **competent authorities**, it is legally obligated to **disclose the required personal data**.

The Data Controller will only transfer data that is **strictly necessary** to achieve the **specified purpose** of the requesting authority.

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