

PRIVACY AND DATA PROCESSING NOTICE

1. PURPOSE AND SCOPE OF THE PRIVACY NOTICE

1.1. The purpose of this Privacy Policy is to set out the data protection and processing principles applied by SolutionInYou (name: Tímea Kertész EV, hereinafter referred to as "Data Controller") and the Data Controller's data protection and processing policy, which the Data Controller acknowledges as binding on itself.

1.2. This Privacy Policy sets out the principles for the processing of personal data voluntarily provided by Users on the Website to use the services provided by the Data Controller.

1.3. In drafting the provisions of the Data Protection Notice, the Data Controller has taken particular account of the provisions on the protection of natural persons regarding the processing of personal data and on the free movement of such data.

1.4. Unless otherwise informed, the scope of this Privacy Policy does not cover services and data processing related to promotions, sweepstakes, services, other campaigns, content published by third parties other than the Data Controller, advertising on the Website referred to below or otherwise appearing on the Website.

1.5. Unless otherwise stated, the scope of the Privacy Notice also does not cover the services and data processing of websites, service providers to which there is a link on the website covered by the Privacy Notice. Such services shall be governed by the provisions of the third-party privacy policy of the service provider and the Data Controller shall not be liable for such processing.

2. DEFINITIONS OF TERMS

2.1. "Processing" means any operation or set of operations which is performed upon personal data or on sets of personal data, whether by automated means, such as collection, recording, organisation, structuring, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2.2. "Data controller" means the natural or legal person who, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of processing are determined by Union or Member State law, the controller or specific criteria for the designation of the controller may also be determined by Union or Member State law.

SolutionInYou

2.3. "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, 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.

2.4. "Sensitive personal data" (special categories of data): personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic or biometric data, health data (e.g. mental or physical condition), sex life or sexual orientation. Such data may be tangentially involved in coaching and mediation and are subject to specific rules.

2.5. "Processor" means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller. For the services referred to in this Privacy Notice, they may be Data Processors:

2.5.1. TudásPalota Kft. / TudásRét Bt.

Székhely: 6772 Deszk, Táncsics utca 24.

Cégjegyzékszám: 06-09-030008 / 06-06-017401

Adószám: 12162079-2-06 / 27471366-1-06

Activities: domain, business mail server, web hosting services

The Data Controller reserves the right to use additional data processors necessary for the technical operation of the service, which the User will be informed of by updating the Data Processing Notice.

2.6. "Data Breach" means a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

2.7. "Website": the website www.solution-inyou.com operated by the Data Controller.

2.8. "Service(s)" means the services operated by the Data Controller and provided by the Data Controller which are available through the Website.

2.9. "User" means a natural person who registers for the Services and, in doing so, provides the information listed below.

2.10. "Data subject's consent" means a freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she signifies his or her agreement to the processing of personal data concerning him or her by means of a statement or by an act unambiguously expressing his or her consent to be bound by the law.

2.11. "Profiling": any form of automated processing of personal data whereby personal data are used to evaluate certain personal aspects relating to a natural person, to analyse or predict characteristics associated with that person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

2.12. "Privacy Policy": this Privacy Policy of the Data Controller.

3. THE SCOPE OF THE PERSONAL DATA PROCESSED

3.1. When the User visits the Website, the IP address of the User is automatically recorded by the Data Controller's system.

3.2. Based on the User's choice, the Data Controller may process the following data in connection with the use of the Services available through the Website, in respect of certain Services:

3.2.1. Contact: name, e-mail address, telephone number

3.2.2. Newsletter: name, e-mail address. Currently, no newsletter is sent, but when the service is launched, the data will be processed solely based on the data subject's consent, with appropriate modifications to the Privacy Notice.

3.3. If the User sends an e-mail or postal letter (e.g. a message) to the Data Controller, the Data Controller records the User's e-mail address, if provided, the address and other data voluntarily provided by the User and processes it to the extent and for the duration necessary for the provision of the service.

3.4. Content editing:

During its content editing activities, the Data Controller processes the data of all natural and legal persons who have contributed to the production of the content, either as a source or by being linked to the edited content. In this case, the personal data most commonly processed by the Data Controller may include: the name, position, place of work, age, place of residence of the data subject, or other data indicating how the data subject relates to the subject matter of the edited content.

3.5. Notwithstanding the foregoing, it is possible that a service provider technically related to the operation of the Services may carry out data management activities on the Website without informing the Data Controller. Such activity shall not constitute Processing by the Controller. The Controller shall use its best efforts to prevent and filter such processing.

3.6. In case of coaching, mediation and other personal services, the Data Subject may voluntarily disclose data that are considered sensitive under the GDPR (e.g. mental state, work conflict, personal relationship information). Such data will be processed by the Data Controller only with the explicit, voluntary consent of the Data Subject, for the time strictly necessary for the provision of the service, in strict confidence, and will not be transferred to third parties or used for any other purpose.

4. THE ADDITIONAL DATA PROCESSED BY THE CONTROLLER

4.1. The Data Controller uses cookies on the Website to ensure the proper functioning of the Website, to enhance the user experience and for statistical analysis. Cookies are small data packets that the website places in the visitor's browser.

4.2. When you visit the Website, the Data Controller may use the following types of cookies:

- Functional (technical) cookies: necessary to ensure the basic functionality of the website. Their use does not require any specific consent.
- Statistical (analytical) cookies: these collect anonymous data about how visitors use the website (e.g. Google Analytics). They are used only with the consent of the data subject.
- Marketing cookies: used to serve targeted ads. SolutionInYou does not currently use cookies for marketing purposes.

When visiting the Website, the visitor will receive a cookie policy notice where he/she will have the option to accept or reject optional cookies. He/she can also change the settings at any time through his/her browser.

4.3. Cookie settings management

The User has the option to disable the use of cookies in his/her browser or to delete cookies already set. Please note, however, that if cookies are disabled, certain functions of the Website may not function properly.

4.4. Scope of data processed by cookies:

- Date of visit
- IP address
- Browser type, version
- Browsing history
- Number of page views, time

5. THE PURPOSES AND LEGAL BASIS OF THE PROCESSING

5.1. The purposes of the processing carried out by the Data Controller:

5.1.1. Contact us:

- contacting the User;
- the provision of services;
- managing and handling individual user requests;
- producing statistics and analyses;
- protect the rights of Users;
- the legitimate interests of the Data Controller.

5.1.2. Content editing:

- online content provision; provision of services
- protect the rights of Users;
- the legitimate interests of the Data Controller.

5.1.3. Subscribe to the newsletter:

- online content delivery;
- sending newsletters related to the provision of the SolutionInYou service;
- contacting the User;
- direct marketing or solicitation (e.g. newsletter, event notifications, etc.);
- protect the rights of Users;
- the legitimate interests of the Data Controller.

Subscription to the newsletter is voluntary and the Data Subject can unsubscribe at any time by using the "Unsubscribe" link at the bottom of the newsletters. The legal basis for sending the newsletter is the prior, explicit consent of the Data Subject (Article 6(1)(a) GDPR).

The newsletter service will only become active in the future, after its actual launch, with the prior and voluntary consent of the Data Subject. The Data Controller shall inform the Data Subjects in advance of the launch of the service and of the precise conditions of data processing.

5.2. The Controller will not use the Personal Data provided for purposes other than those described in these points.

5.2.1. The processing is based on the voluntary and duly informed declaration of the Users, which contains their explicit consent to the use of their Personal Data provided by them during the use of the Website and the Personal Data generated about them. In the case of processing based on consent, the User has the right to withdraw his/her consent at any time, without prejudice to the lawfulness of the processing prior to the withdrawal.

5.2.2. The Data Controller records the User's IP address when the User accesses the Website, in connection with the provision of the Service, regarding the legitimate interest of the Data Controller and for the lawful provision of the Service (e.g. to prevent unlawful use or to filter unlawful content), without the User's consent.

5.2.3. In addition to the User's voluntary consent, the legal basis for the processing of data in the context of the content service is, in certain cases, the provision of fundamental rights to information and expression of opinion, within the limits set by law.

5.2.4. The User warrants that, prior to providing or making available personal data about other natural persons (e.g. gifts) in the course of using the Services, the consent of the natural person concerned has been obtained lawfully and in accordance with applicable law.

5.2.5. All responsibility for the User Content provided by the User rests with the User. By providing his/her e-mail address and the data provided during registration, each User also assumes responsibility for using the Service from the e-mail address, address and data provided by him/her. With regard to this assumption of responsibility, any liability in connection with accessing the Service from an e-mail address and/or data provided shall be borne solely by the User who registered the e-mail address, address or other data and provided the data.

6. THE PRINCIPLES AND METHODS OF DATA PROCESSING

6.1. The Data Controller shall process Personal Data in accordance with the principles of good faith and fairness and transparency, as well as the provisions of applicable law and this Privacy Notice.

6.2. The Data Controller uses the Personal Data necessary for the use of the Services based on the consent of the User concerned and only for the purposes for which they are collected.

6.3. The Controller processes Personal Data only for the purposes set out in this Privacy Notice and in the applicable laws. The scope of the Personal Data processed shall be proportionate to the purpose of the processing and shall not go beyond that purpose. In all cases where the Data Controller intends to use the Personal Data for a purpose other than that for which it was originally collected, the Data Controller shall inform the User thereof and obtain his or her prior explicit consent or provide the User with the opportunity to object to such use.

6.4. The Data Controller shall not transfer the Personal Data it processes to third parties other than the Processors specified in this Privacy Notice.

6.5. The Data Controller shall ensure the security of Personal Data, take technical and organisational measures and establish procedural rules to ensure that the data collected, stored or processed are protected and to prevent their accidental loss, unlawful destruction, unauthorised access, unauthorised use, unauthorised alteration or unauthorised disclosure.

6.6. In view of the relevant provisions of the GDPR, the Data Controller is not obliged to appoint a Data Protection Officer.

7. THE DURATION OF THE PROCESSING

7.1. The Data Controller stores the automatically recorded IP addresses for a maximum of 30 days after their recording.

7.2. In the case of e-mails sent by the User for the sole purpose of contacting the Data Controller, the Data Controller will delete the e-mail address 90 days after the closure of the case referred to in the request, unless in a specific case the legitimate interest of the Data Controller justifies the continued processing of the Personal Data, until the Data Controller's legitimate interest has been established.

7.3. The data provided in course of the provision of the Services will be kept for 6 months from the end of the cooperation and then deleted, unless otherwise required by law.

8. THE RIGHTS OF THE USER AND HOW TO ENFORCE THEM

8.1. The User may request that the Data Controller inform him/her whether it processes the User's Personal Data and, if so, provide him/her with access to the Personal Data processed by the Data Controller, in particular with regard to:

- the purposes of the Processing;
- the categories of Personal Data concerned;
- the recipients or categories of recipients to whom or with whom the personal data have been or will be disclosed, including in particular recipients in third countries or international organisations;
- where applicable, the envisaged period of storage of the personal data or, if this is not possible, the criteria for determining that period;
- the User's right to request the Controller to rectify, erase or restrict the processing of personal data concerning him/her and to object to the processing of such personal data;
- the right to lodge a complaint with a supervisory authority;
- if the data were not collected from the data subject, any available information on their source;
- the fact of any automated decision-making, including pro\creation, and, at least in these cases, the logic used and clear information on the significance of such processing and the likely consequences for the data subject.

8.2. The User may request information about the processing of his/her Personal Data at any time in writing, by registered or certified mail sent to the address of the Data Controller or by e-mail to timea.k@solution-inyou.com.

8.3. The Data Controller shall consider a request for information sent by letter as authentic if the User can be clearly identified based on the request sent. A request for information sent by e-mail shall be considered authentic by the Data Controller only if the User sends it from the e-mail address provided.

8.4. The User may request the correction or modification of his/her Personal Data processed by the Data Controller.

8.5. Considering the purpose of the processing, the User may request the completion of incomplete Personal Data.

8.6. The Personal Data provided by the User in connection with a particular Service may be modified by sending an e-mail to the above e-mail address of the Data Controller, by clicking on the link at the end of each Newsletter, or by editing the account settings in the User's registered account. Once a request to modify personal data has been fulfilled, the previous (deleted) data can no longer be restored.

8.7. The newsletters sent by the Data Controller can be unsubscribed through the unsubscribe link in the newsletter. In case of unsubscription, the Data Controller will delete the User's Personal Data in the newsletter database.

9. DATA PROCESSING

9.1. The Data Controller uses the Data Processors named above in this Privacy Notice to perform its activities

9.2. Processors do not take independent decisions, they are only entitled to act in accordance with the contract concluded with the Data Controller and the instructions received.

9.3. The Data Controller can only control the operations of Data Processors with whom it has a direct contractual relationship. Large service providers (e.g. Google) that have independent data processing practices are governed by their own privacy policies, over which the Data Controller cannot exercise direct control, but which the Data Controller seeks to work only with trusted, GDPR-compliant service providers.

9.4. Processors are entitled to use an additional processor only with the consent of the Data Controller.

9.5. By accepting this Privacy Notice, the User expressly accepts and consents to the Controller transferring his/her Personal Data to the Processors.

10. POSSIBILITY OF DATA TRANSFER

10.1. Transfers to Processors as defined in this Privacy Notice may be made without the User's specific, case-by-case consent, as the User gives his/her explicit and unambiguous consent to such transfers by accepting this Privacy Notice. Unless otherwise provided by law, the disclosure of personal data to third parties or public authorities is only possible based on a decision by a public authority or with the prior express consent of the User.

10.2. The Data Controller is entitled and obliged to transmit to the competent authorities any Personal Data at its disposal and stored by it in accordance with the law, which Personal Data it is required to transmit by law or by a final and binding obligation of a public authority. The Controller shall not be held liable for such transfers and the consequences thereof.

10.3. The Data Controller shall keep records of data transfers for the purposes of monitoring the lawfulness of data transfers and providing information to the User.

11. CHANGES TO THE PRIVACY NOTICE

11.1. The Data Controller reserves the right to amend this Privacy Notice at any time by unilateral decision.

11.2. The relevant legislation and practices change from time to time. If the Data Controller decides to update this Privacy Notice, it will post the changes on the Website. In the event of a material change in the way the Controller processes the User's personal data, the Controller shall give prior notice to the User or, where required by law, obtain the User's consent prior to making such changes. The Controller strongly recommends that the User reads this Privacy Notice and keeps informed about the practices followed by the Controller. This Privacy Notice was last amended on May 15, 2025.

12. ENFORCEMENT OPTIONS

12.1. Any questions or comments related to data management can also be addressed to the Data Controller's staff at the e-mail address: timea.k@solution-inyou.com.

12.2. The User may directly contact the National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.; phone: +36-1-391- 1400; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu) with any complaints regarding the Data Processing.

12.3. In case of violation of the User's rights, he/she may take legal action. The court of law shall have jurisdiction to decide on the action. The action may also be brought, at the option of the person concerned, before the courts of the place of residence or domicile of the person concerned. Upon request, the Data Controller shall inform the User of the possibilities and means of legal remedy.

Budapest, May 15, 2025

12.3. A Felhasználó jogainak megsértése esetén bírósághoz fordulhat. A per elbírálása a törvényszék hatáskörébe tartozik. A per – az érintett választása szerint – az érintett lakóhelye vagy tartózkodási helye szerinti törvényszék előtt is megindítható. Az Adatkezelő kérésre a Felhasználót tájékoztatják a jogorvoslat lehetőségéről és eszközeiről.

Budapest, 2025. május 15.