

PRIVACY POLICY

1. Introduction

The purpose of this privacy policy (hereinafter: the "Policy") is to provide adequate and transparent information on the processing of personal data for users of the www.volfordanita.hu website and for the service provider's customers.

Governing laws: (a) Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (GDPR); (b) Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.).

For information about the Data Controller's processing for other purposes and on other subjects, please refer to documents separate from this Policy. If you have any questions, please do not hesitate to contact our colleagues.

2. Data Controller

ANIVERSUM AVANT LIMITED PARTNERSHIP
[i.e. ANIVERSUM AVANT BT.]
Registered office: 45 Fő street, 6784 Öttömös, Hungary
Company registration number: 06-06-016764
Tax number: 25333431-1-06
Represented by DR VOLFORD, Anita Adrienn, Managing Director

FREEDOM AND ABUNDANCE LIMITED LIABILITY COMPANY
[i.e. SZABADSÁG ÉS BŐSÉG KFT.]
Registered office: 1103 Budapest, 9. Petrőczy street, building A. floor 1., Door 4., Hungary
Company registration number: 01-09-420269
Tax number: 32364118-1-42
Represented by DR VOLFORD, Anita Adrienn, Managing Director

Phone number: +36-30/700-7422
E-mail: info.volfordanita@gmail.com

3. Definitions

"data subject" shall mean any natural person directly or indirectly identifiable by reference to specific personal data;

"personal data" shall mean data relating to the data subject;

"genetic data" shall mean personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;

"biometric data" shall mean personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;

"health data" shall mean personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his health status;

"consent" shall mean any freely given, specific, informed and unambiguous indication of the data subject's wishes, by which he, by a statement or a clear affirmative action, signifies agreement to the processing of personal data relating to him;

"controller" shall mean means the natural or legal person or organisation without legal personality which, within the framework laid down in an Act or in a binding legal act of the European Union, alone or jointly with others, determines the purposes of the processing of data, makes decisions concerning processing (including the means used) and implements such decisions or has them implemented by a processor;

"processing" shall mean any operation or set of operations which is performed on data, regardless of the procedure applied; in particular collection, entering, recording, organisation, storage, alteration, use, retrieval, data transfer, disclosure, alignment or combination, blocking, erasure and destruction, as well as the prevention of the further use of data; taking photos and making audio or visual recordings, as well as the recording of physical characteristics suitable for identification (such as fingerprints or palm prints, DNA samples and iris scans);

"transfer" shall mean the making available of data to a specified third party;

"technical processing" shall mean the totality of processing operations performed by the processor acting on behalf of, or instructed by, the controller;

"processor" shall mean a natural or legal person, or an organisation without legal personality which, within the framework and under the conditions laid down in an Act or in a binding legal act of the European Union, acting on behalf, or according to the instructions, of the controller, processes personal data;

"third party" a natural or legal person, or an organisation without legal personality other than the data subject, controller, processor and persons who, under the direct direction of the controller or processor, carry out operations aimed at processing personal data;

"personal data breach" shall mean a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised transfer or disclosure of, or unauthorised access to, personal data transferred, stored or otherwise processed;

"profiling" shall mean any form of automated processing of personal data which is aimed at evaluating, analysing or predicting certain personal aspects relating to a data subject, in particular aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

"recipient" shall mean a natural or legal person, or an organisation without legal personality, to which the controller or the processor makes personal data available;

"EEA State" shall mean a Member State of the European Union and another State party to the Agreement on the European Economic Area, and a State whose nationals enjoy the same status as nationals of a State

party to the Agreement on the European Economic Area under an international treaty concluded between the European Union and its Member States and a State not party to the Agreement on the European Economic Area;

"*third country*" shall mean any state that is not an EEA state;

"*international organisation*" means an organisation governed by public international law, or its subsidiary organs, or any other body which is established by or under an agreement between two or more States.

4. Privacy Policy

Personal data may only be processed for clearly specified, legitimate purposes, for the exercise of rights and the performance of obligations. At all stages of processing, the processing must be compatible with the purpose of the processing and the collection and processing must be fair and lawful ("*lawfulness, fairness and transparency*").

Only personal data that is necessary for the purpose of the processing and is suitable for achieving that purpose may be processed. Personal data may only be processed to the extent and for the duration necessary for the purpose ("*purpose limitation*")

The personal data must be adequate, relevant and limited to what is necessary for the purposes for which they are processed ("*data minimisation*").

The processing must ensure that the data are accurate, complete and, where necessary for the purposes for which they are processed, kept up to date, and that the data subject can be identified only for the time necessary for the purposes for which they are processed ("*accuracy*").

Personal data must be 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 shall retain that quality during processing for as long as their link with the data subject can be established. The link with the data subject may be re-established if the controller has the technical conditions necessary for such re-establishment ("*limited storage*").

Adequate security of personal data must be ensured by the application of appropriate technical or organisational measures during processing, in particular measures to protect against unauthorised or unlawful processing, accidental loss, destruction or damage ("*integrity and confidentiality*").

The Controller is responsible for compliance with the above policies and must be able to demonstrate such compliance ("*accountability*").

5. Information

Please note in advance that in the case of processing based on the data subject's consent, the data subject has the right to withdraw his or her consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.

5.1. Pre-registration (booking)

The purpose of data processing is to ensure access to services, to prepare the contract between the contracting parties, to simplify the communication and the administrative process. The legal basis for the processing is the voluntary consent of the client concerned (Article 6(1)(a) GDPR / Article 9(2)(a) GDPR), which is deemed to have been given by the client's completion of the data request form available on the website and the express acceptance of the relevant declarations. The following personal data must be provided when booking an appointment: name, (billing) address, telephone number, e-mail address, data concerning the health and physical condition of the client, the date of the consultation, the method and subject of the consultation chosen, the name and address of the treating physician, the date range for accepting the declarations. The Data Controller shall process the registration data of clients for a maximum period of 5 years from the date of their collection, except for the data set strictly necessary for the fulfilment of accounting obligations.

5.2. Use of services

In order to provide a high and complete level of service, the Data Controller processes the contact and care data voluntarily provided by the clients and other categories of information recorded by the Data Controller's intermediary (management notes), which are indispensable for the above reasons, in order to ensure the efficient management and consultation process. The legal basis for the processing is the provision of the service, i.e. the performance of an individual contract between the parties, pursuant to Article 6(1)(b) GDPR by way of voluntary consent of the customer concerned (Article 6(1)(a) GDPR / Article 9(2)(a) GDPR). The Data Controller shall process the registration data of clients for a maximum period of 5 years from the date of their collection, except for the data set strictly necessary for the fulfilment of accounting obligations.

5.3. Links to external websites

The website may also contain links to external websites. If you wish to use content from third (external) parties on our sites, you may be required to accept the specific terms and conditions of those third parties, including the terms and conditions regarding the use of cookies, over which we have no control. The Data Controller is not responsible for the content, privacy and information practices of external websites accessible from this website. If the Data Controller becomes aware that a page linked to by it or the linking violates any law, it will immediately remove the link from the website.

5.4. Cookie tools, tracking (general)

To make the website more attractive to you and to enable you to use certain features, we use cookies. These are small text files that are stored on your device. Some of the cookies we use are deleted when you stop browsing, i.e. when you close your browser (so-called temporary cookies), while other cookies remain on your device and allow us to recognise your browser on subsequent visits (permanent cookies). When you visit the website for the first time, you will be informed about the placement of cookies and you will be able

to decide whether you accept their use on your device. If you do not accept cookies, the usability of the website may be limited.

5.5. Social plugins

You can also use the services of other social networking sites on the website. When you use the plug-ins, your web browser establishes a direct connection with the servers of the social network. This will inform the relevant service provider that your web browser has gained access to our site. The log files (together with the IP address) are then transmitted directly from your web browser to the server of the service provider, where they may be stored. The service provider or its server may be located outside the European Union or the EEA (e.g. in the United States). The built-in modules are standalone plug-ins used by social network providers. Therefore, the Data Controller has no control over the data they collect and store. Information on the purposes and scope of the collection, further processing and use of data, as well as your privacy rights and the settings options supporting the protection of your personal data, can be found in the privacy notices of the relevant social networking sites. If you do not want the social networking service provider to link the data collected from your use of the website to your user account, you must log out of your account before visiting our website.

5.6. Community sites

The Data Controller may operate social fan pages for easy accessibility, through which users may interact with the Data Controller. You can view our community pages and news feeds without registering. Personal data of registered users, followers, fans may be processed during visits to and activities on the community pages. The Data Controller may collect this data either directly from the data subject or in processed form by the community platform provider. In such cases, the legal basis for processing is your consent and the scope of the data processed is the same as the scope of the Community data made public by you. The duration of processing for these purposes is until consent is withdrawn. There are no consequences for failure to provide data. The data of visitors to the social networking sites of the Data Controller will not be compiled into a database and will not be used for purposes other than those for which they were collected. In accordance with the decision of the Court of Justice of the European Union in the preliminary ruling procedure C-210/16, the processing of personal data relating to the official profile page is subject to joint processing between the data controller organs and the community service provider.

5.7. Newsletter

The purpose of the data processing in connection with the newsletter service is to inform the recipient about the services, events and news of the Data Controller on a general or personalised and regular basis. The subscription to the newsletter is based on voluntary consent. The data subjects are natural persons who wish to receive the newsletter of the Controller on a regular basis and therefore subscribe to the newsletter service by providing their personal data. The scope and purpose of the processing of the data processed are: name (contact); e-mail address (sending of the newsletter); date of acknowledgement of receipt of the information (proof). The Controller or its designated processor processes the personal data collected for this purpose only until the data subject unsubscribes from the newsletter list or, in the case of a request for confirmation of consent, until the time limit for providing confirmation expires without result. The processing of data is

mainly carried out electronically, but the possibility to subscribe and unsubscribe is also available on paper for the data subjects. The data source is the data subject who subscribes.

5.8. Contact

The user has the possibility to send a direct request or message for contacting. No personal data other than your name and e-mail address is required to send the message, but if the user enters such data in the text of the message, we will process it in the context of the processing of the request. Please note that in the message you send, you should only provide information that you expressly wish to be disclosed to the Data Controller. In order to ensure effective communication and customer history, we will keep the data for 5 years or until consent is withdrawn after the request has been answered. The provision of data is voluntary, but failure to provide data or incomplete data will result in the Data Controller not responding to the request. The purpose of the processing is for the Controller to maintain contact with the data subject and to provide direct access to its customer service. The data source is the data subject who initiated the contact.

5.9. Billing

In order to fulfil its accounting and tax obligations, the Data Controller is obliged to process data in relation to the services it sells. The purposes of the processing are: invoicing, invoice transmission, contact management, and the provision of information required by accounting and tax legislation. The legal basis for the processing is the fulfilment of the legal obligations of the Data Controller (Article 6(c) GDPR) pursuant to Article 169(2) of Act C of 2000 on Accounting. Data processed: billing name, billing address, ordered product/service, quantity, unit price, net invoice amount, VAT, invoice image. The accounting voucher data are stored in the billing, customer service and business databases of the service provider. Duration of data processing: the Data Controller is obliged to keep the accounting records (and the personal data contained therein) for eight years pursuant to Section 169 (2) of the Accounting Act.

5.10. Assessments

The client may evaluate the activities of the Data Controller after using the service. The response is voluntary and, if the client explicitly requests it, anonymous. If the client expressly consents, his/her opinion will be uploaded on the website by the Data Controller for the sole purpose of informing (future) clients about the quality and standard of the service. The purpose of the processing is to obtain the opinion of the booked service, to improve the services of the Data Controller and to promote the services. The legal basis for the processing is the consent of the data subject, which is deemed to have been given when the evaluation is submitted (Article 6(1)(a) GDPR). The following personal data may be recorded in the context of the evaluation: name of the professional involved, date of the evaluation, content of the opinion, name/identifier to be displayed next to the opinion, as you provide it (real name or freely chosen name, anonymous).

6. Data transmission

Personal data may only be accessed by employees of the Data Controller, other than contracted data processors, who shall have the necessary knowledge of the data to perform their duties. The contracted processor shall carry out the processing in accordance with the Controller's instructions, shall not take any

substantive decisions concerning the processing, shall process the personal data coming to his/her knowledge only in accordance with the Controller's instructions, shall not process the personal data for his/her own purposes, and shall store, preserve and keep confidential the personal data in accordance with the Controller's instructions. The processor shall not engage any other processor without the prior written authorisation, on a case-by-case basis or in general, of the Controller. The Data Controller shall not transfer your personal data directly to a third country or international organisation, but may use services hosted on servers in third countries. Please note that the Controller may be required by a court, prosecutor, investigating authority, law enforcement authority, administrative authority or other bodies authorised by law to provide information or data. In order to fulfil its legal obligation to provide such mandatory data, the Data Controller shall only provide the personal data that are indispensable for the purpose of the request. Permanent, external service providers used for the processing of the data:

Data processor	Contact	Activity
Google LLC	https://policies.google.com/privacy	web analytics, correspondence
Touch Me Soft doo (Amelia)	www.wpamelia.com/privacy-policy/	appointment booking system
Rackhost Zrt.	www.rackhost.hu/contact	hosting provider
MailerLite Limited	https://www.mailerlite.com/gdpr-compliance	newsletter provider
Erika Irén Horváth EV	NA	accounting
KBOSS.hu Ltd.	www.szamlazz.hu/	account management system
Franciska Szalai EV	NA	web development

7. Data security, automated decision-making

The Data Controller stores personal data in its secure IT system, exceptionally keeping paper records. The Data Controller shall ensure the security of the data in a risk-appropriate manner and shall take the technical and organisational measures and establish the procedural rules necessary to enforce the GDPR and other data protection and confidentiality rules. The Data Controller shall protect the data by risk proportionate measures against, in particular, unauthorised access, alteration, transmission, disclosure, erasure or destruction, accidental destruction or damage, and inaccessibility resulting from changes in the technology used. In accordance with Article 13(2)(f) of the GDPR, we hereby inform you that the Data Controller does not carry out automated decision-making, including profiling, in the course of its processing activities.

8. Rights and exercise of rights

You may exercise the rights listed in the following points by making a request to the Data Controller. The contact details of the Data Controller are set out in point 2 of this Policy. The Data Controller shall comply with the data subject's request without undue delay, but no later than one month after receipt of the request, unless this time limit is extended by a further two months in view of the complexity or number of the requests.

8.1. Information and right of access

The data subject has the right to receive feedback from the Data Controller on whether his or her personal data are being processed. If his or her personal data are being processed, he or she has the right to receive detailed information about the processing of his or her personal data, including the categories of personal data processed in relation to him or her. The Data Controller shall provide the data subject with a copy of the personal data which are the subject of the processing. The information shall be provided free of charge if the data subject has not already submitted a request for information to the Controller in the current year for the same set of data. The Controller may charge a reasonable fee based on administrative costs for any additional information requested by the data subject.

8.2. Right to rectification

The data subject shall have the right to have the Data Controller rectify the inaccurate personal data relating to him or her, upon his or her request and without undue delay. The Data Controller shall correct personal data if they are inaccurate and the correct personal data is available to him or her. Taking into account the purposes of the processing, the data subject shall have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

8.3 Right to erasure ("right to be forgotten")

The data subject shall have the right to have the Data Controller erase the personal data relating to him or her, upon his or her request and without undue delay. The Controller may comply with this request where the personal data are no longer necessary for the purposes for which they were collected or otherwise processed. The erasure of personal data relating to the data subject shall also be carried out where the data subject objects to the processing and there are no overriding legitimate grounds for the processing on the part of the Controller or a third party. The Data Controller shall also erase personal data where the personal data have been unlawfully processed or where the personal data must be erased in order to comply with a legal obligation under Union or Hungarian law applicable to the Data Controller. Please note that personal data may not be erased where it is necessary to comply with a legal obligation, to fulfil a legal obligation to preserve personal data or to establish, exercise or defend a legal claim.

8.4. Right to restriction of processing

The data subject shall have the right to obtain, at his or her request, the restriction of processing by the Controller if one of the following conditions is met:

- the data subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the Controller to verify the accuracy of the personal data;
- the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- the Controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or the data subject has objected to the processing; in which case the restriction shall apply for the period until it is established whether the legitimate grounds of the Controller override the legitimate grounds of the data subject.

Where processing is restricted on the basis of the above, such personal data may be processed, except for storage, only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the Union or of a Member State. The Data Controller shall inform any recipient to whom or with which it has disclosed the personal data of the rectification, erasure, blocking or restriction of processing, unless this proves impossible or involves a disproportionate effort.

8.5 Right to data portability

The data subject shall have the right to obtain the personal data concerning him or her which he or she has provided to the Controller in a structured, commonly used, machine-readable format and the right to transmit such data to another controller without hindrance by the Controller, where the processing is based on consent and the processing is automated. In exercising the right to data portability, the data subject shall have the right to request, where technically feasible, the direct transfer of personal data between controllers. The exercise of this right shall be without prejudice to the right to erasure. That right shall not apply where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The exercise of the right shall not adversely affect the rights and freedoms of others.

8.6. Right to object

The data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to processing of his or her personal data based on legitimate interest or if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, including profiling based on those legal bases. In such a case, the Controller may no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

8.7 Right to take action against automated decision-making

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. This provision shall not apply where the decision:

- is necessary for the conclusion or performance of a contract between the data subject and the Controller;
- is permitted by Union or Member State law applicable to the Controller which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or
- is based on the explicit consent of the data subject.

The Controller shall ensure that the data subject has at least the right to obtain human intervention by the Controller, to express his or her views and to object to the decision.

8.8. Complaints and judicial redress

The data subject shall have the right to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information as supervisory authority in relation to or in connection with the processing or to initiate civil court action directly before the competent court against the Data Controller.

Name: Hungarian National Authority for Data Protection and Freedom of Information Authority

Head office: 1055 Budapest, Falk Miksa utca 9-11.

Address for correspondence: 1363 Budapest, Pf. 9.

Phone: +36 1 391 1400

Fax: +36 1 391 1410

E-mail: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>

The data subject can also bring the case before the competent court of the place where you live or stay, if you choose. A person who does not otherwise have legal capacity may also be a party to the action. The supervisory authority may intervene in the court proceedings to ensure that the data subject is successful. However, before lodging a complaint or initiating any civil court proceedings, it may be useful for the data subject to make his or her grievance known directly to the Controller by means of a non-formal request sent to any of the contact details of the Controller indicated in this Policy.

9. Final provisions

The Controller does not verify the personal data provided to it. The user is solely responsible for the accuracy and timeliness of the data provided. If the data subject does not provide his/her own personal data, but the personal data of a third party, he/she must have the appropriate legal basis to do so.

The Data Controller will review the content of the Policy regularly and reserves the right to unilaterally amend it at any time at its discretion and in accordance with the content of applicable law. Any changes to

the Policy will take effect upon publication. If the changes affect the processing based on your consent, we will, if necessary, ask you to confirm them again.

This Privacy Policy is drafted in Hungarian and English language. In case of any discrepancies between the Hungarian and English texts, the Hungarian text shall prevail.

Effective: from 27 March 2024