

## DATA PROCESSING NOTICE

In accordance with the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR) and the Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter: Info Act), Szenetes-Hajler Brigitta EV provides the following information to patients registering with her regarding the processing of their data.

### 1. Data Controller

Szenetes-Hajler Brigitta EV.

Registered office: 1094 Budapest, Márton utca 36-40. 4/45.

Tax number: 76196731-1-43

Phone: +36303896522

Email: [szenibrigitta@gmail.com](mailto:szenibrigitta@gmail.com)

(hereinafter: Data Controller)

The personal data processed by the Data Controller may be accessed by the Data Controller's employees to the extent necessary to achieve the data processing purposes defined in point 2.

### 1. Legal Basis, Purpose, Duration, and Scope of Data Processed

The Data Controller processes personal data for the following purposes and durations:

Type of Data Processing	Legal Basis for Data Processing	Scope of Data Processed	Purpose of Data Processing	Duration of Data Processing
Processing of patients' contact data	Performance of contract (GDPR Article 6 (1)(b))	name, address, email address, phone number, data of legal representative	Communication related to the provision of psychological services	5 years from the provision of the service due to the general statute of limitations regulated in the Civil Code.
Processing of data related to patients' condition	Consent (GDPR Article 6 (1)(a))	medical history, clinical history, diagnosis, treatment details	Provision of psychological services (performed by a clinical psychologist)	Until withdrawal of consent. In the absence thereof, 30 years.
Processing of invoicing data	Compliance with legal obligation (GDPR Article 6 (1) (c))	name, address, email address	Fulfillment of the invoicing obligation prescribed by the Accounting Act.	8 years from the issuance of the invoice as per the Accounting Act.

## 1. Data Processors

The Data Controller transfers the data to the following data processors for processing.

The Data Processors carry out the data processing in accordance with the Data Controller's instructions, may not make substantive decisions regarding the data processing, may process the personal data that come to their knowledge exclusively in accordance with the Data Controller's instructions, may not carry out data processing for their own purposes, and are obliged to store, retain, and delete the personal data in accordance with the Data Controller's instructions. During the data processing, the data may be accessed by the employees of the data processors.

<b>Name of Data Processor</b>	<b>Address of Data Processor</b>	<b>Data Processing Activity</b>	<b>Data Affected by Processing</b>
Bányiné Kiss Gabriella EV.	1213 Budapest Retyezáti út 23.	Accounting	name, address, email address
Szenetes-Hajler Brigitta EV.	1094 Budapest, Márton utca 36-40. 4/45.	Processing of clients' data	name, address, email address, phone number
Google Ireland Ltd.	Gordon House, Barrow Street, Dublin 4, Ireland	Secure cloud-based storage data	name, address, email address, phone number

## 1. Data Transfer

The Data Controller does not transfer the data to any third parties.

### 1. Rights of the Data Subject, Remedies

**Right of access:** The Data Subject is entitled to request information from the Data Controller as to whether or not personal data concerning him or her are being processed. The Data Subject is entitled to access the personal data processed by the Data Controller.

The Data Subject is also entitled to access the information contained in this notice.

**Right to rectification:** The Data Subject is entitled to have inaccurate personal data concerning him or her rectified by the Data Controller without undue delay, or to request the completion of incomplete personal data.

**Right to erasure ("right to be forgotten"):** The Data Subject is entitled to obtain from the Data Controller the erasure of personal data concerning him or her without undue delay upon request. In case of a deletion request, the Data Controller examines the exact legal basis of the data processing (whether there is any other legal basis besides consent), and if the conditions for deletion are met, deletes the data. In case of deletion, the Data Controller ensures that all those who received the data through the Data Controller also delete them.

Right to restriction of processing: The Data Subject is entitled to request the restriction of processing if he or she contests the accuracy of the personal data, objects to the erasure of the data in case of unlawful processing, the Data Controller no longer needs the data but the Data Subject requires them for the establishment, exercise, or defense of legal claims, or the Data Subject has objected to the processing. The Data Controller informs the Data Subject in advance of the lifting of the restriction. The Data Controller informs all recipients to whom the personal data have been disclosed about the restriction.

Right to data portability: The Data Subject is entitled to receive the personal data concerning him or her in a structured, commonly used, machine-readable format and to transmit those data to another controller (or have them transmitted by the controller if technically feasible). This right applies where the processing is based on consent or contract and the processing is carried out by automated means.

Right to object: The Data Subject is entitled to object at any time, on grounds relating to his or her particular situation, to processing of personal data concerning him or her if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of public authority vested in the Data Controller, or if the legal basis for processing is the legitimate interest of the Data Controller or a third party (including profiling).

With regard to the Data Controller's direct marketing (sending advertising offers) and profiling activities, the Data Subject may object at any time.

The Data Controller provides the requested information in writing as soon as possible (without undue delay), but at the latest within one month from the submission of the request, and deletes the data in case of withdrawal of consent. In case of rectification or erasure, the Data Controller informs all recipients to whom the data have been disclosed.

If the Data Controller is unable to comply with the Data Subject's request, it informs the Data Subject thereof within one month.

The Data Controller informs the Data Subjects that the withdrawal of consent to the processing of data does not affect the lawfulness of processing based on consent before the withdrawal.

The Data Subject may exercise his or her rights related to data processing at the contact details specified in point 1 of the Data Controller.

In case of a legal remedy, the Data Subject may turn to the National Authority for Data Protection and Freedom of Information (NAIH) (1055 Budapest, Falk Miksa u. 9-11, postal address: 1363 Budapest, Pf.: 9., [www.naih.hu](http://www.naih.hu), phone: +36 (1) 391-1400, fax: +36 (1) 391-1410, [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)), or, at his or her choice, to the court competent based on the registered office of the Data Controller, the residence or place of stay of the Data Subject.

## 1. Data Security

The Data Controller carries out the data processing in a way that ensures the protection of the Data Subjects' privacy during the processing. The Data Controller protects the data with information technology solutions, in particular against unauthorized access, alteration, transmission, public disclosure, deletion or destruction, as well as accidental destruction and damage, and against becoming inaccessible due to changes in the applied technique.

Budapest, 2026.01.19.