

# Privacy Policy

## Privacy Policy and Processing

### 1. The data controller:

Name: Adelaida-SA Ltd.

Location and postal address: 1182 Budapest, Cziffra Gy. u. 21A

Registry authority: Pest Megyei Cégbíróság.

Registration number: 01-09-952329

VAT number: 23087608-1-43

E-mail: [elektrahatzopoulos@gmail.com](mailto:elektrahatzopoulos@gmail.com)

Website addresses: [helektrahealing.com/en/](http://helektrahealing.com/en/)

Phone number: +36 3, 74 35 497

Name of hosting provider: UNAS Online Kft.

Address of hosting provider: 9400 Sopron, Kőszegi út 14.  
[unas@unas.hu](mailto:unas@unas.hu), [+36-99/200-200](tel:+3699200200)

### 1. The scope of policy

2. This directive on privacy policy and processing (hereafter: policy), covers the data controller's personal processing and all employees of the controller.

### III. The purpose of policy

1. The purpose of this policy is to ensure the protection of personal data under the basic law and the implementation of self-determination as regards information. Furthermore, defining the governing rules of data security and data processing, in relation to the personal data managed by the controller during the processing.

#### 1. Directive on privacy used by the data controller

1. The controller highlights the importance of respect for self-determination of the data subjects. The controller shall keep confidential all personal data, and take all reasonable security, technical and organizational measures to guarantee personal data breach.
2. The controller is committed to ensuring that all data processing which is related to his or her activities, comply with the requirements of the policy and the existing laws.
3. The controller is entitled to modify the policy unilaterally.
4. In the case of modification the policy, the changes will be published [helektrahealing.com](http://helektrahealing.com), at least eight (8) days prior to the entry.
5. The principles of processing in accordance with the laws on data protections, especially the following ones:
  1. The Fundamental Law of Hungary;
  2. Law CXII. of 2011 on the right to self-determination as regards information and freedom of information;
  3. Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR);
  4. Law V. of 2013 on the Civil Code;
  5. Law I. of 2012 on the Labour Code (hereafter: Lc.);
  6. Law XLVII. of 2008 on the Act on the Basic Requirements and Certain Restrictions of Commercial Advertising;
  7. Law C. of 2003 on the Electronic Communications.
6. The controller shall treat the personal data only on the purposes of processing with the consent of the data subjects and under legal provisions.
7. Before collecting, recording and processing of personal data, the controller shall take appropriate measures to provide the purposes, methods and principles relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language.
8. In all cases where data collection, recording and processing are not mandated by national legislation, the controller shall notify the data subjects to the volunteering of providing such data.
9. In case of mandatory disclosure, it shall indicate the law on data processing.
10. In all cases where the controller tends to use personal data from the original purpose of data recording to another purpose, shall inform the data subjects, ask for prior consent and gives the opportunity to the data subject to prohibit the usage.
11. During the data collection, data recording and data processing of personal data, the controller shall observe the legal requirements. The controller shall inform the data subjects about the activities by electronic mail, as required.

#### 1. Definitions

1. „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;
2. „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;
3. „profiling”: means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
4. „filing system”: means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis;
5. „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;

6. „processor”: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
7. „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 4.5.2016 EN Official Journal of the European Union L 119/33 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;
8. „third party”: means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;
9. „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;
10. „personal data breach”: 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;
11. „data concerning health”: means 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 or her health status;
12. „supervisory authority”: means an independent public authority which is established by a Member State pursuant to Article 51.

#### 1. Principles relating to processing of personal data

1. Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject by the controller („lawfulness, fairness and transparency”);
2. Personal data is only for specified, explicit and legitimate purposes; („purpose limitation”);
3. Processing shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed („data minimization”);
4. Processing shall be accurate and, where necessary, kept up to date;
5. The controller need to do every reasonable step which 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”);
6. Data shall 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 („storage limitation”);
7. Processing shall be happened 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”);
8. The controller shall be responsible for, the personal data processing which need to be legitimate, and be able to demonstrate compliance with this legality („accountability”).

#### VII. Lawfulness of processing

1. Processing shall be lawful only if and to the extent that at least one of the following applies:
2. The data subject has given consent to the processing of his or her personal data for one or more specific purposes (hereafter: the processing based on a consent).
3. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (hereafter: the processing based on a contract).
4. Processing is necessary for compliance with a legal obligation to which the controller is subject (hereafter: processing based on a legal obligation).
5. Processing is necessary in order to protect the vital interests of the data subject or of another natural person (hereafter: processing based on vital interests).
6. 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 (hereafter: processing based on public interests).
7. Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child (hereafter: processing based on legitimate interests).
8. The controller always manages data processing based on a single legal basis in relation to handling a personal data set). The legal basis for the processing might change during the processing. The processing shall meet the requirement for the purpose of processing at each stage. Processing shall be legal, fair and transparent. Only personal data can be handled which is essential for the purpose of processing and suitable for achieving targets, and these data can only be handled until the target will not be reached.
9. Regarding the legally incapacitated or lacking full legal capacity minors, such consent shall be lawful only if and to the extent that consent is given or authorized by the holder of parental responsibility over the child.

#### VIII. Cookie usage

1. For the proper function of the website, it is essential to use cookies. By using this website, you consent to the use of cookies. We use cookies in certain areas of our website.

Cookies are files that store information on your hard drive or web browser. Cookies allow the website to recognize you, if you have visited the page already. Cookies helps us understand which part of our website is the most popular, as they let us know which pages the visitors enter and how much time do they spend there. By studying this, we can better adjust our website to your needs and provide a more varied user-experience for you.

#### XVI. Law enforcement options

1. Should you have any further questions or observations, please contact the data controller on the following e-mail address: [elektrahatzopoulos@gmail.com](mailto:elektrahatzopoulos@gmail.com) .
2. The data subjects may contact the Hungarian National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet street 22/c.; phone number: +36-1-391-1400; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) ; website: [www.naih.hu](http://www.naih.hu)) directly with their complaints regarding their data processing.
3. You have the right to turn to a court in any cases of infringement of the rights of a data subject. The final judgment belongs to the jurisdiction of the General Court.

#### XVIII. Entry into force and final provisions

1. It shall apply from 25 May 2021.