

# PRIVACY POLICY

The website of digitalreadiness.com (hereinafter referred to as the "Website") is operated by Thomas Klein Consulting Kft. (1162-Hungary, Budapest, Ákos u. 46.); e-mail: birotom@birotom.com) hereby informs visitors about the data processing on the website in accordance with Regulation (EU) 2016/679 of The European Parliament and of The Council on General Data Protection Regulation (hereinafter referred to as: GDPR).

Regarding the data processing of this website, Thomas Klein Consulting Kft. is the data processor.

## PRIVACY POLICY ON COOKIES

### 1) WHAT IS A COOKIE?

In order to provide customized services, our website uses anonymous user identification so called 'cookies'. Cookies are signals and information files suitable for unique identification and to store profile information. Service providers use cookies on the users' computers which enable to register web-browsing habits (ex. storing user preferences and settings, helping with logins, showing personalized adverts and analyzing website operation) of the user. These signals stored by the cookies are only suitable to identify users' devices, not the person who use the device.

The content of the cookies is strictly protected from third party access by high level encryptions. The cookies used by Thomas Klein Consulting Kft. do not contain any viruses and will not damage your computer.

We inform our users the cookies provided by our website require the data subject's consent according to the Act C of 2003 on Electronic Communications ('Eht.') and the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 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 (General Data Protection Regulation) ('GDPR').

Due to the above at the first visit on our website, a text appears on the bottom of the screen that informs you about that we use cookies. You may accept the usage of cookies by clicking on the 'I accept Cookies' button. You have the possibility to allow only specific categories by clicking on 'change settings' button. Our website does not use cookies without your consent or in the case of withdrawal.

### 2) THE COOKIES USED ON OUR SITE SERVE DIFFERENT FUNCTIONS AS YOU CAN CHECK ON THE DESCRIPTIONS.

1. **Strictly necessary (or required) cookies:** these cookies are necessary for the operation of the website, which allow the visitor to use the website.

2. **Performance (or analytical) cookies:** these cookies store information on how regular visitors use the webpage, or which is the most frequently accessed page, and also whether the visitor receives error messages from the webpage or not.
3. **Functionality (or preferences) cookies:** These cookies help the website to remember the previous settings of the visitor (such as, language setting, region, font size, etc.), to ensure a better and customized service.
4. **Targeting or advertising (or marketing) cookies:** these cookies help us to send ads to the visitor most closely related to his or her interest.

### 3) LEGAL BASE, DURATION OF DATA PROCESSING, THE DATA CONTROLLER, RIGHTS OF THE DATA SUBJECT

1. **Legal base of data procession related to the use of cookie:** the data subject's freely given consent by clicking on the 'I accept Cookies' button when a short information text appears below on the use of cookies.
2. **Period for which the personal data will be stored:** according to the type of cookies.
3. **Data Controller:** Thomas Klein Consulting Kft. Personal data shall only be accessible by Thomas Klein Consulting Kft. and data controllers authorized by Thomas Klein Consulting Kft.
4. **Rights of the data subject:** The data subject shall request to access, to rectify, to erase, to restrict the data processing, and also to withdraw consent at any time. Thomas Klein Consulting Kft. replies without any unnecessary delay but no later than one month after receiving the request, unfulfilled requests must be reasoned. Data subject is entitled to file a complaint to the Hungarian National Authority for Data Protection and Freedom of Information [22/c. Szilágyi Erzsébet fasor, Budapest 1125, Hungary; phone number: +36 (1) 391-1400, fax: +36 (1) 391-1410, email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [www.naih.hu](http://www.naih.hu)].

## 4) DATA PROCESSORS

Thomas Klein Consulting Kft. as data controller may use data processors for technical operations related to the use of cookies on this website.

Name of the data controlling company	Registry number, address	Data controlling task
Google Analytics (Google Ireland Limited)	Gordon House, Barrow Street, Dublin 4, Ireland	independent measuring and auditing of our website's visits
Hotjar Ltd.	registry number: C-65490; registered seat: Level 2, St. Julian's Business Centre, 3, Elia Zammit	recording user behavior and habits, also monitoring the browsing of our pages, to measure and survey the visits of our website
LinkedIn Corporation (LinkedIn Ireland Unlimited Company)	LinkedIn Ireland Unlimited Company Wilton Plaza Wilton Place, Dublin 2 Ireland	social media feature, analytical and targeting purpose
YouTube LLC	901 Cherry Avenue, San Bruno, CA 94066, United States	YouTube video embed and statistics
teucookie.eu/ Altamira Softworks	Altamira Softworks, s. r. o. Jaskový rad 167 831 03 Bratislava Slovakia  ID No. 44880774 VAT ID: SK2022861368	cookie consent management

## 5) MANAGING COOKIES

Users can erase cookies from their devices and the use of cookies can be banned in browsers. To manage cookies you need to visit your browser's Tools/Settings menu under Data Protection/History/Personal Settings by clicking on cookie tracking.

To operate the website, it is not necessary to approve the use of the cookies, but it increases the experience and the performance of the browsing. Cookies can be erased or blocked but in this case certain functions of the website might not work accordingly.

The information provided by the cookies will not be used to identify the user. Data stored by the cookies is strictly used for purposes described in this document.

If you do not approve the use of cookies, you have the right to block cookies or to set your browser to notify you when a website sends these files to your device. If you wish to know more on managing cookie or to specify your cookie settings, please check your browser's tips or helpdesk, or use the link below to turn on and off certain service provider's advertisements based on online behavior: <http://www.youronlinechoices.com/uk/your-ad-choices>

### **Help to manage cookies:**

Chrome: <https://support.google.com/accounts/answer/61416?hl=en>

Edge: Settings -> Special Settings-> Cookies („Authorizing cookies” / „Blocking all cookies” / “Blocking third-party cookies” or: F12 – Errorsearch – Cookies

IE11: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>;  
<https://support.microsoft.com/en-gb/help/260971/description-of-cookies>

Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

## **PRIVACY POLICY ON PERSONAL DATA PROVIDED FOR THE PURPOSE OF MAINTAINING CONTACT**

You can contact us on our website so we can provide further information in connection with the service we provide. The Thomas Klein Consulting Kft. as controller processes the personal data you provide us to contact you.

**The purpose of data processing:** To provide answers about the requests for information through the website and to maintain contact with the interested party related to the service we provide.

**Legal basis for the processing:** the data subject’s freely given consent.

**Scope of data processing:** Name, e-mail address, and any other information voluntarily provided by the interested party in his or her request which is indispensable for fulfilling such request.

**Period for which the personal data will be stored:** Until the consent of the data subject is withdrawn.

**Possible consequences of failure of provide such data:** The requests for information and questions will not be sent to Thomas Klein Consulting Kft. as well as the data subject’s personal data, according to which Thomas Klein Consulting Kft. will not be able to provide information and answers to the request.

The provided personal data will be sent to the employees of Thomas Klein Consulting Kft., particularly the employees responsible for the Sales department and thus become accessible.

Thomas Klein Consulting Kft. as data controller may use data processors for technical operations related to requests for information through the website.

We currently work with the following data processors:

- Web hosting and e-mail: 23VNet KFT. (1132 Budapest, Victor Hugo u. 18-22.)
- E-mail and Microsoft Teams online collaboration platform: Microsoft Office 365 (Microsoft Corporation, One Microsoft Way, Redmond WA 98052 USA).

The processor shall perform data processing tasks related to electronic communication and management by Thomas Klein Consulting Kft.

By accepting Privacy Policy, you explicitly consent to the data controller transmitting your data to the data processor and accordingly, explicitly acknowledge that the data processor may access the provided personal data when strictly necessary and to the extent required for the performance of their duty.

## **PRIVACY POLICY ON NEWSLETTERS AND DIRECT MARKETING**

The Thomas Klein Consulting Kft. as controller processes the personal data and the consent of data subject for direct marketing purposes, such as receiving newsletters.

**The purpose of data processing:** to build a business database and to send e-mail newsletters containing commercial advertising. Consent to direct marketing purposes shall be given only below the age of 16 years.

**Legal basis for the processing:** the data subject's freely given consent, and also the Article 6 (5) of the Act XLVIII of 2008 – on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities.

**Scope of data processing:** name, email address, consent to direct marketing purposes, and the system also stores the analytical data on subscribing and unsubscribing, opening and reading newsletters.

**Period for which the personal data will be stored:** Until the consent of the data subject is withdrawn, or until the fulfillment of the purpose, therefore until the disappearance of the newsletter activity.

**Possible consequences of failure of provide such data:** the data subject is not aware of the data provider's offers and details of the service provided. Thomas Klein Consulting Kft. as data controller may use data processors for technical operations related to direct marketing purposes and sending newsletters.

We currently work with the following data processors:

- Web hosting and e-mail: 23VNet KFT. (1132 Budapest, Victor Hugo u. 18-22.)
- E-mail and Microsoft Teams online collaboration platform: Microsoft Office 365 (Microsoft Corporation, One Microsoft Way, Redmond WA 98052 USA).

The processor shall perform data processing tasks related to send newsletters to recipients. By accepting Privacy Policy, you explicitly consent to the data controller transmitting your data to the data processor and accordingly, explicitly acknowledge that the data processor may access the provided personal data when strictly necessary and to the extent required for the performance of their duty.

The data controller shall transfer the personal data to a third party only in case of the prior written consent of the data subject or in compliance with a statutory obligation.

## **RIGHTS OF THE DATA SUBJECT, REMEDIES RELATED TO DATA PROCESSING**

The data subject has the right to request from the controller to access and rectify or erase his or her personal data, and also to restrict or object the processing.

**Right of access:** the data subject shall have the right to obtain from the controller confirmation as to whether or not what personal data concerning him or her are being processed, for what purpose, for how long, to whom it is to be disclosed.

**Right to rectification:** in case your data changes or is inaccurate, you shall request the rectification the inaccurate personal data. Please be sure to check your data regularly and notify us within 15 days of your change of data so that our database is always up to date and accurate.

**Right to erasure:** you may request that we erasure the data we process in cases the GDPR defines, and also, you can always withdraw your consent for the data processing.

The data subject shall have the **right to obtain** from the controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data,
- the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;
- the data subject has objected to processing, pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims or for the protection of

the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A data subject who has obtained restriction of processing, shall be informed by the controller before the restriction of processing is lifted.

The data subject also shall have the right to receive the personal data concerning his or her, which he or she has provided to a controller, in structures, commonly used and machine-readable format and have the right to transmit those data to another controller (**right to data portability**).

The data subject has the right to withdraw his or her consent any time, free of charge and without any explanation. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. You can ask for the withdrawal of the consent for direct marketing purposes and/or the purpose of maintaining contact and the rectification or erasure of personal data at the following ways:

- via email at [birotom@birotom.com](mailto:birotom@birotom.com)
- by post to the seat of Thomas Klein Consulting Kft.

Thomas Klein Consulting Kft. shall respond to the request of data subjects without undue delay and the latest within one month and to give reasons where controller does not intend to comply with any such requests. The data subject is entitled to file a complaint to the Hungarian National Authority for Data Protection and Freedom of Information (Szilágyi Erzsébet fasor 22/c, Budapest, 1125, Budapest; tel. number: +36 (1) 391-1400, fax: +36 (1) 391-1410, email address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), web: [www.naih.hu](http://www.naih.hu)).

In the event of violation of his or her rights, the data subject may turn to the court of law (according to the choice between the defendant's domicile or the data subject's domicile). The court shall handle action in priority proceeding. In court proceeding related to the protection of personal data, no duty shall be paid.