

PRIVACY POLICY

for visitors of the website <https://digitalis-konyveles.hu/>.

1. Introduction

During the operation of the website, the service provider / data controller processes the personal data of individuals registered on the website for the purpose of providing them with appropriate services.

This Privacy Policy has been prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, taking into account the provisions of Act CXII of 2011 on the right of informational self-determination and on freedom of information.

In all cases of data processing where, in addition to the data controller, other parties are involved in the processing of personal data — whether as joint controllers, independent controllers, or data processors — the data controller shall provide the relevant information in this Notice.

This Policy shall also apply in cases where the data subject establishes contact with the data controller, or where the data controller initiates contact with the data subject in connection with the service.

The website may from time to time contain links to external websites operated by third parties or to services provided by such parties, which are governed by the privacy policies determined by those third parties. In such cases, please carefully review the relevant terms and conditions and privacy notices published by such third parties before providing your personal data to them. Given that the data controller has no influence over the terms and conditions established and published by third parties or over the operation of their services, the data controller shall not be held liable for them; such responsibility lies with the external service provider used.

2. Identification and Contact Details of the Service Provider / Data Controller

Company name:	Q-Digital Tanácsadó Kft.
Seat:	1126 Budapest, Kiss János altábornagy street 21.
Postal address:	1126 Budapest, Kiss János altábornagy street 21.
Tax identification number:	32091805-2-43
Name of the website:	https://digitalis-konyveles.hu/
Availability of the Privacy Policy:	https://digitalis-konyveles.hu/
E-mail address:	iroda@digitalis-konyveles.hu
Telephone number:	+36 20 314 62 54

3. Definitions

- **GDPR** (General Data Protection Regulation): Regulation (EU) 2016/679 of the European Parliament and of the Council;

- **processing**: any operation or set of operations which is performed on personal data or on data sets, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **processor**: a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;
- **personal data**: 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;
- **controller**: a natural or legal person, public authority, agency or any 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 designation may be provided for by Union or Member State law;
- **consent of the data subject**: 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;
- **personal data breach**: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed
- **recipient**: a natural or legal person, public authority, agency or any other body to whom personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the 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 such public authorities shall comply with the applicable data protection rules according to the purposes of the processing;
- **third party**: a natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

4. Principles of Data Processing

The Data Controller hereby declares that it processes personal data in accordance with the provisions set out in this Privacy Policy and complies with the applicable legal requirements, with particular regard to the following principles:

- Personal data shall be processed lawfully, fairly, and in a transparent manner in relation to the data subject.
- Personal data shall be collected only for specified, explicit, and legitimate purposes.

- The purpose of processing personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date. Inaccurate personal data shall be erased or rectified without delay.
- Personal data shall be stored in a form which permits identification of data subjects for no longer than is necessary. Personal data may be stored for longer periods only insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes.
- Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.
- The principles of data protection shall apply to any information relating to an identified or identifiable natural person

5. Key Information on Data Processing

The purpose of data processing is to enable the Service Provider / Data Controller, in the course of operating the website, to provide enhanced services to individuals registered on the website. The legal basis for data processing is the consent of the data subject. The categories of data subjects concerned include users of the website. The duration of data processing shall always depend on the specific purpose of use; however, personal data shall be erased without undue delay once the original purpose of processing has been fulfilled. The data subject may withdraw their consent to data processing at any time. Where there is no legal impediment to deletion, the personal data shall be erased upon such withdrawal. The withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal. The data subject also has the right to lodge a complaint with a supervisory authority.

If the data subject wishes to make use of the benefits provided by registration (contact form), i.e. to use the related services of the website, the provision of the requested personal data is required. The data subject is not obliged to provide personal data; failure to do so shall not result in any adverse consequences. However, certain functions of the website cannot be used without registration (completion of the contact form).

The data subject may request the modification or deletion of their personal data via email, telephone, or postal mail using the contact details of the Data Controller.

6. Categories of Personal Data Processed by the Data Controller and Specific Processing Activities

The following section sets out the categories of personal data collected by the Data Controller and the purposes for which such data are processed:

6.1 For the Purpose of Pre-Contractual Consultation (Contact Form)

Purpose of Processing: Where the data subject initiates contact with the Data Controller —particularly through the contact form available on the website — the data subject provides certain personal data in order for the Data Controller to record such data in its internal systems, to contact and maintain communication with the data subject for business

development purposes, to provide offers related to its services, and to initiate the conclusion of a contract.

Legal Basis for Processing: Where the data subject is a natural person acting on their own behalf, the processing is necessary for taking steps at the request of the data subject prior to entering into a contract between the data subject and the Data Controller (Article 6(1)(b) GDPR).

Where the data subject acts as a contact person for a legal entity (non-natural person) for the purpose of requesting an offer or concluding a contract, the processing is necessary for the purposes of the legitimate interests pursued by the Data Controller and the contracting legal entity, namely to facilitate the conclusion of a contract, to negotiate its terms, and to maintain contact during this process (Article 6(1)(f) GDPR).

The Data Controller processes only such personal data as are strictly necessary for pre-contractual consultations and the provision of offers.

Categories of Personal Data Processed:

Category of Data	Purpose of Processing
Name	Identification, contact.
Company name	Identification, contact.
Tax identification number	Identification, contact.
E-mail address	Identification, contact.
Telephone number	Identification, contact.
Timestamp	Technical/logging purposes.

Duration of Processing: Personal data shall be processed until the withdrawal of the data subject's consent, but in any case no longer than one (1) year from the date the data were provided.

Recipients of Personal Data: Employees or authorised representatives of the Data Controller responsible for contract preparation and the operation of the customer database.

Method of Storage: Electronic storage.

6.2 Conclusion of Contract

Purpose of Processing: For the purpose of ordering the service and concluding and performing the related contract, the data subject is required to provide certain personal data. The purpose of data processing is the establishment and performance of the contract in relation to the ordered service, as well as the exercise of rights and fulfilment of obligations arising therefrom.

Legal Basis for Processing: The performance of a contract between the Data Controller and the data subject / customer relating to the service, including the exercise of rights and fulfilment of obligations arising therefrom.

Where the data subject is a natural person acting on their own behalf, the 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 (Article 6(1)(b) GDPR).

Where the data subject provides their data as a contact person of a legal entity for the purpose of concluding a contract, the processing is necessary for the purposes of the legitimate interests pursued by the Data Controller and the contracting legal entity, namely to enable the conclusion of the contract, negotiation of its terms, and maintaining contact during this process (Article 6(1)(f) GDPR).

Categories of Personal Data Processed:

Category of Data	Purpose of Processing
Name	Identification, contact
Company name	Identification, contact
Residential address	Identification, contact, mailing, administration
Place of birth	Identification, contact
Date of birth	Identification, contact
Mother's maiden name	Identification, contact
E-mail address	Identification, contact
Telephone number	Identification, contact
Details of the ordered product/service	Identification of the service (accounting / advisory services)
Date of contact	Technical/logging purposes

Duration of Processing: Personal data shall be processed for the duration of the contract, except where statutory provisions require longer retention as set out in this Policy. Pursuant to Section 169(2) of Act C of 2000 on Accounting, the Data Controller is obliged to retain accounting documents and invoices for a period of eight (8) years from the date of issuance. Where the data subject acts as a contact person for a legal entity customer, and in the absence of an explicit objection, the Data Controller may retain the personal data for business development purposes for a period of two (2) years from the date of data collection.

Recipients of Personal Data: Employees or authorised representatives of the Data Controller responsible for contract preparation and the operation of the customer database, as well as data processors.

Method of Storage: Electronic storage and, in certain cases, hard copy (paper-based) storage.

6.3 Customer Service Data Processing

Purpose of Processing: The Data Controller records customer inquiries received through its contact channels, as well as the responses provided, in order to review, process, and respond to such inquiries. In relation to any complaints submitted by customers or their representatives, the purpose of data processing is to resolve complaints and disputes and to investigate the relevant case.

Legal Basis for Processing: In the case of an ongoing order or an existing contract, where the customer acts on their own behalf, the legal basis for processing is the performance of the contract between the customer and the Data Controller. Where the data subject acts as a contact person of a legal entity, the processing is necessary for the purposes of the legitimate interests pursued by the Data Controller and the customer, namely to enable the conclusion and performance of the contract and to fulfil the parties' obligation to cooperate (Article 6(1)(f) GDPR).

Categories of Personal Data Processed: Personal data provided by the data subject in the course of any communication, including in particular via email, telephone, or postal mail using the contact details provided by the Data Controller, as well as data necessary for identification.

Duration of Processing: Customer service records shall be retained for a period of two (2) years from the date the matter is resolved.

Recipients of Personal Data: Employees or authorised representatives of the Data Controller responsible for the operation of customer service, as well as data processors.

Method of Storage: Electronic storage and, in certain cases, hard copy (paper-based) storage.

6.4 Invoicing

Purpose of Processing: For the purpose of payment for the service, the data subject is required to provide certain personal data. The purpose of data processing is the settlement and accounting of fees stipulated in the contract in relation to the ordered service.

Legal Basis for Processing: The performance of a contract between the Data Controller and the data subject / customer relating to the service, including the exercise of rights and fulfilment of obligations arising therefrom.

Where the data subject is a natural person acting on their own behalf, the processing is necessary for the performance of a contract concluded with the data subject (Article 6(1)(b) GDPR).

Where the data subject provides their data as a contact person of a legal entity for the purpose of concluding a contract, the processing is necessary for the purposes of the legitimate interests pursued by the Data Controller and the contracting legal entity, namely to enable the conclusion of the contract, negotiation of its terms, and maintaining contact during this process (Article 6(1)(f) GDPR).

Categories of Personal Data Processed:

Category of Data	Purpose of Processing
Name	Identification, contact
Company name	Identification, contact, invoicing
Address	Identification, contact, invoicing
E-mail address	Identification, contact
Telephone number	Identification, contact
Tax number / Tax identification number	Identification of the customer
Invoice data	Identification of the invoice
Date of invoice issuance	Technical/logging purposes

Duration of Processing: Pursuant to Section 169(2) of Act C of 2000 on Accounting, the Data Controller is required to retain accounting documents and invoices for a period of eight (8) years from the date of issuance.

Method of Storage: Electronic storage.

6.5 Newsletter Distribution

Purpose of Processing: The purpose of data processing is to send newsletters and marketing communications to customers, contracting parties, and other interested persons.

Legal Basis for Processing: The consent of the data subject (Article 6(1)(a) GDPR).

Categories of Personal Data Processed:

Category of Data	Purpose of Processing
Name	Identification, contact, newsletter distribution
Company name	Identification, contact, newsletter distribution
E-mail address	Identification, contact, newsletter distribution

Recipients of Personal Data: Employees or authorised representatives of the Data Controller responsible for the preparation of newsletters and the operation of the customer database, as well as data processors.

Duration of Processing: Personal data shall be processed until the data subject unsubscribes from the newsletter (withdraws consent). In the absence of unsubscribing: in the case of contracting parties, for a maximum period of five (5) years following the termination of the contract; in the case of other interested persons, for a maximum period of ten (10) years from the date of subscription. The data subject may indicate their intention to unsubscribe by replying to the newsletter or by contacting the Data Controller using the contact details provided.

Method of Storage: Electronic storage.

6.6 Website Activity – Cookies

Cookies are small files placed on the user's computer by the websites they visit, containing information such as website preferences or login status.

Cookies are therefore small data files created by visited websites. By storing browsing data, they enhance the user experience. Through the use of cookies, the website remembers site settings and provides locally relevant content.

The Service Provider's website places a small file (cookie) on the visitor's computer in order to record the fact and time of the visit. The Service Provider informs visitors of this practice.

Users have the option to delete cookies at any time via the "Settings" menu of their browser.

Purpose of Processing: To provide enhanced services, enable identification, and track website visitors.

Categories of Data Subjects: Visitors of the website.

Legal Basis for Processing: User consent is not required where the use of cookies is strictly necessary for the operation of the service provided by the Service Provider.

Categories of Data Processed: Unique identifier, timestamp, preference settings.

Recipients of Personal Data: The Data Controller does not process personal data through the use of cookies.

Method of Storage: Electronic storage.

6.7 Google Analytics

Our website uses Google Analytics.

Google Analytics uses internal cookies to generate reports for its clients regarding the usage patterns of website visitors.

On behalf of the website operator, Google uses this information to evaluate how users interact with the website. As an additional service, Google prepares reports on website activity for the website operator in order to facilitate the provision of further services.

The data are stored by Google on its servers in an encoded format in order to make misuse of the data more difficult and to prevent unauthorized access.

Google Analytics can be disabled as follows. Quotation from the source:

Users who do not wish Google Analytics JavaScript to report their data may install the Google Analytics Opt-out Browser Add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics. The browser add-on is available for most modern browsers. The Google Analytics Opt-out Browser Add-on does not prevent data from being sent to the website itself or to other web analytics services.

<https://support.google.com/analytics/answer/6004245?hl=hu>

Google's Privacy Policy: <https://policies.google.com/privacy?hl=hu>

Detailed information regarding the use and protection of data is available at the above links.

Detailed Data Protection Information:

https://static.googleusercontent.com/media/www.google.com/en//intl/hu/policies/privacy/google_privacy_policy_hu.pdf

7. Data Processors

The Data Controller shall transfer the personal data of data subjects, in the cases and for the purposes specified in this Privacy Policy, to a predefined category of third parties in order to provide the service and to ensure its proper use and performance. Furthermore, the Data Controller — subject to prior information provided to the data subject — may transfer personal data to data processors on the basis of a relevant agreement. In certain cases, partners process personal data strictly in accordance with the instructions of the Data Controller and within the limits defined by the Data Controller; such partners qualify as data processors, and their engagement does not require separate consent. In other cases, partners provide their own services using the transferred personal data and make independent decisions in relation to such processing (e.g. coordination with recipients). These partners qualify as independent controllers, and the legal basis for the transfer of

personal data to them shall correspond to the legal basis of the Data Controller's processing activities. The Data Controller enters into agreements with both data processors and partner controllers, under which such parties undertake to process the personal data received in compliance with applicable laws and to maintain confidentiality.

In the course of providing its services, the Data Controller transfers or discloses personal data to the following recipients in connection with the processing activities listed below:

:

Data Processing Activity	Hosting services, server services
Company name	Inelton Számítástechnikai Szolgáltató és Kereskedelmi Kft.
Registered office	1116 Budapest, Sipos Pál street 40.

Data Processing Activity	Newsletter distribution
Company name	MailerLite Limited
Registered office	88 Harcourt Street, Dublin 2, D02 DK18, Ireland

Data Processing Activity	Invoicing
Company name	KBOSS.hu Kereskedelmi és Szolgáltató Kft.
Registered office	1031 Budapest, Záhony street 7.

Data Processing Activity	Invoicing
Company name	Billingo Technologies Zrt.
Registered office	1133 Budapest, Árbóc street 6.

Data Processing Activity	Administrative system (ANYK – tax authority form filing system)
Company name	National Tax and Customs Administration (NAV)
Registered office	1054 Budapest, Széchenyi utca 2.

Data Processing Activity	Administrative system (RLB double-entry bookkeeping, payroll)
Company name	RLB-60 Bt.
Registered office	3000 Hatvan, Balassi Bálint street 40.

Data Processing Activity	Administrative system (Netaccounting)
Company name	NetAccount Plus Kft.
Registered office	1119 Budapest, Fehérvári street 85. C. building, 4. floor

Data Processing Activity	Anti-money laundering identification
Company name	identiGO Kft.
Registered office	1054 Budapest, Honvéd street 8. 1. floor 2.

Data Processing Activity	Administrative system (task tracking)
Company name	VIKI asszisztens PROWEBSTORE KFT.
Registered office	1174 Budapest, Csermely Károly street 33/3.

Data Processing Activity	Administrative system (storage management, tax account management)
Company name	Kapusegéd RELAX Szoftverház Kft.
Registered office	6625 Fábíansebestyén, Bem street 1.

Data Processing Activity	Data storage and management (Google Workspace)
Company name	Google Ireland Limited
Registered office	Gordon House, Barrow Street, Dublin 4, Ireland

The Data Controller reserves the right to review its contractual partners performing data processing activities from time to time, for unchanged purposes, and, where necessary, to enter into contractual relationships with new partners involving data processing activities. The Data Controller shall provide information on its current contractual partners upon request of the data subject and shall update the list of partners in the respective updated versions of this Privacy Policy, where necessary.

8. Social Media Platforms

Social media platforms are communication tools through which content is disseminated via users. Social media utilises the internet and online platforms to enable users to transition from passive recipients of content to active content creators.

Social media constitutes an interface of online applications where user-generated content is made available, including, but not limited to, platforms such as Facebook / Meta, Google+, LinkedIn, Instagram, Twitter, and Pinterest, etc.

Content published on social media may take the form of public statements, presentations, demonstrations, or descriptions of products or services. Such content may include forum posts, blog entries, images, videos, audio materials, message boards, and email messages, etc.

Accordingly, the scope of data processed may, in addition to personal data, include publicly available profile images of users.

It is important to note that when users upload or submit personal data, they grant a worldwide licence to the operator of the given social media platform to store and use such content. Certain social media providers may also transfer data to third countries outside the European Union.

Users are therefore strongly advised to ensure that they are fully authorised to disclose any information they publish.

9. Data Subject Rights

Right to Information

You may request information from us via the contact details provided regarding the personal data processed by our company, including the legal basis, purpose of processing, source of the data, and the duration of processing. Upon your request, we shall provide such information without undue delay, but no later than within thirty (30) days, via the email address you have provided.

Right to Rectification

You may request the correction of your personal data via the contact details provided. We shall comply with your request without undue delay, but no later than within thirty (30) days, and shall notify you of the action taken via the email address you have provided.

Right to Erasure

You may request the deletion of your personal data via the contact details provided. We shall comply with your request without undue delay, but no later than within thirty (30) days, and shall notify you accordingly via the email address you have provided.

Right to Restriction of Processing

You may request the restriction of processing of your personal data via the contact details provided. The restriction shall apply for the period justified by the reason indicated by you. We shall comply with your request without undue delay, but no later than within thirty (30) days, and shall notify you accordingly via the email address you have provided.

Right to Object

You may object to the processing of your personal data via the contact details provided. We shall examine the objection within the shortest possible time, but no later than within fifteen (15) days from the submission of the request, make a decision regarding its merits, and inform you of our decision via email.

Enforcement of Data Protection Rights

In the event of unlawful data processing identified by you, please notify our company so that we may promptly take steps to restore lawful processing. We will make every effort to resolve the issue in your interest.

If, in your opinion, the lawful situation cannot be restored, you may notify the supervisory authority using the following contact details:

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

Postal address: H-1530 Budapest, P.O. Box 5, Hungary

Address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c, Hungary

Telephone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

Email: ugyfelszolgalat@naih.hu

Website: <https://naih.hu>

In the event of unlawful data processing, you may also initiate civil proceedings before a court. Jurisdiction lies with the competent regional court. At your option, the action may also be brought before the court having jurisdiction over your place of residence.

10. Data Security Measures

The Data Controller implements appropriate technical and organisational measures, taking into account the level of risk, to ensure the security of personal data and to protect such data against unauthorised or unlawful processing, accidental loss, destruction, or damage. This includes ensuring the confidentiality, integrity, availability, and resilience of the IT systems and services used for processing personal data.

For example, the Data Controller uses IT security tools such as firewalls and encryption, as well as physical security measures, and ensures physical protection of all locations where personal data are accessible.

11. Review and Amendment of the Privacy Policy

The circumstances of data processing may change from time to time, and the Data Controller may decide to supplement its ongoing processing activities with new purposes. Accordingly, the Data Controller reserves the right to amend this Privacy Policy at any time. The Data Controller shall inform users of any changes via the website.

Effective date: 1 April 2026

Date of last modification: 1 April 2026