

Dr. Gábor Hermann's privacy policy on the website

This Data Protection Notice describes the data processing, in particular the characteristics of the collection, storage and use of data, carried out on the website drgaborhermann.com (hereinafter referred to as the "Website") operated by Dr. Hermann Gábor János (registered office: 1089 Budapest, Benyovszky Móric u. 6., company registration number: 01-09-362334, represented by: Dr. Hermann Gábor János, senior officer, hereinafter referred to as the "Data Controller").

This Data Protection Notice is effective from 01/September/2025. The Data Controller makes the current version of the Data Protection Notice available on its website.

The Data Protection Notice has been prepared on the basis of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: "GDPR"), taking into account the provisions of Act CXII of 2011 on the right to informational self-determination and freedom of information (hereinafter: "Infotv."), and its conceptual system is the same as the concepts defined in Article 4 of the GDPR, and in certain points supplemented by the interpretative provisions of Section 3 of the Infotv. In matters not specified in this Data Protection Notice, the GDPR, or in cases permitted by it, the rules of the Infotv. shall apply.

The Data Controller is entitled to prepare an extract from the content of this Data Protection Notice in connection with individual data processing, and may also ensure that the data subjects declare by signing this document in connection with prior information related to the processing of personal data that they have read and acknowledged the contents of the extract. The Data Controller reserves the right to amend this Data Protection Notice. If the amendment affects the use of personal data provided by the data subject, the data subject will be informed of the changes in an appropriate manner, for example by e-mail. If the details of the data protection are also changed as a result of the amendment to the Data Protection Notice, the Data Controller will separately request the data subject's consent.

Please read the information below carefully and use the services available on the website only if you agree with what is written below.

1. The Data Controller

Name of the Data Controller	dr. Hermann Gábor János
Registered office of the Data Controller	1089 Budapest, Benyovszky Móric u. 6.
Data Controller Registration number	41178084
Data Controller tax number	70907461-1-42
Data Controller contact information	info@hermannortho.hu
Data Controller telephone number	+361 306 7846

2. Data processing related concepts

The conceptual system of the Data Processing Information is the same as the concepts defined in Article 4 of the GDPR, supplemented in certain points by the interpretative provisions of Section 3 of the Infotv. and its definitions. Based on these, therefore:

Data Processor: a natural or legal person or an organization without legal personality who processes data on the basis of a contract – including a contract concluded on the basis of the provisions of the law – the data processors used by the Data Controller are included in the Data Processing Register according to Annex 1 to this Data Processing Information.

Data Processing: any operation or set of operations performed on personal data or data files, whether or not by automated means, such as collection, recording, systematization, structuring, storage, transformation or alteration, query, inspection, use, disclosure by transmission, dissemination or otherwise making available, coordination or combination, restriction, deletion or destruction.

Data Controller: a legal entity as defined in Section 1 of this Data Protection Notice that independently determines the purpose of data processing, makes and implements decisions regarding data processing, or has them implemented by a data processor.

Data Destruction: the complete physical destruction of the data medium containing the data.

Data Deletion: rendering the data unrecognizable in such a way that its recovery is no longer possible.

Data Breach: a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Recipient: the natural or legal person, public authority, agency or any other body to whom or with whom the personal data are disclosed, whether a third party or not. Public authorities which have access to personal data in the context of an individual investigation in accordance with Union or Member State law shall not be considered recipients; the processing of such data by such public authorities shall comply with the applicable data protection rules in accordance with the purposes of the processing.

EEA Member State: a Member State of the European Union and another State party to the Agreement on the European Economic Area, as well as a State whose nationals enjoy the same legal status as nationals of a State party to the Agreement on the European Economic Area under an international agreement concluded between the European Union and its Member States and a State not party to the Agreement on the European Economic Area.

Data subject: any natural person identified or identifiable, directly or indirectly, on the basis of any personal data.

Profiling: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal characteristics relating to a natural person, in particular to analyse or predict characteristics relating to his or her performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Personal data: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person can be identified, directly or indirectly, in particular by reference to an identifier such as a name, a 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.

Objection: any statement by the data subject by which he or she objects to the processing of his or her personal data and requests the cessation of the processing or the erasure of the data processed.

3. Principles of data management

When providing its services, the Data Controller pays particular attention to the protection of personal data, compliance with mandatory legal provisions, and secure and fair data management. The Data Controller treats the personal data provided to it confidentially, as set out in point 4 of the Data Management Information.

Since informational self-determination is a fundamental right of every natural person enshrined in the Fundamental Law, the Data Controller considers it particularly important to carry out its individual data management and data management procedures only and exclusively in accordance with the provisions of the applicable laws and in accordance with the following principles, and to develop its practices accordingly:

- In view of the principles of legality, fairness and transparency, the Data Controller processes personal data lawfully and fairly, and in a manner transparent to the data subject, in order to exercise a right or fulfill an obligation. The Data Controller strictly prohibits the use of personal data processed by the Data Controller for private purposes.
- In view of the principle of purpose limitation, the Data Controller collects and processes personal data only for specified, explicit and legitimate purposes, to the minimum extent and for the period necessary to achieve the

purpose, and does not process them in a manner incompatible with these purposes. Accordingly, the Data Controller uses the personal data of the data subjects only for the purposes communicated at the time of collection or for other appropriate purposes in accordance with the law.

The Data Controller pays particular attention to ensuring that its data processing complies with the principle of purpose limitation at all times, and that the data are deleted if the purpose of the data processing has ceased to exist or if the data processing is otherwise unlawful. If the personal data are no longer needed, the Data Controller destroys them.

- In view of the principle of data quality (data economy and accuracy), the Data Controller shall only process and collect personal data that is adequate, relevant and necessary for the purposes of the data processing. The Data Controller shall also take reasonable measures to ensure that the personal data are accurate, complete and up-to-date, and that personal data that is unnecessary for the purposes of the data processing are deleted.

- In accordance with the principle of limited storage, the Data Controller shall only process personal data that enables the identification of data subjects for the period necessary to achieve the purposes of the data processing. After the purpose of the data processing has changed or ceased, the Data Controller shall ensure that the data is deleted. The Data Controller shall only store personal data for a longer period if the personal data are processed for archiving purposes in the public interest, for scientific and historical research purposes or for statistical purposes. It shall exercise particular care when disposing of data carriers containing personal data.

- In view of the principle of integrity and confidentiality, the Data Controller ensures the closed, complete, continuous and risk-proportionate protection of personal data, and takes organizational and technical measures, in particular to protect against unauthorized or unlawful processing, accidental loss, destruction or damage to data. In order to protect data against unauthorized use or disclosure, the Data Controller applies data security controls in its own activities.

The information security measures designed and implemented by the Data Controller ensure the confidentiality, integrity and availability of personal data. These measures are included in the Data Controller's IT security policy.

- In view of the principle of accountability, the Data Controller plans and implements its data processing processes and develops its data processing system in such a way that it is able to demonstrate compliance with the principles set out in this point at any time during data processing, in particular when and in what form the personal data were collected and what information the data subject received when the personal data was collected.

The Data Controller shall inform the data subjects in accordance with Articles 13 and 14 of the GDPR with this Data Management Notice.

In its capacity as data controller, the Data Controller shall ensure that the data subject has access to the data processed by the Data Controller - unless otherwise provided by law - and may exercise the right to request information, access, rectification, restriction, erasure, data portability and objection.

4. Data processing carried out in connection with the Data Controller's Website

4.1. Contact

The Data Controller provides the opportunity for visitors to the Website to contact the Data Controller by clicking on the "Contact" icon or using one of the contact details provided on the Website.

Purpose of data processing? Answering questions and, in this context, establishing and maintaining contact.

Scope of data processed: Name, telephone number, e-mail address of the data subject.

Scope of data subjects: The person contacting the Data Controller.

Legal basis for data processing: Based on Article 6(1)(a) of the GDPR, the consent of the data subject.

Data storage period: Until the question is successfully answered or the purpose is achieved, but no later than until the data subject requests deletion.

Data processing method: Electronically.

Data source: Data collected from the data subject.

Possible consequences of failure to provide data: If the data subject does not provide the data to the Data Controller, he or she will not be able to contact the Data Controller.

Automated decision-making and profiling: The Data Controller does not use automated decision-making and does not perform profiling.

Who can access the data?: Competent employees of the Data Controller and employees of any data processors. The current list of the Data Controller's data processors is contained in Section 5 of this Data Processing Notice.

Data transfer: Data transfer to a third country or international organization does not take place.

4.2. Appointment request

The Data Controller provides the possibility to request an appointment.

Purpose of data processing Management: response to appointment requests, sending date suggestions.

Scope of data processed: Name, e-mail address, telephone number of the person requesting the appointment, as well as other data indicated by the person requesting the appointment.

Scope of data subjects: Persons requesting an appointment on the Website.

Legal basis for data processing: Based on Article 6 (1) a) of the GDPR, the consent of the person concerned.

Data storage period: Until the consent is withdrawn.

Data processing method: Electronically.

Data source: Data collected from the person concerned.

Possible consequences of failure to provide data: If the person concerned does not provide the data to the Data Controller, the Data Controller is not able to offer an appointment.

Automated decision-making and profiling: The Data Controller does not use automated decision-making and does not perform profiling.

Who can access the data?: Competent employees of the Data Controller and employees of any data processors. The current list of the Data Controller's data processors is contained in Section 5 of this Data Processing Notice.

Data transfer: Data transfer to a third country or international organization does not take place.

4.3. Callback request

The Data Controller provides the opportunity for visitors to the Website to request a callback from the Data Controller by clicking on the "Request a callback" icon.

Purpose of data processing: Answering questions, and in this context, establishing and maintaining contact.

Scope of data processed: Name and telephone number of the data subject.

Scope of data subjects: The person requesting a callback from the Data Controller.

Legal basis for data processing: Based on Article 6(1)(a) of the GDPR, the data subject's

consent.

Data storage period: Until the question is successfully answered or the purpose is achieved, but no later than until it is deleted at the request of the data subject.

Data processing method: Electronically.

Data source: Data collected from the data subject.

Possible consequences of failure to provide data: If the data subject does not provide the data to the Data Controller, he or she will not be able to contact the Data Controller.

Automated decision-making and profiling: The Data Controller does not use automated decision-making and does not perform profiling.

Who can access the data?: Competent employees of the Data Controller and employees of any data processors. The current list of the Data Controller's data processors is contained in Section 5 of this Data Processing Notice.

Data transfer: Data transfer to a third country or international organization does not take place.

4.4. Request for an appointment for a discounted consultation and diagnostics

The Data Controller provides the opportunity for visitors to the Website to request a discounted appointment from the Data Controller by clicking on the "Patient Recommendation" icon.

Purpose of data processing: Handling and responding to appointment requests, sending date suggestions.

Scope of data processed: Name, e-mail address, telephone number of the person requesting the appointment, as well as other data provided by the person requesting the appointment.

Scope of data subjects: Persons requesting a discounted appointment on the Website.

Legal basis for data processing: The consent of the data subject, pursuant to Article 6(1)(a) of the GDPR.

Data storage period: Until the consent is withdrawn.

Data processing method: Electronically.

Data source: Data collected from the data subject.

Possible consequences of failure to provide data: If the data subject does not provide the data to the Data Controller, the Data Controller cannot provide him/her with a preferential date.

Automated decision-making and profiling: The Data Controller does not use automated decision-making and does not perform profiling.

Who can access the data?: Competent employees of the Data Controller and employees of any data processors. The current list of the Data Controller's data processors is contained in Section 5 of this Data Processing Notice.

Data transfer: Data transfer to a third country or international organization does not take place.

4.5. Data processing related to health data and documentation

The data subject may disclose his/her previous and current health data and health documentation to the Data Controller for the purpose of informing the Data Controller and clarifying the subsequent service, and the Data Controller records, stores, records and processes health data and health documentation during the examination of the data subjects.

Recording health data and documentation is part of the provision of the service. The treating physician decides which health data needs to be recorded and stored in accordance with professional rules.

Purpose of data processing: Providing appropriate service to the data subject.

Scope of data processed: Name, address, date and place of birth, mother's name, social security number, certain necessary health data of the data subject.

Scope of data processed: Data subjects using the Data Controller's service.

Legal basis for data processing: Necessary for the performance of a contract, pursuant to Article 6(1)(b) of the GDPR. Article 9(2)(h) of the GDPR.

Data storage period: Health data is at least 30 years, the final report is at least 50 years, imaging diagnostic imaging is 10 years from the date of its creation, and the report prepared from the imaging is 30 years from the date of the creation of the imaging.

Data processing method: Electronically.

Data source: Data collected from the data subject.

Possible consequences of failure to provide data: If the data subject does not provide the data to the Data Controller, the Data Controller will not be able to provide its services to the data subject.

Automated decision-making and profiling: The Data Controller does not use automated decision-making and does not perform profiling.

Who can access the data?: Competent employees of the Data Controller and employees of any data processors. The current list of the Data Controller's data processors is contained in Section 5 of this Data Processing Notice.

Data transfer: Data transfer to a third country or international organization does not take place.

4.6. Data processing related to customer registration

Data processing necessary for maintaining contact with the data subject.

Purpose of data processing: Registering the Data Controller's customers and facilitating contact.

Scope of data processed: Name, telephone number, e-mail address of the data subject.

Scope of data processed: Data subjects using the Data Controller's services.

Legal basis for data processing: Based on Article 6(1)(a) of the GDPR, the data subject's consent.

Data storage period: Until the withdrawal of consent or the expiry of the general limitation period (5 years) following the termination of the legal relationship.

Data processing method: Electronically.

Data source: Data collected from the data subject.

Possible consequences of failure to provide data: If the data subject does not provide the data to the Data Controller, the Data Controller will not be able to provide its service to the data subject.

Automated decision-making and profiling: The Data Controller does not use automated decision-making and does not perform profiling.

Who may see the data?: Competent employees of the Data Controller and employees of any data processors. The effective list of the Data Controller's data processors is contained in Section 5 of this Data Management Notice.

Data transfer: Data transfer to a third country or international organization does not take place.

4.7. With the consent of the data subject, publication of images, videos, and audio recordings taken of the data subject - for example, during the use of the service - on the Website and on the Data Controller's social media pages.

In individual cases, the Data Controller may conduct an interview with the data subject after the data subject's consent, or may take pictures of the teeth during the treatment to demonstrate the effectiveness of the treatment.

Purpose of data processing: Promotion of the Data Controller's service.

Scope of processed data: The data subject's face and voice.

Scope of data subjects: Data subjects using the Data Controller's service who have consented to the creation and publication of such content.

Legal basis for data processing: The data subject's consent pursuant to Article 6(1)(a) of the GDPR.

Data storage period: Until the consent is withdrawn.

Data processing method: Electronically.

Source of data: Data collected from the data subject.

Possible consequences of failure to provide data: If the data subject does not provide the data to the Data Controller, the Data Controller will not create such content about him/her.

Automated decision-making and profiling: The Data Controller does not use automated decision-making and does not perform profiling.

Who may access the data?: Competent employees of the Data Controller and employees of any data processors. The current list of the Data Controller's data processors is contained in Section 5 of this Data Management Notice.

Data transfer: Data transfer to a third country or international organization does not take place.

4.8. Data processing related to complaints

The data subject is entitled to submit a complaint to the Data Controller, verbally, electronically or in writing, based on Act CLV of 1997 on Consumer Protection (Fgy.tv.). The customer can send electronic complaints to the e-mail address info@hermannortho.hu, orally and in writing, by letter sent to the registered office. The Data Controller handles complaints received by the Data Controller in accordance with the provisions of the Consumer Protection Act and informs the consumer about the results of the investigation of the complaint within the specified deadline.

Purpose of data processing: Receiving, investigating and handling customer complaints and inquiries.

Scope of processed data: Name, address, e-mail address of the data subject, other data related to the complaint specified in Section 17/A. (5) of the Consumer Protection Act.

Scope of data subjects: The person making the complaint and, in the case of an Enterprise Qualified as a Consumer, his representative.

Legal basis for data processing: The consent of the data subject pursuant to Article 6(1)(a) of the GDPR, and the fulfilment of the legal obligation pursuant to Article 6(1)(c) of the GDPR, in view of the provisions of the Consumer Protection Act.

Data storage period: If the data subject has not raised any further objections after sending the response, the Consumer Protection Act shall Pursuant to Article 17/A.§ (7), the Data Controller deletes the data 5 years after the response was sent; in the event of further claims, the data will be deleted after the expiry of the limitation period, or in the event of any civil claims, after the final completion of the related procedure.

Method of data processing: On paper and/or electronically

Source of data: Data collected from the data subject

Possible consequences of failure to provide data: The provision of personal data is mandatory; if the data subject does not provide the data to the Data Controller, the Data Controller will not be able to investigate the complaints.

Automated decision-making and profiling: The Data Controller does not use automated decision-making and does not perform profiling.

Who can access the personal data?: The Data Controller's competent employees and potential legal representatives may access it.

Data transfer to a third country or international organization: Data transfer to a third country or international organization does not take place.

4.9. Data processing related to newsletters and direct marketing

In order to serve the needs of customers as fully as possible, the Data Controller sends e-mails and newsletters to the data subject for direct offer or informal purposes based on the prior clear and express consent of the data subject. The Data Controller ensures that the data subject can unsubscribe from marketing e-mails at any time without restriction and free of charge, via the "Unsubscribe" link in the newsletter.

The Data Controller provides Meta with the e-mail addresses of the persons who contribute to direct marketing activities, so in this respect Meta qualifies as the Data Controller's data processor. The purpose of the transfer of e-mail addresses is for Meta to send targeted advertisements.

You can modify your settings related to the permission of advertisements on Facebook here:

https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen

Purpose of data processing: Effectively informing and disseminating knowledge to those who subscribe to the newsletter.

Scope of processed data: Name and email address of the subscriber to the newsletter.

Scope of data subjects: Persons subscribing to the newsletter.

Legal basis for data processing: Data subject's consent pursuant to Article 6(1)(a) of the GDPR.

Data storage period: Until the consent is withdrawn.

Data processing method: Electronically.

Data source: Data collected from the data subject.

Possible consequences of failure to provide data: If the data subject does not provide the data to the Data Controller, the Data Controller will not be able to send him/her a newsletter.

Automated decision-making and profiling: The Data Controller does not use automated decision-making and does not perform profiling.

Who may learn the personal data?: The Data Controller's competent employees and employees of any data processors. The current list of the Data Controller's data processors is contained in Section 5 of this Data Processing Information.

Data transfer to a third country or international organization: Data transfer to a third country or international organization does not take place.

4.10. Data processing related to the Facebook page

The Data Controller operates a Facebook page on the website <https://www.facebook.com/>, which is available at the following link: <https://www.facebook.com/gabor.hermann.370>

The Data Controller publishes information and informal news related to its services and activities on its Facebook page. Visitors to the page have the opportunity to express their opinion regarding the Data Controller's services. The Data Controller collects data and analyzes the activities of visitors using the Page Analytics function on its Facebook page.

With regard to personal data collected during Page Analytics related to the Facebook page, the Data Controller and Meta Platforms Ireland Ltd. are considered joint data controllers pursuant to Article 26 of the GDPR, as the Data Controller and Meta Platforms Ireland Ltd. jointly determine the purposes and means of data processing. For any other processing of personal data relating to the Facebook Page and associated content, for which the purposes and means have not been jointly determined, Meta Platforms Ireland Ltd. and, as the case may be, the Controller remain independent, separate controllers. The main obligations and responsibilities in relation to the joint processing between the Controller and Meta Platforms Ireland Ltd. are divided as follows. Meta Platforms Ireland Ltd. assumes primary responsibility for the processing of analytics data under the GDPR and for complying with all relevant obligations under the GDPR in relation to the processing of analytics data. Meta Platforms Ireland Ltd. informs data subjects about the processing in the "Information on Page Analytics data" section of the Facebook Page. Meta Platforms Ireland Ltd. identifies the communication channels for data subjects as points of contact.

If data subjects exercise their rights against the Controller in relation to the processing of analytics data, or the supervisory authority contacts the Controller in relation to the processing of analytics data, the Controller shall immediately, but no later than within 7 calendar days, forward all relevant data relating to such requests to Meta Platforms Ireland Ltd. Meta Platforms Ireland Ltd. undertakes to respond appropriately to the requests of data subjects in accordance with its obligation. The Controller does not act and cannot respond on behalf of Meta Platforms Ireland Ltd.

The Controller ensures that it has an appropriate legal basis under the GDPR for the processing of analytics data. The Controller does not request from Meta Platforms Ireland Ltd. specific personal data processed during Site Analytics, the Controller only sees statistics and statements prepared by Meta Platforms Ireland Ltd., not the personal data underlying them.

Further information on the joint data management agreement between the Data Controller and Meta Platforms Ireland Ltd. regarding the Facebook page can be found at the following address:

https://www.facebook.com/legal/terms/information_about_page_insights_data

The purpose of data processing is to process data arising from the use of the Facebook page.

Scope of data processed: As a general rule, the Data Controller only processes statistical data, such as the number of likers, the number of new likes, in relation to posts placed on the Facebook page, how many people read, liked, commented on or shared the post, the number of spam marks, in relation to visits to the Facebook page, how many times the page was viewed, how many times they came to the Facebook page from an external page or website, in relation to videos published on the Facebook page, how many times the video was viewed, which videos were most viewed. In relation to people who like the Facebook page, the Controller also processes age, gender and place of residence as statistical data.

The scope of data subjects is visitors to the Facebook page.

Legal basis for data processing: The consent of the data subject pursuant to Article 6(1)(a) of the GDPR.

Data storage period: Until the data subject withdraws their consent.

Data processing method: Electronically.

Data source: Data collected from the data subject.

Who may access the personal data?: Competent employees of the Data Controller, employees of Meta Platforms Ireland Ltd., and employees of any data processors. The effective list of the Data Controller's data processors is contained in Section 5 of this Data Processing Notice.

Data transfer: Data transfer to a third country or international organization will not take place.

4.11. Data processing related to the maintenance of records related to the exercise of data subject rights under the GDPR

Purpose of data processing: Data processing related to the maintenance of records related to the exercise of data subject rights specified in the GDPR.

Scope of data processed: Name, place and date of birth of the applicant, mother's name, address, mailing address, application for the exercise of data subject rights under the GDPR.

Scope of data subjects: A person exercising data subject rights under the GDPR.

Legal basis for data processing: The legal basis for data processing is the fulfillment of a legal obligation pursuant to Article 6(1)(c) and legitimate interest pursuant to Article 6(1)(f) of the GDPR.

Data storage period: 5 years from the date of consideration of the application.

Data processing method: On paper and/or electronically.

Data source: Data collected from the data subject.

Possible consequences of failure to provide data: If the data subject does not provide the data to the Data Controller, the Data Controller will not be able to consider the data subject's request.

Automated decision-making and profiling: The Data Controller does not use automated decision-making and does not perform profiling.

Who may access the personal data?: Competent employees of the Data Controller and employees of any data processors. The current list of the Data Controller's data processors is contained in Section 5 of this Data Processing Notice.

Data transfer: Data transfer to a third country or international organization does not take place.

4.12. Cookies

The Data Controller uses cookies on the Website, detailed information about which can be accessed via the following link: <https://drgaborhermann.com/cookie-tajekoztato/>

5. Data Processors

The Data Processors do not make independent decisions, they are only entitled to act in accordance with the contract concluded with the Data Controller and the instructions received. The Data Processors record, manage and process the personal data transmitted to them by the Data Controller and managed or processed by them in accordance with the provisions of the GDPR. The Data Processors perform data management operations on the personal data provided by the data subjects within the available usage period specified in this Data Management Information, in accordance with the individual data management purposes. The Data Controller uses the following data processors in connection with the data management specified in this Data Management Information:

Data processor category	Purpose of data processing	Data processor		
		Name	Headquarters	Registration number
Hosting provider	Hosting service	Tárhely.Eu Kft.	1144 Bp. Ormánság u. 4., 10.em/241.	01-09-909968
Newsletter	Sending newsletter	Sendinblue.com	SendinBlue 7	FR80498019298

			rue de Madrid 75008 Paris France PARIS RCS 498 019 298 SAS au capital social de 383 772 euros SIRET 498 019 298 00088	
Facebook advertisements	Facebook advertisements	Meta Platforms Ireland	4 Grand Canal Square, Grand Canal Harbour Dublin 2, Ireland	-
Data processing related to Utube page	Data processing related to Utube page	YouTube, LLC	901 Cherry Ave. San Bruno, CA 94066, USA	-
Statistical data collection	Creating statistics on the Website	Google Ireland	Gordon House, Barrow Street	-

(Google Analytics), marketing (Google Ads)	about visitors, marketing activities		Dublin 4, Ireland	
Statistical data collection, marketing	Creating statistics about website visitors, marketing activities	Hotjar	3141 Malta, Dragonara út, Paceville St Julian's Dragonara Business Centre, 5. emelet	-
Marketing (Meta Pixel)	Marketing	Meta Platforms Ireland	4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland	-

Google Analytics is a service of Google Ireland and when using the service, the data processor's contractual partner is Google Ireland (postal address: Gordon House, Barrow Street, Dublin 4, Ireland), which is therefore the data processor. The data processor is authorized to process the data received solely in accordance with the instructions of the Data Controller, unless otherwise provided for by any EU or Member State law. The data processor is also obliged to act in accordance with applicable law, in particular the provisions of the GDPR.

We use Hotjar to better understand our users' needs and to optimize this service and the user experience. Hotjar is a service that helps us better understand our users' habits (e.g. how much time they spend on each page, which links they click, what they like and what they don't like, etc.), and this allows us to build and maintain our service based on user feedback. Hotjar uses cookies and other technologies to collect data about our users' behavior and devices. These include the device's IP address (which is processed during the session and stored in an anonymous form), the device's screen size, the device type (unique device identifiers), browser data, geographical location (with country identification only) and the language used to display our website. Hotjar stores this information in a pseudonymized user profile. Hotjar is prohibited from selling the data collected on our behalf.

The Data Controller draws the attention of the data subjects that the data measuring consumption habits provided on the Website is not connected to the data of the users, the data provided is not suitable for the Data Controller to identify the data subject in any form, and does not fall within the scope of personal data.

6. Enforcement of the rights of data subjects

The data subject may request information about the processing of his/her personal data; and may request the correction of his/her personal data; restriction of data processing; deletion of his/her data from the Data Controller directly at the e-mail address info@hermannortho.hu, and is entitled to exercise his/her right to data portability, legal remedy, and the right to withdraw consent.

In the event of a complaint, the data subject may turn to the National Data Protection and Freedom of Information Authority or – at his/her choice – to a court in the territory of Hungary. The court has jurisdiction in the court proceedings.

In the event of fulfilling the data subject's request for the processing of personal data, the Data Controller shall, with regard to the data subject's status (client, applicant, etc.), identify the data subject in accordance with this Data Processing Information, and the Data Controller shall be entitled to comply with the data subject's request/request only after the data subject has been identified to an appropriate level.

If the applicant has not made his/her request for personal data processing in accordance with this Data Protection Notice and the Data Controller was unable to perform the identification of the applicant (as required by this Data Protection Notice) necessary for data security and/or confidentiality (as required by this Data Protection Notice) (he/she was unable to identify him/her as a data subject), the Data Controller shall invite the applicant to fill in the gaps, in case of failure to do so or failure to do so, the Data Controller shall not be able to respond to the request.

The time elapsed from the request to provide the necessary personal data/perform the missing activity requested by the Data Controller until the provision of the personal data is not included in the deadline for responding to the request.

The Data Controller shall inform all recipients to whom or with whom the personal data have been disclosed of any rectification, erasure or restriction of data processing, unless this proves impossible or requires a disproportionate effort. The Data Controller shall inform the data subject of these recipients upon request.

a) Right to information and access

In accordance with the obligation set out in Article 13 of the GDPR, the Data Controller shall, where the personal data originate from the data subject at the time the personal data are obtained, provide the data subject with the following information on the processing:

a) the identity and contact details of the data controller and its representative;

- b) the contact details of the data protection officer, if any;
- c) the purposes of the intended processing of the personal data and the legal basis for the processing;
- d) where applicable, the recipients or categories of recipients of the personal data, if any;
- e) the period for which the personal data will be stored or, where that is not possible, the criteria for determining that period;
- f) information on the data subject's right to request from the data controller access to, rectification, erasure or restriction of processing of personal data concerning him or her, and to object to the processing of such personal data, as well as the data subject's right to data portability;
- g) in the case of data processing based on consent, the right to withdraw consent at any time, which does not affect the lawfulness of the data processing carried out on the basis of consent before its withdrawal;
- h) the right to lodge a complaint with a supervisory authority;
- i) whether the provision of personal data is based on a legal or contractual obligation or is a prerequisite for entering into a contract, and whether the data subject is obliged to provide the personal data, as well as the possible consequences of failure to provide the data.

If the personal data were not obtained from the data subject, the Data Controller shall provide the data subject with the above information and, in addition, with the following information pursuant to Article 14 of the GDPR:

- a) the categories of personal data concerned;
- b) the recipients of the personal data or the categories of recipients, if any;
- c) the source of the personal data and, where applicable, whether the data originate from publicly available sources.

If the personal data were not obtained from the data subject, the Controller shall provide the information:

- a) within a reasonable time from the date on which the personal data were obtained, but no later than one month;
- b) if the personal data are used for the purpose of communicating with the data subject, at least upon first contact with the data subject; or
- c) if the data are expected to be communicated to other recipients, no later than upon first communication of the personal data.

The above information obligation does not need to be fulfilled if:

- the data subject already has the information set out in these points,
- providing the information in question proves impossible or would involve a disproportionate effort,
- obtaining or disclosing the data is expressly required by EU or Hungarian law applicable to the Data Controller, which also provides for appropriate measures to protect the legitimate interests of the data subject, or
- the personal data must remain confidential based on a professional secrecy obligation provided for in EU or Hungarian law in force.

The data subject's right of access – in accordance with Article 15 of the GDPR – covers the provision of the following information:

- purposes of data processing;
- categories of personal data concerned;
- recipients to whom the personal data are or will be disclosed;
- planned period of storage of personal data;
- rights of the data subject in relation to the processing of personal data;
- source of the data, if they were not collected from the data subject;
- information on automated decision-making.

The Data Controller shall in all cases strive to ensure that the information provided to the data subject is as concise, transparent, understandable, easily accessible, clear and plain as possible, while complying with the rules set out in the GDPR. The Data Controller is responsible for the provision of information and taking action. The Data Controller shall provide all information provided to the data subject in writing, including electronically. The Data Controller shall provide information to the data subject only and exclusively if the Data Controller is convinced of the identity of the data subject, in accordance with the data security rules set out in Article 15 and Article 32 of the GDPR. If identity is not verified, the Data Controller will reject the data subject's request to exercise their rights and will also inform the data subject about how to exercise their rights.

The Data Controller shall inform the data subject of his/her rights in the event of a request - included in a duly communicated statement - within one month of receipt of the request. Taking into account the complexity of the request and the number of requests, this one-month deadline may be extended by a further two months by the Data Controller, with a reasoned notification sent to the data subject within one month of the submission/receipt of the request to the Data Controller.

Adequate communication or receipt shall be deemed to be the case if the data subject sends the written request to the Data Controller's official address or to the email address provided for this purpose and it is received there.

Any request not communicated in accordance with the above shall not be taken into account by the Data Controller.

Information and communication related to the processing of personal data shall be easily accessible and understandable and shall be formulated in clear and plain language. This principle applies in particular to informing data subjects about the identity of the controller and the purposes of the processing, as well as to providing further information to ensure fair and transparent processing of the data subject's personal data, and to informing them that they have the right to obtain confirmation and information about the data processed about them.

The Controller shall provide the information and measures set out in this point free of charge, and shall only charge reimbursement of costs in the cases specified in Article 12(5) of the GDPR.

b) Right to rectification

The data subject shall have the right to obtain from the Controller, upon request, the rectification of inaccurate personal data concerning him or her without undue delay. 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 statement.

c) Right to object

The data subject may object to the processing of his or her personal data by means of a statement addressed to the Data Controller, if the legal basis for the processing is

- public interest pursuant to point (e) of Article 6(1) of the GDPR or
- legitimate interest pursuant to point (f) of Article 6(1) of the GDPR.

In the event of exercising the right to object, the Data Controller may no longer process the personal data, unless the Data Controller demonstrates 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. The Data Controller's management shall decide whether the processing is justified by compelling legitimate grounds.

It shall inform the data subject of its position in this regard in an opinion. The personal data shall be restricted accordingly for the period until such determination is made.

d) Right to restriction of data processing

Data processing may be restricted if:

- the data subject disputes the accuracy of the data, the Data Controller restricts the processing of personal data for a period of time until the accuracy of the data is established;
- the data processing is unlawful and the data subject requests restriction of use instead of deletion;
- the data controller no longer needs the data, but the data subject requires them for the purpose of asserting legal claims;
- the data subject objects to the processing of personal data in accordance with Article 21 of the GDPR, pending the assessment of the objection.

For the duration of the assessment of the data subject's objection to the processing of his or her personal data – but not more than 5 days – the Data Controller shall suspend the processing of the data, examine the grounds for the objection and make a decision, of which the applicant shall be informed.

If the objection is justified, the Data Controller shall restrict the data, i.e. only storage as data processing may take place as long as:

- the data subject consents to the data processing;
 - the processing of personal data is necessary for the exercise of legal claims;
 - the processing of personal data becomes necessary in order to protect the rights of another natural or legal person;
- or
- the processing is required by law in the public interest.

If the Data Controller lifts the restriction on data processing, it shall inform the data subject at whose request the restriction was made in writing of the fact of the lifting of the restriction before lifting the restriction, unless this proves impossible or requires a disproportionate effort. If the data subject requested the restriction on data processing, the Data Controller shall inform the data subject in advance of the lifting of the restriction.

e) Right to erasure (“right to be forgotten”)

The data subject shall have the right to obtain from the Controller the erasure of personal data concerning him or her without undue delay, and the Controller shall be obliged to erase personal data concerning him or her without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws his or her consent on which the processing is based and there is no other legal basis for the processing;
- c) the personal data have been processed unlawfully
- d) the personal data must be erased for compliance with a legal obligation to which the controller is subject under Union or Member State law;
- e) the personal data were collected in connection with the offering of information society services.

The right to erasure of the data subject may only be restricted if the following exceptions are stated in the GDPR, i.e. if the above reasons exist, the further retention of personal data is considered lawful,

- a) if it is necessary to exercise the right to freedom of expression and information, or

- b) if it is necessary to comply with a legal obligation (i.e. in the case of an activity recorded in the Data Management Register with a legal obligation for a period corresponding to the purpose of the data processing), or
- c) if it is necessary to perform a task carried out in the public interest, or
- d) if it is necessary to exercise official authority vested in the data controller, or
- e) if it is necessary to exercise public interest in the field of public health,
- f) if it is necessary to archive data in the public interest, or
- g) if it is necessary to exercise scientific and historical research or for statistical purposes, or
- h) if it is necessary to assert, exercise or defend legal claims.

f) Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Controller, in a structured, commonly used and machine-readable format and shall have the right to transmit those data to another controller without hindrance from the controller to whom the personal data have been provided, where:

– the legal basis for the processing is the consent of the data subject or the processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract [GDPR

Article 6(1)(a) or (b) and Article 9(2)(a)]

– the processing is carried out by automated means.

The right set out in this point shall not apply to the data subject if the processing is carried out in the public interest or in the exercise of official authority vested in the Data Controller, and where such processing would adversely affect the rights and freedoms of others.

If the Data Controller is required to disclose personal data to a person other than the data subject based on the data subject's right to data portability, the Data Controller shall inform and call upon such third party in the context of this Data Protection Notice that the personal data provided by the Data Controller in relation to the data subject may not be used for its own purposes and may only be processed for the purposes specified in the relevant data protection legislation. The Data Controller shall not be liable for the use by a third party of personal data duly transmitted to a third party at the request of the data subject.

g) Right to withdraw consent

If the legal basis for the processing of the data subject's personal data by the Data Controller is the data subject's consent, the data subject may withdraw his or her consent to the data processing at any time. In this regard, the Data Controller informs the data subjects that the Data Controller may process the data subject's personal data for the purpose of fulfilling its legal obligation or exercising its legitimate interests even after the data subject has withdrawn its consent, if the exercise of such interest is proportionate to the restriction of the right to the protection of personal data.

7. Legal Remedy

The data subject has the right to contact the Data Controller directly at the following e-mail address to eliminate the violation of the law or with any other complaint: info@hermannortho.hu.

If the data subject considers the data processing of the Data Controller to be offensive, he/she may file a complaint with the National Data Protection and Freedom of Information Authority (address: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, Pf. 9., telephone number: +36 (1) 391-1400, e-mail: ugyfelszolgalat@naih.hu, website: www.naih.hu). The data subject has the option of contacting a court in order to protect his/her data, which will proceed with the matter as a matter of urgency. In this case, you are free to decide whether to file your claim with the court of your place of residence (permanent address) or your place of stay (temporary address) (<http://birosag.hu/torvenyszekek>). You can find the court of your place of residence or stay at <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.