

DATA MANAGEMENT INFORMATION

Vital-tréning Ltd.

2025.06.17.

The purpose of the following Privacy Policy is to inform you about the data processing operations of Vital-tréning Egészségmegőrző Korlátolt Felelősségű Társaság (registered office: 1061 Budapest, Király utca 14, I./5., company registration number: 01 09 889471, tax number: 14113253-2-42) in connection with the operation of its website "www.kristonmethod.com ", other services and the sending of newsletters in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 20 December 2016 on the protection of individuals with regard to the processing of personal data (2016. (GDPR) and in accordance with the requirements of the applicable Hungarian legislation.

Vital-tréning Kft. is the data controller (hereinafter referred to as the "Data Controller") with regard to the processing of data related to the operation of the website, the provision of services and the sending of newsletters. The contact details of the Data Controller are info@intimtorna.hu.

In its data management processes, the Data Controller complies with the provisions of applicable law and in its data management practices fully respects the fundamental rights and privacy of individuals, with particular regard to the provisions of the General Data Protection Regulation.

1. Account registration

On the website, the user may create an account in order to use the services provided by the Service Provider (course registration, audio materials, documents, etc.) or to store certain information about you. The information stored in the account can be modified or deleted at any time other than the email address provided at registration.

Account registration can only be created with your consent (legal basis for data processing: GDPR § 6 (1) a)), which you can withdraw at any time by deleting your account. The processing takes place for the duration of the account (duration of processing).

Deleting your account will also result in your reviews (point 4) subsequently appearing under the "anonymous user" designation.

The scope of personal data stored in the account:

- a) contact details: name, email address, telephone number
- b) details provided when applying for a course: billing, payment method
- c) list of courses taken and already enrolled
- d) trainer evaluations.

The Data Controller emphasises that the user is contractually bound to the trainer for participation in the course and that by applying, the user accepts the trainer's Terms and Conditions and can read the privacy policy. Registration implies a commitment to pay the trainer. The Data Controller only provides the application process to the user and the trainer.

By registering, the user acknowledges that the Data Controller will transmit the data to the trainer of the course selected during the registration process in order to take further organizational steps regarding the course (cancellation, change of date, other important circumstances).

2. The fact of enrolment, the declarations you have made

The knowledge, exercises and all the information provided in the courses based on the Kriston method are protected by copyright, which is owned without time limit by the author (Andrea Kriston) and the company authorised to exercise certain copyrights (Data Controller). The Data Controller is responsible for detecting possible copyright infringements and for the enforcement of the law, which cannot be done without the Data Controller having accurate information about the persons enrolled in each course and the course. The Data Controller will not use these personal data for any other purpose, and will use them only to the extent necessary for the purposes of enforcement or legal proceedings (purpose of processing).

For this purpose, the Data Controller stores the contact details (name, email address, telephone number) of the individuals who have participated in the course and a list of the courses attended. Personal data are processed by the Data Controller for a period of 20 years from the end date of the last course attended.

The legal basis for processing is the legitimate interest of the Data Controller. The Data Controller has carried out an interest assessment, in which it has determined that the data of the participants are necessary for the procedure incumbent on it to protect the integrity of the Kriston Method, which also benefits individuals, that the Data Controller only stores the minimum necessary personal data and that its procedure does not cause irreversible or substantial or perceptible harm or prejudice to the fundamental rights of the individuals involved. The Controller shall use the data only when and to the extent necessary to enforce copyright protection.

There is no data transmission.

3. Subscribe to newsletter and send newsletters

The user has the possibility to subscribe to several newsletters on the Website. When registering, and at any time in the footer or in his/her profile, he/she can subscribe/unsubscribe to/unsubscribe from the Service Provider's central newsletter/newsletters on the Kriston method.

In addition, users can subscribe to two types of newsletters for each Trainer: the newsletter of the Trainer about the Kriston Method related activity and the newsletter of the Trainer about non-Kriston Method related activity. The user can do this on the Trainer's profile, when applying for a session with the Trainer, or on their profile at any time if they have already subscribed to any of the Trainer's newsletters or applied for any of the Trainer's sessions.

The Website only provides the possibility to subscribe and unsubscribe to the Trainer's newsletters, the sending of the newsletters and the related data management after subscription and unsubscription is the full responsibility of the Trainer. The Trainer's information on data management is available in the Trainer's Privacy Notice on the Trainer's profile.

By subscribing to the trainer's newsletter, the user acknowledges that the Data Controller will transfer the data to the trainer concerned by the subscription, who will be responsible for the lawful use of the data and for sending the newsletter.

The content of the newsletters is not targeted at individuals. In order to send out the newsletters, the Data Controller processes the data required by law (Article 6 of the Advertising Act) (name, e-mail address, date of subscription), in addition to the gender of the participant and the course completed, and may send newsletters based on these data.

Your data will be used solely for the purpose of sending you our newsletter. The controller will not transfer the processed data to any other controller.

The sending of newsletters is only possible after your consent, and the processing is based on your voluntary consent (legal basis for processing: GDPR § 6 (1) a)), which entitles us to send newsletters. If you withdraw your consent or use the unsubscribe function available in the newsletter, your data will be deleted immediately (duration of data processing). Please note that you must initiate the unsubscription from the trainer newsletter to the trainer, the Data Controller is not involved in this process.

Every three years, we review the accuracy of our data and delete email addresses that have become inactive (e.g. none of our newsletters have been opened) or inoperative (newsletters bounce), even in the absence of an opt-out.

4. Evaluation

If you are a registered user and you have registered for a course through the Website and have attended a course, you have the opportunity to post your opinion about the Trainer of the course you have attended on the Website in the interface provided.

The review will appear under your first name on the public page.

5. Provisions on data security

The security of your personal and business data is important to us. Only the data necessary for the purposes for which the Data Controller is processing the data will be collected.

The Data Controller stores the processed data in the IT system provided by its contractual data processing partners, WebCapital Kft. (headquarters: 7622 Pécs, Rákóczi út 17.) and on the storage space provided by them in the European Union.

When sending the newsletter, UAB Sender.It (Vilnius, Lithuania), which operates the Sender.net service, supports the Data Controller as a data processor, and the data is stored within the European Union.

6. Your rights

Please note that you may exercise your rights under the law by sending an email to info@intimtorna.hu, within the limits set by law:

- a. request access to or a copy of the personal data we process about you; (Article 15)
- b. request information on the main features of the processing (purpose, scope of the data processed, processors involved, duration of the processing); (Article 15)
- c. may withdraw its consent at any time; (Article 7(3))
- d. request the rectification of inaccurate personal data concerning you or the completion of incomplete personal data without undue delay; (Article 16)
- e. request the erasure of personal data concerning you without undue delay (Article 17), if.
 - i. the personal data are no longer necessary for the purposes indicated in points 1 and 2 (provision of professional material, sending newsletters);
 - ii. You withdraw your consent and there is no other legal basis for further processing;
 - iii. You object to the sending of newsletters;
 - iv. your data was unlawfully processed;

Data cannot be deleted if it is necessary for the establishment, exercise or defence of legal claims.

- f. request the restriction of the use of the data (Article 18); and
- g. may request to receive data about you in a commonly used, machine-readable format or to transfer it directly to another controller (Article 20);
- h. may object to the sending of newsletters - your data will not be processed for this purpose following your objection (Article 21(2)-(3));
- i. to the supervisory authority of the place of residence, workplace or place of the alleged infringement (Article 77).

The supervisory authority in Hungary is the National Authority for Data Protection and Freedom of Information (Budapest, 1055, Falk Miksa út 9-11, ugyfelszolgalat@naih.hu)

In the event of a breach of rights, you also have the right to bring legal proceedings against the controller or processor before the courts of the Member State in which the controller or processor is established and before the courts for the place where you are resident.

We will respond to your request for information, once identified, within 30 days at the contact details provided.