

## Privacy Notice for business partners

**IDBC Creative Solutions Kft.**, **IDBC New Tech Kft.** and **IDBC GO Kft.** provide human resource management services as well as IT services related to business process management. Given that the target groups and business partners of the three companies differ, but the provision of services (searching for potential partners, concluding contracts, performance, etc.) generally follows the same methodology, the three companies have entered into a joint controller agreement.

The essence of the joint controller agreement is that IDBC Creative Solutions Kft., IDBC New Tech Kft. and IDBC GO Kft. jointly perform and operate the provision of the services falling within their respective fields of activity and its operation (e.g. sales, client relations).

The preparation and up-to-date maintenance of the privacy notice for business partners, the handling of any data protection incidents and, where necessary, their notification to the data protection supervisory authority, as well as the exercise of data subjects' rights, are carried out with the involvement of **IDBC Creative Solutions Kft.** Where any data-protection-related activity (e.g. amendment of the privacy notice, communication with data subjects) affects the activities of IDBC New Tech Kft. and/or IDBC GO Kft., IDBC Creative Solutions Kft. acts after consultation with the Parties or the affected Party.

In the course of its business activities, IDBC Creative Solutions Kft., IDBC New Tech Kft. and IDBC GO Kft. (hereinafter jointly: **IDBC or Controller**) come into contact with natural persons, legal entities and organisations without legal personality. Legal entities and organisations without legal personality are referred to as “business partners”.

In this Privacy Notice, we have summarised the information (purpose, legal basis and duration of processing, categories of personal data processed, etc.) relating to the processing of personal data in connection with establishing contact with business partners, cooperating with our existing business partners, and IDBC's business activities (the provision of its services).

IDBC's marketing activities (webinars, promotion, market research, social media, website cookies, etc.) may involve the processing of personal data; our related privacy notice can be found here: <https://idbc.hu/adatvedelem/>

Our privacy notice for candidates (job applicants) relating to cooperation for the purposes of job search and placement can be read here: <https://idbc.hu/adatvedelem/>

Persons working for IDBC (including our subcontractors) receive the notice on the processing of their personal data before signing their employment contract or subcontractor agreement.

Legislation relating to the processing and protection of personal data

- a) refers to the subject of the personal data (e.g. the natural person representing, or in contact with, the business partner) as the data subject (hereinafter: data subject),
- b) refers to any information relating to, or capable of being linked to, the data subject as personal data,
- c) refers to any operation performed on personal data (collection, recording, storage, processing, retrieval, disclosure, querying, access, publication, etc.) as processing,
- d) refers to the authorisation for processing as the legal basis for processing,

- e) refers to the entity that determines the purposes and means of the processing as the controller,
- f) refers to those who do not belong to the controller but who, under a written agreement, participate in processing operations, as processors,
- g) and refers to a person other than the data subject, the controller and the processor as a third party; we therefore use these terms in this Privacy Notice.

This Privacy Notice also contains the data protection, enforcement and remedy rights afforded to data subjects.

## 1. Identity and contact details of the Controllers

### Controller 1: **IDBC Creative Solutions Kft.**

Registered seat and postal address: 1138 Budapest, Népfürdő u. 22., Duna Tower Office Building, Tower A, 13th floor

Registering authority: Company Registry Court of the Budapest-Capital Regional Court

Company registration number: 01-09-192925

Tax number: 24983332-2-41

Private employment agency licence number: BPM/0701/597-1/2016-1012

E-mail address: [info@idbc.hu](mailto:info@idbc.hu)

Phone number: +36 30 479 8090

Website: <https://idbc.hu>

Data Protection Officer's contact details: [adatvedelem@idbc.hu](mailto:adatvedelem@idbc.hu)

### Controller 2: **IDBC New Tech Kft.**

Registered seat and postal address: 1138 Budapest, Népfürdő u. 22., Duna Tower Office Building, Tower A, 13th floor

Registering authority: Company Registry Court of the Budapest-Capital Regional Court

Company registration number: 01-09-861417

Tax number: 13556075-2-41

E-mail address: [info@idbc.hu](mailto:info@idbc.hu)

Phone number: +36 30 479 8090

Data Protection Officer's contact details: [adatvedelem@idbc.hu](mailto:adatvedelem@idbc.hu)

### Controller 3: **IDBC GO Kft.**

Registered seat and postal address: 1138 Budapest, Népfürdő u. 22., Duna Tower Office Building, Tower A, 13th floor

Registering authority: Company Registry Court of the Budapest-Capital Regional Court

Company registration number: 01-09-283268

Tax number: 25578182-2-41

E-mail address: [info@idbc.hu](mailto:info@idbc.hu)

Phone number: +36 30 479 8090

Data Protection Officer's contact details: [adatvedelem@idbc.hu](mailto:adatvedelem@idbc.hu)

## 2. Key legislation applicable to the processing

- a) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and

on the free movement of such data, and repealing Directive 95/46/EC (GDPR or General Data Protection Regulation)

- b) Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Infotv.)
- c) Act V of 2013 on the Civil Code (Ptk.)
- d) Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Commercial Advertising Activity (Advertising Act)
- e) Act CVIII of 2001 on Certain Issues of Electronic Commercial Services and Services Related to the Information Society (E-Commerce Act)
- f) Act XXV of 2023 on Complaints, Public Interest Disclosures, and the Rules Relating to the Reporting of Irregularities (Complaints Act)
- g) Act C of 2000 on Accounting (Accounting Act)

### 3. Activities involving the processing of personal data

#### 3.1. Preparation and performance of a business services contract

IDBC concludes contracts for the provision or use of its services. Contact with a prospective business partner is initiated either by IDBC or by the prospective business partner.

During the preparation of the contract (making contact, negotiations, etc.) and the conclusion of the business contract, we process the name of the natural person representing the business partner and, if applicable, their title, position, e-mail address and telephone number, as well as the name of the business partner and information relating to the requested service (subject matter of the contract, content of the service, start date, etc.).

In addition to the designation, the processing associated with contracts concluded by IDBC also includes the registered seat, tax number and company registration number or registration number of the business partner, which only qualify as personal data when combined with information relating to the natural person (e.g. name and position).

Legal basis for processing: Article 6(1)(b) GDPR – preparation and performance of the contract

Retention period for personal data:

- 5 years from termination of the contract, pursuant to Section 6:22 of the Civil Code (the general limitation period).
- if no order or contract is concluded following a request for or submission of an offer, we delete the personal data 1 year after the business offer or the last contact (e.g. a telephone inquiry)

For the processing relating to contact in connection with the preparation (submission of offers) and performance of the contract, see Section 3.3.

#### 3.2. Processing related to invoicing

IDBC issues an invoice, in accordance with legislation, for the fee requested or received for services performed under the contract.

The invoice contains the name of the business partner, its registered seat or billing address, its tax number, details of the service (designation, quantity or duration, etc.) and its price, as well as information relating to taxation (tax rate, etc.). In this case, the name of a sole-trader business partner is not personal data, but “functions as a company name”. In connection with invoicing, we also process the personal data (name, e-mail address or postal address) necessary for sending the invoice to the addressee (business partner).

Personal data appear on the invoice only where the business partner expressly requests (in writing) that the name or other personal data (e.g. a personal e-mail address, individual telephone number) of the natural person representing it, or in contact with it, also be indicated. In such a case, it is the business partner's responsibility to inform the data subject (whose name and/or personal e-mail address or individual telephone number appears on the invoice) about the processing of their personal data, including the fact that the business partner requested that the personal data be included on the invoice issued by IDBC.

Legal basis for processing: Article 6(1)(c) GDPR – compliance with the legal obligation under Section 159(1) of the VAT Act and Section 166(1) of the Accounting Act

Duration of processing: 8 years from performance of the invoice, pursuant to Section 169(1) of the Accounting Act

### 3.3. Processing related to the contact necessary for the preparation and performance of the business services contract

The provision of various information, answering questions, handling any problems – that is, ongoing cooperation and communication between the contracting parties – is a natural part of preparing and performing business services contracts (and is also the conduct expected under the Civil Code), and this could not be achieved without processing the personal data (e.g. name, position, e-mail address, telephone number, name of the business partner, content of communications) of the business partner's representative and/or contact person. In addition to the personal data of the business partner's representative and/or contact person mentioned above, we also process the name, registered seat and/or postal address, central telephone number and e-mail address of the business partner.

Legal basis for processing: Article 6(1)(f) GDPR – IDBC's legitimate interest in the preparation and performance of the contract

Duration of processing:

- 5 years from termination of the contract or completion of the contact-related task, pursuant to Section 6:22 of the Civil Code (the general limitation period);
- if no order or contract is concluded following a request for or submission of an offer, we delete the personal data 1 year after the business offer or the last contact (e.g. a telephone inquiry).

### 3.4. Newsletter, market research or public opinion polling

In addition to the contact described in Section 3.3, IDBC regularly (a few times a year) sends a newsletter to, or may contact by telephone, the business partner's representative and/or contact person at their official contact details provided (work e-mail address, telephone number), informing them of news and developments related to IDBC's business activities, information about upcoming events (e.g. topic, date), as well as reports and interesting facts about past events, and may occasionally conduct telephone or written public opinion or market research on a topic of general interest, etc.

Based on the information available to it under Section 3.3 (e.g. the field of activity of the represented company, job role, area of interest) or conclusions drawn therefrom, IDBC carries out profiling (grouping according to certain characteristics) from time to time, and may send specific messages or thematic newsletters to different target groups, or carry out business, business-development, opinion-polling or market research outreach (e.g. surveying business partners' representatives on human resource topics of interest to them).

Subscribing to the newsletter is not a condition for concluding a contract with, or maintaining contact with, IDBC, or for using IDBC's services; therefore, the newsletter subscriber may unsubscribe from the newsletter at any time via the link contained in it. Unsubscribing from the newsletter can also be done by sending a request to [adatvedelem@idbc.hu](mailto:adatvedelem@idbc.hu) (see also Sections 8.3 and 8.4).

After unsubscribing from the newsletter, the data subject will no longer receive notifications about IDBC's latest offers, trends and developments in its field of activity, professional information, or reports on past online events, and will no longer take part in any market research or opinion polling.

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

Duration of processing: until withdrawal of the data subject's consent (see also Sections 8.3 and 8.4), or, in the absence thereof, 1 year from the last contact (e.g. newsletter)

### 3.5. Processing related to complaints

A complaint is the expression of a grievance, inconvenience or dissatisfaction relating to conduct experienced in the course of cooperation or dealings with IDBC. A complaint may also contain a suggestion.

Complaints relating to IDBC's services or to dealings arising in the course of cooperation with business partners may be submitted to us via the contact details set out in Section 1.

In order to resolve the complaint as quickly as possible, we process the complainant's name, identification data (as necessary), contact details (e.g. e-mail address), and information relating to the complaint (subject matter, date, duration, etc.).

If IDBC has any doubt as to the identity of the complainant, it may request further identification data. If the data subject does not provide the personal data strictly necessary for handling the complaint, IDBC will reject the complaint, stating the reason.

Legal basis for processing: Article 6(1)(c) GDPR – compliance with the legal obligation under Sections 2–6 of the Complaints Act.

Duration of processing: 5 years from the closure of the complaint handling (the general limitation period).

### 3.6. Enforcement of claims relating to the business services contract

Where legal and/or business claims arise (e.g. non-payment of a fee, causing damage) in connection with a service performed or to be performed by IDBC, or in connection with the business services contract, IDBC processes the following personal data of the business partner, regardless of which party raises the claim: the name, position, and business contact details (e.g. e-mail address, telephone number) of the business partner's representative or another natural person connected to it, and information relating to the legal and/or business claim (e.g. designation and content of the claim, date).

In addition to the personal data of the business partner's representative mentioned above, we also process the name, registered seat and/or postal address, central or departmental telephone number and e-mail address of the business partner.

Legal basis for processing: Article 6(1)(f) GDPR – IDBC's legitimate interest in enforcing claims relating to the business services contract

Retention period for personal data: 5 years from performance of the contract, pursuant to Section 6:22 of the Civil Code (the general limitation period).

### 3.7. Processing related to the exercise of the data subject's rights and to complaints concerning the processing of personal data

In connection with all processing activities carried out by IDBC, the data subject may exercise the rights set out in Section 8, may submit a complaint to the Controller regarding the processing of their personal data, or may exercise the remedies described in Section 9.

The rights of data subjects are personal rights, which may only be exercised in person. The expression “exercised in person” means that these rights may only be exercised by the person to whom the personal data or the data protection complaint relating to the exercise of that right relates.

The data subject's identification data (name, place and date of birth, mother's name) will only be processed in full where the data subject's right cannot be exercised, or the complaint concerning the processing cannot be assessed, without providing such data.

If the exercise of a data subject's right or a data protection complaint adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, IDBC is entitled to refuse compliance with the data subject's request, to the extent necessary and proportionate, or to provide a response of limited content.

If a problem relating to the processing of personal data can be linked to the activities of a party contributing to IDBC's business activities, that contributing party is responsible for handling the matter (see Chapter 5).

In the case of a data protection complaint or exercise of a data subject's right concerning processors (see Chapter 6), IDBC acts if the data protection complaint or exercise of the data subject's right concerns processing activities commissioned by IDBC. IDBC may involve the processor in investigating a data protection complaint or exercise of a data subject's right concerning processing activities commissioned by it, and for this purpose may transfer the data subject's personal data under this point to the processor, provided that this does not prejudice the rights and freedoms of the data subject. A data protection complaint or exercise of a data subject's right concerning an activity of the processor that falls outside the content of the contract concluded between the processor and IDBC shall take place directly with the processor.

In order to ensure the exercise of data subjects' rights and to handle data protection complaints (receipt, assessment, etc.), IDBC processes the data subject's personal data [name, data relating to the exercise of the data subject's right (subject matter, date, and data relating to compliance)].

Legal basis for processing: Article 6(1)(c) GDPR – compliance with the legal obligation under Article 12(5) and (6), Articles 15–18 and Article 21 of the GDPR

Retention period for personal data: 5 years from the fulfilment of the exercise of the data subject's right (closure of the matter) (the general limitation period)

If the exercise of the data subject's rights or the handling of a data protection complaint leads to administrative or judicial proceedings, the duration of processing under this point shall last until the expiry of the retention period applicable to the documents of those proceedings.

### 3.7. Operation of cameras

The cameras installed at IDBC's registered seat operate with a field of view covering the entrance to the premises, the reception area and the lobby in front of it, as well as the two corridors leading to the office and meeting rooms.

The purpose of camera surveillance is to protect human life and physical safety, as well as IDBC's assets (including trade secrets and personal data), and to investigate any unauthorised entry.

The cameras record the data subject's image, conduct, and the location and time of their movement. The cameras do not record sound, and are not connected to any computer system

that automatically establishes a data subject's identity based on their face or other physical characteristics (e.g. gait).

Legal basis for processing: Article 6(1)(f) GDPR – IDBC's legitimate interest in protecting human life and physical safety and its assets, investigating any unauthorised entry, and ensuring undisturbed operation

Retention period for personal data: 30 days from creation of the data.

Where the use of camera footage is necessary for the conduct of any proceedings, it is retained together with the data of those proceedings, for the retention period applicable to the data of those proceedings (e.g., in the case of enforcement of a claim, for the duration specified in Section 3.5).

#### 4. Profiling and automated decision-making

From among the personal data it processes, IDBC occasionally carries out profiling (grouping according to certain characteristics) based on conclusions drawn from the business partner's company name, or the interests and job role of the representative/contact person subscribing to the newsletter, which it uses to determine the target audience for thematic newsletters and advertising campaigns.

In connection with, or on the basis of, profiling, IDBC does not apply automated decision-making (a decision based solely on automated processing that affects the data subject).

#### 5. Access to data; data transfer

In providing its services, IDBC also makes use of the services of contributors. Some contributors (e.g. platform providers) qualify as controllers, while others qualify as processors (for processors, see Chapter 6).

IDBC may, on occasion, transfer personal data for proceedings before the National Authority for Data Protection and Freedom of Information, which performs data protection supervision, or before another authority or court.

Invoices issued by IDBC are also, pursuant to legal requirements, received by the National Tax and Customs Administration (registered seat: 1054 Budapest, Széchenyi utca 2.; website: [www.nav.gov.hu](http://www.nav.gov.hu); privacy notice: <https://nav.gov.hu/footer-tartalmak/adatvedelem>).

Service providers qualifying as controllers contribute to the following activities:

##### 5.1. Electronic data processing

IDBC uses, under a business subscription, Microsoft Ireland Operations Limited's (registered seat: Ireland, Dublin 18, Leopardstown, South County Business Park, One Microsoft Place; privacy notice: <https://privacy.microsoft.com/hu-hu/privacystatement>) Microsoft 365 and Microsoft Teams services.

##### 5.2. Bookkeeping, auditing

Bookkeeping and accounting tasks for IDBC are carried out by EGM Adó-kontír Kft. (registered seat: 1116 Budapest, Talpas u. 3.; company registration number: 01-09-666553; tax number: 12313464-2-43).

IDBC's business operations are audited by Petrovics és Társa Könyvvizsgáló, Adótanácsadó és Számviteli Szolgáltató Betéti Társaság (registered seat: 1141 Budapest, Szederkény utca 3.; company registration number: 01 06 110388; tax number: 28171966-2-42) as auditor.

### 5.3. Paper-based correspondence and parcel delivery

In its written communications and dealings with its business partners, IDBC uses the services of Magyar Posta (registered seat: 1138 Budapest, Dunavirág utca 2-6.; company registration number: 01 10 042463; tax number: 10901232-2-44; privacy notice: [https://www.posta.hu/adatkezelesi\\_tajekoztato](https://www.posta.hu/adatkezelesi_tajekoztato)).

In its communications and dealings with its business partners, IDBC also uses the services of Gepárd Express Kft. (registered seat: 2636 Tésa, Kossuth utca 70.; company registration number: 13-09-209821; tax number: 28984768-2-13).

## 6. Processors

Under the GDPR, business partners that carry out data-processing operations related to IDBC's services on the basis of IDBC's written mandate (contract), and thereby may also access personal data, qualify as processors.

In its contracts with processors, IDBC includes and monitors the requirement that employees of the contributing processor business partner may only access personal data relating to IDBC's services for the purpose of, and to the extent necessary for, performing their duties, and only after having completed data protection and data processing training and having assumed responsibility.

Processors may not make decisions relating to processing (e.g. for what purpose, which personal data are processed, for how long); they are only entitled to act in accordance with the contract concluded with IDBC and the instructions received, and to carry out specific processing operations (e.g. collection, analysis, transfer, deletion).

IDBC only engages processors that implement appropriate technical and organisational measures to guarantee a level of data protection and data security appropriate to the degree of risk.

The specific tasks and responsibilities of the processor are set out in the contract between IDBC and the processor.

Service providers qualifying as processors contribute to the following activities:

### 6.1. Invoicing

IDBC issues and manages invoices for the fees for its services using the services of KBOSS.hu Kft. (szamlazz.hu) [registered seat: 1031 Budapest, Záhony utca 7/D; company registration number: 01 09 303201; tax number: 13421739-2-41; privacy notice: <https://www.szamlazz.hu/adatvedelem/>].

### 6.2. Electronic data processing

IDBC processes personal data relating to its business operations electronically, using modules of the Zoho One software suite developed and operated by Zoho Corporation Pvt. Ltd. (registered seat: Estancia IT Park, Plot No. 140 & 151, GST Road, Kanchipuram Dist, Vallancherry Village, Chennai, Tamil Nadu 603202, India). Further details on Zoho's data protection and data security principles can be found here (<https://www.zoho.com/privacy.html?ireft=nhome&src=home1-footer>) and on its GDPR compliance here (<https://www.zoho.com/gdpr.html>).

## 7. Data security

IDBC takes technical, organisational and personnel measures to ensure that the personal data it processes are protected against, among other things, unauthorised access, unauthorised alteration and destruction.

Access to personal data stored in the IT system is role-based and logged, meaning that it is always possible to verify who accessed which personal data and when. Only IDBC's authorised and trained employees have access to the personal data processed, and only to the extent necessary for the performance of their job duties.

## 8. Data subjects' rights in connection with the processing

### 8.1. Right to request information (right of access)

The data subject may, in writing, via the contact details provided in Section 1, request information from IDBC on which of their personal data are processed, on what legal basis, for what processing purpose, from what source, and for how long, as well as to whom, when and on the basis of which legislation the Controller has granted access to, or to whom it has transferred, which of the data subject's personal data.

IDBC complies with the data subject's request within a maximum of one month, by a reply sent to the contact details provided by the data subject.

Where the data subject requests such information in multiple copies, the Controller is entitled to charge a reasonable fee, commensurate with the administrative costs of producing the additional copies.

If the data subject's right of access under this point adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, IDBC is entitled to refuse compliance with the data subject's request to the extent necessary and proportionate.

Before complying with the request, IDBC may ask the data subject to clarify the content of the request and to specify precisely the information or processing activities requested.

### 8.2. Right to rectification

The data subject may, in writing, via the contact details provided in Section 1, request that IDBC amend any of their personal data (for example, they may change their e-mail address or other contact details at any time) or complete any incomplete personal data.

The Controller complies with the request within a maximum of one month and notifies the data subject thereof by letter sent to the contact details provided by them.

IDBC informs those to whom it has transferred the data subject's personal data of the rectified data, provided that doing so is not impossible or does not require disproportionate effort on the part of the Controller.

### 8.3. Right to erasure

The data subject may, in writing, via the contact details provided in Section 1, request that IDBC erase all or some of their personal data. IDBC will not comply with the erasure request if legislation obliges it to continue storing the personal data and the retention period specified in that legislation has not yet expired.

If there is no such obligation, IDBC will process the data subject's request within a maximum of one month and will notify the data subject of the outcome by letter sent to the contact details provided by them.

IDBC informs those to whom it has previously transferred the data subject's personal data of the erasure of the data, provided that doing so is not impossible or does not require disproportionate effort on the part of the Controller.

#### 8.4. Right to restriction of processing (blocking)

The data subject may, in writing, via the contact details provided in Section 1, request that IDBC restrict their personal data. Restriction is carried out by clearly marking the restricted nature of the processing and storing the data separately from other data. This means that no processing operation other than storage may be carried out on the data. The restriction lasts for as long as the reason indicated by the data subject makes it necessary to keep the personal data under restricted storage. A data subject may, for example, request restriction of their personal data if they believe that IDBC has processed their personal data unlawfully, but administrative or judicial proceedings initiated by them require that the Controller not erase the personal data. In such a case, IDBC keeps the personal data under restriction until the authority or court has been approached, and, following the conclusion of the administrative proceedings, either erases the data or continues processing it.

#### 8.5. Right to object

The data subject may, in writing, via the contact details provided in Section 1, object to processing where IDBC processes the personal data on the basis of its own legitimate interest or that of a third party. The data subject may, for example, object to processing where IDBC would transfer or use the data subject's personal data for the purposes of public opinion polling or scientific research on the basis of its own or a third party's legitimate interest.

IDBC examines the data subject's objection within a maximum of one month and notifies the data subject of the outcome (including, where applicable, a communication regarding the deletion of any unlawfully processed personal data) by letter sent to the contact details provided by them.

### 9. Means of enforcing rights and remedies in connection with the processing

The data subject may contact IDBC via the contact details indicated in Section 1 in order to enforce their rights relating to the processing and protection of their personal data.

If the data subject believes that their rights relating to the protection of their personal data have been infringed, they may seek a remedy from the following authority:

National Authority for Data Protection and Freedom of Information (NAIH)  
registered seat: 1055 Budapest, Falk Miksa u. 9-11.  
postal address: 1363 Budapest, P.O. Box 9.  
telephone: +36 (1) 391-1400  
website: [www.naih.hu](http://www.naih.hu)  
e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

If the data subject experiences unlawful processing of their personal data, they may initiate court proceedings (a civil action) against the Controller. Jurisdiction to hear the action lies with the regional court (törvényszék). At the data subject's choice, the action may also be brought before the regional court having jurisdiction over the data subject's place of residence (the contact details of the regional courts can be viewed via the following link: <https://birosag.hu/torvenyszekek>)

### 10. Updating and availability of the Privacy Notice

IDBC reserves the right to unilaterally amend this Privacy Notice.

This Privacy Notice may be amended in particular where necessary due to a change in legislation, the practice of the data protection supervisory authority, business needs, or a newly identified security risk.

## 11. Cookies

Our website uses cookies to ensure the proper operation of the site, improve the user experience, analyze website traffic, and support our marketing activities. Cookies that are strictly necessary for the operation of the website are always enabled. Analytical and marketing cookies are only stored on your device with your consent. Some cookies are set directly by our website, while others are placed by trusted third-party providers such as Google and Meta. You can manage or withdraw your cookie preferences at any time through the cookie consent banner or your browser settings.

| Cookie                          | Category           | Provider           | Purpose                                                                                                 | Duration                         |
|---------------------------------|--------------------|--------------------|---------------------------------------------------------------------------------------------------------|----------------------------------|
| <b>PHPSESSID</b>                | Strictly Necessary | Website            | Maintains the user's PHP session and enables essential website functionality during a browsing session. | Session                          |
| <b>wp-wpml_current_language</b> | Strictly Necessary | Website            | Stores the user's selected language to display the website in the preferred language.                   | 1 day (or as configured by WPML) |
| <b>_ga</b>                      | Analytics          | Google Analytics 4 | Distinguishes unique visitors and collects anonymous statistics about website usage.                    | 2 years                          |
| <b>_ga_8M4C6V7LYR</b>           | Analytics          | Google Analytics 4 | Stores session and event data for the website's Google Analytics 4 measurement ID.                      | 2 years                          |
| <b>_gcl_a</b>                   | Marketing          | Google Ads         | Used by Google Ads to measure ad conversions and improve advertising effectiveness.                     | 3 months                         |

|                       |                        |                 |                                                                                                                        |                      |
|-----------------------|------------------------|-----------------|------------------------------------------------------------------------------------------------------------------------|----------------------|
| <b>_fbp</b>           | Marketing              | Meta (Facebook) | Used by Meta Pixel to identify visitors, measure conversions, and deliver personalized advertising.                    | 3 months             |
| <b>GRECAPTCHA</b>     | Strictly Necessary     | Google          | Used by Google reCAPTCHA to distinguish legitimate users from automated bots and protect forms against spam and abuse. | Up to 6 months       |
| <b>SIDCC</b>          | Third-Party / Security | Google          | Security cookie used by Google to protect user data and help maintain secure sessions.                                 | Approximately 1 year |
| <b>Secure-1PSIDCC</b> | Third-Party / Security | Google          | Security cookie used by Google to authenticate users and protect against fraud and unauthorized access.                | Approximately 1 year |
| <b>Secure-3PSIDCC</b> | Third-Party / Security | Google          | Security cookie used by Google to enhance browsing security and prevent fraudulent activity.                           | Approximately 1 year |