

Privacy policy

About data processing related to the operation of the “DietWizard” mobile application and the website <https://www.dietwizardapp.com>

Introduction

This Notice, in accordance with the rules of the EU General Data Protection Regulation 2016/679 (GDPR/General Data Protection Regulation), provides information on the activities of András Szabó IE. (hereinafter referred to as the Data Controller) with the data of natural persons in connection with the operation of the “DietWizard” mobile application and the website <https://www.dietwizardapp.com>. It provides information on the rules under which he acts during this activity and provides insight into the measures he takes to protect the data he uses. Last but not least, it provides information on all the rights that data subjects have in protecting their interests. The Data Controller provides the mandatory information pursuant to Article 13 of the GDPR to data subjects and interested parties as follows.

1. Data controller

Name of the data controller:	Szabó András IE.
IE. registration number:	60337616
Headquarters:	5630 Békés Mátra utca 11.
Tax number:	90976049-1-24
E-mail:	andras.szabo.work@gmail.com
Telephone:	+3630 2912 894
Customer service availability:	dietwizardapp@gmail.com

Our webshop hosting partner: WordPress.org
Contact: <https://hu.wordpress.org/wordpress-biztonsag/>
Privacy policy: <https://wordpress.org/about/privacy/>

2. Principles of personal data processing

As a data controller, we operate in compliance with the following principles::

- *The principle of purpose limitation: shows for what purpose the Data Controller stores and uses the data of natural persons in the course of its activities.*
- *The principle of data economy: therefore, the scope of the data processed is appropriate for a given purpose and only to the extent necessary for that purpose.*
- *The principle of accuracy: according to this, the Data Controller immediately corrects or deletes inaccurate personal data in the interests of the Data Subjects and legal compliance.*

As a data controller, we receive personal data directly from the data subjects. We accept as binding the performance of tasks related to the protection of personal data processed in connection with our activities, through which we help to prove – where appropriate – to the Authorities, business partners and the affected customers that we have acted in compliance with the Regulation and the Info. tv., as well as other relevant regulations in this regard (principle of accountability).

3. The main laws governing our data processing activities:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection

Regulation – GDPR, hereinafter referred to as the Regulation) Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (Info. tv.)

- Act XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activities
- Act I of 2012 on the Labor Code
- Act CL of 2017 on the Taxation System
- Act C of 2000 on Accounting
- Act CVIII of 2001 on electronic commerce services

4. Concepts

GDPR: REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

Personal data: any information relating to a data subject, such as an identifier, name, number, location data, online identifier or data relating to the physical, physiological, genetic, mental, economic, cultural or social identity of a natural person.

Data processing: any operation or set of operations performed on personal data or data files, regardless of the procedure used, including in particular collection, recording, recording, organization, structuring, storage, alteration, transformation, use, retrieval, transmission, disclosure, alignment or combination, blocking, erasure and destruction, access to data and preventing further use of data, taking photographs, audio or video recordings and taking physical characteristics (e.g. fingerprints or palm prints) suitable for identifying a person.

Data controller: the natural or legal person or organization without legal personality who, independently or jointly with others, determines the purposes and means of processing personal data, makes and implements decisions relating to data processing, or has them implemented by the data processor.

Data processor: the natural or legal person, or an organization without legal personality, who processes personal data on behalf of the data controller.

Data subject: any natural person who is identified or can be identified, directly or indirectly, on the basis of one or more factors, in particular by reference to an identifier such as a name, number, location data, online identifier or one or more factors. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, online identifier or one or more factors.

Data transfer: making personal data available to a specific third party. Data transfers to EEA member states or to European Union bodies shall be considered as data transfers within the territory of Hungary.

Data erasure/deletion: making data unrecognizable by content erasure or in a manner that allows for an equivalent result.

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

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 citizen enjoys the same legal status as a citizen of a state party to the Agreement on the European Economic Area based on an international treaty concluded between the European Union and its Member States and a state not party to the Agreement on the European Economic Area.

Third country: any state that is not an EEA member state.

NAIH: National Data Protection and Freedom of Information Authority, the supervisory authority under the GDPR for Hungary.

5. Data processing procedure

We process business partner or User (customer) data that we have come to know in any way and to any extent in the course of our activities in accordance with the provisions of this Data Management Information, under an obligation of confidentiality, in accordance with the provisions of the GDPR and the relevant Hungarian laws.

We may lawfully store personal data received in the course of performing tasks related to our activities, we may systematize them within the framework of the laws, and we may use them to the necessary extent.

We will terminate data processing immediately if its purpose has been fulfilled or has ceased, or we will consider it if the data subject requests it.

6. Details of data processing related to our activities, by purpose

6.1 Login/Registration

Data subjects: registered users

Purpose of data processing: individual account management, contact management

Data type	Legal basis	Guard time
e-mail address	GDPR Article 6(1)(a); your consent	Until consent is withdrawn, but for a maximum of 5 years

About the data processing process:

If you are a registered user, you can quickly log in to your account by providing only one piece of information (e-mail address), which allows for faster administration during your purchases.

Registration can be canceled, but without this there is no way to use your individual account. You can cancel your registration and withdraw your consent at any time, without giving any reason, but this does not affect the lawfulness of the data processing carried out previously based on your consent. You can withdraw your request by sending a request to the above e-mail address, which we will fulfill as soon as possible, but no later than within 5 working days.

6.2 Contact, customer service

Data subjects: anyone who sends us a message using the website form

Purpose of data processing: handling inquiries, messages

Data type	Legal basis	Guard time
Name	GDPR Article 6(1)(a); your consent	Until consent is withdrawn, but for a maximum of 5 years
e-mail address		
order ID (optional)		

About the data processing process:

If you would like to contact us or have any questions, you can use our customer service contact: dietwizardapp@gmail.com In the event of such a request, we definitely need your consent to data processing, without which we cannot process your data and we cannot keep in touch with you. You can give your consent with one click on our website or in the application.

You can withdraw your consent at any time, without giving any reason, but this does not affect the lawfulness of data processing carried out previously based on your consent. You can withdraw your consent by sending a request to the above e-mail address, which we will fulfill as soon as possible, but no later than within 5 working days.

6.3 Technical operations related to the service

Data subjects: our users

Purpose of data processing: recording data necessary for the operation of the service and its technical implementation

Data type	Legal basis	Guard time
date of registration	GDPR Article 6 (1) (c); legal compliance; Act CVIII of 2001 on electronic commerce services, Section 13/A (3)	until the registration is cancelled
name		
height	GDPR Article 6(1)(a); consent of the data subject	until the registration is cancelled or consent is withdrawn. Up to 30 days after the termination of the contract (according to the GTC)
weight		
age		
gender		
pregnancy info (yes/no)		
e-mail address	GDPR Article 6(1)(b); performance of a contract	until the end of the relationship according to the contract (GTC)
contact details of dietitians (name, phone, email)	GDPR Article 6(1)(b); performance of contract; Service provider recommendation for premium subscribers according to contract.	until the end of the relationship according to the contract (GTC)

The process of data management:

As a service provider, we may process personal data that is technically necessary for the provision of the service. Personal data will only be processed if this is absolutely necessary for the provision of the service and for the fulfilment of other purposes specified in Act CVIII of 2001, but even in this case only to the extent and for the period necessary.

No data transfer takes place.

6.4 Action related to data processing or consumer complaints

Data subjects: The natural person whose rights have been violated, the data subject.

Purpose of data processing: Identification, conducting the procedure and maintaining contact.

Data type	Legal basis	Guard time
name	GDPR Article 6 (1) (c); Compliance with a legal obligation; in the case of data protection, Regulation (EU) 2016/679 (GDPR); in the case of consumer complaints: Act CLV of 1997 (on consumer protection) Section 17/A (5)	3 years after the closure of a given case
residential address		
e-mail address		
telephone number		
information received during the complaint process		

The data processing process:

With regard to the data processing we carry out and in connection with purchases, every data subject has the right to file a complaint if they feel that they have been harmed or damaged.

Providing the data is mandatory in order to investigate the complaint and maintain contact - i.e. to conduct the due process. Without this, the complaint and/or the complainant cannot be identified, so we are unable to conduct the procedure.

6.5 Account management, accounting

Data subjects: webshop customers

Purpose of data processing: Document management according to the Accounting Act

Data type	Legal basis	Guard time
name, billing name and address	GDPR Article 6(c); Fulfillment of a legal obligation;	8 years following the year of issue of the invoice
tax number, registered office, if applicable	Act C of 2000 on Accounting, Section 169(2)	

The process of data management:

In the case of sole proprietors, invoices and receipts contain personal data. We retain this data in accordance with the provisions of the Accounting Act.

Providing the data is mandatory according to the applicable laws. Failure to do so will result in the invoice not being accepted.

We store the data electronically using the szamlazz.hu service.

- Partner: KBOSS.hu Kft.
- Data protection info: <https://www.szamlazz.hu/adatvedelem/>

The accounting is done by our external partner:

- Nánasdi Anikó IE.
- Availability: idna@wdsi.hu

6.6 Online payment, advance payment, cash on delivery

Data subjects: customers of the web service

Purpose of data processing: support of financial operations

Data type	Legal basis	Guard time
name, billing name and address	GDPR Article 6(c); Fulfillment of a legal obligation; Act C of 2000 on Accounting, Section 169(2)	8 years following the year of issue of the invoice

The process of data management:

To simplify the purchase and ensure a secure payment process, we use an online payment solution, for which we use the services of ApplePay and GooglePay. As a reminder, we inform users that we do not receive bank details from the service provider and do not process them.

- Partner: ApplePay. (as data processor)
- Data managements information about the scope of data we transmit: name, email, address

ApplePay Data Management Information: <https://www.apple.com/legal/privacy/data/en/apple-pay/>

- Partner: GooglePay (as data processor)
Data processing information: <https://pay.google.com/about/policy/>

Our company's financial affairs are handled by OTP Bank:

- Partner: OTP Bank Nyrt. (as data processor)
- Data management info: <https://www.otpbank.hu/portal/hu/adatvedelem>

6.7 Using our website

Data subjects: anyone who visits our website

Purpose of data processing: operation of the website and collection of information related to its operation

The <http://www.dietwizardapp.com/> website and mobile application currently only use strictly necessary (functional) cookies, which do not require consent.

If this changes, we will update this notice.

The process of data management:

Our website uses a technology called "cookies". A cookie is a small text file that the website provider places on your computer's hard drive. Cookies provide various functions that support the operation of the website.

The user has the option to allow or refuse cookies when they first visit the website. After that, they have the opportunity to change their previous decision on each subsequent visit. If you decide to refuse cookies, you may not be able to use some of the features of our website properly.

7. **Transmission and transfer of data**

We occasionally transfer personal data to third parties in connection with our activities. The transfer of data may be done on paper or electronically, in both cases ensuring that the data is accessible only to the recipient.

- paper-based transmission: by personal delivery or by mail, specifically to the recipient
- electronically (e-mail): personal data does not appear in the text of the message. If necessary, personal data is sent in an attached Excel or compressed file, in each case with a unique password. In other cases, using a cloud service, with unique password protection, without sending messages (written or attached data).
- As a data controller - with the legal basis of "performance of contracts" or "legal compliance" - we transfer data - in addition to the partners indicated above - to the following organizations operating as data processors or independent data controllers:
 - OTP Bank Nyrt.
 - Data management info.: <https://www.otpbank.hu/portal/hu/adatvedelem>

8. Data security

We ensure the security of the personal data we process by implementing technical and organizational measures and procedures.

Only those of our employees who need to know personal data to perform their duties have access to it.

To ensure data security:

- during the design and operation of the IT system, we assess and take into account potential risks, striving to continuously reduce them
- we monitor emerging threats and vulnerabilities (such as computer viruses, computer intrusions, denial of service attacks, etc.) so that we can take timely action to avoid and mitigate them
- we protect IT devices and paper-based information against unauthorized physical access and environmental influences (e.g. water, fire, electrical surges)
- we ensure the detection of potential problems and events by monitoring our IT system
- reliability is a fundamental aspect when selecting service providers participating in the operation

9. Data subjects have the following rights with regard to their personal data pursuant to Articles 15-20 of the GDPR:

- right to information;
- right of access;
- right to rectification;
- right to erasure;
- the right to restrict data processing;
- right to data portability;
- right to protest

You can exercise your rights by sending a request to dietwizardapp@gmail.com.

Based on the right of access, you can request information about whether your personal data is being processed, and if such data processing is in progress, you can access the personal data and receive information about the security conditions of data processing.

According to the right to rectification, we will correct your inaccurate personal data and complete your incomplete data without delay upon your request.

Based on the right to erasure, we will erase your personal data without undue delay in the following cases:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- if the consent forming the basis for data processing is withdrawn and there is no other legal basis for processing the data;
- if the personal data has been processed unlawfully;
- we are required by law to delete personal data.

We cannot delete personal data if the processing is necessary for the establishment, exercise or defense of legal claims.

Upon request, we will restrict the use of personal data based on **the right to restrict data processing**, in which case we will only use personal data within a specific scope.

Based on the right to data portability, we will send your data to you in a structured, commonly used and machine-readable format, or, at your request, directly transmit the data to another controller, provided that this does not adversely affect the rights and freedoms of others.

Right to information: The data subject may request information from us about the processing of his or her personal data within the period of data processing. As soon as possible after the request is submitted, but no later than 30 days, we will provide the data subject with written information in a clear and understandable form about the data processed, the purpose, legal basis, and duration of the data processing, and – if the data has been transferred – about who receives or has received the data and for what purpose.

Right to object: We will examine the objection as soon as possible after the request is submitted, but no later than 15 days, make a decision on its merits, and provide written information about our decision. If we are unable to comply with the data subject's request for rectification, blocking or erasure, we will communicate the factual and legal reasons for rejecting the request for rectification, blocking or erasure in writing or, with the data subject's consent, electronically within 30 days of receipt of the request.

10. Other provisions regarding data processing

Termination of data processing

We will delete all personal data that,

- in the case of the processing of which the purpose of data processing has ceased, or
- for the processing of which the data subject's consent is not available,
- the right to which the data subject has withdrawn or prohibited the processing, or
- for which there is no legal basis for handling.

Instead of erasure, we will block personal data if the data subject requests it or if, based on the information available to us, it can be assumed that erasure would harm the legitimate interests of the data subject. We will only process personal data blocked in this way for as long as the purpose of the data processing that precluded the erasure of the personal data exists.

11. Our procedural rules for handling data protection complaints

The procedure: we treat and handle all written comments from the natural persons concerned as complaints, if they are related to data protection and express a grievance regarding our procedure or omission that is incompatible with the provisions of this Data Protection Notice (hereinafter: complaint).

You can file a complaint by sending a report to our e-mail address above (electronically) or to your mailing address.

The complaint must include at least: the complainant's name, address (e-mail address), telephone number, date of the grievance, specific description of the complaint, signature of the complainant, and a statement that he/she consents to the processing of his/her data included in the complaint in the complaint procedure, simultaneously with signing the complaint. In the absence of this data and statement, the complaint will not be investigated and the Complainant will be notified in writing.

We process the Complainant's data exclusively in connection with the complaint, we do not disclose it to third parties, except for official or court requests stipulated by law, and we do not use it for business purposes.

We will investigate the complaint and provide a reasoned, written response within 30 days of receipt in the same manner as the complaint was filed (e-mail or post). If the 30-day deadline is not sufficient to

investigate the complaint, we will inform the complainant. In this case, we will provide a written, reasoned response within 3 months of the filing in the same manner as the filing.

If, after investigating the complaint, we determine that it was factual and justified, we will inform you about the method and extent of the remedy for your grievance at the same time as the complaint is assessed.

If the complaint is rejected, we will inform you in writing that you can then contact the National Authority for Data Protection and Freedom of Information (hereinafter: NAIH) with your complaint or, in case of grievance, the Court of Justice.

The NAIH facilitates the enforcement of data subject rights by issuing standard forms:

<https://naih.hu/panaszuegyintezes-rendje.html>

Complaint report: NAIH; 1055 Budapest, Falk Miksa u. 9-11,
E-mail address: ugyfelszolgalat@naih.hu
tel.: +36(1) 391 1400
website: www.naih.hu

12. Data protection incident and its management

Data protection incident: any activity, intervention or omission that enables the unlawful handling or processing of personal data, in particular unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage.

If you notice this in connection with our activities, please report it as soon as possible by email to dietwizardapp@gmail.com.

As a data controller, we will record the report and immediately begin investigating it. If the data protection incident occurred in an IT system, we will also inform the service providers responsible for operating the affected databases.

In order to investigate the report and handle the incident, we collect all information that may be necessary to identify it, reduce any potential damage, and develop further measures to be taken for remediation. We record it as much as possible.

- the time and place of the incident,
- description and circumstances of the incident,
- the scope and quantity of data compromised during the incident,
- the range of people affected by the compromised data

In addition to all this - in accordance with legal requirements - we will report to the Authority (NAIH) within 72 hours.

Data Protection Officer: As a data controller, we do not process large amounts of personal data and/or particularly sensitive data related to our main activity, therefore we do not consider the appointment or employment of a data protection officer to be justified, and our company is not obliged to do so by the current legal regulations.

Note: As the data controller, we reserve the right to continuously update this Data Protection Notice, and to unilaterally modify the information detailed therein, also following legal changes. The currently valid notice is available on our website.

Békés, 2025 april

Szabó András IE.