

PRIVACY NOTICE ON DATA PROCESSING RELATED TO
[HTTPS://HEALBEYONDTRAUMA.COM/](https://healbeyondtrauma.com/) AND TO THE PROVISION OF THE WINGWAVE
COACHING SERVICE

This document contains information on the data processing activities carried out through the website registered under the domain name healbeyondtrauma.com (hereinafter referred to as: the “Website”), which was created and is operated by the Controller for the purpose of providing, among other things, coaching services, as well as the data processing activities pursued in connection with the provision of the Wingwave coaching service. It also includes the relevant provisions of the applicable data protection laws.

The Controller reserves the right to unilaterally amend this Privacy Notice. Any modification shall take effect upon its publication on the Website.

Please note that this Privacy Notice covers only information related to the Website and to the provision of the Wingwave coaching service. It does not apply to the Controller’s social media pages or activities conducted there.

I. Controller Information

Name: Zsuzsanna Fodor – sole proprietor

Registered address: 1024 Budapest, Ezredes utca 13–15. 3rd floor, door 2.a

Mailing address: 1024 Budapest, Ezredes utca 13–15. 3rd floor, door 2.a

Phone: +36 30 984 14 98

E-mail: info@healbeyondtrauma.com

II. Data Protection Officer

The Controller does not meet any of the conditions specified in Article 38(1) of the GDPR; therefore, the appointment of a data protection officer is not required under applicable law.

III. Applicable Legislation

The provisions of this Privacy Notice are governed by the following European Union and Hungarian laws and regulations:

- 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, hereinafter: **GDPR**);
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: **Infotv.**);
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services.

IV. Definitions

For the purposes of this Privacy Notice:

- **Website:** A set of logically and functionally interconnected websites, resources and services organized under a common domain name (or subdomain), which the user perceives as a single online service.
- **Web page:** A self-contained unit of content on the web, identified by a URL and viewable in a browser. Its technical implementation varies (HTML, JavaScript, dynamic generation, API calls, etc.), but its function is to provide displayed information or interaction to the user.
- **Personal data:** Any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier, or to one or more factors specific to that person’s physical, physiological, genetic, mental, economic, cultural, or social identity.
- **Processing:** Any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment, restriction, erasure, or destruction.
- **Controller:** The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of personal data processing.
- **Processor:** A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.
- **Data subject’s consent:** Any freely given, specific, informed, and unambiguous indication of the data subject’s wishes by which they, by a statement or clear affirmative action, signify agreement to the processing of personal data relating to them.
- **Data breach:** A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored, or otherwise processed.

All definitions used by the GDPR can be found in Article 4 of the Regulation, accessible at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02016R0679-20160504>

V. Data Processors

Processor	Description of Activity	Processor’s Privacy Documentation
NetMasters Korlátolt Felelősségű Társaság (NetMasters Ltd.) Registered office: 4200 Hajdúszoboszló, Diószegi Sámuel utca 5. Company reg. no.: 09-09-025522 Tax number: 24812087-2-09	Web hosting and domain registration	For questions related to the processor’s privacy practices, please contact them through any of the contact options available at https://netmasters.hu/ .

Processor	Description of Activity	Processor's Privacy Documentation
NetMasters Korlátolt Felelősségű Társaság (NetMasters Ltd.)	E-mail account hosting	Same as above.
	<i>Accounting</i>	
	<i>Issuance and storage of invoices</i>	

VI. Data Processing on the Website <https://healbeyondtrauma.com/> and in connection with the provision of the Wingwave coaching service

1. Contacting Us via the Website (phone or e-mail)

- You may contact us directly through the contact details provided on our Website (phone, e-mail) for information, inquiries, or appointment requests.
- For this purpose, we process your name, phone number, e-mail address, and any personal data you voluntarily provide in your message.
- **Legal basis:** Article 6(1)(f) of the GDPR (processing is necessary for the purposes of the legitimate interests pursued by the controller).
- **Legitimate interest:** Providing information, communication, and scheduling appointments related to the Controller's services.
- **Recipients:** No data transfer is performed for this processing purpose.
- **Retention period:** 30 days following a one-time inquiry; for multiple inquiries, 30 days after the last contact.
- **Data security:** Personal data is stored using secure IT systems accessible only by the Controller.

2. Issuance and retention of invoices

- The Controller shall issue invoices with regard to the services provided or intermediated by the Controller.
- For this purpose, we process your name, address, the name of the service provided, the date of performance and the payment deadline.
- **Legal basis:** Article 6(1)(c) of the GDPR (processing is necessary for compliance with a legal obligation to which the Controller is subject, inter alia, pursuant to Article 169 of Act C of 2000 on Accounting).
- **Recipients:** The National Tax and Customs Administration is entitled to access the invoices under statutory obligation to which the Controller is subject.

- **Retention period:** 8 years.
- **Data security:** Personal data is stored using secure IT systems accessible only by the Controller.

VII. Data Subject Rights

1. Right to Information

You have the right to receive concise, transparent, and understandable information from the Controller about the essential aspects of data processing and your rights and remedies before or at the latest immediately after the start of data processing.

This privacy notice has been drawn up and published with a view to exercising this right.

Please note that you may exercise additional rights and remedies related to the processing of your personal data after verifying your identity.

2. Right of Access

You have the right to obtain confirmation as to whether or not personal data concerning you is being processed and, where that is the case, access to the personal data and obtain information on the purposes of, grounds for, duration of processing, the grounds for, and recipients of, data transfer, if any.

3. Right to Rectification (modification), Erasure, or Restriction of Processing

You may request correction of inaccurate data, deletion of non-mandatory data, or restriction of processing as applicable.

4. Right to Object

Based on this right – in case of your objection – the Controller may only continue to process your personal data to the extent necessary for the mandatory data processing established by the applicable laws. With regard to your data that is not subject to mandatory processing, the Controller shall restrict the processing and investigate the objection.

It is important that we may only continue to process your data that is not subject to mandatory data processing if we prove that the data processing is justified by compelling legitimate grounds that override your interests, rights and freedoms, or that are related to the establishment, exercise or defence of legal claims.

If the objection is established to be well-founded, we will terminate the data processing with regard to your data that is not subject to mandatory data processing and delete the data.

5. Right to Data Portability

You have the right to receive the personal data concerning you, which you have provided to the Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Controller, where:

- the processing is based on your consent or explicit consent, or

- the processing is necessary for the performance of a contract to which you are a party, or
- it is necessary to take steps at your request prior to entering into a contract, and
- the processing is carried out by automated means.

In exercising this right, you have the right to request the direct transmission of your personal data between the Controller and other controllers, where technically feasible.

The exercise of this right shall not prejudice your right to erasure (to be forgotten), which shall not apply where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.

This right may not adversely affect the rights and freedoms of others.

6. **Rights Related to Automated Decision-Making**

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you, except when:

- it is necessary for entering into or performing a contract with the Controller;
- it is authorized by applicable law providing safeguards for your rights and freedoms; or
- it is based on your explicit consent.

In the cases referred to in the first and third lists, the Controller shall take all appropriate measures to safeguard your rights, freedoms and legitimate interests.

The above-mentioned decisions shall not be based on personal data unless

- you have given your explicit consent to the processing of your personal data for one or more specific purposes, or
- the processing is necessary for reasons of substantial public interest, is based on Union or Member State law, is proportionate to the aim pursued, respects the essence of the right to the protection of personal data, and provides for suitable and specific measures to safeguard your fundamental rights and interests and
- appropriate measures have been taken to safeguard your rights, freedoms and legitimate interests.

VIII. Remedies and Legal Enforcement

1. If you believe that the Controller has processed your personal data unlawfully, you may bring a civil action before the competent court. The case shall fall within the jurisdiction of the regional court (törvényszék). The lawsuit may also be filed before the court competent for your place of residence or habitual stay.
2. If you consider that your rights related to personal data have been violated, you may file a complaint or initiate an investigation or official procedure with the **National Authority for Data Protection and Freedom of Information (NAIH)**. The procedure is free of charge; the costs are borne by the Authority.

IX. Supervisory Authority Contact Details

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

Address: 1055 Budapest, Falk Miksa utca 9–11

Postal address: 1363 Budapest, Pf.: 9

Phone: +36 (30) 683-5969 / +36 (30) 549-6838 / +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

Official electronic gateway:

Short name: NAIH

KR ID: 429616918

Budapest, November 12, 2025 (Last updated)