

I. Purpose and scope of this Privacy Policy

This Privacy Policy (hereinafter: the “Policy”) aims to clearly and comprehensibly present to data subjects (hereinafter: “Data Subject” or “User”) how **Arnold Halász sole proprietor** (hereinafter: “Service Provider”) processes personal data on the **arnoldmethod.com** website and its subpages, as well as in connection with related digital services (e-books, online programs, membership services, newsletters).

The scope of this Policy extends to:

- visitors of the website,
- persons using the contact forms,
- newsletter subscribers,
- clients purchasing digital content, online programs, or membership services,
- and any other data processing carried out by the Service Provider internally or through contracted data processors.

The Service Provider reserves the right to amend this Policy at any time. The current version is always available on the **arnoldmethod.com** website.

II. Data Controller

Data Controller: **Arnold Halász sole proprietor**

Registration number: **53464914**

Tax number: **69633304-2-33**

Registered office / mailing address: **2022 Tahitótfalu, Napsugár utca 17., Hungary**

Phone: **+36 30 248 2281**

E-mail: **legal@arnoldmethod.com**

The Data Controller has not appointed a Data Protection Officer, as the nature of its activities does not require such an appointment.

III. Principles of Data Processing

The data processing practices of the Service Provider are in line with the applicable data protection laws, in particular:

- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Infotv.), and
- Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation, GDPR).

When processing personal data, the Service Provider applies the following principles:

1. **Lawfulness, fairness, transparency** – Data is processed lawfully and in a manner transparent to the Data Subject.

2. **Purpose limitation** – Data is collected only for specific, explicit, and legitimate purposes, and is not further processed in a manner incompatible with those purposes.
3. **Data minimization** – Only the data that is necessary and relevant for the purpose of processing is processed.
4. **Accuracy** – Data must be accurate and kept up to date; inaccurate data will be rectified or erased without delay.
5. **Storage limitation** – Personal data is kept only for as long as necessary for the purposes of processing.
6. **Integrity and confidentiality** – Appropriate technical and organizational measures are applied to ensure the security of personal data against unauthorized or unlawful processing, accidental loss, destruction, or damage.
7. **Accountability** – The Service Provider is responsible for compliance with these principles and must be able to demonstrate such compliance.

In plain terms: the Service Provider is committed to processing the Data Subject's personal data safely, fairly, and only to the extent necessary.

IV. Legal Bases of Data Processing

The Service Provider processes personal data exclusively on lawful grounds. The legal bases for processing, in accordance with Article 6 of the GDPR, are as follows:

1. **Consent (Article 6(1)(a) GDPR)**
 - when the Data Subject has given voluntary, specific, informed, and unambiguous consent to the processing of their personal data.
 - In particular: subscribing to the newsletter, accepting marketing cookies and tracking tools (e.g., Google Analytics, Facebook Pixel, Google Ads conversion tracking, remarketing tools).
2. **Performance of a contract (Article 6(1)(b) GDPR)**
 - when processing is necessary for the performance of a contract to which the Data Subject is a party.
 - In particular: purchasing and delivering digital content (e-book), online programs, or membership services.
3. **Compliance with a legal obligation (Article 6(1)(c) GDPR)**
 - when processing is necessary for compliance with a legal obligation applicable to the Service Provider.
 - In particular: handling and retention of invoicing data as required by tax and accounting laws.
4. **Legitimate interest (Article 6(1)(f) GDPR)**
 - when processing is necessary for the purposes of the legitimate interests pursued by the Service Provider or by a third party, provided such interests are not overridden by the fundamental rights and freedoms of the Data Subject.
 - In particular: ensuring website security, preventing abuse, maintaining IT systems, and the establishment, exercise, or defense of legal claims.

V. Purposes of Processing and Categories of Data

The Service Provider processes the personal data of Data Subjects solely for specific, explicit, and legitimate purposes. The purposes of processing and the categories of data are as follows:

1. **Contact and communication**
 - **Purpose:** responding to inquiries, providing offers, handling complaints.
 - **Data processed:** name, e-mail address, phone number, message content, IP address, timestamp.
 - **Legal basis:** consent or legitimate interest.
 - **Retention:** 1 year, unless linked to a contract.
2. **Newsletter and marketing communication**
 - **Purpose:** sending newsletters, offers, promotions.
 - **Data processed:** name, e-mail address, subscription date, IP address, double opt-in confirmation, unsubscription data.
 - **Legal basis:** consent.
 - **Retention:** until withdrawal (unsubscribe).
3. **Digital content, online programs, memberships, and user accounts**
 - **Purpose:** performance of purchases, account creation, operation of membership club, customer support.
 - **Data processed:** name, e-mail address, encrypted password, billing details (address, tax number), payment details (via provider), purchase history, login logs.
 - **Legal basis:** performance of a contract, legal obligation.
 - **Retention:** while the account is active; billing data retained for 8 years in line with accounting law.
4. **Website operation, analytics, and cookies**
 - **Purpose:** operation of the website, statistics, improvement of user experience.
 - **Data processed:** IP address, browser/device data, cookie data.
 - **Legal basis:**
 - strictly necessary cookies → legitimate interest,
 - analytics and marketing cookies → consent.
 - **Retention:** 1 day to 2 years depending on cookie type, or until consent is withdrawn.
5. **Remarketing and advertising**
 - **Purpose:** displaying personalized ads (e.g., Google Ads, Meta/Facebook).
 - **Data processed:** IP address, cookies, advertising identifiers, browsing history.
 - **Legal basis:** consent.
 - **Retention:** until withdrawal, maximum 540 days (Google Ads).
6. **Legal disputes and enforcement of claims**
 - **Purpose:** submission, enforcement, or defense of legal claims.
 - **Data processed:** contracts, invoices, correspondence.
 - **Legal basis:** legitimate interest.
 - **Retention:** 5 years (statutory limitation period).

General retention rule: The Service Provider stores personal data until the purpose of processing has been fulfilled or for as long as required by law.

VI. Data Processors

In the course of processing personal data, the Service Provider engages data processors to perform certain tasks. Data processors process personal data on behalf of and under the instructions of the Service Provider, and they do not make independent decisions. The data processors used and their tasks are as follows:

1. Hosting services

- Provider: **Tárhely.Eu Szolgáltató Kft.**
- Address: 1538 Budapest, Pf. 510., Hungary
- E-mail: support@tarhely.eu
- Phone: +36 1 789 2 789
- Website: www.tarhely.eu
- Access: full website content, technical logs, user data.

2. E-mail services

- Provider: **Google Inc. (Gmail)** – Mountain View, California, USA
- Access: metadata of incoming and outgoing e-mails, e-mail addresses.
- Provider: **Tárhely.Eu** – e-mail hosting.

3. Invoicing and bookkeeping

- Provider: **Számlázz.hu (KBOSS.hu Kft.)**
 - E-mail: info@szamlazz.hu
 - Phone: +36 30 354 4789
 - Website: www.szamlazz.hu
 - Access: invoicing name, address, tax number, item details, payment information.
- Accountant: **Szabdél Kft.**
 - Address: 2022 Tahitótfa, Visegrádi út 14., Hungary
 - Phone: +36 20 289 5320
 - Access: invoicing and bookkeeping data, documents, client details.

4. Payment services

- Provider: **Stripe Payments Europe Ltd.**
 - Address: The One Building, 1 Grand Canal Street Lower, Dublin 2, Ireland
 - Access: payment transaction data (card details handled exclusively by Stripe).
- Provider: **PayPal (Europe) S.à r.l. et Cie, S.C.A.**
 - Address: L-2449 Luxembourg
 - Access: transaction data, invoicing name and e-mail address.

5. Web analytics

- Provider: **Google LLC (Google Analytics 4)**
 - Address: Mountain View, California, USA
 - Access: visitor behavioral data (with IP anonymization), device data, page visits.

6. Advertising and remarketing partners

- Provider: **Meta Platforms Inc. (Facebook, Instagram)**
 - Address: Menlo Park, California, USA
 - Tools: Facebook Pixel, Instagram share button
 - Access: IP address, cookies, browsing data, advertising identifiers.

7. Newsletter and e-mail marketing

- Provider: **Brevo (Sendinblue SAS)**
 - Address: 106 boulevard Haussmann, 75008 Paris, France
 - Access: name, e-mail address, subscription data, campaign analytics.
 - Provider: **MailerLite UAB**
 - Address: Paupio g. 46, LT-11341 Vilnius, Lithuania
 - Access: name, e-mail address, subscription data, campaign analytics.
 - Provider: **Substack Inc.**
 - Address: San Francisco, California, USA
 - Access: subscriber e-mail addresses, newsletter analytics.
8. **Content management system and plugins**
- System: **WordPress** and related plugins (e.g., WooCommerce, Divi, MemberPress, LearnDash).
 - Access: user account data, purchase history, login logs.
 - Note: some plugins may transmit data to their own servers (e.g., license verification).
9. **Security and performance providers**
- Provider: **Cloudflare Inc.** (if applied)
 - Access: IP addresses, security logs, traffic data.

The Service Provider enters into written data processing agreements with all data processors to ensure appropriate data protection and information security measures. If the processor is located outside the European Economic Area (EEA) or has access to data from outside the EEA, the Service Provider ensures compliance through the use of Standard Contractual Clauses (SCC) or other applicable international data transfer safeguards.

VII. Security Measures

To ensure the security of personal data, the Service Provider applies appropriate technical and organizational measures that guarantee protection against unauthorized access, alteration, disclosure, deletion, or destruction of data.

The measures applied include in particular:

1. **Technical measures**
 - data transmission on arnoldmethod.com is protected by SSL certificates,
 - passwords are stored in encrypted (hashed) form,
 - regular security updates (WordPress and its plugins),
 - firewall and antivirus protection provided by the hosting service,
 - regular data backups.
2. **Organizational measures**
 - access to data is restricted: only authorized persons may access personal data,
 - internal access management (separation of administrator rights),
 - data protection awareness and training,
 - data processing agreements with all external service providers.

The Service Provider continuously monitors technological developments and updates security measures as necessary to ensure a high level of protection of personal data.

VIII. Rights of Data Subjects

Data Subjects have the rights provided by the GDPR in relation to the processing of their personal data. These rights include:

1. **Right of access**

The Data Subject has the right to obtain confirmation as to whether their personal data is being processed, and if so, to access the data as well as information on the purposes of processing, the categories of data processed, the recipients, and the retention period.

2. **Right to rectification**

The Data Subject has the right to request without undue delay the correction of inaccurate personal data and the completion of incomplete data.

3. **Right to erasure (“right to be forgotten”)**

The Data Subject has the right to request the deletion of their personal data when the data is no longer necessary for the purposes for which it was collected, when consent is withdrawn, when the Data Subject objects to the processing, or when processing is unlawful.

4. **Right to restriction of processing**

The Data Subject may request the restriction of the processing of their personal data, for example, if they contest the accuracy of the data or have objected to processing.

5. **Right to data portability**

The Data Subject has the right to receive their personal data in a structured, commonly used, and machine-readable format and to transmit those data to another controller.

6. **Right to object**

The Data Subject has the right to object at any time to the processing of their personal data based on legitimate interests, including profiling and processing for direct marketing purposes.

7. **Right not to be subject to automated decision-making and profiling**

The Data Subject has the right not to be subject to a decision based solely on automated processing – including profiling – which produces legal effects concerning them or similarly significantly affects them.

Exercise of rights

The Data Subject may submit a request concerning any of the rights listed above to the Service Provider by e-mail at **legal@arnoldmethod.com**. The Service Provider will assess the request without undue delay and provide a response within 30 days at the latest.

IX. Complaints and Legal Remedies

If the Data Subject considers that the processing of their personal data infringes applicable data protection laws, they have the following options:

1. **Contacting the Data Controller**

The Data Subject may submit their complaint or request directly to the Service Provider at **legal@arnoldmethod.com** or by postal mail to the Service Provider’s registered office. The Service Provider will investigate the complaint without undue delay and provide a response within 30 days.

2. **Submitting a complaint to the supervisory authority**

The Data Subject has the right to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH), as the supervisory authority of the Service Provider's country of establishment:

- Name: Hungarian National Authority for Data Protection and Freedom of Information (NAIH)
- Address: H-1055 Budapest, Falk Miksa utca 9–11.
- Mailing address: H-1363 Budapest, Pf. 9.
- Phone: +36 (1) 391-1400
- E-mail: ugyfelszolgalat@naih.hu
- Website: www.naih.hu

The Data Subject may also lodge a complaint with **any other supervisory authority within the European Union**, in particular in the country of their habitual residence, place of work, or the place of the alleged infringement.

3. **Judicial remedy**

The Data Subject also has the right to bring proceedings before the competent court of their place of residence or stay in the event of unlawful data processing.

X. Cookies

The arnoldmethod.com website uses cookies to provide better service to Users and to ensure the efficient operation of the site. Cookies are small text files stored by the User's browser that allow the website to remember certain information.

Cookies are used for the following purposes:

1. **Strictly necessary cookies**

- These cookies are essential for the basic operation of the website (e.g., login, shopping cart functionality, security features).
- Legal basis: the legitimate interest of the Service Provider.
- Retention: usually until the end of the browser session.

2. **Functional cookies**

- These cookies allow the website to remember certain preferences and provide convenient features (e.g., language settings).
- Legal basis: the Data Subject's consent.
- Retention: 1–12 months.

3. **Analytics and performance cookies**

- For example, Google Analytics 4 cookies and similar tracking tools.
- Purpose: measuring website traffic, improving user experience, optimizing content.
- Legal basis: the Data Subject's consent.
- Retention: 1–24 months, depending on Google Analytics settings.

4. **Marketing and remarketing cookies**

- Tools such as the Facebook Pixel, Google Ads, and similar services.
- Purpose: displaying personalized advertisements, remarketing, conversion tracking.
- Legal basis: the Data Subject's consent.

- Retention: up to 540 days (Google Ads remarketing cookie).

Cookie management options

On their first visit, Users can accept or reject cookies in the cookie banner that appears. Users may change their settings at any time in their browser or via the cookie settings available on the website.

Disabling cookies may result in certain features of the website not functioning fully.

Links to cookie settings in popular browsers:

- Chrome: <https://support.google.com/chrome/answer/95647>
- Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Edge: <https://support.microsoft.com/help/4027947>
- Safari: <https://support.apple.com/guide/safari/sfri11471/mac>

XI. International Data Transfers

In certain cases, the personal data of Data Subjects may be transferred to countries outside the European Economic Area (EEA), particularly to the United States of America, due to the use of the following service providers:

- **Google LLC (Gmail, Google Analytics, Google Ads)** – Mountain View, California, USA
- **Meta Platforms Inc. (Facebook, Instagram, Facebook Pixel)** – Menlo Park, California, USA
- **Substack Inc.** – San Francisco, California, USA
- **Stripe, Inc.** – San Francisco, California, USA (although European customers' data is also processed by Stripe Payments Europe Ltd., Dublin, Ireland)
- **PayPal, Inc.** – San Jose, California, USA (for EU customers: PayPal (Europe) S.à r.l., Luxembourg)

Such international transfers always take place in full compliance with the GDPR. The legal basis of such transfers may include:

- the European Commission's adequacy decision (EU–US Data Privacy Framework),
- Standard Contractual Clauses (SCC) adopted by the European Commission,
- and additional safeguards undertaken by the relevant service providers.

The service providers listed above have all committed to adequate protection of personal data and provide detailed information on their data protection measures in their privacy notices:

- Google: <https://policies.google.com/privacy/frameworks>
- Meta (Facebook, Instagram): <https://www.facebook.com/privacy/policy>
- Stripe: <https://stripe.com/privacy>
- PayPal: <https://www.paypal.com/webapps/mpp/ua/privacy-full>
- Substack: <https://substack.com/privacy>

XII. Amendments and Entry into Force

The Service Provider reserves the right to unilaterally amend this Privacy Policy at any time in order to improve it. Amendments take effect upon publication on the website.

Data Subjects are advised to regularly review the Privacy Policy to stay informed about the processing of their personal data. In the event of significant changes, the Service Provider may also notify Data Subjects by e-mail.

This Privacy Policy enters into force on September 25, 2025.