

Privacy Policy

This document contains the information of **Elevate Strategy and Design Kft.** (hereinafter: **Service provider**) as the operator of the website www.thisiselevate.com (hereinafter: **Website**) regarding the processing of personal data of individuals (hereinafter: **Data subjects**) who provide personal data on the Website.

Contact details

Name: Elevate Strategy and Design Ltd.

Registered office: 9026 Győr, Dózsa György rakpart 47. 4th floor 8/A.

Email address: work@thisiselevate.com

This privacy policy was prepared in accordance with Regulation (EU) 2016/679 (hereinafter: **Regulation**).

1. The scope of processed data, the legal basis for data processing, the purpose of data processing, and the duration of data processing

a. Data processed for price inquiry

Description of data processing, purpose of data processing

Clients may send their inquiries to the Data Controller by emailing work@thisiselevate.com.

We process the following data for a price inquiry:

- email address;
- message.

The purpose of data processing is to provide a price offer and to establish contact.

Legal basis for data processing

The legal basis for data processing is your consent, pursuant to Article 6(1)(a) of the Regulation.

Duration of data processing

We will process your data until the offer is valid.

b. Data processed for newsletter subscription

Description of data processing, purpose of data processing, scope of processed data

To provide you with information directly about our services, we offer the possibility to subscribe to our newsletter on the Website. To send the newsletter, we process your name and email address.

Legal basis for data processing

The legal basis for data processing is your consent, pursuant to Article 6(1)(a) of the Regulation.

Duration of data processing

We will process your data until you withdraw your consent or unsubscribe from the newsletter.

c. Data processing for the purpose of confirming consent

Description of data processing, purpose of data processing

During the filling out of the form, the IT system stores the consent-related information for later proof.

Scope of processed data:

- IP address.

Legal basis for data processing

The legal basis for data processing is the obligation set forth in Article 7(1) of the Regulation [data processing pursuant to Article 6(1)(c) of the Regulation].

Duration of data processing

Due to legal requirements, it is necessary to be able to prove the consent later, therefore, the storage of data is carried out until the expiration of the limitation period following the termination of data processing.

2. Data processors

When processing data, we use Webflow Inc. (registered office: 398 11th Street, 2nd Floor, San Francisco, CA 94103, USA) as a data processor.

During the management of data in the newsletter service, as a technical service provider involved in the operation of the Mailchimp newsletter service (<https://mailchimp.com/contact/>) provided by The Rocket Science Group LLC (based in 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA; contact: <https://mailchimp.com/contact/?primaryTopic=prospective>), we utilize The Rocket Science Group, LLC as our service provider.

3. Cookie data management

Certain parts of the website use small data files (hereinafter referred to as "cookies") to identify the user. By visiting the website and using its functions, the user consents to the storage of these cookies on their computer and to the data controller accessing them.

The user can use their browser to configure and prevent cookie-related activities. However, it should be noted that if cookies are not used, the user may not be able to use all the services provided by the website.

As a technical intermediary, the Service Provider may ensure that third parties cooperating with the Service Provider, especially Google Inc., store cookies when the user has previously visited the Service Provider's website, and based on this, can display advertisements to the user.

The user can delete cookies from their own computer and configure their browser to block the use of cookies. In addition, Google provides a page (<http://www.google.hu/policies/technologies/ads/>) to disable Google-placed cookies that display ads to the user. However, disabling or deleting cookies may make the use of the website less convenient for the user.

What are cookies and how do we manage them?

Cookies are small data files (hereinafter referred to as "cookies") that are downloaded and stored by the internet browser of the user on their computer through the use of the Website.

The general functions of cookies are:

- to collect information about visitors and their devices;
- to remember individual settings of visitors, which may be used, for example, when making online transactions, so that they do not have to be entered again;
- to facilitate the use of the Website;
- to provide a high-quality user experience.

In order to provide personalized service, a small data packet, a so-called cookie, is placed on the user's computer and is read back during later visits. If the browser sends back a cookie that was previously saved, the cookie management provider has the opportunity to link the user's current visit to the previous ones, but only with regard to its own content.

Most commonly used internet browsers (Chrome, Firefox, Edge, Explorer, Opera, Safari, etc.) accept and allow the download and use of cookies as a default setting, but it is up to the user to modify their browser settings to reject or disable them, and the user can also delete cookies that are already stored on their computer.

The essential cookies for the Website are:

Cookie's name	Purpose	Lifespan
CONSENT	We use this to detect that the user checks the analytics checkbox in the cookie banner. This makes our site GDPR-compliant.	2 years
test_cookie		

The statistical cookies for the Website are:

Cookie's name	Host	Purpose	Lifespan
_ga	google-analytics.com	Unique ID for generating data based on how you browse our site.	2 years
_gat	google-analytics.com	Used by Google Analytics for reducing request rate.	1 day

_dlt	Google Tag Manager	Sets the session's ID. This makes it possible for the site to gain data from the user's behaviour.	1 day
_gid	google-analytics.com	Unique ID for generating data based on how you browse our site.	1 day
Felhasználóhoz kapcsolódó			
hjSessionUser{site_id}	hotjar.com	<ul style="list-style-type: none"> Set when a user first lands on a page. Persists the Hotjar User ID which is unique to that site. Hotjar does not track users across different sites. Ensures data from subsequent visits to the same site are attributed to the same user ID. JSON adattípus. 	365 days
_hjFirstSeen	hotjar.com	<ul style="list-style-type: none"> Identifies a new user's first session. Used by Recording filters to identify new user sessions. Boolean true/false data type. 	30minutes, extends on user activity
_hjHasCachedUserAttributes	hotjar.com	<ul style="list-style-type: none"> Enables us to know whether the data set in _hjUserAttributes Local Storage item is up to date or not. Session duration. Boolean true/false data type. 	Session
_hjUserAttributesHash	hotjar.com	<ul style="list-style-type: none"> Enables us to know when any User Attribute has changed and needs to be updated. 	2 minutes, extends on user activity on

		<ul style="list-style-type: none"> • 2 minutes duration, extended every 30 seconds. • Content hash data type. 	every 30 minutes
hjUserAttributes	hotjar.com	<ul style="list-style-type: none"> • Stores User Attributes sent through the Hotjar Identify API. • Base64 encoded JSON data type. 	–
hjViewportId	hotjar.com	<ul style="list-style-type: none"> • Stores user viewport details such as size and dimensions. • Session duration. • UUID data type. 	Session
Munkamenethez kapcsolódó			
hjSession{site_id}	hotjar.com	<ul style="list-style-type: none"> • Holds current session data. • Ensures subsequent requests in the session window are attributed to the same session. • 30 minutes duration, extended on user activity. • JSON data type. 	30 minutes
_hjSessionTooLarge	hotjar.com	<ul style="list-style-type: none"> • Causes Hotjar to stop collecting data if a session becomes too large. • Determined automatically by a signal from the server if the session size exceeds the limit. • Boolean true/false data type. 	Session
_hjSessionResumed	hotjar.com	<ul style="list-style-type: none"> • Set when a session/recording is reconnected to Hotjar servers after a break in connection. • Session duration. 	Session

		<ul style="list-style-type: none"> • Boolean true/false data type. 	
_hjCookieTest	hotjar.com	<ul style="list-style-type: none"> • Checks to see if the Hotjar Tracking Code can use cookies. If it can, a value of 1 is set. • Deleted almost immediately after it is created. • Under 100ms duration, cookie expiration time set to session duration. • Boolean true/false data type. 	100 ms, extends based on Session duration
_hjLocalStorageTest	hotjar.com	<ul style="list-style-type: none"> • Checks if the Hotjar Tracking Code can use Local Storage. If it can, a value of 1 is set. • Data stored in _hjLocalStorageTest has no expiration time, but it is deleted almost immediately after it is created. • Boolean true/false data type. 	<100ms
_hjSessionStorageTest	hotjar.com	<ul style="list-style-type: none"> • Checks if the Hotjar Tracking Code can use Session Storage. If it can, a value of 1 is set. • Data stored in _hjSessionStorageTest has no expiration time, but it is deleted almost immediately after it is created. • Boolean true/false data type. 	<100ms
_hjIncludedInPageviewSample	hotjar.com	<ul style="list-style-type: none"> • Set to determine if a user is included in the data sampling defined by your site's pageview limit. • 2 minutes duration, extended every 30 seconds. 	2 minutes, Extends on every 30s

		<ul style="list-style-type: none"> • Boolean true/false data type. 	
hjIncludedInSessionSample{site_id}	hotjar.com	<ul style="list-style-type: none"> • Set to determine if a user is included in the data sampling defined by your site's daily session limit. • Boolean true/false data type. 	2 minutes, Extends on every 30s
_hjAbsoluteSessionInProgress	hotjar.com	<ul style="list-style-type: none"> • Used to detect the first pageview session of a user. • 30 minutes duration, extended on user activity. • Boolean true/false data type. 	30 minutes, Extends based on user's session
_hjTLDTest	hotjar.com	<ul style="list-style-type: none"> • We try to store the _hjTLDTest cookie for different URL substring alternatives until it fails. • Enables us to try to determine the most generic cookie path to use, instead of page hostname. • It means that cookies can be shared across subdomains (where applicable). • After this check, the cookie is removed. • Session duration. • Boolean true/false data type. 	Session
Relating to Recordings			
_hjRecordingEnabled	hotjar.com	<ul style="list-style-type: none"> • Set when a Recording starts. • Read when the Recording module is initialized to see if the user is already in a recording in a particular session. 	Session

		<ul style="list-style-type: none"> • Boolean true/false data type. 	
_hjRecordingLastActivity	hotjar.com	<ul style="list-style-type: none"> • Updated when a user recording starts and when data is sent to the server (the user performs an action that Hotjar records). • Numerical value (timestamp) data type. 	Session
Relating to Feedback and Survey tools			
_hjClosedSurveyInvites	hotjar.com	<ul style="list-style-type: none"> • Set when a user interacts with a Link Survey invitation modal. • Ensures the same invite does not reappear if it has already been shown. • List of Survey IDs, URL encoded. 	365 days
_hjDonePolls	hotjar.com	<ul style="list-style-type: none"> • Set when a user completes an on-site Survey. • Ensures the same Survey does not reappear if it has already been filled in. • List of Survey IDs, URL encoded. 	365 days
_hjMinimizedPolls	hotjar.com	<ul style="list-style-type: none"> • Set when a user minimizes an on-site Survey. • Ensures that the Survey stays minimized when the user navigates through your site. • 365 days duration. • List of Survey IDs, URL encoded. 	365 days

_hjShownFeedbackMessage	hotjar.com	<ul style="list-style-type: none"> • Set when a user minimizes or completes a Feedback widget. • Ensures the Feedback widget will load as minimized if the user navigates to another page where it is set to show. • Boolean true/false data type. 	1 day
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About the use of cookies, the "help" menu of each browser provides more information.

Disabling cookies in different browsers:

- Chrome: <https://support.google.com/accounts/answer/61416?hl=en>
- Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>
- Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- Edge: <https://support.microsoft.com/en-us/microsoft-edge/view-delete-browser-history-in-microsoft-edge-00cf7943-a9e1-975a-a33d-ac10ce454ca4>
- Opera: <https://help.opera.com/en/latest/web-preferences/#cookies>

1. Rights of the Data Subject regarding data processing

During the period of data processing, you are entitled to the following rights under the Regulation:

- Access to personal data and information related to data processing
- Right to rectification
- Right to restriction of processing
- Right to erasure
- Right to data portability
- Right to object
- Right to withdraw consent

If you wish to exercise your rights, it will require identification, and we will need to communicate with you as necessary. Therefore, personal data will be required for identification (although identification can only be based on data that we already have about you), and your data protection complaints will be available in our email account within the time frame specified in this information notice for complaints.

Complaints related to data processing will be answered within 30 days at the latest.

a. Right to Withdraw Consent

You have the right to withdraw your consent to data processing at any time, in which case the data provided will be deleted from our systems.

b. Access to Personal Data and Information

You have the right to receive feedback on whether the processing of your personal data is in progress, and if data processing is in progress, you have the right to:

- Access the processed personal data
- Be informed about the following:
 - Purposes of data processing
 - Categories of personal data processed about you
 - Information on recipients or categories of recipients with whom we have or will share personal data
 - The planned duration of personal data storage, or if this is not possible, the criteria used to determine this period
 - Your right to request rectification, erasure, or restriction of processing of your personal data, and to object to processing of such personal data based on legitimate interests
 - Your right to file a complaint with a supervisory authority
 - If the data was not collected from you, all available information about its source
 - Regarding automated decision-making (if such a procedure is used), including profiling, and at least in these cases, clear information about the applied logic and the significance and expected consequences of such data processing must be provided. The exercise of rights may aim to determine and verify the lawfulness of data processing, and in case of repeated requests for information, we may charge a reasonable fee for providing the information.

We ensure access to personal data by sending the processed personal data and information to you via email after verifying your identity.

Please indicate in your request whether you are seeking access to personal data or information regarding data processing.

c. Right to rectification

You have the right to request the correction of inaccurate personal data concerning you without undue delay.

d. Right to restriction of processing

You have the right to request the restriction of the processing if one of the following applies:

- You contest the accuracy of the personal data, for a period enabling us to verify the accuracy of the personal data. If the accuracy of the personal data has been verified, the restriction will be lifted;
- The processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead;

- We no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise, or defence of legal claims;
- You have objected to processing, pending the verification whether our legitimate grounds override your legitimate grounds.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.

You will be informed in advance (at least 3 working days before the restriction is lifted) about the lifting of the restriction.

e. Right to erasure (right to be forgotten)

You have the right to obtain from us the erasure of personal data concerning you without undue delay, and we have the obligation to erase personal data if one of the following applies:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- You withdraw your consent on which the processing is based, and there is no other legal ground for the processing;
- You object to the processing based on our legitimate interests, and we have no overriding legitimate grounds for the processing;
- The personal data have been unlawfully processed;
- The personal data have to be erased for compliance with a legal obligation under Union or Member State law to which we are subject.

If data processing is restricted, such personal data may only be processed with your consent, or for the submission, enforcement, or defense of legal claims, or to protect the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State, except for storage.

You will be informed in advance (at least 3 working days before the lifting of the restriction) of the lifting of the restriction on data processing.

f. Right to erasure - right to be forgotten

You have the right to have your personal data erased without undue delay if one of the following grounds applies:

- the personal data is no longer necessary in relation to the purposes for which it was collected or processed;
- you withdraw your consent and there is no other legal ground for the processing;
- you object to the processing based on legitimate interests and there are no overriding legitimate grounds for the processing;
- the personal data has been unlawfully processed and this has been established based on a complaint;
- the personal data has to be erased for compliance with a legal obligation in Union or Member State law to which we are subject.

Where we have made the personal data concerning you public and are obliged to erase the personal data pursuant to one of the grounds listed above, we will, taking account of available technology and

the cost of implementation, take reasonable steps, including technical measures, to inform other data controllers processing the personal data that you have requested erasure by such controllers of any links to, or copy or replication of, those personal data. We will not disclose your personal data as a general rule.

Erasure shall not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which we are subject (such as data processing for invoicing purposes, as retention of invoices is required by law), or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- for the establishment, exercise or defense of legal claims (e.g. if we have a claim against you which is outstanding or if there is a pending consumer or data protection complaint).

g. Right to protest

The individual has the right to object, at any time, to the processing of their personal data based on legitimate interests relating to their own situation. In this case, we may no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the individual, or for the establishment, exercise, or defense of legal claims.

h. Right to data portability

Where the processing is based on a contract or on the individual's consent, they have the right to receive the personal data concerning them which they have provided to us, in a structured, commonly used, and machine-readable format, and have the right to transmit those data to another controller, where technically feasible.

i. Recourse

If the individual considers that we have violated any legal provisions relating to data processing, or failed to respond to a request, they may initiate an investigation by the National Authority for Data Protection and Freedom of Information (postal address: Pf. 9, 1363 Budapest, Hungary; email: ugyfelszolgalat@naih.hu) to terminate the presumed illegal data processing. Additionally, the individual may also file a lawsuit in a court of law.

5. Data security

We implement necessary authorization management, internal organization, and technical solutions to ensure that unauthorized parties do not gain access to, delete, extract or modify data during the operation of information systems. We also require our data processors to comply with the requirements of data protection and data security. We maintain records of any data protection incidents, and if necessary, inform the individual of any such incidents.

6. Other provisions

We reserve the right to modify this Privacy Policy in a manner that does not affect the purpose and legal basis of data processing. However, if we wish to carry out further data processing for a purpose that differs from the original purpose of data collection, we will inform you in advance of the purpose of data processing and provide you with the following information:

- The duration of personal data storage or, if this is not possible, the criteria used to determine the storage period;
- Your right to request access to, correction, deletion, or restriction of processing of your personal data, as well as to object to the processing of your personal data based on legitimate interests, and to request the right to data portability in case of consent-based or contract-based data processing;
- The right to withdraw your consent at any time in case of consent-based data processing;
- Your right to file a complaint with the supervisory authority;
- Whether the provision of personal data is based on a legal or contractual obligation or is a prerequisite for entering into a contract, as well as whether you are obliged to provide personal data and the possible consequences of not providing it;
- The fact of automated decision-making (if such a procedure is applied), including profiling, and at least in these cases, understandable information on the logic used and the expected consequences of such data processing.

Data processing may only begin after providing the above information if the legal basis for data processing is consent, and you must also consent to data processing beyond the provision of information.

This Privacy Policy is effective from April 1, 2023.