



GYORFI
THINKING AHEAD OF TIME

Cookie and Privacy Policy

The General Data Protection Regulation (GDPR) - which came into force on May 25th, 2018 - aims to protect the fundamental right to privacy and the protection of the personal data of European Union (EU) citizens. This regulation affects any entity (including websites) that processes EU citizens' personal data. The National Data Protection Commission (CNPD) is responsible for enforcing these rules for controllers and processors located in Luxembourg.

This Cookie and privacy policy applies between you, the User of this Website and GYORFI SARL-S, the owner and provider of this Website. Your privacy is important to us and we therefore take the privacy of your information very seriously. This Cookie and privacy policy applies to our use of all Data collected by us or provided by you in relation to your use of the Website and / or by our Services.

When and if entering into a contractual relationship with us, this privacy policy should be read alongside, and in addition to, our Confidentiality agreement as well as our Services agreement both of which is provided to at the start of the contractual relationship.

Please read this Cookie and privacy policy carefully.

Definitions and interpretation

1. In this Cookie and privacy policy, the following definitions are used:

Data	collectively all information that you submit to GYORFI SARL-S via the Website, when signing a contract with us or when making an electronic payment to us. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
Cookies	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the Cookies used by this Website are set out in the clause below (Cookies);

Data Protection Laws	any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations, and secondary legislation, for as long as the GDPR is effective in Luxembourg;
GDPR	the General Data Protection Regulation (EU) 2016/679;
GYORFI SARL-S, we or us	GYORFI SARL-S, a company incorporated in with registered number B236649 whose registered office is at 14, rue Kriibsebaach L-6185 Gonderange;
EU Cookie Law	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
Services	GYORFI SARL-S is a project management consultancy firm
User or you	any third party that accesses the Website and is not either (i) employed by GYORFI SARL-S and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to GYORFI SARL-S and accessing the Website in connection with the provision of such services;
Website	the website that you are currently using, www.gyorfi.lu , and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. In this Cookie and privacy policy, unless the context requires a different interpretation:
- ❖ the singular includes the plural and vice versa;
 - ❖ references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this Cookie and privacy policy;
 - ❖ a reference to a person includes firms, companies, government entities, trusts and partnerships;
 - ❖ "including" is understood to mean "including without limitation";
 - ❖ reference to any statutory provision includes any modification or amendment of it;
 - ❖ the headings and sub-headings do not form part of this Cookie and privacy policy.

Scope of this privacy policy

- I. This privacy policy applies to the actions of GYORFI SARL-S and Users with respect to this Website, to a contract between them or to electronic payments to one another. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.



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+352 621 436 501
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Business permit N. 10098549/0
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VAT number LU31470905

- II. For purposes of the applicable Data Protection Laws, GYORFI SARL-S is the "data controller". This means that GYORFI SARL-S determines the purposes for which, and the way, your Data is processed.

Data collected

We may collect the following Data, which includes personal Data, from you:

- ❖ name;
- ❖ address;
- ❖ date of birth;
- ❖ place of birth;
- ❖ contact information such as email addresses and telephone numbers;
- ❖ communications (email exchanges)
- ❖ financial information such as bank account number
- ❖ IP address (automatically collected);
- ❖ web browser type and version (automatically collected);
- ❖ operating system (automatically collected);
- ❖ a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected);

in each case, in accordance with this Cookie and privacy policy.

How we collect Data

We collect Data in the following ways:

- ❖ data is given to us by you
- ❖ data is received from other sources; and
- ❖ data collected automatically

Data that is given to us by you

GYORFI SARL-S will collect your Data in a number of ways, for example:

- ❖ when you contact us through the Website, by telephone, post, e-mail or through any other means;
- ❖ when you register with us and set up an account to receive our Services;
- ❖ when you complete surveys that we use for research purposes (although you are not obliged to respond to them);
- ❖ when you make payments to us, through this Website or otherwise;
- ❖ when you elect to receive marketing communications from us;
- ❖ when you use our Services;



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- ❖ when you participate in our events, promotions;
 - ❖ when you enter into contractual relationship with us
- in each case, in accordance with this Cookie and privacy policy.

Data that is received from publicly available third parties sources

We will receive Data about you from the following publicly available third-party sources:

- ❖ LinkedIn page

Data that is collected automatically

To the extent that you access the Website, we may collect your Data automatically, for example:

- ❖ we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
- ❖ we will collect your Data automatically via Cookies, in line with the Cookie settings on your browser. For more information about Cookies, and how we use them on the Website, see the section below, headed "Cookies".

How we use your Data

Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website and Services. Specifically, Data may be used by us to communicate with you in email, on the phone, in text message or postal mail for the following reasons:

- ❖ to provide and operate the Services
- ❖ To set up Services contract with you
- ❖ to provide you with an ongoing customer service and to troubleshoot problems
- ❖ to answer your queries, collect potential outstanding fees or monies owed and to enforce any agreement we may have with you
- ❖ to improve our Services and poll your opinions through surveys or questionnaires
- ❖ to contact you with general or personalized service-related notices, promotional message and campaigns
- ❖ to comply with any applicable laws and regulations

in each case, in accordance with this Cookie and privacy policy.

We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).



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For the delivery of direct marketing to you via e-mail or post, we'll need your consent, whether via an opt-in or soft-opt-in:

- I. soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular service, and we are marketing similar services). Under "soft opt-in" consent, we will take your consent as given unless you opt-out.
- II. for other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box or signing the Cookie and privacy policy on paper form that we'll provide.
- III. if you are not satisfied about our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your rights" below.

When you register with us and set up an account to receive our Services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Who we share Data with

We may share your Data with the following groups of people for the following reasons:

- ❖ our employees, agents and/or professional advisors (to obtain advice) to provide timely and high-quality Service to you;
 - ❖ third party payment providers who process payments made over the Website or via other electronic payment method, including payment terminal (Point of Sales PCS terminal) - to enable third party payments providers to process user payments and refunds;
 - ❖ relevant authorities in case required so by the law, by any regulation or a legal proceeding
- in each case, in accordance with this Cookie and privacy policy.

Keeping Data secure

We will use technical and organizational measures to safeguard your Data, for example:

- a. access to your account is controlled by a password and a user name that is unique to you.
- b. we store your Data on secure servers.

Technical and organizational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorized access to your Data, please let us know immediately by contacting us via this e-mail address: contact@gyorfi.lu

Our company is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell our Services to you. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall. For more information on security, please visit www.wix.com. If you want detailed information from Get Safe Online



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on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org.

Data retention

Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this Cookie and privacy policy or until you request that the Data be deleted.

Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

Your rights

You have the following rights in relation to your Data:

- ❖ Right to access - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update, or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
- ❖ Right to correct - the right to have your Data rectified if it is inaccurate or incomplete.
- ❖ Right to erase - the right to request that we delete or remove your Data from our systems.
- ❖ Right to restrict our use of your Data - the right to "block" us from using your Data or limit the way in which we can use it.
- ❖ Right to data portability - the right to request that we move, copy, or transfer your Data.
- ❖ Right to object - the right to object to our use of your Data including where we use it for our legitimate interests.

To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: contact@gyorfi.lu.

If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For Luxembourg, this is The National Data Protection Commission (CNPDP).

It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

Links to other websites



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This Website may, from time to time, provide links to other websites, including www.linkedin.com. We have no control over such websites and are not responsible for the content of these websites. This Cookie and privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes of business ownership and control

GYORFI SARL-S may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of GYORFI SARL-S. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Cookie and privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

We may also disclose Data to a prospective purchaser of our business or any part of it. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

Cookies

This Website may place and access certain Cookies on your computer. GYORFI SARL-S uses Cookies to improve your experience of using the Website and to improve our range of services as well as for safety purposes. GYORFI SARL-S uses a website provider (Wix) that has chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

All Cookies used by this Website are used in accordance with current EU Cookie Law.

Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to approve those Cookies or alternatively to customize / set those Cookies. By giving your consent to the placing of Cookies, you are enabling GYORFI SARL-S to provide a better experience and service to you. You may, if you wish, deny consent to the placing of non-essential Cookies with the Customize button; however certain features of the Website may not function fully or as intended.

You may also opt to change your cookie settings at any later date by clicking on 'Change my Cookie settings' at the button left side of the Website. This change option appears every time you visit our Website.

List of Cookies

Below is the list of Cookies that this Website may place. We have tried to ensure this is complete and up to date, but if you think that we have missed a Cookie or there is any discrepancy, please let us know.



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Essential Cookies	These are Cookies required for the operation of our Website. They enable core functionality such as security, verification of identity and network management. These cookies cannot be disabled. They include, for example, Cookies that enable us to maintain your session whilst you are using our Website, to enable you to log into secure areas of our Website, use a shopping cart or make use of e-billing services.
Marketing Cookies	These cookies are used to track advertising effectiveness to provide a more relevant service and deliver better ads to suit your interests.
Functional Cookies	These cookies collect data to remember choices users make to improve and give a more personalized experience. This enables us to personalize our content for you, greet you by name and remember of your preferences (for example, your choice or language or region).
Analytics Cookies	These cookies help us to understand how visitors interact with our website, discover errors, and provide better overall analytics. These cookies are used to recognize unique users (through a numerical code), when and how often they return to our Website, which page they engage with, from where they were redirected to our Website and from which location they view our Website as well as the device (mobile or desktop) they use to connect.

You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser.

You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalization settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

For more information generally on Cookies, including how to disable them, please refer to aboutCookies.org. You will also find details on how to delete Cookies from your computer.



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General

You may not transfer any of your rights under this Cookie and privacy policy to any other person. We may transfer our rights under this Cookie and privacy policy where we reasonably believe your rights will not be affected.

If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this Cookie and privacy policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

This Agreement will be governed by and interpreted according to the law of Luxembourg.

All disputes arising under the Agreement will be subject to the exclusive jurisdiction of Luxembourgish Courts.

Changes to this privacy policy

GYORFI SARL-S reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you on the Website that it has been updated. You may contact GYORFI SARL-S by email at contact@gyorfi.lu.

Attribution

This Cookie and privacy policy was created using the help of Rocket Lawyer (<https://www.rocketlawyer.com/gb/en>).

29 September 2023



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