

PRIVACY NOTICE

1. INTRODUCTION:

Impact Works Service and Consultancy Limited Liability Company as the Data Controller creates memoirs of data subjects' lives with the help of artificial intelligence. For the performance of the service provided by the Data Controller, it is essential that the Data Controller processes personal data of the natural person data subjects (hereinafter referred to as the "Data Subject") using the service. The Data Controller provides the information contained in this notice in relation to the processing of the personal data of the Data Subjects in accordance with Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as "GDPR").

2. CONTACT DETAILS OF THE CONTROLLER AND ITS REPRESENTATIVE:

The Data Controller is:

Name: Impact Works Service and Consultancy Limited Liability Company (hereinafter referred to as "Data Controller")

Head office: Hungary, 1062 Budapest, Délibáb street 21.

Representative:

Name: András Batiz, Managing Director

Contact: contact@write-clio.com

3. NAME AND CONTACT DETAILS OF THE DATA PROTECTION OFFICER

The appointment of a Data Protection Officer is not mandatory for the Data Controller under the GDPR. However, the Data Controller will contact data subjects on specific data protection issues using the contact details below:

Contact: contact@write-clio.com

4. DATA PROCESSING RELATED TO THE SERVICE

Data subjects: natural persons using the Data Controller's service.

The Data Controller informs the Data Subjects that the lack of provision of personal data significantly reduces the quality of the service provided by the Data Controller, and therefore, in the absence of personal data, the service of the Data Controller cannot be used.

Scope of the data processed:	Purpose of data processing	Legal basis for processing
name, e-mail address	Contact necessary to use the service	The Data Controller processes these data on the basis of Article 6(1)(a) of the GDPR (your consent), which you provide by ticking the checkbox on the website when applying for an interview.
any personal data relating to the life and career of the data subject which the data subject provides during the interview, including any special categories of personal data within the meaning of Article 9(1) of the GDPR	Use of the service, provision of the service	The Data Controller processes personal data on the basis of Article 6(1)(b) of the GDPR (processing necessary for the preparation and performance of the contract). The Data Controller processes the special categories of personal data provided by the data subject on the basis of Article 9(2) of the GDPR (your explicit consent), which you give by ticking the checkbox on the website when applying for an interview.

Persons entitled to access the data: the personal data provided above may be accessed by the Data Controller's staff within the organisation acting in the provision of the service and the preparation of the interviews.

Data transfers: the Data Controller will not transfer the following personal data provided by data subjects to a third party within the EU, to a third country or to an international organisation:

Data processors: the Data Controller uses the following data processors to achieve the purpose of data processing:

Name and contact details of the data processor	Data processing operations carried out by the processor
Squarespace, Inc. Address: 225 Varick Street, 12th Floor, New York, NY 10014.	hosting the website
Google Ireland Limited address: Gordon House, Barrow Street. Dublin 4, Ireland	providing the Google Workspace service, including the email sending and an online appointment booking module, therefore storage of completed interview transcripts, storage of completed memoirs
RiversideFM, Inc. address: Tel-Aviv Yafo, Israel	making audio recordings of the interviews, storing the recordings made and transcribing the audio recordings

LogiNet Systems Ltd. address: 1221 Budapest, Vihar utca 5. D. ép . 4. em. 15.	storing interview transcripts for system development
OpenAI Ireland Ltd. Address: 1st Floor, The Liffey Trust Centre, 117-126 Sheriff Street Upper, Dublin 1, D01 YC43,	preparing a memoir based on interview transcripts using artificial intelligence

Place and method of processing: the personal data provided by the data subject are stored on the servers of the data processors used by the Data Controller or any additional sub-processors used by them.

Data retention period: the personal data of the data subject will be kept until the following dates:

- the Data Controller deletes the audio recordings of interviews 30 days after the approval of the memoirs and the transcript of the audio recordings is kept for 1 year from the date of the delivery of the memoirs,
- the completed memoirs handed over to the data subject will be kept for 5 years from the date of handover,

5. SENDING NEWSLETTER (MARKETING PURPOSE)

Data subjects: natural persons who have subscribed to receive information and marketing communications from the Data Controller

Scope of the data processed:	Purpose of data processing	Legal basis for processing
name, e-mail address	Sending electronic mail messages containing advertising, news, promotions, information	The Data Controller processes these data on the basis of Article 6 (1) (a) of the GDPR (your consent), which you provide by ticking the checkbox when you subscribe to the newsletter.

Persons entitled to access the data: the personal data provided above may be accessed by the staff responsible for sending marketing mailings and IT operations within the Data Controller's organisation.

Data transfers: the Data Controller will not transfer the following personal data provided by data subjects to a third party within the EU, to a third country or to an international organisation.

Data processors: the Data Controller uses the following data processors to achieve the purpose of data processing:

Name and contact details of the data processor used	Data processing operations carried out by the processor
Squarespace, Inc. Address: 225 Varick Street, 12th Floor, New York, NY 10014.	sending newsletters, providing the interface for sending newsletters, hosting services

Place and method of processing: the personal data provided by the data subject are stored on the servers of the data processors used by the Data Controller or any additional sub-processors used by them.

Data retention period: until unsubscribing from the newsletter and thus until the withdrawal of the data subject's consent.

Please note that we do not send unsolicited commercial messages, and you may unsubscribe from receiving newsletters and other direct marketing messages without restriction and without giving any reason, free of charge. In this case, your data processed for the purpose of sending you promotional messages will no longer be processed for this purpose, and you will no longer be contacted for marketing purposes. You can unsubscribe from electronic newsletters by clicking on the link in the email message or by sending an email to the above contact details of the Data Controller.

6. PROCESSING OF COOKIES

The Data Controller hereby informs the data subjects that the Website uses cookies. Cookies are small data files that are used by websites to make the user experience more effective. These data files are placed on the User's Device when the Website is visited and are read back during subsequent visits, thus identifying the user. In some cases, these data files are considered personal data under the GDPR, since if the browser returns a previously saved cookie, the cookie management service provider has the possibility to link the User's current visit to previous visits, but only in relation to its own content.

According to the applicable legislation, cookies may be placed on the user's device without the user's consent if they are necessary for the functioning of the website. All other (non-essential) cookies can only be set with the user's consent.

6.1. NECESSARY COOKIES

Data subjects: natural persons visiting the Website

Scope of the data processed: session ID, time of visit to the website

Purpose of the processing: the cookies required to facilitate the usability of the website, to enable basic functions such as navigating the website and accessing secure websites. The Website will not function properly without the use of these cookies.

Legal basis for processing: the consent of the data subject is not required for the use of the necessary cookies; these data are processed by the Data Controller on the basis of Article 6(1)(f) of the GDPR (**legitimate interest of the controller**). The Data Controller has prepared an interest balancing test relating to legitimate interest as a legal basis and will make it available to data subjects upon request.

NAME	PURPOSE	RETENTION TIME
_acloggedin	Supports login by Acuity Scheduling client if the client has an account	January 1, 2025
ACUITY_CART	Stores details about a client's package, gift, or subscription purchase, including the item purchased and the quantity. Only applies to the new scheduler	No expiration
_client_acloggedin	Supports login by Acuity Scheduling client if the client has an account	January 1, 2025
_dd_cookie_test	Tests if cookies are supported	Expires instantly
_dd_s	Tracks browser errors	Four hours
_dd_site_test	Tests if cookies are supported	Expires instantly
_grecaptcha	Helps reduce spam in Acuity Scheduling	No expiry
_ssid	Remembers devices for anti-fraud purposes	Four years
CART	Shows when a visitor adds a product to their cart	Two weeks
CHECKOUT_WEB SITE	Identifies the correct site for checkout when checkout on your domain is disabled	Session
client_username	Remembers a logged in Acuity Scheduling client's username between visits	One year
clientUser	Stores the Acuity Scheduling client's username, OAuth2 Access Token, and OAuth2 Refresh Token. This cookie is required for functionality of logged-in clients	30 days
Commerce-checkout-state	Stores state of checkout while the visitor is completing their order in PayPal	Session
Crumb	Prevents cross-site request forgery (CSRF)	Session
hasCart	Tells Squarespace that the visitor has a cart	Two weeks
Locked	Prevents the password-protected screen from displaying if a visitor enters the correct site-wide password	Session
orderStatusSession Token	Authenticates a visitor who logs into an order status page	One year
PHPSESSID	Securely authenticates a visitor during their checkout in Acuity Scheduling	One month
RecentRedirect	Prevents redirect loops if a site has custom URL redirects. Redirect loops are bad for SEO	30 minutes
remember_client	Remembers Acuity Scheduling client's login details if they have an account	365 days
siteUserCrumb	Prevents cross-site request forgery (CSRF) for logged in site users	Three years
SiteUserInfo	Identifies a visitor who logs into a customer account	Three years
SiteUserSecureAuthToken	Authenticates a visitor who logs into a customer account	Three years
squarespace-announcement-bar	Prevents the announcement bar from displaying if a visitor dismisses it	Persistent

squarespace-likes	Shows when you've already 'liked' a blog post	Persistent
squarespace-popup-overlay	Prevents the promotional pop-up from displaying if a visitor dismisses it	Persistent
squarespace-video-player-options	Remembers video player selected preferences (volume, playback speed, and quality) for videos uploaded directly to Squarespace	Persistent
ss_cookieAllowed	Remembers if a visitor agreed to placing analytics cookies on their browser if a site is restricting the placement of cookies	30 days
ss_sd	Ensures that visitors on the Squarespace 5 platform remain authenticated during their sessions	Session
Test	Investigates if the browser supports cookies and prevents errors	Session
TZ	Enables an Acuity Scheduling client's appointments to display correctly based on their time zone preferences	Persistent

6.2. ANALYTICAL COOKIES

Data subjects: natural persons visiting the Website and consenting to data processing

Data processed: user's IP address, website access path (page visited before the website, page visited via the website), time of the visit to the website, duration of the visit to the website, browser ID, location of the website, behaviour of the user on the website

Purpose of processing: statistical cookies help website owners understand how visitors interact with websites. In doing so, information is collected anonymously.

Legal basis for processing: the Data Controller processes the statistical cookies on the basis of Article 6(1)(a) of the GDPR (**consent of the data subject**), which is given by the data subject on the first visit to the site, on the interface at the bottom of the page.

NAME	PURPOSE	RETENTION TIME
ss_cid	Identifies unique visitors and tracks a visitor's sessions on a site	Two years
ss_cpvisit	Identifies unique visitors and tracks a visitor's sessions on a site	Two years
ss_cvvisit	Identifies unique visitors and tracks a visitor's sessions on a site	30 minutes
ss_cvr	Identifies unique visitors and tracks a visitor's sessions on a site	Two years
ss_cvt	Identifies unique visitors and tracks a visitor's sessions on a site	30 minutes

6.3. MARKETING COOKIES

Data subjects: natural persons visiting the website and consenting to data processing

Data processed: IP address of the device, cookie ID, device ID of mobile devices, intermediary URL (previously visited page), pages viewed (date, time, URL, address, time of stay), files downloaded, links clicked to other websites, where applicable, certain goals achieved (conversions), technical information: operating system; browser type, version and language; device type, brand, model and resolution, approximate location (country and, where applicable, city).

Purpose of processing: marketing cookies are used to track visitors to websites. The purpose of placing marketing cookies is to display personalized ads that are tailored to the interests of users. The information obtained is always more valuable to advertisers.

Legal basis for processing: the marketing cookies are processed by the Data Controller on the basis of Article 6 (1) (a) of the GDPR (**consent of the data subject**), which is given by the data subject on the first visit to the site, on the interface at the bottom of the page.

NAME	PURPOSE	RETENTION TIME

6.4. COMMON RULES ON THE PROCESSING OF COOKIES

Persons entitled to access the data: the personal data collected using cookies may be accessed by the competent staff within the Data Controller's organisation responsible for the marketing activities linked to the website.

Data transfers: personal data collected by the above cookies is transferred to the service provider that collected the data. The data transfer under this section is subject to the express consent of the data subject by accepting the cookie.

Data processors: the Data Controller uses the following data processors to achieve the purpose of data processing:

Name and contact details of the data processor used	Data processing operations carried out by the processor
Squarespace, Inc. Address: 225 Varick Street, 12th Floor, New York, NY 10014.	hosting services, web hosting, analysis and statistics from the data collected by the cookie, therefore storing any analysing the personal data

Place and method of processing: the personal data of the data subject are stored on the servers of the data processor used by the Data Controller or any other sub-processor used by the Data Controller.

7. LINKS

Please note that the Data Controller's website may contain links to other websites. The use of such external websites is subject to the privacy policy and privacy notice of the relevant website, and by clicking on the external link or the relevant button, the Data Controller has no control over the collection, storage or processing of personal data and therefore the Data Controller is not responsible for such processing.

8. DATA SECURITY

Please be informed that the Data Controller will take all the technical and organisational measures and establish the procedural rules necessary to enforce the GDPR rules on confidentiality and security of processing.

The Data Controller shall take appropriate measures to protect the data processed by it against unauthorised access, alteration, disclosure, transmission, disclosure, deletion or destruction, as well as against accidental destruction or damage.

In the course of its processing, the Data Controller shall retain.

- a) confidentiality: it protects information so that only those who are entitled to access it have access to it;
- b) integrity: it protects the accuracy and completeness of the information and the method of processing;
- c) availability: ensuring that the rightful user has effective access to the information he needs and the means to access it when he needs it.

The Data Controller shall adequately protect its information technology systems and networks against computer fraud, espionage, fire and flood, viruses and computer intrusions. The Data Controller shall ensure security through server-level and application-level protection procedures. The Data Controller monitors its systems in order to record and provide evidence of any security incidents. System monitoring also allows the effectiveness of the security measures in place to be verified. The compliance of the information security measures applied by the Data Controller is also required by the provisions of any contracts it may have with data processors and its compliance is monitored.

9. RIGHTS OF THE DATA SUBJECT, ENFORCEMENT OF RIGHTS

Please note that you may request personal data about you at any time without restriction:

- ___information, access to data,
- ___rectification,
- ___cancellation,
- ___the restriction of processing,
- ___the portability of data,
- ___may withdraw its consent,
- ___may also object to the processing of personal data.

Right to information

The Data Controller shall take appropriate measures to provide data subjects with all the information referred to in Articles 13 and 14 of the GDPR and all the information referred to in Articles 15 to 22 and 34 of the GDPR relating to

the processing of personal data in a concise, transparent, intelligible and easily accessible form, in clear and plain language.

The right to obtain information may be exercised in writing through the contact details indicated in point 3 of this notice.

Right of access of the data subject

The data subject shall have the right to obtain from the controller information as to whether his or her personal data are being processed and, if such processing is taking place, the right to access the personal data and the details of the processing as provided for in the GDPR.

The Data Controller shall provide the data subject with a copy of the personal data processed. For additional copies requested by the data subject, the controller may charge a reasonable fee in line with the administrative costs. At the request of the data subject, the Data Controller shall provide the information in electronic form.

The Data Controller shall provide the information within a maximum of one month from the date of the request.

Right of rectification

The data subject may request the correction of inaccurate personal data concerning him or her processed by the Data Controller and the completion of incomplete data.

Right to erasure

The data subject shall have the right, upon request and without undue delay, to obtain the erasure of personal data relating to him or her where one of the following grounds applies:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- personal data are collected in connection with the provision of information society services.

The erasure of data may not be initiated if the processing is necessary: for the exercise of the right to freedom of expression and information; for compliance with an obligation under Union or Member State law to process personal data or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; for public health purposes or for archiving, scientific or historical research purposes or statistical purposes in the public interest; or for the establishment, exercise or defence of legal claims.

Right to restriction of processing

At the request of the data subject, the Data Controller shall restrict processing if one of the following conditions is met:

- the data subject contests the accuracy of the personal data, in which case the restriction applies for a period of time which allows the accuracy of the personal data to be verified;
- the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- the controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- the data subject has objected to the processing; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the controller override those of the data subject.

Where processing is restricted, personal data, other than storage, may be processed only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the Union or of a Member State. The Data Controller shall inform the data subject in advance of the lifting of the restriction on processing.

Right to data portability

The data subject shall have the right to receive personal data relating to him or her which he or she has provided to the controller in a structured, commonly used, machine-readable format and to transmit such data to another controller, if:

- processing is based on the data subject's consent or on a contract to which the data subject is a party, and
- the processing is carried out by automated means.

Right to object

The data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to processing of his or her personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or necessary for the purposes of the legitimate interests pursued by the controller or by a third party, including profiling based on those provisions. In the event of an objection, the controller may no longer process the personal data, except on compelling legitimate grounds which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing.

In the event of an objection to the processing of personal data for direct marketing purposes, the data shall not be processed for such purposes.

Right to object to automated decision-making in individual cases, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The above right shall not apply where the processing is

- necessary for the conclusion or performance of a contract between the data subject and the controller;
- is permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or
- is based on the explicit consent of the data subject.

Please be informed that the Data Controller does not use automated decision-making in connection with the purposes of data processing set out in this notice and does not process personal data for profiling purposes.

Right of withdrawal

The data subject has the right to withdraw his or her consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.

Procedural rules

The controller shall inform the data subject without undue delay, and in any event within one month of receipt of the request, of the action taken on the request made by the data subject in relation to the above. If necessary, considering the complexity of the request and the number of requests, this time limit may be extended by a further two months.

If the controller fails to act on the data subject's request, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for the failure to act and of the possibility for the data subject to lodge a complaint with a supervisory authority and to exercise his or her right of judicial remedy.

The Data Controller shall provide the requested information and data free of charge. Where the data subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the controller may, considering the administrative costs of providing the information or information requested or of taking the action requested, charge a reasonable fee or refuse to act on the request.

Damages and compensation

Any person who has suffered pecuniary or non-pecuniary damage as a result of a breach of the Regulation shall be entitled to receive compensation from the controller or processor for the damage suffered. A processor shall be liable for damage caused by processing only if it has failed to comply with the obligations expressly imposed on processors by law or if it has disregarded or acted contrary to lawful instructions from the controller.

Where more than one controller or more than one processor, or both controller and processor, are involved in the same processing and are liable for the damage caused by the processing, each controller or processor is jointly and severally liable for the total damage.

The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

If you have a complaint or problem regarding the processing of your personal data, please contact us in order to resolve it amicably.

If this would not be successful, you may also contact the competent data protection authority or the competent court in your place of residence or stay if you become aware of a personal data breach.

You can submit a complaint to the Supervisory Authority using the following contact details:

Authority name: National Authority for Data Protection and Freedom of Information (website: <http://www.naih.hu>)

Head office: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, PO Box 9.

10. PROFILING, AUTOMATED DECISION-MAKING

Please be informed that the Data Controller does not use automated decision-making in connection with the purposes of data processing set out in this notice and does not process personal data for profiling purposes.

11. PROCESSING FOR OTHER PURPOSES

Please be informed that the data provided to the Data Controller on the basis of this information will not be used for purposes other than those stated in this notice, will not be transferred to third parties, and will not be sold.