

EU Privacy Policy

This Privacy Policy applies to you (as an individual) when you visit our homepage from the European Union. To read our U.S. privacy policy [click here](#).

1. Data controller

Dr. Gyorgy Tilesch

e-mail address: team@betweenbrains.com

EU representative: DHG Law Office (Váci út 18., 1132 Budapest, Hungary)

2. Processing activities

Categories of data	Purpose of processing	Data retention time	Legal basis of processing	Rights
If you buy our book: name, e-mail address	To fulfill the order	Until we forward you the link	Processing is necessary for the performance of the contract concluded with you online. Without the data it is not possible to buy the book. (GDPR ¹ Article 6. (1) b)	4.2.-4.6.
Your data on the invoice: Name	To comply with law	6 years	Processing is necessary for compliance with a legal obligation. After invoicing, retention is required due to tax and accounting regulations. Without having the data it is not possible to buy the book. (GDPR Article 6. (1) c)	4.2.,4.3.,4.5.
If you subscribe to our newsletter: name, e-mail address	Providing information on our recent activity, sales, content updates	Until you unsubscribe	Your consent given by the subscription. You can withdraw your consent any time by writing us. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. (GDPR Article 6. (1) a)	4.1.-4.6.
Data indicated in the correspondence: name, e-mail address, other provided information	Answering to e-mails and letters	1 year	Your consent given by writing us. You can withdraw your consent any time by writing us. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. (GDPR Article 6. (1) a)	4.1.-4.6.

¹ 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)

Comments and reviews	Getting to know your opinion	Until the request for deletion	Your consent given by writing a comment. You can withdraw your consent any time by writing us. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. (GDPR Article 6. (1) a)	4.1.-4.6.
IP address, web browser and device data saved automatically at the time you visit the homepage	Technical development of the home page, statistics	30 days	Our legitimate interest to proper functioning of the home page. (GDPR Article 6. (1) f)	4.2,4.3.,4.5., 4.7.
Social media: Profile data	Providing information on our recent activity, sales, content updates	Until you unfollow us	Your consent given by following us. You can withdraw your consent any time by unfollow us. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. (GDPR Article 6. (1) a) Social media platforms are separate controllers. Find out more about their actions on their Privacy Policy.	4.1.-4.6.

3. Data processors and other data controllers (third parties)

✓ Data processors:

When sending emails we use **Mailchimp** (The Rocket Science Group, LLC; 675 Ponce de Leon Ave NESuite 5000 Atlanta, GA 30308 USA) (currently active on the Privacy Shield list).

The server service and web design are performed by **Exaro Kft.** (Madzsar József utca 27. 4. em. 13., 1039 Budapest, Hungary).

✓ Data controller:

In case of PayPal payment, we will automatically redirect you to the homepage of PayPal: PayPal Europe S.à r.l. & Cie, S.C.A. (5th Floor 22-24 Boulevard Royal, L-2449, Luxembourg). More information on PayPal: <https://www.paypal.com/en/webapps/mpp/ua/privacy-full>

4. Your rights

Your rights are detailed in Sections 4.1 to 4.7. If you would like to exercise your rights, please write us on contact details indicated under point 1.

Identification

Before completing your request, we have to identify Your identity. Unfortunately, if we cannot identify You, we will not be able to meet your request.

Responding to the request

After identification we will give you feedback in regards to Your request in writing, electronically or, upon your request, verbally. Please note that if You have submitted your request electronically, we will respond electronically. Of course, in this case also, you have the opportunity to ask for a different response method.

Administration deadline

We will notify You within 1 (one) month from the receipt of your request about the measures taken in relation to your request. This deadline may, however, be extended by 2 (two) months if warranted by the complexity of the request or the number of requests, which we will inform you about within the 1 (one) month deadline.

We are also obligated to inform You about the omission of measures within the deadline. You can file a complaint against this at the Data Protection Authority (Section 5.1) and exercise your right to legal remedy (Section 5.2).

Administration fee

The requested information and taken measures are free of charge. An exception is the case where the request is clearly unfounded or, in the case of its particularly repetitive nature, excessive. In this case, we may charge a fee or refuse to fulfil the request.

4.1. You may withdraw your consent

You may withdraw Your consent at any time in the case of data processing based on Your consent. Please note that the withdrawal of consent shall not affect the legality of processing activities carried out prior to the withdrawal.

4.2. You may request information (access)

You may request information about whether your personal data is currently being processed and, if so,

- ✓ Precisely what data are being processed?
- ✓ Who do we transfer these data to?
- ✓ How long do we store these data?
- ✓ What are Your rights and options for legal remedies?
- ✓ Where did we receive Your data from?
- ✓ Do we make an automated decision regarding You by using Your personal data? In such cases, you may also ask for information on what method are we applying, how such data processing is relevant and what are the expected consequences.

- ✓ If you have found that your data has been transferred to an international organization or third country (non-EU Member State), you may request that we provide you with information on how we guarantee that your personal data is adequately processed.
- ✓ You can request a copy of the personal data we are processing (We may charge a fee based on administrative costs for additional copies.)

4.3. You may request rectification

You may ask us to rectify or complete Your inaccurately or incompletely recorded personal data.

4.4. You may request the erasure of your personal data ('right to be forgotten')

You may request us to erase Your personal data if:

- ✓ The personal data are no longer needed for the purpose they were obtained;
- ✓ You have withdrawn your consent;
- ✓ You successfully object to the processing of the data;
- ✓ It is established that personal data is being processed unlawfully;
- ✓ The erasure is required by EU or national legislation.

Personal data **may not be erased** if it is needed:

- ✓ To exercise rights to freedom of expression and information;
- ✓ To fulfil of the obligation relating to the processing of personal data by the Controller based on legislation of the European Union or a Member State thereof, or out of public interest;
- ✓ Based on public interest that relates to public health;
- ✓ For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes if erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- ✓ For the presentation, enforcement or defence of legal claims.

4.5. You can request us to restrict the processing

You have the right to request the restriction of the processing if any of the following criteria apply:

- ✓ You contests the correctness of the personal data. In such cases the restriction shall only apply to the time period necessary for us to verify the correctness of the personal data;
- ✓ The data processing activity has no legal basis, but You do not consent to the erasure of the data but instead you request the restriction of their use;
- ✓ We no longer require the personal data for processing purposes, but You request the data for submission, enforcement or protection of legal claims;

- ✓ You objected to the processing. (In such cases the restriction shall only apply to the time period necessary to determine whether the Controller's justified needs precede Your justified needs.)

Should the processing activity be subject to restriction, such personal data shall only be used, beyond storage, with Your consent or for the submission, enforcement or protection of legal claims or the protection of the rights of other natural or legal persons or in the important public interest of the European Union or a Member State thereof. We shall inform You in advance of any potential lifting of restrictions.

4.6. You may request for us to hand over your personal data (right to data portability)

You are entitled to receive your personal data processed by us in machine readable format, and you are also entitled to forward this data to another data controller or request us to do so, insofar as the processing of data is solely based on Your consent, or on a contract concluded with You, by automated means.

This right cannot be applied in cases where the purpose of the personal data processing activity is of public interest. It shall not prejudice the right to erasure and shall not adversely affect the rights and freedoms of others.

4.7. You may object to the processing of your personal data

- ✓ You may object to the processing of your personal data if the processing is necessary for the enforcement of the legitimate interest of the Controller or a third party. In this case, we shall erase the personal data unless their processing is justified by legitimate reasons which take precedence over Your interests, rights and freedoms, or are necessary for the submission, enforcement or protection of legal claims.
- ✓ If personal data is processed for direct business acquisition, you may object to such data processing at any time. The personal data may not be processed for this purpose thereafter.
- ✓ You may also object to the processing of your personal data if the personal data is being processed for scientific and historical research purposes or for statistical purposes. In this case, the personal data will be erased unless the processing is necessary for the performance of a task for reasons of public interest.

5. Legal remedy options

5.1. You may submit a complaint to national data protection authority

If You feel that Your personal data is being processed in violation of GDPR, You have the right to file a complaint with the supervisory authority deemed competent based on the location of your regular place of residence, your workplace or the Member State where the presumed violation took place.

5.2. You may turn to the court

If You believe that Your rights under GDPR have been infringed as a result of the processing of your personal data in non-compliance with GDPR, You can turn to a court. Such proceedings may be brought before the courts of the Member State where the data subject has his or her habitual residence.

6. Data security

Our processing activity follows the requirements of the GDPR. We do our utmost to implement the appropriate technical and organizational measures in order to guarantee an adequate level of data protection for the degree of risk, by taking into account the current state of science and technology, the costs of implementation, the nature of the data processing and the risk to the rights and freedoms of natural persons.

Your personal data is always processed in a confidential manner, with limited access, encryption and the maximization of resilience, and by ensuring restoration in the event of a problem. Our system is tested regularly to guarantee security. When determining the adequate security level we take into consideration the risks stemming from data processing that arise from the accidental or unlawful destruction, loss, modification, unauthorized disclosure or unauthorized access to personal data, especially those forwarded, stored or processed by using other methods.

7. Other

The Controller may at any time modify the terms and conditions of this Privacy Policy. Any modification will come into effect simultaneously with its publication on the website, and we shall call your attention to the change in a pop-up window when entering the website.

Last updated and effective: April 23, 2020