



GDPR policy of “Excellence Coaching by Boglarka Simon”

1. Responsible for data collection, storage and processing

Responsible provider of the services of “Excellence coaching by Boglárka Hatala” brand and the website growth-mindset.space in terms of data protection law is:

Praetorian Non-Profit Art and Health Consulting gUG

Tieckstrasse 6.

01099 Dresden

E-Mail: info@praetprianprojects.com

For questions and information on the processing of personal data at Praetorian Non-Profit Art and Health Consulting gUG please contact CEO, István Simon

With the following data protection declaration, we inform you in particular about the type, scope, purpose, duration and legal basis of the processing of personal data, insofar as we decide either alone or together with others about the purposes and means of processing. In addition, we will inform you below about the third-party components we use for optimization purposes and to increase the quality of use, insofar as third parties process data on their own responsibility.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we use such information.

2. Scope

2.1. This privacy notice describes how we collect and use personal information about you during and after your relationship with your Prateorian coach in accordance with the General Data Protection Regulation (GDPR).



2.2. This notice applies to:

- All clients, partners (individual and corporate)
- All Third Parties and Suppliers with whom we have dealings in the ordinary course of our business including those individuals with whom we send marketing information.

2.3. Any reference to 'we', 'us', 'our', 'the company' shall mean Praetorian Non-Profit and subcontractor or employed coaches.

2.4. On projects where we are appointed as a supplier of a service, we may act as the "Data Processor" and not the "Data Controller", and will be required to process data in line with the suppliers' policy in relation to GDPR.

2.5. Any reference to 'you' or 'Data Subject' or "Partner" shall mean any individual receiving this notice for whom we hold personal data.

2.6. Data protection guidelines for the training, coaching, consulting and concept development

2.7. Personal data (hereinafter mostly referred to as "data") are only processed by us to the extent necessary and for the purpose of providing a service in alignment with the Terms and Conditions and to provide a functional and user-friendly website, including its content and the services offered there.

2.8. According to Art. 4 No. 1 of Regulation (EU) 2016/679, i.e. the General Data Protection Regulation (hereinafter referred to as "GDPR"), "processing" is any process carried out with or without the help of automated processes or any such series of processes in connection with personal data, such as collecting, recording, organizing, arranging, storing, adapting or changing, reading out, querying, using, disclosing through transmission, dissemination or any other form of provision, comparison or linking, restriction, deletion or destruction.



3. GDPR, privacy policies and data protection guidelines in connection with coaching, training and consulting services

3.1. Coaching and training services of Praetorian Non-Profit and subcontractors are covered by coach-coachee confidentiality.

3.2. We will comply with data protection laws including GDPR. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only if necessary for the purposes we have told you about.
- Kept securely.

3.3. The kind of information we hold about clients

1. Personal data, or personal information, means any information about an individual from which that person can be identified.
2. There are “special categories” of more sensitive personal data which require a higher level of protection i.e. biometric and psychometric data.

3.4. We will collect, store, and use the following categories of personal information about clients:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- We may collect, store, and use the following categories of personal information about clients following some coaching interventions.
- Marital status and dependants.



- Location of employment or workplace.
- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, medical conditions, or disabilities, biometric and psychometric data.
- Business address and company registration number(s).
- A management contact for the business I am engaged with

3.5. Why we hold information on clients? It is necessary to retain data on clients in order for us to fulfil professional and contractual obligations and hold data for legitimate business needs. We will only retain data which we reasonably require and for a period which is reasonably necessary. We will not disclose your data to the third parties unless you have consented for us to do so or we are otherwise required to do either contractually or under another law or enactment.

3.6. How we collect, store and process personal information? We collect personal information about clients directly from themselves when they contact us via telephone, email, social media or through our website and website forms. Client and business data is stored within a GDPR compliant growth-mindset.space website and offline, and at the cloud services of Google and Microsoft, password protected. Some data on current clients that we are actively working with is also stored on our mobile telephones which are also password encrypted. If our coaching is carried out online, contact data will be stored within the application for the duration that we are actively in a coaching relationship. We reserve the right to change the systems in which data is stored without notification to another equivalent system but at all times we will ensure the appropriate security of your data and GDPR compliance.

3.7. How we will use your information? We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.



- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- We may also use your personal information in the following situations, which are likely to be rare:
 - Where I need to protect your interests (or someone else's interests).
 - Where it is needed in the public interest (or for official purposes).

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Administering the contract I have entered into with you.
- Dealing with legal disputes involving you.
- To prevent fraud.
- To market other products or services which I offer which may be of interest to you.
- To inform you about updates about our services.
- To administer our business which may include disclosure of client data to our accountant.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

In certain circumstances listed above, we hold your data to market other services to you, send you inspirational blogs, or send you information that we think may interest you. We have a legitimate business interest in retaining your data for this purpose, but you may 'opt out' of receiving these types of communication from us.



3.8. If you fail to provide certain information when requested, we may not be able to perform the contract we have entered with you or we may be prevented from complying with our legal obligations.

3.9. We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

3.10. During our day-to-day business, we acquire information regarding individuals other than our clients and we will retain this data where we have a legitimate business reason to do so. Typically, we acquire personal data on individuals, third parties and suppliers other than our clients in the following circumstances:

- Where we have met individuals, third parties and suppliers at networking or other marketing events;
- Where individuals, third parties or suppliers have made enquiries with us regarding possible services but have not subsequently become clients of our business;
- Where we have dealt with individuals, third parties or suppliers in the capacity as suppliers of goods or services to us;
- Where we have regular business-related dealings with you.

We have a legitimate business interest in retaining this data to send informative blogs, event details or other updates relating to our services or something that we believe relates to your interests. You have the right to ask me to erase or rectify your data and you have the right to opt out of receiving marketing, networking information or information we think might be of interest to you.



3.11 We might share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

4. Data security

4.1. The transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted online and transmission is made at your own risk. If you communicate with us by email then you assume the risks of such communications being intercepted, not received or delivered, or received by individuals other than the intended recipient.

4.2. For security measures of data protection of Praetorian, please contact info@praetorianprojects.com

5. Data retention

5.1. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Given the nature of our services clients often return to me with repeat instructions within weeks, months or years of contacting us in the first instance. The seven-year period referred to above will start from the last contact we had with the client, third party or supplier, to ensure we are able to assist as and when we need to. Should you not contact us for seven years, we will confidentially destroy all data held for you.

6. Rights of access, correction, erasure, and restriction



6.1. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

6.2. Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for me continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact info@praetorianprojects.com



Please note that where you ask us to erase, correct, object to process or seek to restrict our processing of data, we may refuse your request where we have a legal obligation, contractual or other legitimate business interest to refuse your request. If we refuse your request then we will notify you of this refusal and you will have the right to appeal. To access this information we might charge a fee

7. Right to withdraw consent

You have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact info@praetorianprojects.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

8. Data protection privacy considering the websites growth-mindset.space and praetorianprojects.com

8.1 Responsible provider of the websites in terms of data protection law is: Praetorian Non-Profit Art and Health Consulting gUG, Tieckstrasse 6., 01099 Dresden, e-mail: info@praetprianprojects.com. For questions and information on the processing of personal data at Praetorian Non-Profit Art and Health Consulting gUG please contact CEO, István Simon.

8.2. Rights of users and data subjects: with regard to the data processing described in more detail below, users and data subjects have the right

- for confirmation as to whether the data concerning you are being processed, for information about the processed data, for further information about the data processing as well as for copies of the data (see also Art. 15 GDPR);
- to correct or complete incorrect or incomplete data (see also Art. 16 GDPR);
- to the immediate deletion of the data concerning them (cf. also Art. 17 GDPR), or, alternatively, if further processing is necessary in accordance with Art. 17 Para. 3 GDPR, to restriction of processing in accordance with Art. 18 GDPR;



- to receive the data concerning them and provided by them and to transfer this data to other providers / responsible parties (cf. also Art. 20 GDPR);
- to complain to the supervisory authority if they are of the opinion that the data concerning them are being processed by the provider in violation of data protection regulations (cf. also Art. 77 GDPR).

In addition, the provider is obliged to notify all recipients to whom data has been disclosed by the provider of any correction or deletion of data or the restriction of processing that takes place on the basis of Articles 16, 17 Paragraph 1, 18 GDPR teach. However, this obligation does not exist if this notification is impossible or involves disproportionate effort. Irrespective of this, the user has a right to information about these recipients.

According to Art. 21 GDPR, users and data subjects also have the right to object to the future processing of the data concerning them, provided that the data is processed by the provider in accordance with Art. 6 Para. 1 lit.f) GDPR. In particular, an objection to data processing for the purpose of direct advertising is permitted.

8.3 Information on data processing: your data processed when using our website will be deleted or blocked as soon as the purpose of storage no longer applies, the deletion of the data does not conflict with any statutory retention requirements and no other information on individual processing methods is given below.

8.3.1. Server data: for technical reasons, in particular to ensure a secure and stable website, your internet browser transmits data to us or to our web space provider. These so-called server log files record the type and version of your Internet browser, the operating system, the website from which you switched to our website (referrer URL), the website (s) of our website that you are visiting, the date and time of the respective access as well as the IP address of the internet connection from which our website is used. The data collected in this way is temporarily stored, but not together with other data from you.



This storage takes place on the legal basis of Art. 6 Para. 1 lit.f) GDPR. Our legitimate interest lies in the improvement, stability, functionality and security of our website. The data will be deleted after seven days at the latest, unless further storage is required for evidence purposes. Otherwise, the data will be wholly or partially excluded from deletion until an incident has been finally clarified.

8.3.2. Cookies

a) session cookies / session cookies

We use so-called cookies on our website. Cookies are small text files or other storage technologies that are stored and stored on your device by the internet browser you use. These cookies process certain information about you on an individual basis, such as your browser or location data or your IP address.

This processing makes our website more user-friendly, more effective and more secure, as the processing enables, for example, the reproduction of our website in different languages or the offer of a shopping cart function.

The legal basis for this processing is Art. 6 Paragraph 1 lit b.) GDPR, provided that these cookies are used to process data to initiate or process contracts.

If the processing does not serve to initiate or process a contract, our legitimate interest lies in improving the functionality of our website. The legal basis is then Article 6 (1) (f) GDPR.

When you close your internet browser, these session cookies are deleted.

b) third party cookies

Our website may also use cookies from partner companies with whom we work for the purpose of advertising, analyzing or improving the functionality of our website.



Please refer to the following information for details on this, in particular on the purposes and legal basis for processing such third-party cookies.

c) possibility of elimination

You can prevent or restrict the installation of cookies by setting your internet browser. You can also delete cookies that have already been saved at any time. The steps and measures required for this, however, depend on the specific Internet browser you are using. If you have any questions, please use the help function or documentation of your Internet browser or contact its manufacturer or support. In the case of so-called flash cookies, however, processing cannot be prevented via the browser settings. Instead, you have to change the setting of your Flash player. The steps and measures required for this also depend on the specific Flash player you are using.

However, should you prevent or restrict the installation of cookies, this may mean that not all functions of our website can be used to their full extent.

8.3.3. Newsletter

If you register for our free newsletter, the data you have requested for this purpose, i.e. your e-mail address and – optionally – your name and address, will be transmitted to us. At the same time, we save the IP address of the Internet connection from which you access our website, as well as the date and time of your registration. As part of the further registration process, we will obtain your consent to the sending of the newsletter, describe the content in detail and refer to this data protection declaration. We use the data collected in this way exclusively for sending the newsletter – therefore, in particular, it is not passed on to third parties. The legal basis for this is Article 6 (1) (a) GDPR. You can revoke your consent to the sending of the newsletter at any time with effect for the future in accordance with Art. 7 Para. 3 GDPR. To do this, all you have to do is inform us of your revocation or use the unsubscribe link contained in every newsletter.



8.3.4. Contact inquiries / contact options

If you contact us via the contact form or email, the data you provide will be used to process your request. The specification of the data is necessary for processing and answering your request – without this provision we cannot answer your request, or at most only to a limited extent. The legal basis for this processing is Article 6 (1) lit. b) GDPR. Your data will be deleted if your request has been finally answered and the deletion does not conflict with any statutory retention requirements, for example in the event of a subsequent contract processing.

8.3.5. Google analytics

We use Google Analytics on our website. This is a web analysis service provided by Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043 USA, hereinafter referred to as “Google”. Through certification according to the EU-US data protection shield (“EU-US Privacy Shield”)

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

Google guarantees that the EU's data protection requirements will also be complied with when processing data in the USA. The Google Analytics service is used to analyze the usage behavior of our website. The legal basis is Art. 6 Paragraph 1 lit.f) GDPR. Our legitimate interest lies in the analysis, optimization and economic operation of our website. Usage and user-related information, such as IP address, location, time or frequency of visits to our website, are transmitted to a Google server in the USA and stored there. However, we use Google Analytics with the so-called anonymization function. With this function, Google shortens the IP address within the EU or the EEA.

The data collected in this way is in turn used by Google to provide us with an evaluation of the visit to our website and of the usage activities there. This data can also be used to provide other services related to the use of our website and the use of the Internet. Google states that it will not associate your IP address with other data. In addition, Google maintains



<https://www.google.com/intl/de/policies/privacy/partners>

Further data protection information is available for you, for example also on the possibilities of preventing the use of data. Google also offers

<https://tools.google.com/dlpage/gaoptout?hl=de>

a so-called deactivation add-on along with further information on this. This add-on can be installed with common internet browsers and offers you further control over the data that Google collects when you visit our website. The add-on informs the JavaScript (ga.js) of Google Analytics that information about visiting our website should not be transmitted to Google Analytics. However, this does not prevent information from being transmitted to us or to other web analysis services. You can of course also find out in this data protection declaration whether and which other web analysis services are used by us. Alternatively, the future analysis of your website visit by Google Analytics can be deactivated by” clicking “on the link below. By “clicking” on the link, a so-called “opt-out cookie” is set. Please note that if you delete the cookies in your browser settings, this can result in the opt-out cookie being deleted as well and you may have to reactivate it.

8.5.6. Facebook (Meta) social plug-in

We use the plug-in of the social network Facebook on our website. Facebook is an internet service provided by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA. In the EU, this service is in turn operated by Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland, hereinafter both referred to as “Facebook”. Through certification according to the EU-US data protection shield (“EU-US Privacy Shield”)

<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>

Facebook guarantees that the EU’s data protection requirements will also be complied with when processing data in the USA. The legal basis is Art. 6 Paragraph 1 lit.f) GDPR. Our legitimate interest lies in improving the quality of our website. Further



information about the possible plug-ins and their respective functions is available from Facebook <https://developers.facebook.com/docs/plugins/> ready for you.

If the plug-in is stored on one of the pages you visit on our website, your Internet browser will download a representation of the plug-in from the Facebook servers in the USA. For technical reasons, it is necessary for Facebook to process your IP address. In addition, the date and time of your visit to our website are also recorded. If you are logged in to Facebook while visiting one of our websites with the plug-in, the information collected by the plug-in about your specific visit will be recognized by Facebook. Facebook may assign the information collected in this way to your personal user account there. If you use the so-called “Like” button on Facebook, for example, this information will be saved in your Facebook user account and possibly published on the Facebook platform. If you want to prevent this, you must either log out of Facebook before visiting our website or use an add-on for your Internet browser to prevent the Facebook plug-in from being blocked. Further information about the collection and use of data as well as your rights and protection options in this regard is available from Facebook under <https://www.facebook.com/policy.php> available data protection information.

8.5.7. We use YouTube on our website. This is a video portal from YouTube LLC., 901 Cherry Ave., 94066 San Bruno, CA, USA, hereinafter referred to as “YouTube”. YouTube is a subsidiary of Google LLC., 1600 Amphitheater Parkway, Mountain View, CA 94043 USA, hereinafter referred to as “Google”. Through certification according to the EU-US data protection shield (“EU-US Privacy Shield”)

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

Google, and thus also its subsidiary YouTube, guarantees that the EU’s data protection requirements will also be complied with when processing data in the USA. We use YouTube in connection with the “Extended data protection mode” function in order to be able to show you videos. The legal basis is Art. 6 Paragraph 1 lit.f) GDPR. Our legitimate interest lies in improving the quality of our website. According to



information provided by YouTube, the “extended data protection mode” function means that the data described in more detail below are only transmitted to the YouTube server when you actually start a video. Without this “extended data protection”, a connection to the YouTube server in the USA will be established as soon as you call up one of our Internet pages on which a YouTube video is embedded. This connection is required in order to be able to display the respective video on our website via your internet browser. In the course of this, YouTube will at least record and process your IP address, the date and time and the website you visited. A connection to the Google “DoubleClick” advertising network is also established. If you are logged into YouTube at the same time, YouTube will assign the connection information to your YouTube account. If you want to prevent this, you must either log out of YouTube before visiting our website or make the appropriate settings in your YouTube user account. For the purpose of functionality and to analyze usage behavior, YouTube permanently saves cookies on your device via your Internet browser. If you do not agree to this processing, you have the option of preventing the storage of cookies by setting your Internet browser. You can find more information on this under “Cookies” above. Further information on the collection and use of data as well as your rights and protection options in this regard is available from Google

<https://policies.google.com/privacy>

available data protection information.

8.5.7. We use “Vimeo” on our website to display videos. This is a service provided by Vimeo, LL C, 555 West 18th Street, New York, New York 10011, USA, hereinafter referred to as “Vimeo”.Some of the user data is processed on Vimeo servers in the USA. Through certification according to the EU-US data protection shield (“EU-US Privacy Shield”)

<https://www.privacyshield.gov/participant?id=a2zt00000008V77AAE&status=Active>



However, Vimeo guarantees that the EU's data protection requirements will also be complied with when processing data in the USA. The legal basis is Art. 6 Paragraph 1 lit.f) GDPR. Our legitimate interest lies in improving the quality of our website.

If you visit a page of our website in which a video is embedded, a connection to the Vimeo servers in the USA is established to display the video. For technical reasons, it is necessary for Vimeo to process your IP address. In addition, the date and time of your visit to our website are also recorded. If you are logged in to Vimeo at the same time as you visit one of our websites in which a Vimeo video is embedded, Vimeo may assign the information collected in this way to your personal user account there. If you want to prevent this, you must either log out of Vimeo before visiting our website or configure your Vimeo user account accordingly. For the purpose of functionality and usage analysis, Vimeo uses the web analysis service Google Analytics. Google Analytics stores cookies on your device via your Internet browser and sends information about the use of our Internet pages, in which a Vimeo video is embedded, to Google. It cannot be ruled out that Google will process this information in the USA. If you do not agree to this processing, you have the option of preventing the installation of cookies by making the appropriate settings in your Internet browser. You can find details on this under the heading "Cookies" above. The legal basis is Art. 6 Paragraph 1 lit.f) GDPR. Our legitimate interest lies in improving the quality of our website and in Vimeo's legitimate interest in statistically analyzing user behavior for optimization and marketing purposes. Vimeo offers under <http://vimeo.com/privacy> further information on the collection and use of data as well as your rights and options for protecting your privacy.