

Privacy Notice

Effective date: 1 September 2026

This notice explains how I process personal data in connection with my engineering leadership mentoring services, the related website, appointment booking, client communication, and invoicing.

1. Data controller

Name	Ádám Czuprak, sole proprietor (egyéni vállalkozó)
Registered seat	2053 Herceghalom, Sándor Móric tér 6. fsz. 4a., Hungary
Tax ID	92333714-1-33 HU92333714
Email	adam@adamczuprak.com
Website	adamczuprak.com

Given the nature and scale of the activity, **no data protection officer (DPO) is required.**

2. What activities does this cover?

My services are offered to **individuals** (Career & Leadership Discovery Call, Career & Leadership Roadmap, Engineering Leadership Growth Program).

Data subjects may include, in particular:

- website visitors;
 - people who book a call or make an enquiry (including via LinkedIn);
 - mentoring clients (individuals).
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3. Purposes, legal bases, and data categories

3.1. Operating the website

- **Purpose:** to display and operate the website securely.
- **Legal basis:** legitimate interest (a working, secure site).
- **Data:** technical data (e.g. IP address, browser/device type, server logs) as processed by the hosting provider.
- **Note:** the site is served by Firebase Hosting (Google). **I do not use analytics or marketing cookies, and I do not show a cookie banner.** I do not load third-party web fonts (Google Fonts); fonts are served from the website's own hosting.

3.2. Booking and Career & Leadership Discovery Call

- **Purpose:** scheduling a free Career & Leadership Discovery Call, staying in touch, and assessing fit for mentoring.
- **Legal basis:** steps prior to entering into a contract / measures taken at your request.
- **Data:** name, email address, slot, timezone, and any message or short background you provide when booking.
- **Tool:** booking is handled through Calendly (Calendly, LLC); Calendly is a processor. Calls take place on Google Meet.

I do not record mentoring conversations as audio or video. During conversations I may take short written notes that serve the mentoring purpose.

3.3. Mentoring services (Career & Leadership Roadmap and Engineering Leadership Growth Program)

- **Purpose:** performing the service agreement: pre-session questionnaire, running sessions, written summary / next steps, email follow-up between sessions, and interview prep when needed.
- **Legal basis:** performance of a contract.
- **Data:** identity and contact details; professional/career information shared in the questionnaire and sessions; **written notes and summaries** that may contain information you disclose in sessions (to keep the mentoring process continuous and to track agreed next steps); emails and attachments arising from client communication (e.g. CV, LinkedIn profile, interview materials); other information you provide that is needed to deliver the service.
- **Storage:** the questionnaire is sent by email (Exchange Online) or prepared in Google Docs / Drive; session notes are kept in Google Docs / Drive (Google Account).
- **Important:** workplace and career context shared in sessions is handled confidentially and only for mentoring purposes.

I do not record mentoring conversations as audio or video. During conversations I may take short written notes that serve the mentoring purpose. Google Meet still processes data necessary to run the call.

3.4. Invoicing and accounting

- **Purpose:** issuing invoices, accounting, and meeting tax/bookkeeping obligations.
- **Legal basis:** legal obligation and performance of the contract.
- **Data:** billing name and address, email, description and price of the service, payment-related details.
- **Payment:** invoice / payment request via Számlázz.hu; settlement by Wise bank transfer, or a Barion payment link (card, Apple Pay, Google Pay). I do not use Calendly's payment feature.

3.5. Incoming enquiries (LinkedIn, email, and other channels)

- **Purpose:** answering the enquiry, staying in touch, and assessing fit for mentoring.
- **Legal basis:** steps prior to entering into a contract where the enquiry is about taking up the service; otherwise legitimate interest (responding to a professional enquiry).
- **Data:** name, contact details and message shared on that channel, and related publicly shared professional profile information. For LinkedIn enquiries, LinkedIn is an independent controller of its platform; I process the data you send me for the purpose above.

Using a given service requires providing the data needed for that purpose. If you do not provide them, I cannot provide that service or parts of it.

4. Retention

- **Mentoring notes, questionnaires, and session summaries: 12 months after the mentoring relationship ends**, unless a longer period is justified (e.g. ongoing follow-up or a legal claim).
- **Client / contract / business records:** after the relationship ends, generally for the period during which civil claims can be enforced (typically **5 years** under Hungarian law), or as long as needed for claim defence.
- **Invoicing / tax records:** for the period required by the tax and accounting rules applicable from time to time.
- **Booking / enquiry data without a contract:** until the purpose is fulfilled, and no longer than **12 months**, unless a longer period is justified (e.g. an ongoing conversation).

- **Web server logs / technical data:** for as long as needed to operate and secure the service, and otherwise according to the provider's applicable retention rules.

5. Recipients and processors

I share personal data with service providers only as needed for the purposes above:

Role	Provider	Note
Web hosting	Firebase Hosting (Google)	Processor. Serves the website via Google's global infrastructure.
Appointment booking	Calendly, LLC	Processor. Used to process booking data. United States and other countries; applicable transfer safeguards apply, in particular the EU-US Data Privacy Framework and the European Commission's standard contractual clauses.
Video calls	Google Meet (Google)	Used to run mentoring conversations. I do not record conversations; I do not make audio or video recordings. Google processes the data needed to operate the service under the service's own terms and privacy policy.
Notes / questionnaire	Google Drive / Google Docs (Google)	Cloud storage and documents used via a Google Account. Used to store mentoring questionnaires, notes, and summaries. Google processes personal data under the service's own terms and privacy policy.

Role	Provider	Note
Email / communication	Microsoft Exchange Online	Processor. Used for email and client communication. Microsoft's applicable privacy and data-processing terms apply.
E-invoicing	Számlázz.hu (KBOSS.hu Kft.)	Processor for the invoicing service; independent controller for some of its own purposes.
Accounting	B-Top Kft. (managing director: Erika Nagy)	Processor for bookkeeping.
Payments (transfer)	Wise Europe SA	Independent controller when providing the payment service.
Payments (card)	Barion Payment Zrt.	Independent controller when providing the payment service. Payment link: card, Apple Pay, Google Pay.
Contact channel	LinkedIn	LinkedIn is an independent controller of its platform. For enquiries via LinkedIn, I process the data you provide there.

Where personal data are transferred to a recipient outside the EEA, the transfer takes place under Chapter V GDPR safeguards, in particular an adequacy decision or applicable standard contractual clauses. Transfer to or access from outside the EEA may occur in particular in connection with Google (Firebase Hosting, Google Drive / Docs, Google Meet), Microsoft (Exchange Online), Calendly, and LinkedIn.

I do **not** use automated decision-making or profiling to deliver mentoring services.

6. Your rights

Subject to the GDPR and applicable Hungarian rules, you may exercise the following rights:

Access

You may ask whether I process personal data about you, and if so, obtain access to that data and information about purposes, recipients, retention, and the source of the data (if not obtained from you).

Rectification

You may ask me to correct inaccurate data or complete incomplete data.

Erasure

You may ask for deletion where, for example, the data are no longer needed for the original purpose; you object and there are no overriding grounds; processing was unlawful; or deletion is required by law.

Erasure is not always possible — in particular where processing is required for a legal obligation, for legal claims, or another recognised exception.

Restriction

You may ask me to restrict processing if, for example, you contest accuracy; processing is unlawful but you prefer restriction over deletion; I no longer need the data but you need them for legal claims; or you have objected and the balancing assessment is ongoing.

While restricted, data are generally only stored, and further use depends on your consent or limited legal grounds.

Objection

Where processing is based on legitimate interest, you may object. I will then stop processing unless compelling legitimate grounds override your interests, or processing is needed for legal claims.

I currently do not process personal data for direct marketing (e.g. newsletters or ads). If that changes, I will update this notice, and you may object to that purpose at any time.

Data portability

Where processing is based on a contract and is carried out by automated means, you may receive the data you provided in a structured, commonly used, machine-readable format, and — where feasible — have them transmitted to another controller. This must not adversely affect others' rights and does not override the right to erasure.

How to make a request

You may submit a request or complaint directly to me using the contact details above. After verifying identity where needed, I will respond without undue delay and within **one month**. For complex or numerous requests this may be extended by **up to two further months**; I will inform you within one month if so.

If you submit a request electronically, I will reply electronically where possible, unless you ask otherwise. If I do not take action, I will explain why within one month and inform you of available remedies.

Information and action are generally **free of charge**. For clearly unfounded or — especially if repetitive — excessive requests, I may charge a reasonable fee or refuse to act.

7. Remedies

If you believe your rights have been infringed, you may lodge a complaint with the **Hungarian National Authority for Data Protection and Freedom of Information (NAIH)**:

- Address: 1055 Budapest, Falk Miksa utca 9–11.
- Postal: 1363 Budapest, Pf. 9.
- Website: www.naih.hu
- Email: ugyfelszolgalat@naih.hu

You may also go to court; proceedings may be brought before the competent tribunal, including at your place of residence or stay.

8. Changes to this notice

I may update this notice when needed. The current version will be available on the website. I will also email existing mentoring clients about material changes.

