



Privacy Policy

Last modified: 07 May 2026



The purpose of the following privacy notice is to inform data subjects about the personal data processing activities carried out in connection with the services provided on the Alberti Studio online platform.

1. The Data Controller's Data Privacy Policy Principles

The Data Controller is an innovative technology company that provides online services. It is committed to protecting personal data and ensuring its users have as much control over their personal data as possible.

The Data Controller has designed its service according to the principle of "privacy by design," meaning that the operational structure of the service has been built to take maximum account of data protection aspects.

At each stage of service use, the Data Controller limits the processing of personal data to those strictly necessary for the service's proper operation. To enhance data security, the Data Controller has, where possible, built into its operational structure measures — including the use of third parties — to process personal data only where and when strictly necessary.

The Data Controller believes that the lawful, fair, and transparent processing of personal data increases the trust of data subjects and promotes the use of innovative technological solutions by a wider range of users.

2. Concepts

2.1. Data Controller: the business company Tengrai Artificial Intelligence Korlátolt Felelősségű Társaság, which operates and manages the Platform

2.2. Platform: the platform operated by the Data Controller, called "Alberti Studio," which is an online platform for generating content based on the use of artificial intelligence solutions, available under the domains <https://alberti.studio> and <https://albertistudio.ai>

2.3. Data Subject: a natural person who comes into contact with the Data Controller while browsing or using the Platform and whose personal data is processed by the Data Controller in this regard

3. Data Controller's Details and Contact Information

Company Name	Tengrai Artificial Intelligence Korlátolt Felelősségű Társaság
Registering Auth.	Szeged Court of Szeged (Hungary)
Headquarters	Hungary, 6724 Szeged, Rókusi boulevard 21, 1st floor, door 4
Company Reg. No.	06-09-028918
Tax Number	32315028-2-06
Website	https://alberti.studio / https://albertistudio.ai
E-mail	privacy@alberti.studio

4. Data Processing by the Data Controller

4.1. The Data Controller processes the Data Subject's personal data in connection with the use of the Platform for different purposes and on different legal bases.

4.2. The services available on the Platform can only be used after registration. The registration process is designed so that the personal data required to complete registration is provided directly by the Data Subject to a third-party partner of the Data Controller, which acts as a data processor and performs the operations necessary to identify the user. The Data Controller does not perform any personal data processing in connection with registration and user identification.

4.3. The Data Controller processes personal data where the Data Subject uses a fee-based service. In connection with the payment of fees, the Data Controller is subject to invoicing and accounting obligations which entail the processing of personal data.

4.4. The Data Controller also handles complaints in compliance with its legal obligations, which involve the processing of personal data.

4.5. The Platform uses cookies that collect information about the Data Subject during browsing. Detailed information on data processing through cookies is provided in this notice.

5. Data Processing Related to the Fulfillment of Accounting Obligations

5.1. Legal basis for processing

The following legislation requires the Data Controller to comply with legal obligations that involve the processing of personal data:

- a) pursuant to Section 159 (1) of Act CXXVII of 2007 on Value Added Tax, the Data Controller is obliged to issue an invoice in respect of the service fee; and
- b) Article 169 (1) of Act C of 2000 on Accounting requires the Data Controller to keep its accounting records and supporting documents for at least 8 years.

The legal basis for processing is therefore compliance with a legal obligation to which the Data Controller is subject.

5.2. Purpose of data processing

To enable the Data Controller to comply with its statutory accounting obligations.

5.3. Scope of personal data processed

The data content of the accounting document issued by the Data Controller:

- the name of the Data Subject, billing address, amount of the service fee, tariff plan used, payment method, receipt number.

The Data Subject can only pay the service fee via bank card. Bank card payments are not processed by the Data Controller but by a payment service provider contracted with the Data Controller. The bank card data required for payment are not known, stored, or managed by the Data Controller; the payment service provider acts as data controller in this regard.

Payment service provider under contract with the Data Controller:

Company	Stripe Inc.
Headquarters	354 Oyster Point Blvd, South San Francisco, CA 94080, United States
Privacy policy	https://stripe.com/privacy

5.4. Duration of data processing

The Data Controller shall keep personal data contained in accounting documents for eight years, as provided for in Act C of 2000 on Accounting.

5.5. Data processor

The Data Controller uses a third-party invoicing service provider acting as a data processor to issue invoices. The following personal data will be transmitted to the billing service provider: the name of the Data Subject, billing address, amount of the service fee, tariff plan used, payment method, and receipt number.

Invoicing service provider:

Company	KBOSS.hu Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság (KBOSS.hu Kft.)
Website	szamlazz.hu
Headquarters	1031 Budapest, Záhony utca 7., Hungary

6. Data Processing Related to Complaint Handling

6.1. Legal basis for data processing

Pursuant to Article 17/A of Act CLV of 1997 on Consumer Protection, the Data Controller is obliged to carry out complaint-handling activities, and in this context to document and preserve the reported complaint and the response given to it in the manner prescribed by law. The legal basis for data processing is the fulfillment of this legal obligation.

6.2. Purpose of data processing

To comply with the Data Controller's legal obligation to settle, document, and preserve complaints.

6.3. Scope of personal data processed

The Data Subject's complaint may include personal data, the scope of which cannot be precisely defined in advance.

The Data Controller shall assign a unique identification number to any oral complaint communicated by telephone or electronic communication service. If the Data Subject does not agree with the handling of a verbal complaint, or if it is not possible to investigate it immediately, the Data Controller shall promptly take a record containing:

- a) the Data Subject's name and address
- b) the place, time, and method of complaint submission

- c) a detailed description of the complaint and a list of documents or evidence presented
- d) a statement by the Data Controller on its position, where immediate investigation is possible
- e) the signature of the person taking the record and, except for telephone/electronic complaints, the signature of the Data Subject
- f) the place and time of recording
- g) the unique identification number of the complaint, in the case of a telephone or electronic oral complaint

6.4. Duration of data processing

The Data Controller is legally obliged to keep the record of the complaint and a copy of the response for three years.

7. Data Processing Related to the Use of Cookies

The Data Controller uses cookies on the Platform. A cookie is a packet of information placed by the Platform's server on the visitor's computer or mobile device, which the server may subsequently read. The purpose of cookies is to facilitate the use of the Platform and its features, and to improve the user experience. Some cookies also allow the Data Controller to collect statistical information about Platform visitors.

Some cookies do not contain any personal information, while others contain a unique identifier that indirectly identifies the visitor. The Data Controller is considered the data controller with respect to indirectly identifiable data collected by cookies.

When visitors browse the Platform, the Data Controller informs them about cookies via a notice on the Platform, which contains a link to this privacy policy.

7.1. Cookies used by the Platform

7.1.1. Strictly necessary cookies

These cookies are essential for the basic functioning of the Platform. Without them, certain features — in particular authenticated access — will be unavailable. They do not store personal data beyond what is strictly required to maintain a logged-in session.

The legal basis for these cookies is the legitimate interest of the Data Controller (Article 6(1)(f) GDPR), as they are strictly required for the operation of the service. Consent is not required for these cookies.

Concerned	Cookie name	Data type	Purpose	Legal basis	Retention
Registered / logged-in user	sb-[project-id]-auth-token	Authentication token	Identifies the logged-in user and maintains the authenticated session	GDPR Art. 6(1)(f) — legitimate interest	Duration of session; deleted on logout or registration cancellation

7.1.2. Statistics cookies

These cookies collect anonymised or pseudonymised information about how visitors use the Platform, such as pages visited and time spent. This helps the Data Controller understand and improve Platform performance. These cookies do not directly identify individual visitors.

The legal basis for statistics cookies is the Data Subject's consent (Article 6(1)(a) GDPR), given by accepting cookies via the consent notice on the Platform. The Platform may use statistics cookies in the future; this section will be updated accordingly when such cookies are introduced.

Concerned	Cookie name	Data type	Purpose	Legal basis	Retention
Platform visitor	Statistics cookies (to be specified)	Country, browser type, device/OS, language, pages visited	Platform analytics and development	GDPR Art. 6(1)(a) — consent	Until withdrawal of consent or registration cancellation

Right of withdrawal: The Data Subject may withdraw consent at any time by disabling or deleting cookies in their browser settings. Withdrawal does not affect the lawfulness of processing carried out prior to withdrawal.

7.2. Cookie management

Visitors may enable, disable, or delete cookies in their browser settings. Disabling cookies may prevent access to certain Platform features or impede browsing.

8. Rights of the Data Subject

8.1. Right to information: The Data Subject has the right to request information from the Data Controller about all processing of their personal data, using the contact details set out in this notice.

8.2. Right to withdraw consent: Where processing is based on consent, the Data Subject may withdraw it at any time, free of charge, using the contact details provided. Withdrawal does not affect the lawfulness of processing prior to withdrawal.

8.3. Right of access: The Data Subject has the right to receive confirmation as to whether their personal data is being processed, and if so, to access that data and the following information:

- a) the purposes of processing
- b) the categories of personal data concerned
- c) recipients or categories of recipients to whom data has been or will be disclosed, including those in third countries or international organisations
- d) the intended storage period
- e) the right to rectification, erasure, restriction of processing, and the right to object
- f) the right to lodge a complaint with a supervisory authority
- g) information on data sources
- h) the fact of any automated decision-making, including profiling, and its likely consequences for the Data Subject

The Data Controller shall provide a copy of personal data undergoing processing on one occasion. For additional copies, a reasonable fee based on administrative costs may be charged. Information shall be provided within one month of the request.

8.4. Right of rectification: The Data Subject may request the rectification of inaccurate personal data or the completion of incomplete data by contacting the Data Controller.

8.5. Right to erasure: The Data Subject may request erasure of their personal data where:

- a) the data are no longer necessary for the purposes for which they were collected
- b) the Data Subject withdraws consent and there is no other legal basis for processing
- c) the Data Subject objects to processing and there are no overriding legitimate grounds
- d) the data have been unlawfully processed
- e) erasure is required to comply with a legal obligation
- f) the data were collected in connection with information society services

Erasure may not be requested where processing is necessary to comply with a legal obligation or to establish, exercise, or defend legal claims.

8.6. Right to restriction of processing: The Data Subject may request restriction of processing where:

- a) the accuracy of data is contested, pending verification
- b) processing is unlawful and the Data Subject requests restriction rather than erasure
- c) the Data Controller no longer needs the data but the Data Subject requires it for legal claims
- d) the Data Subject has objected to processing, pending determination of whether the Controller's legitimate grounds prevail

Where processing is restricted, data may only be processed — other than storage — with the Data Subject's consent, for legal claims, for the protection of the rights of another person, or for important public interest. The Data Controller shall inform the Data Subject before lifting any restriction.

8.7. Right to object: The Data Subject may object at any time to processing of their personal data where the legal basis is the legitimate interests of the Data Controller, including profiling. The Data Controller may no longer process the data unless it demonstrates compelling legitimate grounds that override the Data Subject's interests, rights, and freedoms, or for legal claims.

8.8. Right to data portability: The Data Subject has the right to receive their personal data in a structured, commonly used, machine-readable format and to transmit it to another data controller.

8.9. Automated decision-making, including profiling: The Data Subject has the right not to be subject to a decision based solely on automated processing — including profiling — which produces legal or similarly significant effects. This right does not apply where the decision is:

- a) necessary for the conclusion or performance of a contract between the Data Subject and the Data Controller
- b) permitted by applicable Union or Member State law with appropriate safeguards
- c) based on the Data Subject's explicit consent

8.10. Right to bring a claim before a court: In the event of a breach of rights relating to the processing of personal data, the Data Subject may bring an action against the Data Controller before the competent court.

8.11. Initiating a procedure with the data protection authority: In case of unlawful data processing, the Data Subject may lodge a complaint with the National Authority for Data Protection and Freedom of Information:

Authority	Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)
Headquarters	1055 Budapest, Falk Miksa Street 9-11
Postal address	1363 Budapest, PO Box 9
Telephone	+36-1-391-1400
Fax	+36-1-391-1410
E-mail	ugyfelszolgalat@naih.hu
Website	https://www.naih.hu

