

Privacy Statement

Introduction

This notice ensures transparency in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679, hereinafter: GDPR), providing information on how **BIMGO Group Kft** (hereinafter: the Controller) processes personal data of natural persons in connection with the tasks detailed below. It describes the rules the Controller follows in the course of its activities and outlines the measures it takes to protect the data it processes. Furthermore, it provides information about the rights to which the data subjects are entitled for the protection of their interests.

The regulations described in this Privacy Notice have been developed based on the GDPR, as well as on the provisions of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (Grt.), and Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Info Act).

1) Controller's Identification Data

Name: BIMGO Group Kft.

Registered office and mailing address: 1194 Budapest, Zalaegerszeg utca 86.

Tax number: 32301647-2-43

Company registration number: 03 09 102945

Court of registration: Company Registry Court of the Metropolitan Court of Budapest

Customer service email: bimgo@bimgo.hu

Hosting provider: Microsoft (SQL Server)

Customer service (Hungarian support): +3680 204 999; +36(1) 267 4636

2) Principles of Personal Data Processing

The Controller operates in accordance with the following principles:

- **Purpose limitation:**
This principle ensures that the Controller only stores and uses the personal data of natural persons for specific, clearly defined purposes related to its activities.
- **Data minimisation:**
Only the data that is relevant and necessary for the given purpose is collected and processed.
- **Accuracy:**
To ensure the rights of data subjects and compliance with the law, the Controller shall promptly rectify or delete any inaccurate personal data.

The Controller receives personal data directly from the data subjects. It considers itself bound by the obligations relating to the protection of personal data processed in connection with its activities. These obligations help to demonstrate—if necessary to authorities, business partners, or customers—that the Controller has acted in compliance with the GDPR, the Info Act, and other applicable laws (**principle of accountability**).

3) Definitions

This Privacy Notice uses the following terms:

- **“Personal data”**: any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **“Data subject”**: the natural person whose personal data is processed by the Controller.
- **“Data subject’s consent”**: any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- **“Controller”**: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **“Data breach”**: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.
- **“Data protection officer (DPO)”**: a person appointed under the GDPR who performs expert tasks related to personal data protection within the organisation, and maintains contact with the data protection authority (NAIH). Appointment of a DPO is mandatory in certain cases defined by law, and recommended in others.

4) The Processing of Personal Data

During its activities, the Controller processes any personal data it obtains—whether directly or indirectly—concerning business partners, interested parties, employees, and customers in accordance with this Privacy Notice. It undertakes a duty of confidentiality and acts in compliance with applicable Hungarian laws and the provisions of the GDPR.

The Controller is legally permitted to store, organize, and use the data it receives in connection with its activities to the extent necessary and within the framework of the law. Data processing is terminated immediately if the purpose has been fulfilled or no longer exists, or at the request of the data subject, if appropriate.

The Controller does not engage in profiling or automated decision-making in connection with its activities.

5) Details of Data Processing Activities by Purpose

Purpose of processing: Requesting a quotation, pre-contractual communication via email

- **Legal basis:** Pre-contractual arrangements (GDPR Article 6(1)(b))
- **Method:** Electronically
- **Processed data:** Name, phone number, email address
- **Duration of processing:**
 - Without contract: 60 days
 - With contract: 8 years after termination or expiry of the contract (taking into account accounting and financial obligations)

- **Data access:** Controller, Controller's accountant

Purpose of processing: Contract conclusion with business partners (e.g., accounting firms) or clients

- **Legal basis:** Performance of a contract (GDPR Article 6(1)(b))
- **Method:** On paper and electronically
- **Processed data:**
 - For sole proprietors: name, registered office, tax number, phone number, email
 - For companies: representative's name, phone number, email
- **Duration of processing:** 8 years after contract termination or expiry
- **Data access or transfer:** Contracting parties, Controller's accountant

Purpose of processing: Complaint handling

- **Legal basis:** Legal obligation (GDPR Article 6(1)(c); Hungarian Civil Code 2013, Act CLV of 1997 on Consumer Protection)
- **Method:** On paper and/or electronically
- **Processed data:** Name, phone number, email address, and any other voluntarily provided information in the complaint
- **Duration of processing:** 5 years
- **Data access:** Controller, Authorities in case of inspection, possibly Controller's legal representative

Purpose of processing: Invoicing

- **Legal basis:** Legal obligation (GDPR Article 6(1)(c); Act C of 2000 on Accounting; Act CL of 2017 on Taxation)
- **Method:** Electronically
- **Processed data:** Name, tax number, and other billing data
- **Duration of processing:** 8 years
- **Data access:** Controller, Controller's accountant, National Tax and Customs Administration (NAV), bank

Purpose of processing: Contact via the website <https://www.bimgo.hu> ("BIM? GO!" form)

- **Legal basis:** Data subject's consent (GDPR Article 6(1)(a))
- **Method:** Electronically
- **Processed data:** First name, last name, email address

Note: No additional personal data is requested or processed. Any unsolicited personal data submitted through the form or by email is immediately and permanently deleted.

- **Recommendation:** Do not include personal data in the "Your Message" field of the contact form.
- **Duration of processing:** Until the consent is withdrawn
- **Data access:** Controller

Notice: You may refuse or withdraw your consent at any time (without justification). Please send such requests in writing to the email address above. We will delete the data as soon as possible, but no later than within 5 working days.

Withdrawal of consent does not affect the lawfulness of processing based on prior consent. Without active consent, we can only respond to inquiries by phone.

Purpose of processing: Data processing related to service use (in the application)

- **Legal basis:** Performance of a contract (GDPR Article 6(1)(b))
- **Method:** Electronically
- **Processed data:**
First name, last name, email address, username,
Revit Version, Command Id, Command Name, Ribbon Tab, Ribbon Panel, Document Name,
Document Type, Active View Name, Active View Type, Transaction Name, Operation,
Added Element Ids, Modified Element Ids, Deleted Element Ids, Modified Count, Time Stamp,
Added Count, Deleted Count
- **Duration of processing:** 5 years after the deletion of registration
- **Data access:** Controller

Database Service Provider

- **Provider:** Microsoft.com, app.powerbi.com
- **Privacy policy:** <https://privacy.microsoft.com/en-US/privacystatement#mainnoticetoendusersmodule>
- **Legal basis for processing:** Performance of a contract (GDPR Article 6(1)(b))
- **Scope of processed data:** Metadata from Autodesk Revit virtual models, including the following:
- **Purpose of processing:** Providing database visualization services
- **Duration of processing:** Until the expiration or termination of the contract

Information on the Use of Cookies on the Website

Data subjects concerned: All individuals who visit the Controller's website at <https://www.bimgo.hu>

- Strictly necessary cookies – no consent required:

Key	Domain	Duration	Description
hs	.www.bimgo.hu	persistent	Used for security purposes
XSRF-TOKEN	.www.bimgo.hu	persistent	Helps ensure website security and prevents cross-site request forgery.

a.) Targeting cookies – consent required, but not mandatory to accept:

Key	Domain	Duration	Description
svSession	.www.bimgo.hu	13 months	Identifies unique visitors and tracks sessions on the website.

Cookies (general information):

This website uses so-called “cookies.” A cookie is a small text file placed on your computer's hard drive by the website's server. Cookies provide various support functions for the website. We do not collect information that personally identifies you through the use of cookies.

You can allow or refuse the use of cookies. Your browser usually enables cookies automatically, but you can modify the settings to reject them or receive warnings before cookies are stored. For more details on managing cookies, refer to your browser's help section or documentation.

Cookie deletion:

If you do not accept cookies, some website features may not be fully available to you. More information on deleting cookies can be found at the links provided by your browser's documentation.

6) Data Transfers, Disclosures, and Access

The Controller may, in connection with its activities, transfer personal data to third parties. Such transfers may occur either in paper form or electronically. In both cases, the Controller ensures that the data is accessible only to the intended recipient.

In the case of electronic data transfers, the information is sent from a computer used exclusively for the Controller's activities, protected by antivirus software and a unique password.

The Controller may transfer personal data to the following partners, acting as data processors or independent controllers, on the legal basis of "performance of a contract" or "legal compliance":

Tax Authority (NAV)

- **Contact:** Budapest 19th District NAV Customer Service Office, phone: +36 80 202 122
- **Legal basis for transfer:** Legal obligation (GDPR Article 6(1)(c); Act C of 2000 on Accounting; Act CL of 2017 on the Rules of Taxation)
- **Transferred data:** Name, address, tax number, invoice information
- **Timing and method:** Occasional, electronically

Banking Services

- **Service provider:** Erste Bank Zrt.
- **Privacy policy:** <https://www.erstebank.hu/hu/adatkezelesi>
- **Legal basis:** Performance of a contract (GDPR Article 6(1)(b))
- **Processed data:** Name of data subject, bank account number
- **Purpose:** Use of financial services
- **Duration:** 8 years after contract termination or expiry

Accounting Services

- **Provider:** Verebélyi és Tsa Kft.
- **Contact:** info@adonavigator.hu
- **Legal basis:**
 - Performance of a contract (GDPR Article 6(1)(b))
 - Legal obligation (GDPR Article 6(1)(c); Act C of 2000 on Accounting; Act CL of 2017 on the Rules of Taxation)
- **Transferred data:** Name, billing name, billing address
- **Purpose:** Bookkeeping, accounting services
- **Duration:** Until the end of the contract

Invoicing Service Provider

- **Service provider:** www.szamlazz.hu (KBOSS Kft.)
- **Privacy policy:** <https://www.szamlazz.hu/adatvedelem/>
- **Legal basis:** Legal obligation (GDPR Article 6(1)(c))

- **Processed data:** Invoice data
- **Purpose:** Use of invoicing service
- **Duration:** 8 years after contract termination or expiry

Web Hosting Provider

- **Provider:** WIX.com
- **Privacy policy:** <https://www.wix.com/manage/privacy-security-hub>
- **Legal basis:** Performance of a contract (GDPR Article 6(1)(b))
- **Processed data:** Invoice data
- **Purpose:** Provision of web services
- **Duration:** Until the end of the contract

Online Payment Provider – PayPal

- **Privacy policy:** <https://www.paypal.com/us/legalhub/paypal/privacy-full>
- **Legal basis:** Performance of a contract (GDPR Article 6(1)(b))
- **Processed data:** Payment data
- **Purpose:** Provision of online payment services
- **Duration:** Until the end of the contract

Online Payment Provider – Stripe

- **Privacy policy:** <https://stripe.com/en-hu/privacy>
- **Legal basis:** Performance of a contract (GDPR Article 6(1)(b))
- **Processed data:** Payment data
- **Purpose:** Provision of online payment services
- **Duration:** Until the end of the contract

Database Service Provider

- **Provider:** Microsoft.com, app.powerbi.com
- **Privacy policy:** <https://privacy.microsoft.com/en-US/privacystatement#mainnoticetoendusersmodule>
- **Legal basis:** Performance of a contract (GDPR Article 6(1)(b))
- **Processed data:** Autodesk Revit virtual model metadata including: Username, Revit Version, Command Id, Command Name, Ribbon Tab, Ribbon Panel, Document Name, Document Type, Active View Name, Active View Type, Transaction Name, Operation, Added Element Ids, Modified Element Ids, Deleted Element Ids, Modified Count, Time Stamp, Added Count, Deleted Count
- **Purpose:** Provision of database visualization service
- **Duration:** Until the contract expires or is terminated

7) Rights of the Data Subjects

Right to Information

During the data processing period, the data subject may request information from the Controller about the processing of their personal data. The Controller shall respond in writing in a clear and understandable manner within the shortest possible time, but no later than 30 days from the submission of the request. The response shall include the data being processed, the purpose and legal basis of processing, the duration of processing, and – where applicable – information about data transfers and the recipients or categories of recipients.

Right to Rectification

The data subject may request the Controller to rectify their personal data during the processing period. The Controller shall fulfil this request within 15 days.

Right to Erasure ("Right to be Forgotten")

The data subject may request the deletion of their personal data, which the Controller shall carry out within 15 days.

Note: This right does not apply where the Controller is legally obliged to retain the data, or in cases where the Controller is authorized under Section 6(5) of the Info Act to continue processing (e.g., for invoicing purposes).

Right to Restriction of Processing

The data subject may request the Controller to restrict the processing of their data if deletion would harm the data subject's legitimate interests. Restricted data may only be processed as long as the purpose excluding deletion exists.

Right to Data Portability

Data subjects have the right to receive their personal data, which they have provided to the Controller, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller.

In the context of internet-based data processing, it is not sufficient to offer erasure; data may be stored by multiple data controllers and devices, and may remain accessible via search engines. The GDPR allows data subjects to request deletion from all accessible sources to ensure real and complete enforcement of this right.

Right to Object

The Controller shall examine the objection as soon as possible, but no later than 15 days after submission, decide on its validity, and notify the data subject in writing.

If the Controller denies the request for rectification, restriction, or erasure, it shall inform the data subject within 30 days of receiving the request, including the factual and legal reasons for the denial, either in writing or electronically (with the data subject's consent).

8) Other Provisions Regarding Data Processing

Termination of Data Processing

The Controller will delete all personal data if:

- the purpose of processing ceases to exist, or
- there is no valid consent from the data subject, or
- the data subject has withdrawn consent or objected to processing, or

- there is no legal basis for processing.

Instead of deletion, the Controller will restrict the processing of personal data if:

- the data subject requests it, or
- the available information suggests that deletion would harm the data subject's legitimate interest.

Restricted data will only be processed as long as the reason preventing deletion exists.

9) Handling of Data Protection Complaints

Procedure:

The Controller treats all written complaints received from data subjects concerning its personal data processing activities as formal complaints (hereinafter: "complaint").

A complaint must be submitted in writing within 30 days of the occurrence of the specific issue to the Controller's email or postal address.

Missing this deadline results in the loss of the right to file a complaint.

The complaint must include at least:

- the complainant's name, address (or email), phone number
- the time of the incident
- a detailed description of the complaint
- the complainant's signature
- a declaration of consent for processing the complaint-related personal data

If any of the above are missing, the Controller will not investigate the complaint and will inform the complainant in writing.

The Controller will:

- use the data only for complaint handling,
 - not disclose it to third parties (except where required by law),
 - respond in writing within 30 days of receipt (via the same method: email or post).
- If the investigation cannot be completed in 30 days, the Controller will notify the complainant and provide a written response within 3 months.

If the complaint is found to be valid, the Controller will inform the complainant of the resolution and any corrective actions taken.

If the complaint is rejected, the Controller will notify the complainant in writing and inform them of their right to contact the:

- **Hungarian National Authority for Data Protection and Freedom of Information (NAIH)**
 - Address: 1055 Budapest, Falk Miksa u. 9–11.
 - Email: ugyfelszolgalat@naih.hu
 - Phone: +36 (1) 391-1400
 - Website: www.naih.hu

Note: According to Section 52(1) of the Info Act, NAIH will only investigate complaints if the data subject has previously contacted the Controller regarding their rights.

10) Procedure for Handling Objections

Upon receiving an objection, the Controller shall assess it as soon as possible, but no later than 15 days from submission. A decision will be made regarding its validity, and the applicant will be informed of the result in a provable format matching the method of submission (e.g., in writing or via email).

If the objection is found valid, the Controller will:

- immediately terminate data processing (including further data collection and transmission),
- restrict the data,
- notify all parties to whom the objected data was previously disclosed,
- and instruct them to comply with the objection and take necessary action.

If the data subject disagrees with the Controller's decision, or if the Controller fails to respond within 15 days, the data subject may within 30 days of the decision or deadline:

- appeal to the court, or
- contact the Hungarian National Authority for Data Protection and Freedom of Information (NAIH).

The Authority also provides template letters to assist in exercising data subject rights:

<https://naih.hu/panaszuegyintezes-rendje.html>

11) Data Security

The Controller stores personal data electronically exclusively on computers used within the business, which are protected by both physical and electronic security measures. This prevents unauthorized access, modification, transmission, deletion, or destruction—including accidental loss, damage, or inaccessibility due to technical issues.

Paper-based data storage takes place in locked rooms and locked cabinets, inaccessible to unauthorized persons.

The Controller does not request, receive, or store sensitive data (e.g., health information). Any such data received unsolicited will be deleted immediately and permanently.

12) Data Incident Management

A data breach is any activity, interference, or omission that leads to the unlawful processing of personal data—especially unauthorized access, alteration, transmission, disclosure, deletion, destruction, accidental loss, or damage.

If a data breach is suspected in connection with the Controller's activities, it must be reported as soon as possible to: megyesi.zsolt@bimgo.hu

The Controller will:

- record the incident,
- immediately start an investigation,
- notify database service providers if IT systems are affected.

During the investigation, the Controller gathers all necessary information to:

- identify the breach,
- mitigate damage,
- determine further steps to prevent recurrence.

The Controller documents:

- the time and location of the incident,
- its description and impact,
- scope and volume of compromised data,
- the individuals affected by the breach.

Additionally, and in accordance with the law, the Controller will notify the NAIH within 72 hours.

Data Protection Officer

The Controller does not process large volumes of sensitive data, nor is it a public authority. Therefore, under current legal obligations, it is not required to appoint or employ a Data Protection Officer (DPO).

Final Remarks

The Controller reserves the right to continuously update this Privacy Policy and to unilaterally modify the information it contains in line with legislative changes. The current version is always available at the Controller's premises and on its website.

Budapest, 25 November 2025

BIMGO Group Kft