

## 1. Introduction

BB, Milhoffer & Kameraden Kft. (headquarters: 2367 Újhartyán, József Attila utca 8., tax number: 27490648-2-13 (hereinafter: Service Provider, Data Controller) on the protection of natural persons with regard to the management of personal data and the free flow of such data , and in accordance with REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (April 27, 2016) on the repeal of Regulation 95/46/EC (general data protection regulation), provides the following information and fully submits to the information contained in the information .

This data management information sheet regulates the data management of the following website:

<https://bbmilhoffer.com>

The data management information is available from the following page:

<https://bbmilhoffer.com>

Amendments to the prospectus will take effect upon publication at the above address.

## 2. The data controller and his contact details

Name: BB, Milhoffer & Kameraden Kft.

Headquarters: 2367 Újhartyán, József Attila utca 8.

E-mail: [iroda@bbmilhoffer.com](mailto:iroda@bbmilhoffer.com)

Web: <https://bbmilhoffer.com>

BB, Milhoffer & Kameraden Kft. is a joint data controller with Google Ireland Limited, (Gordon House, Barrow Street, Dublin 4, Ireland). This information only applies to the data management of BB, Milhoffer & Kameraden Kft.. The privacy policy of Google Ireland Limited is available here: <http://privacy.google.com/businesses/mapscontrollerterms/>

## 3. Concept definitions

3.1 "personal data": any information relating to an identified or identifiable natural person ("data subject"); a natural person can be identified directly or indirectly, in particular on the basis of an identifier such as a name, number, location data, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person identifiable;

3.2 "data management": any operation or set of operations performed on personal data or data files in an automated or non-automated manner, such as collection, recording, organization, segmentation, storage, transformation or change, query, insight, use, communication, transmission, distribution or other by making it available, coordinating or connecting, limiting, deleting or destroying;

3.3 "data controller": the natural or legal person, public authority, agency or any other body that determines the purposes and means of processing personal data independently or together with others; if the purposes and means of data management are determined by EU or member state law, the data controller or the special aspects regarding the designation of the data controller may also be determined by EU or member state law;

3.4 "data processor": the natural or legal person, public authority, agency or any other body that processes personal data on behalf of the data controller;

3.5 "recipient": the natural or legal person, public authority, agency or any other body to whom or to which the personal data is communicated, regardless of whether it is a third party. Public authorities that have access to personal data in accordance with EU or Member State law in the context of an individual investigation are not considered recipients; the management of said data by these public authorities must comply with the applicable data protection rules in accordance with the purposes of data management;

3.6 "consent of the data subject": the voluntary, specific and well-informed and clear declaration of the will of the data subject, with which the data subject indicates through a statement or an act clearly expressing the confirmation that he/she consents to the processing of personal data concerning him/her;

3.7 "data protection incident": a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or unauthorized access to personal data transmitted, stored or otherwise handled.

#### 4. Principles for the management of personal data

##### 4.1 Personal data:

4.1.1 must be handled legally and fairly, as well as transparently for the data subject ("legality, fair procedure and transparency");

4.1.2 should only be collected for specific, clear and legitimate purposes, and should not be handled in a manner incompatible with these purposes; in accordance with Article 89 (1), further data processing for the purpose of archiving in the public interest, for scientific and historical research purposes or for statistical purposes is not considered incompatible with the original purpose ("purpose limitation");

4.1.3 they must be appropriate and relevant in terms of the purposes of data management, and must be limited to what is necessary ("data economy");

4.1.4 must be accurate and, if necessary, up-to-date; all reasonable measures must be taken to ensure that inaccurate personal data for the purposes of data management are immediately deleted or corrected ("accuratesity");

4.1.5 must be stored in a form that allows the identification of the data subjects only for the time necessary to achieve the goals of personal data management; personal data may be stored for a longer period only if the personal data will be processed in accordance with Article 89 (1) for the purpose of archiving in the public interest, for scientific and historical research purposes or for statistical purposes, the rights of the data subjects and subject to the implementation of appropriate technical and organizational measures required to protect your freedoms ("limited storage capacity");

4.1.6 must be handled in such a way that adequate security of personal data is ensured through the application of appropriate technical or organizational measures, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage of data ("integrity and confidentiality").

The data controller is responsible for compliance with the above and must be able to prove this compliance ("accountability").

## 5. Data management

### 5.1 Data management related to ordering and applying for services

#### 5.1.1 The fact of data collection, the scope of processed data and the purpose of data management:

##### PERSONAL DATA PURPOSE OF DATA MANAGEMENT LEGAL BASIS FOR DATA MANAGEMENT

Name Contact, contact. Article 6 a) and b) GDPR

E-mail address Contact, contact. Article 6 a) and b) GDPR

Telephone number Contact, contact. Article 6 a) and b) GDPR

Other freely given data Preparation of an indicative expert offer. Article 6 a) and b) GDPR

In the case of the e-mail address, it is not necessary that it contain personal data.

#### 5.1.2 Scope of stakeholders: the scope of users of any of the website's services

5.1.3 Person of the possible data controllers entitled to access the data, recipients of the personal data: Personal data can be handled by the sales, marketing and financial staff of the data controller, in compliance with the above principles.

#### 5.1.4 Description of the rights of data subjects related to data management:

- The data subject may request from the data controller access to personal data relating to him, their correction, deletion or restriction of processing, and
- you can object to the processing of such personal data, as well as
- the data subject has the right to data portability and to withdraw consent at any time.

5.1.5 The data subject can initiate access to personal data, its deletion, modification or restriction of processing, portability of data, objection to data processing in the following ways:

- by e-mail at the e-mail address [iroda@bbmilhoffer.com](mailto:iroda@bbmilhoffer.com).

#### 5.1.6 Legal basis for data management:

5.1.6.1 Consent of the data subject, Article 6 (1) point a), Infotv. Paragraph (1) of Section 5, unless otherwise indicated in the table above.

5.1.6.2 CVIII of 2001 on certain issues of electronic commerce services and services related to the information society. Act (hereinafter: Elker Law) 13/A. Section (3):

"For the purpose of providing the service, the service provider may process the personal data that is technically absolutely necessary for the provision of the service. If the other conditions are the same, the service provider must choose and in any case operate the tools used in the provision of services related to the information society in such a way that personal data is only processed if this is absolutely necessary for the provision of the service and the fulfillment of other objectives defined in this law necessary, but in this case also only to the extent and for the necessary time."

#### 5.1.7 We inform you that

- data management is based on your consent.

- is obliged to provide personal data so that we can fulfill the ordered service/application in accordance with the contract.
- failure to provide data has the consequence that we cannot process the ordered service/application.

## 5.2 Complaint handling

5.2.1 The fact of data collection, the scope of processed data and the purpose of data management: complaint management

5.2.2 The range of stakeholders: all stakeholders who use the website's request for proposal service and complain about quality issues.

5.2.3 Duration of data management, deadline for erasure of data: copies of the minutes, transcripts and the response to the objection received in the CLV of 1997 on consumer protection. Act 17/A. § (7) must be kept for 3 years.

5.2.4 The person of the possible data controllers entitled to access the data, the recipients of the personal data: the personal data can be handled by the sales and marketing staff of the data controller, in compliance with the above principles.

5.2.5 Description of the data subjects' rights related to data management: - The data subject may request from the data controller the relevant access to sensitive data, their correction, deletion or restriction of processing, and - can object to the processing of such personal data, as well as - the data subject has the right to data portability, as well as the right to withdraw consent at any time.

5.2.6 The data subject can initiate access to personal data, its deletion, modification or restriction of processing, portability of data, objection to data processing in the following ways:

– by e-mail at the e-mail address [iroda@bbmilhoffer.com](mailto:iroda@bbmilhoffer.com).

5.2.7 Legal basis for data management: consent of the data subject, Article 6 (1) point c), Infotv. Paragraph (1) of Section 5 and CLV of 1997 on consumer protection. Act 17/A. (7) of §

5.2.8 We inform you that

- the provision of personal data is based on a contractual obligation.
- the processing of personal data is a prerequisite for the conclusion of the contract.
- you must provide personal data so that we can handle your complaint.
- failure to provide data will result in us not being able to handle your complaint.

## 5.4 Customer relations and other data management

5.4.1 If the data subject has any questions or problems while using the services of the data controller, he can contact the data controller at the e-mail address provided on the website.

5.4.2 The data controller processes received e-mails, messages, on the phone, on Facebook, etc. data provided, together with the name and e-mail address of the interested party, as well as other voluntarily provided personal data, will be deleted within 60 days upon the user's e-mail request.

5.4.3 We provide information on data management not listed in this information when the data is collected.

5.4.4 The Service Provider is obliged to provide information, communicate and hand over data, and make documents available in the event of an exceptional official request, or in the event of a request from other bodies based on the authorization of the law.

5.4.5 In these cases, the Service Provider only discloses personal data to the requester - if he has specified the exact purpose and the scope of the data - to the extent and to the extent that is absolutely necessary to achieve the purpose of the request.

#### 5.5 Newsletter, direct marketing activities

5.5.1 XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activities. pursuant to § 6 of the Act, the User can give prior and express consent to the Service Provider's advertising offers and other mailings using the contact information provided during registration.

5.5.2 Furthermore, taking into account the provisions of this information, the User may consent to the Service Provider handling his personal data necessary for sending advertising offers.

5.5.3 The Service Provider does not send unsolicited advertising messages, and the User may unsubscribe from the sending of offers free of charge without limitation or justification. In this case, the Service Provider deletes all of the User's personal data necessary for sending advertising messages from its records and does not contact the User with further advertising offers. The User can unsubscribe from advertisements by clicking on the link in e-mail messages.

5.5.4 Scope of stakeholders: all stakeholders who subscribe to the newsletter / direct marketing activity.

5.5.5 Purpose of data management: sending electronic messages (e-mail, sms, push message) containing useful professional content, knowledge materials, advertising to the data subject, providing information about current information, products, promotions, new functions, etc.

5.5.6 Duration of data management, deadline for deletion of data: data management lasts until withdrawal of consent, i.e. until unsubscription.

5.5.7 The person of the possible data controllers entitled to access the data, the recipients of the personal data: the personal data can be handled by the sales and marketing staff of the data controller, in compliance with the above principles.

5.5.8 Description of the rights of data subjects related to data management:

- the data subject may request from the data controller access to personal data relating to him, their correction, deletion or restriction of processing, and

- you can object to the processing of such personal data, as well as

- the data subject has the right to data portability and to withdraw consent at any time.

5.5.9 The data subject can initiate access to personal data, its deletion, modification or limitation of processing, portability of data, objection to data processing in the following ways:

- by e-mail at [iroda@bbmilhoffer.com](mailto:iroda@bbmilhoffer.com).

5.5.10 The person concerned can unsubscribe from the newsletter / direct marketing activity at any time, free of charge.

5.5.11 Legal basis for data management: consent of the data subject, Article 6 (1) point a), Infotv. Paragraph (1) of Section 5 and XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activities. Section 6 (5) of the Act:

"The advertiser, the advertising provider, and the publisher of the advertisement - within the scope specified in the consent - keeps a record of the personal data of the persons who have given their consent. The data recorded in this register - relating to the recipient of the advertisement - can only be handled in accordance with the consent statement, until it is revoked, and can only be transferred to third parties with the prior consent of the person concerned."

5.5.13 We inform you that

- data management is based on your consent. - you must provide personal data if you want to receive a newsletter from us. - failure to provide data will result in us not being able to send you a newsletter / direct marketing message.

6. Rights of data subjects

6.1 Right of access: You have the right to receive feedback from the data controller as to whether your personal data is being processed, and if such data processing is underway, you are entitled to access the personal data and the information listed in the regulation.

6.2 Right to rectification: You have the right to have inaccurate personal data corrected without undue delay upon your request. Taking into account the purpose of data management, you are entitled to request the completion of incomplete personal data, including by means of a supplementary statement.

6.3 Right to erasure: You have the right to have the data manager delete your personal data without undue delay at your request, and the data manager is obliged to delete your personal data without undue delay under certain conditions.

6.4 The right to be forgotten: if the data controller has made personal data public and is obliged to delete it, it will take reasonable steps, including technical measures, taking into account the available technology and the costs of implementation, in order to inform the data controllers that process the data that you requested the deletion of the links to the personal data in question or the copy or duplicate of this personal data.

6.5 The right to restrict data processing: You have the right to have the data controller restrict data processing at your request if one of the following conditions is met:

– You dispute the accuracy of the personal data, in which case the limitation applies to the period that allows the data controller to check the accuracy of the personal data;

– the data management is illegal and you oppose the deletion of the data and instead request the restriction of its use;

- the data controller no longer needs the personal data for the purpose of data management, but you require them to present, enforce or defend legal claims;

– You objected to data processing; in this case, the limitation applies to the period until it is established whether the legitimate reasons of the data controller take precedence over your legitimate reasons.

6.6 The right to data portability: You have the right to receive the personal data about you that you have provided to the data controller in a segmented, widely used, machine-readable format, and you are also entitled to transmit this data to another data controller without this would be hindered by the data manager to whom the personal data was made available.

6.7 The right to object: You have the right to object at any time to the processing of your personal data, including profiling based on the aforementioned provisions, for reasons related to your own situation.

6.8 Objection in the event of direct business acquisition: if personal data is processed for the purpose of direct business acquisition, you have the right to object at any time to the processing of your personal data for this purpose, including profiling, if it is related to direct business acquisition. If you object to the processing of personal data for direct business purposes, then the personal data may no longer be processed for this purpose.

6.9 Automated decision-making in individual cases, including profiling: You have the right not to be subject to the scope of a decision based solely on automated data management, including profiling, which would have legal effects on you or would similarly significantly affect you.

The previous paragraph does not apply if the decision:

- Necessary to conclude or fulfill the contract between you and the data controller;
- it is made possible by EU or member state law applicable to the data controller, which also establishes appropriate measures for the protection of your rights and freedoms, as well as your legitimate interests; obsession
- is based on your express consent.

## 7. Action deadline

7.1 The data controller will inform you without undue delay, but in any case within 30 calendar days from the receipt of the request, as described above

i on measures taken following requests.

7.2 If necessary, this can be extended by another 60 calendar days. The data controller will inform you of the extension of the deadline, indicating the reasons for the delay, within 30 calendar days of receiving the request.

7.3 If the data controller does not take measures following your request, it will inform you without delay, but no later than within 30 calendar days from the receipt of the request, of the reasons for the failure to take action, as well as the fact that you can file a complaint with a supervisory authority and exercise your right to judicial redress.

## 8. Security of data management

8.1 The data controller and the data processor implement appropriate technical and organizational measures, taking into account the state of science and technology and the costs of implementation, as well as the nature, scope, circumstances and purposes of data management, as well as the variable probability and severity of the risk to the rights and freedoms of natural persons. in order to

guarantee a level of data security appropriate to the degree of risk, including, among others, where appropriate:

- pseudonymization and encryption of personal data;
- ensuring the continuous confidentiality, integrity, availability and resilience of the systems and services used to manage personal data;
- in the event of a physical or technical incident, the ability to restore access to personal data and the availability of data in a timely manner;
- a procedure for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures taken to guarantee the security of data management.

## 9. Informing the data subject about the data protection incident

9.1 If the data protection incident likely entails a high risk for the rights and freedoms of natural persons, the data controller shall inform the data subject of the data protection incident without undue delay.

9.2 In the information given to the data subject, the nature of the data protection incident must be clearly and comprehensibly described, and the name and contact details of the data protection officer or other contact person providing additional information must be provided; the likely consequences of the data protection incident must be described; the measures taken or planned by the data controller to remedy the data protection incident must be described, including, where appropriate, measures aimed at mitigating any adverse consequences resulting from the data protection incident.

9.3 The data subject does not need to be informed if any of the following conditions are met:

- the data controller has implemented appropriate technical and organizational protection measures and these measures have been applied to the data affected by the data protection incident, in particular those measures – such as the use of encryption – that make them unintelligible to persons not authorized to access personal data the data;
- after the data protection incident, the data controller has taken additional measures to ensure that the high risk to the rights and freedoms of the data subject is unlikely to materialize in the future;
- providing information would require a disproportionate effort. In such cases, the data subjects must be informed through publicly published information, or a similar measure must be taken that ensures similarly effective information to the data subjects.

9.4 If the data controller has not yet notified the data subject of the data protection incident, the supervisory authority, after considering whether the data protection incident is likely to involve a high risk, may order the data subject to be informed.

## 10. Notification of a data protection incident to the authority

10.1 The data controller shall report the data protection incident to the supervisory authority competent under Article 55 without undue delay and, if possible, no later than 72 hours after becoming aware of the data protection incident, unless the data protection incident is likely to pose no risk to natural persons regarding your rights and freedoms.

10.2 If the notification is not made within 72 hours, the reasons justifying the delay must also be attached.



## 11. Possibility of lodging a complaint

11.1 You can file a complaint with the National Data Protection and Freedom of Information Authority against a possible violation of the data controller:

National Data Protection and Freedom of Information Authority

Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mailing address: 1530 Budapest, PO Box: 5.

Phone: +36 1 391 1400

Fax: +36 1 391 1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

### 1612 Closing remarks

During the preparation of the information sheet, we paid attention to the following legislation:

- On the protection of natural persons with regard to the processing of personal data and on the free flow of such data, and on the repeal of Regulation 95/46/EC (General Data Protection Regulation) THE EUROPEAN PARLIAMENT AND COUNCIL REGULATION (EU) 2016/679 (April 27, 2016)
- CXII of 2011 Act - on the right to self-determination of information and freedom of information (hereinafter: Infotv.)
- CVIII of 2001 Act - on certain issues of electronic commercial services and services related to the information society (mainly § 13/A)
- XLVII of 2008 law - on the prohibition of unfair commercial practices towards consumers;
- XLVIII of 2008 Act - on the basic conditions and certain limitations of economic advertising (especially § 6.a)
- 2005 XC. Act on Electronic Freedom of Information
- Act C of 2003 on electronic communications (specifically § 155.a)
- 16/2011. s. Opinion on the EASA/IAB Recommendation on Best Practices for Behavioral Online Advertising
- The recommendation of the National Data Protection and Freedom of Information Authority on the data protection requirements of prior information
- Regulation (EU) 2016/679 of the European Parliament and of the Council (April 27, 2016) on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, and on the repeal of Regulation 95/46/EC