



GENERAL DATA PROTECTION REGULATION

1. Purpose and effect of the regulation

The purpose of this data management Regulation (hereinafter: Regulation) is by the Böröczffy Engineering Office Ltd. (registered office: 1053 Budapest, Reáltanoda street 16. 1st floor. 7., business register number: 01-09-907472, webpage: www.boroczffy.hu, e-mail: info@boroczffy.hu, telephone number: +36 70 9488 202), as data controller (hereinafter: Data Controller or Company), to keep actual adequacy for the normative and current legislation, and introduction of data management and data protection principles, what the Company binds himself to acknowledge.

The current Regulation contains the principles of data management of the personal data the Company collect about the contractors of the Company, the visitors of the Company's webpage, who reach the Company via the webpage, by filling the contact form or writing to the central e-mail address (hereinafter: Concerned). The Company is committed for protecting the personal data of the Concerned, and give high priority to respect the right of informational self-determination, and all-time opportunity to enforce these rights. The Company manage these data confidentially, and make every safety, technical and organizational measure what guarantee the safety of the data.

The Company keep the right for changing anytime the current Regulation according to the laws and actual data management practices. The Company covenant for informing the Concerned about the changes of the current Regulation, by publishing on the www.boroczffy.hu webpage.

The Company made the current data management Regulation in line with the rules of data protection, especially the within named laws:

- European Parliament and Council (EU) 2016/679 general data protection regulation (GDPR)
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information
- Act V of 2013 on the Civil Code
- Act CVIII of 2001 on certain issues of electronic commerce activities and information society services
- Act C of 2003 of electronic communications
- Act XLVIII of 2008 on the essential conditions and certain limitations of business advertising activity

2. Usage of personal data for marketing purposes

2.1 Purpose of data management

Inquiries with direct marketing content for services offered by the Company, inquiries to popularize them, informations, professional informations, invitations for events, communications what counts as economic advertisement.

2.2 Scope of managed personal data

Personal data given by the Concerned when sending message via the webpage, like the Concerned's:



- full name (surname and forename)
- electric mail address.

2.3 Source of personal data and claim of data management

Providing personal data determined in 2.2 related to request for quotation is voluntary, what the Concerned gives to the Company when register to the newsletter. The claim for managing the personal data is the given and voluntary consent of the Concerned to send newsletters and advertising mails, by marking clearly the checkbox on the Company's webpage, considering especially the communication law 5. § (1) a) point, and Act XLVIII. 6. § (1)-(2) paragraph.

2.4 Timeframe of data management

The Company manage the personal data determined in 2.2 of the Regulation related to request for quotation until the Concerned withdraw their consent.

The Concerned entitled to withdraw consent anytime for managing data for direct marketing purposes without cause and free, in case they do not want such inquiries in the future. For the data management for direct marketing - thus doing direct marketing activity - the Company ensure the withdrawal of the consent by sending e-mail to the address given on the webpage, with that from the statement the person who sent it clearly identifiable.

After receiving the statement about withdrawal of the consent, the Company immediately delete the personal data managed for providing direct marketing service, for the person who sent the withdrawal statement they will not send any advertisement anymore.

3. Contacting with the Company

3.1 Purpose of data management

In case of initiating contact with the Company on the webpage filling the „Write to us!" named contact form, or directly sending mail to the iroda@boroczffy.hu electric mail address, the Company for answering the inquiry and to give proper information manage the personal data of the persons who shows interest for the Company's services.

3.2 Scope of managed personal data

The Company manage the below listed personal data of the Concerned who get in contact with them using the contact methods on the www.boroczffy.hu webpage:

- full name (surname and forename)
- e-mail address
- any data what counts as other personal data provided by the Concerned related to the inquiry.

3.3 Claim of data management

The claim for managing the personal data of the Concerned who get in contact with the Company - using the contact methods on the www.boroczffy.hu webpage - is the voluntary, expressed consent of the Concerned given to the Company when making the contact, determined in the GDPR decree 4. article 11 point.



3.4 Timeframe of data management

The Company entitled to manage the personal data of the Concerned who get in contact with them - using the contact methods on the www.boroczffy.hu webpage – until they withdraw their consent. The Concerned anytime can withdraw their consent by sending a statement to the iro-da@boroczffy.hu electric mail address, what is able to clearly identify the Concerned, after that the Company is obliged to immediately delete the personal data.

4. Other data management

Our company set smaller data package on web page visitors's computer, so called cookie, in order to provide a customized service. The cookie contains information about the user of the website (IP address), which can make the next visit smoother and make it easier to use the web-site.

The Company furthermore cooperate with the Google Analytics webanalytics service provider concerning it's webpage. This service provider have access to the IP address of the visitors who visit the Company's webpage, furthermore by using cookies and click meters they ensure making statistics and analyzing the Company's webpage.

The visitor of the webpage can reject or allow in the internet browser installing cookies to the computer, however important to know that rejecting all cookies may help to protect personal data, but can limit the usability of some pages. Allowing or rejecting cookies usually can be done in the web browsers Tools/Settings menu under the Data protection settings, in the cookies menu. Identifying cookies set by the service providers can be done based on the related domain.

5. Principles of managing personal data

The Company meets it's engagements of the governing data protection laws stated in the GDPR decree's 5. article by

- legally, honestly, and in a transparent way manages the personal data of the Concerned („legality, fair play and transparency”);
- guarantee that the collection of the managed personal data only happens for defined, obvious and legal purposes, furthermore guarantee that those are managed in harmony of those purposes („bind to purpose”);
- keep the personal data up to date; do every rational action to immediately delete or correct inaccurate personal data from the managed data's point of view („accuracy”);
- guarantee, that the storage of the managed personal data happens in a form, what identifying the Concerned only for the necessary time reaching the purpose of the management of personal data („restricted storage”);
- safely store and delete them;
- not collect or keep too much data, guarantee that the managed personal data for the purpose of the data management adequate and relevant, and restricted to the necessary („data frugality”);
- protect the personal data from losing, abusing, unauthorized access and come forth to the public, and care about the proper technical measurements what protects the data.



The Company when managing the personal data do the proper technical and organizational measurements, guarantee the proper safety of the personal data, including the protection against the unauthorized or illegal usage, unintended losing, destroying or damaging of the data. („integrity and confidentiality”);

The company use different level of access entitlements for the data, what guarantees that only those entitled persons have access to the data who needs to know them to performing their job or related obligations.

The Company in view of the all-time stage of development of technology care about with technical, organizational and systemic measurements for the protection of the data management, what provides suitable protection level for the risks concerning the data management.

The Company when doing the data management keeps:

1. secrecy: protect the information, guarantee that only entitled persons have access;;
2. inviolability: protect the information and the accuracy and completeness of the processing method;
3. availability: guarantees, that the entitled really have access to the concerning informations when he/she needs it, and do have the available tools.

6. Method of storing personal data

The Company's IT systems and other storage places can be found in its registered office.

The Company chooses and operates the IT tools for managing the personal data when provide services, that the managed data:

1. available for the entitled persons (availability);
2. credible and the verification secured (data management credibility);
3. the invariance certifiable (data integrity);
4. protected against unauthorized access (data confidentiality).

7. Concerned's rights

7.1 Right for access and information

The Concerned can request information in a statement from the Company, whether they handle their personal data, and if yes, give them access to the managed personal data. In this information the Company can inform the requestor as Concerned about the managed data related to the requestor, the purpose of data management, about its claim, about possible recipients, about the planned timeframe for storing the personal data, and if its not possible, about how to determine this timeframe, about the name of data processor if there any, it's contact data, it's activity related to data management, about the managed data, and about the Concerned's rights regarding the data.

The Concerned furthermore entitled to ask copy of the managed personal data, with the condition the Company entitled to charge a reasonable fee as administration cost, if they asks further copies.



7.2 Right for correction

The Concerned with its written statement entitled to ask for correction in the personal data managed by the Company, in case those are inaccurate, wrong.

7.3 Right for deletion („right for forgetting“)

The Concerned entitled to ask for deleting the personal data managed by the Company. The Company in this case obliged to delete the personal data, with that, in case they can refuse the request based on legal regulations, about the refusal they inform the requestor in every case, indicating the reason why they refused the deletion. After fulfilling the request for deleting personal data, the former (deleted) data cannot be restored.

7.4 Right for restricting the data management

The Concerned can ask the Company to restrict the personal data management, if the Concerned dispute the accuracy of the managed personal data. In this case the restriction valid for the timeframe what makes possible for the Company to check the accuracy of the personal data.

The Concerned can ask the Company to restrict the personal data management when the data management is illegal, but the Concerned oppose the deletion of the managed personal data, instead asks for restricting the usage.

7.5 Common rules for exercise the rights of the Concerned, right for file a complain

The Concerned can submit their request to the Company related to points 7.1-7.4 as a postal matter sent to the registered office of the Company, or in a form of electric mail sent to the iroda@boroczffy.hu address, with that in last case from the request the person who sent it clearly identifiable.

The Company is obliged to inform the Concerned about the measurements they made regarding the requests recorded in points 7.1.-7.5. without unreasonable delay, but within a month the latest, without any charge. The due date for answering the request can be extended one time with two month, in case the complexity of the request make that reasonable.

The Company is obliged to inform the Concerned immediately about the extension of the due date, with indicating the reason of the delay at the same time.

The Company, in case do not take any measurement for the Concerned's request, or in case they refuse that, obliged to inform the Concerned immediately, but within one month at the latest, by indicating the reasons at the same time why not taken any measurement or why they refused the request.

7.6 Exercise of rights

Right for complain

The Concerned, in case the Company refuse their request related to points 7.1.-7.4., or do not make any measurement, furthermore if experience any injuria in the personal data management, entitled to file a complain by the supervising authority, thus initiate an authority investigation.

Name of supervising authority: Hungarian National Authority for Data Protection and Freedom of



Information

registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Mail address: 1530 Budapest, Pf.: 5.

Telephone number: + 36 (1) 391-1400

Electric mail address: ugyfelszolgalat@naih.hu

Webpage: <http://naih.hu>

Right for juridical legal remedy

The Concerned is entitled to turn to court and initiate a lawsuit – after initiating an authority investigation – in case he/she judges the Company, respectively the data processor who trusted or instructed by them violate the regulations of personal data management when managing or managed the personal data.

The Concerned can initiate the lawsuit - based on their choice – by the competent courthouse of their residence or place of abode.

The Company calls attention to the fact that by browsing the webpage the visitor accept the content of this Regulation, the data management principles of the webpage.

Effective: 2019. augusztus 23 - till withdrawal.