

The Beck Mérnöki Menedzsment Ltd. Privacy Statement

1. PREAMBLE

As the data controller, Beck Mérnöki Menedzsment Ltd. (8200 Veszprém, Jutasi út 21. (hereinafter as Beck Mérnöki MenedzsmentLtd., service provider, data controller) is bound by the contents of the present legal statement. It undertakes to ensure that all data handling pertaining to its activity adheres to the present statement and to the demands of the relevant effective regulations.

The data protection principles governing the data handling of the service available through the www.beckandrea.com web address are continuously available through the www.beckandrea.com website.

Beck Mérnöki Menedzsment Ltd. reserves the right to modify the present document at any time. Naturally, it will inform concerned parties of such changes in a timely manner.

Should users have any questions in relation to the present statement, we kindly ask them to write to us and our colleagues will address their issues.

Beck Mérnöki MenedzsmentLtd. handles all personal information confidentially and takes all safety, technical and organizational measures to provide for the safety of data.

In the following, Beck Mérnöki Menedzsment Ltd. wishes to present its data handling principles and the demands it is bound by and seeks to uphold as a data controller.

Its data handling principles are in agreement with the relevant regulations, in particular the following:

- Act CLV of 1997 – on consumer protection;
- Act XIX of 1998 – on criminal proceedings (Cp.);
- Act C of 2000 on accounting, section 169, paragraph (2)
- Act CVIII of 2001 – on certain aspects of electronic commerce and information society services (E.comm. law);
- Act C of 2003 – on electronic communication (E.cm.);
- Act XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activities (C.a.);
- Act CXII of 2011 – on informational self-determination and freedom of information (Info law);
- Act V of 2013 on the Civil Code (new CvC.);

2. DEFINITIONS

- 2.1. concerned party: any specific natural person identifiable through their personal data or in other direct or indirect manners;
- 2.2. personal data: data tied to the concerned party – in particular the concerned party's name, identification number or one or more piece of knowledge related to their physical, physiological or social characteristics – as well as the conclusions deductible from the data related to the concerned party;
- 2.3. consent: the voluntary and resolute expression of the concerned party's will, which is based on proper information and with which they give their unambiguous approval to the handling of their personal data - either comprehensively or related to certain transactions;
- 2.4. objection: the statement of the concerned party in which they object to the handling of their personal information and with which they request the termination of the data handling and the deletion of the handled data;
- 2.5. data controller: natural persons, legal entities and organizations without a legal entity, who or which determine the purpose of the data handling, take and implement measures related to the data handling (including the utilized devices) or ensure their implementation through an entrusted data processor;
- 2.6. data handling: regardless of the utilized procedure all forms of operations performed with the data, in particular, their collection, recording, transcription, systemization, storage, modification, usage, retrieval, forwarding, publishing, reconciliation or connection, blocking, deletion and termination, as well as preventing their further usage, the recording of photographs, sounds or images, as well as the recording of characteristics suitable for the identification of the individual (for example, finger or palm prints, DNA samples, iris images);
- 2.7. data transfer: providing access to the data for a specific third party;
- 2.8. publishing: providing access to the data for all parties;
- 2.9. data deletion: rendering the data unrecognizable by excluding the possibility of their restoration;
- 2.10. data designation: adding an identifier to the data in order to differentiate it;
- 2.11. data blocking: adding an identifier to the data in order to definitely or indefinitely limit its handling;
- 2.12. data termination: the complete physical destruction of the data storage device containing the data;
- 2.13. data processing: the performance of technical tasks tied to the data handling, regardless of the method and device used for the performance of the operations, as well as the location of their application, insofar as the technical task is performed on the data;
- 2.14. data processor: natural persons, legal entities and organizations without a legal entity, who or which perform the processing of the data based upon a contractual obligation – including contracts formed through the provisions of legal regulations;
- 2.15. third party: natural persons, legal entities and organizations without a legal entity, who or which are not identical to the concerned party, the data handler or the data processor;
- 2.16. third country: all non-EEA states.
- 2.17. BCR - binding corporate rules: an obligatory code of conduct employed by multinational corporations, approved by the data protection authority of the EU-member state according to the registered seat. In accordance with these rules, the multinational corporation undertakes to provide a higher level of security than usual in the target country for the transfer of personal data within the corporate group from EU-member states to third party, non-EU countries.

2.18. data protection incident: includes all unlawful data handling, regardless of whether this was caused intentionally, carelessly or through technical failure. The data controller must record such data protection incidents with the purpose of providing information to the concerned parties and to allow for the data protection authority to inspect the conduct of the data controller in relation to the incidents.

3. PRINCIPLES OF DATA HANDLING OF BECK MÉRNÖKI MENEDZSMENT LTD.

The handling of personal data is possible if

- a) the concerned party gives its consent, or
- b) if the handling is prescribed by law or local government decree - as authorized by law in the scope determined by law.

Beck Mérnöki Menedzsment Ltd. considers it exceptionally important to provide for the protection of personal data and the respect of rights related to said data.

Consent may be given for minors younger than 14 years of age and for legally incapacitated visitors by their legal representative.

In the case of minors between the ages of 14 and 16 and for visitors with limited incapacity, consent for the data handling may be provided through the consent or subsequent approval of their legal representative. Minors over the age of 16 may make independent statements, and the validity of said statements require the consent or subsequent approval of their legal representatives.

Personal data can only be handled for a specific purpose, the exercising of rights or fulfillment of obligations. This must be upheld throughout all stages of the data handling process.

Only personal data which are indispensable for the fulfillment of the purpose of the data handling may be handled in this matter, which are suitable for achieving the desired goal and only until the extent and time necessary to fulfill said goal.

Personal data can only be handled after an agreement based on appropriate information.

The concerned party must be informed - unambiguously, coherently and thoroughly - of all the facts related to the handling of his or her data, particularly the purpose and legal grounds for the data handling, the individuals authorized for the data handling and processing, the duration of the data handling and the list of individuals with access to said data. The information must extend to the rights of the concerned party pertaining to the data handling and his or her options for legal remedies.

The handled personal data must satisfy the following requirements:

- a) their recording and handling must be of a decent and legal nature;
- b) they must be precise, comprehensive and, if necessary, up-to-date;
- c) the method of their storage must allow for the identification of the concerned party only up until the time required for the fulfillment of the purpose of the storage.

The use of unlimited, general and unified personal identification numbers is prohibited.

Personal data may only be transferred and the various forms of data handling may only be linked with the consent of the concerned party or if allowed by law and if the conditions of the data handling are fulfilled for all items of personal data.

4. THE RANGE OF PERSONAL DATA, THE PURPOSE, LEGAL GROUNDS AND DURATION OF DATA HANDLING

Data handling related to the website located at the www.beckandrea.com address are of voluntary nature. However, in certain cases, a range of provided data, their storage and transfer is allowed by law, of which we will specifically inform our customers. We hereby bring attention to the data providers of Beck Mérnöki Menedzsment Ltd. that should they provide the personal data of individuals other than themselves, the data providers are required to ask for the permission of the concerned parties.

5. CUSTOMER SERVICES OF THE SERVICE PROVIDER

Beck Mérnöki Menedzsment Ltd. provide both email and telephone based customer service.

6. DATA HANDLING TIED TO PURCHASES MADE THROUGH THE WEBSITE

Data handling purpose: implementation of purchases made through the website, establishing contact

Legal grounds of the data handling: the consent of the concerned party, and section 13/A of Act CVIII of 2001 on certain aspects of electronic commerce and information society services, section 6, paragraph 5 of Act XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activities, section 169, paragraph 2 of Act C of 2000 on accounting, and Act CXII of 2011 on informational self-determination and freedom of information.

The range of handled data: Surname, first name, address, email address

Duration of data handling: 5 years

Data protection registration number: NAIH-91575/2016

By accepting the privacy statement, the concerned party accepts that the following personal information stored by Beck Mérnöki Menedzsment Ltd. on the user database of www.beckandrea.com will be transferred to KBOSS.hu Ltd. (company seat: 2000 Szentendre, Táltos u. 22/b.; court register number: 13-09-101824), and OTP Mobil Ltd. (1093 Budapest, Közraktár u. 30-32., court register number: 01-09-174466), as data controllers. The range of transferred data: surname, first name, country, address, email address. The purpose of the data transfer: confirmation of Transactions and fraud-monitoring conducted for the protection of users, customer service assistance provided to users and providing invoicing services.

By using the www.beckandrea.com page and providing the relevant data, the concerned party gives his or her voluntary, expressed and resolute consent for the handling of their data for the purposed defined by the current statement, and for a duration determined at the current moment.

The consent of the concerned party may be revoked at any stage of the data handling, which is regulated in detail by item no. 13, below.

7. DATA HANDLING TIED TO THE USE OF THE GUESTBOOK

Data handling purpose: the use of the guestbook located at the www.beckandrea.com website

Legal grounds of the data handling: consent of the concerned party and Act CXII of 2011 on informational self-determination and freedom of information.

The range of handled data: name, address, email address

Duration of data handling: deleted at the request of the concerned party

Data protection registration number: NAIH-91576/2016

In the case of the data handling defined by the current item, the data provided by the concerned party is handled in a closed system and will not be transferred to any third party.

By using the www.beckandrea.com page and providing the relevant data, the concerned party gives his or her voluntary, expressed and resolute consent for the handling of their data for the purposed defined by the current statement, and for a duration determined at the current moment.

The consent of the concerned party may be revoked at any stage of the data handling, which is regulated in detail by item no. 13, below.

8. DATA HANDLING TIED TO ONLINE INQUIRIES THROUGH THE WEBSITE

Data handling purpose: establishing contact

Legal grounds of the data handling: consent of the concerned party and Act CXII of 2011 on informational self-determination and freedom of information.

The range of handled data: name, address, email address, phone number

Duration of data handling: the duration of the client relationship between the concerned party and the data controller, or the time until the concerned party revokes his or her consent

In the case of the data handling defined by the current item, the data provided by the concerned party is handled in a closed system and will not be transferred to any third party.

By using the www.beckandrea.com page and providing the relevant data, the concerned party gives his or her voluntary, expressed and resolute consent for the handling of their data for the purposed defined by the current statement, and for a duration determined at the current moment.

The consent of the concerned party may be revoked at any stage of the data handling, which is regulated in detail by item no. 13, below.

9. WEB ANALYTICS COLLECTION AND ADSERVERS

The www.beckandrea.com website makes use of the Google Inc. Google Analytics service. Google Analytics uses cookies for the purpose of facilitating the analysis of the website's usage. The information contained in the cookies (including the User IP-address) is stored on the servers of Google Inc. located in the United States of America. Google Inc. may transfer the collected information to third parties when required by law or if said third party processes the information as commissioned by Google Inc. As part of its Google AdWords remarketing service, Google Inc. places tracking cookies on the devices of Users, which monitor the online activities of visitors and based upon which Google Inc. provides them with access to advertisements on other websites based on their user behavior and circle of interests. The tracking cookie allows for Google Inc. to identify the website visitor on other websites.

Google Inc.'s "Privacy policy" www.google.hu/intl/hu/policies/privacy

Information on Google Inc.'s data-based activities, blocking of cookies and personalized advertisements: www.google.com/intl/hu/policies/privacy/ads

10. MISCELLANEOUS

We hereby inform our clients that the data controller may be approached by courts of law, public prosecutors, investigative authorities, penal authorities, administrative authorities, data protection supervisors, and other bodies prescribed by law for information, provision and transfer of data, and for the rendering of documents.

www.beckandra.com will only provide personal data for the authorities - insofar as the authorities define the precise purpose and range of data - in an amount and to the extent which is absolutely necessary for the realization of the purpose of the request.

11. THE METHOD OF THE STORAGE OF PERSONAL DATA AND DATA HANDLING SAFETY

Throughout the provision of services, www.beckandrea.com selects and uses IT devices for the handling of personal data in a way in which the handled data:

- a) is accessible for the authorized parties (accessibility);
- b) its authenticity and validation is provided for (data handling authenticity);
- c) its invariability can be verified (data integrity);
- d) is protected against unauthorized access (data confidentiality).

www.beckandrea.com takes all necessary technical, organizing and organizational measures to provide for the protection of the data handling, which provides a level of protection appropriate to the risks related to the data handling.

During the course of the data handling, www.beckandrea.com retains

- a) secrecy: it protects information, making sure only authorized parties can access it;
- b) integrity: it protects the precision and comprehensiveness of the information and its processing method;
- c) accessibility: it makes sure that when authorized users are need of information, they can indeed access it along with the devices related to the information.

The IT system and network of www.beckandrea.com and its partners are protected against computer-based fraud, spying, sabotage, vandalism, fire and flood damage, computer viruses and intrusions as well as attacks leading to the denial of services. The operator provides for system and application-level protective measures.

We hereby inform the users that electronic messages forwarded over the internet are vulnerable, regardless of protocol (e-mail, web, ftp, etc.), to network threats, which can lead to indecent activities, contractual disputes or the revealing and modification of information. The service provider will take all reasonable measures to provide for protection against such threats, including the monitoring of systems in order to record all security anomalies and to provide for evidence in the case of a safety incident. The system monitoring also allows for inspecting the effectiveness of the preventive measures.

12. DATA CONTROLLER DATA, CONTACT

Name: Beck Mérnöki Menedzsment Ltd.

Company seat: 8200 Veszprém, Jutasi út 21.

Representative: Andrea Beck

Court register number: 19-09-515718

Court of registration: Municipal Court of Veszprém, acting as Court of Registration

Tax number: 24123150-2-19

Email: hello@beckandrea.com

Data protection registration numbers: NAIH-91575/2016

NAIH-91576/2016

13. LEGAL REMEDIES

Concerned parties may request information on the handling of their personal data, the correction of their personal data as well as - with the exception of the data provision required by law - the deletion of their data in the manner described at the time of the provision of the data or through customer service.

At the request of the concerned party, as a data controller, Beck Mérnöki Menedzsment Ltd. will provide information on the data handled or on the data processed by a commission data processor, the purpose of the data handling, its legal grounds, duration, the name, address (company seat) of the data processor and his or her activity pertaining to the data processing, as well as who and for what purpose received the data in question. The data controller will provide written information in an easily comprehensible form in the shortest time possible, yet within 30 days at the latest. This information is free of charge if the data requesting party did not apply for information of the same nature within the year in question.

In all other cases, Beck Mérnöki Menedzsment Ltd. is entitled to set a fee for the requested service.

Beck Mérnöki Menedzsment Ltd. will delete the personal data if their handling is unlawful, upon request of the concerned party, if the purpose of the data handling has expired or if the deadline for the data storage determined by law has expired, or at the request of a court of law or the data protection supervisor.

The concerned party may file an objection to the handling of their personal data,

- a) solely if the handling (forwarding) of the personal data is necessary for the validation of the righteous interests of the data controller of the data receiver, unless the data handling was required by law;
- b) if the usage or forwarding of the personal data takes place for the sake of direct marketing, opinion polling or scientific research;
- c) the right of objection is otherwise allowed for by law.

Beck Mérnöki Menedzsment Ltd. will examine the submitted request within the shortest period of time - while simultaneously suspending the data handling - yet within 15 days at the latest and will inform the requesting party of the outcome in writing. Insofar as the objection is justified, the data controller will cease the data handling, - including additional data recording and forwarding - will block the data in question and will notify all parties of the objection and the measures taken in lieu to whom the personal data in question have been forwarded to and how they are required to take measures to validate said right to objection.

Insofar as the concerned party disagrees with the decision of the data controller, he or she may turn to a court of law within 30 days of the receipt of the communication of said decision.

In the case of an infringement of the concerned party's rights, the concerned party may file a claim at a court of law, which the court will deal with out of turn.

Beck Mérnöki Menedzsment Ltd. will reimburse all damages caused through the unlawful handling of the concerned party's data or the breach of data protection demands. The data controller assumes no liability for such damages if the damage was due to an unavoidable cause outside of the scope of the data handling.

Furthermore, the data controller will not reimburse damages insofar as they were caused through the intention or gross negligence of the claimant.

Requests for legal review and complaints may be filed to the Hungarian National Authority for Data Protection and Freedom of Information:

Name: Hungarian National Authority for Data Protection and Freedom of Information

Company seat: 1125 Budapest Szilágyi Erzsébet fasor 22/C

Postal address: 1530 Budapest, Pf.: 5.

Telephone: +36 1 391 1400

Fax: +36 1 391 1410

Email: ugyfelszolgalat@naih.hu

Should access to data of common interest be restricted due to the fact that it was classified as national data, a review investigation may be initiated in relation to the data qualification. The review investigation will be conducted by the authority for data protection, however, should the data requester find this measure to be insignificant, they may request a confidentiality review procedure. This latter procedure will be conducted by the same authority, which will be classified as a procedure conducted in its own right even if it was preceded by a review based upon a notification. However, the notifying party must be informed of the confidentiality review procedure and the ruling concluding the procedure. As a result of the confidentiality review procedure, the authority may determine that the classification as national data was unlawful and will call upon the classifier to administer a change in accordance with the regulations pertaining to the level of classification or time of validity or will oblige the classifier to terminate the classification in question. As the other possible outcome of the procedure, the authority may determine that the data in question was duly classified under the protection of national data. The authority must conduct the confidentiality review process within a period of two months, which can be extended on a single occasion (by thirty days at the most).

LEGAL STATEMENT

Limitation of liability:

1. Beck Mérnöki Menedzsment Ltd. is in no way liable for damages incurred due to the following, regardless of their cause:

- Any data sent and/or received over the internet.
- All forms of malfunctions in the internet network, which prevent the uninhibited operation and reception of our website.
- All forms of malfunctions in the reception of communication channels on devices.
- The loss of letters - whether electronic or paper-based - and especially, data of any nature.
- The inappropriate functioning of any software.
- The consequences of program errors, abnormal events or technical errors.

2. Beck Mérnöki Menedzsment Ltd. can in no way be held responsible for instances of force majeure or other events which are beyond its control.

3. Beck Mérnöki Menedzsment Ltd. reserves the right to modify or refresh the website without any previous warning or to temporarily or lastingly cease or terminate its operation. Users of the website acknowledge the fact that Beck Mérnöki Menedzsment Ltd. assumes no responsibility for damages due to the modification, refreshing, suspension of operation or termination of the website.

4. Any modifications to the current statement are valid from the time said modification is available online through the www.beckandrea.com website.

Copyrights

All information, photos, graphic elements and technical structure of the pages on the website are exclusively owned by Beck Mérnöki Menedzsment Ltd. and are copyright protected (Act LXXXVI of 1999 on copyright).

The usage of these elements without the rightholders' consent constitutes an infringement of copyright law which entails legal implications.

The use of any part of the website requires the prior written authorization of Beck Mérnöki Menedzsment Ltd.