

BITNEXT KFT. PRIVACY NOTICE

This Privacy Notice sets out the information on the processing of personal data carried out by BitNext Informatikai Korlátolt Felelősségű Társaság (hereinafter: "BitNext Kft." or "Data Controller") in connection with the operation of the Company, the use of its website at www.bitnext.hu (hereinafter: "Website") and the services provided through the Website (hereinafter: "Services").

This Privacy Notice has been prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: "GDPR"), Act CXII of 2011 on Informational Self-Determination and Freedom of Information, and Act CVIII of 2001 on Certain Issues of Electronic Commerce Services.

The use of the functions available on the Website and the use of the Services provided by BitNext Kft. is subject to the data subject (hereinafter: "Data Subject") acknowledging and accepting the content of this Privacy Notice.

BitNext Kft. reserves the right to amend this Privacy Notice at any time. Any amendment takes effect upon publication on the Website.

1. Identity and Contact Details of the Data Controller

Company name: BitNext Informatikai Korlátolt Felelősségű Társaság

Short name: BitNext Kft.

Registered office: 1114 Budapest, Bocskai út 11. Ground floor, Door 2, Hungary

Company registration number: 01-09-435912

Tax number: 32659373-2-43

Website: www.bitnext.hu

Email: adatvedelem@bitnext.hu

For the purposes of this Privacy Notice, Data Subject means any natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier or one or more factors specific to the economic identity of that person. Personal data means any information relating to an identified or identifiable natural person.

2. Purposes, Legal Basis and Sources of Data Processing

2.1 Contact Enquiries

Personal data may be provided by the Data Subject when using the contact section of the Website or when sending an email enquiry.

By voluntarily providing personal data, the Data Subject enables his or her questions and requests to reach BitNext Kft. and to receive responses at the contact details provided. Personal data provided for the purpose of maintaining contact may be processed by BitNext Kft. until the withdrawal of the Data Subject's consent. Withdrawal does not affect the lawfulness of processing carried out prior to its withdrawal. Where further processing of contact data is no longer justified, BitNext Kft. shall delete it without delay.

Purpose of processing: Responding to enquiries and maintaining contact with the Data Subject

Legal basis: Voluntary consent of the Data Subject (Article 6(1)(a) GDPR)

Data processed: Full name, email address, phone number

Retention period: Until the Data Subject's deletion request or until BitNext Kft. deletes the data if further processing is no longer justified

2.2 Contract Conclusion and Service Provision

The Data Subject, acting as a representative of a company or enterprise, may enter into contracts with BitNext Kft. for the use of various Services. The personal data of the Data Subject, as contact person or representative of the contracting party, are necessary for the performance of the various contracts and for the management of any claims arising therefrom.

Purpose of processing: Communication between contracting parties and performance of contracts

Legal basis:

- performance of the contract (Article 6(1)(b) GDPR)
- compliance with a legal obligation (Article 6(1)(c) GDPR)
- legitimate interests of the Data Controller (Article 6(1)(f) GDPR)

Data processed: Name, phone number, email address, billing name and address, IP address, order date

Retention period: Until the general 5-year limitation period under the Civil Code; billing data: until the end of the 8th year following the year of the last invoice (Accounting Act)

2.3 Newsletter and Marketing Communications

By voluntarily providing personal data, the Data Subject enables BitNext Kft. to send information about its current Services, new service launches, maintenance notifications, policy changes and other updates by email to the address provided. Subscription is voluntary and may be cancelled at any time by clicking the unsubscribe link in the newsletter.

Personal data provided for newsletter and marketing purposes may be processed until the withdrawal of the Data Subject's consent. Withdrawal does not affect the lawfulness of processing carried out prior to the withdrawal.

Purpose of processing: Sending newsletters, marketing materials and service notifications

Legal basis:

- voluntary consent of the Data Subject (Article 6(1)(a) GDPR)
- Act XLVIII of 2008 on the Basic Conditions and Certain Limitations of Commercial Advertising Activities, s. 6(1)

Data processed: Full name, email address

Retention period: Until withdrawal of consent, deletion request, or deletion by BitNext Kft. if further processing is no longer justified

2.4 Website Visit Data (Log Files)

When visiting the Website, the Data Controller's server automatically logs certain data about visitors. BitNext Kft. uses these data solely for internal and statistical purposes.

Purpose of processing: Website operation, security and statistics

Legal basis: Legitimate interests (Article 6(1)(f) GDPR)

Data processed: IP address, browser type and version, operating system, referring URL, date and time of visit

Retention period: Log files: 1 month; other statistical data: 5 years

2.5 Contracts with Third Parties

BitNext Kft. may use various services or purchase products from third parties. The personal data of the contact persons and representatives of the contracting parties are necessary for the performance of such contracts.

Purpose of processing: Communication between contracting parties and performance of contracts

Legal basis: Performance of the contract (Article 6(1)(b) GDPR)

Data processed: Name, phone number, email address and job title of the Data Subject

Retention period: Until the general 5-year limitation period under the Civil Code; accounting documents: 8 years

3. Children and Minors

Persons under the age of 16 may not transmit any personal data to BitNext Kft. without the consent of their parents or legal guardians. BitNext Kft. does not request personal data from children and minors, does not collect such data, and does not transfer it to third parties.

Parents and guardians are responsible for protecting the privacy of their children online. If BitNext Kft. becomes aware that personal data has been collected from a child under the age of 16 without parental consent, such data will be deleted without delay.

4. Rights of the Data Subject

BitNext Kft. shall inform the Data Subject of the measures taken in response to a request under Articles 15–22 of the GDPR without undue delay and in any event within one month of receiving the request. Where necessary, this period may be extended by a further two months; the Data Controller shall notify the Data Subject of such extension within one month, stating the reasons for the delay.

Information, notifications and actions shall be provided free of charge. Where requests are manifestly unfounded or excessive, BitNext Kft. may charge a reasonable fee or refuse to act on the request. The burden of demonstrating the manifestly unfounded or excessive nature of the request lies with BitNext Kft.

The Data Subject may request the following from BitNext Kft. regarding his or her personal data:

- (i) right of access: the Data Subject is entitled to obtain confirmation as to whether personal data concerning him or her is being processed and to obtain access to the personal data and key information about the processing (Article 15 GDPR)
- (ii) right to rectification: the Data Subject is entitled to have inaccurate personal data corrected or incomplete data completed without undue delay (Article 16 GDPR)
- (iii) right to erasure ('right to be forgotten'): the Data Subject is entitled to have personal data erased without undue delay where the legal basis for processing has ceased, consent has been withdrawn or the data was processed unlawfully (Article 17 GDPR)
- (iv) right to restriction of processing: the Data Subject is entitled to restriction of processing where the accuracy of the data is contested or processing is unlawful (Article 18 GDPR)
- (v) right to object: the Data Subject is entitled to object at any time to the processing of personal data on the basis of legitimate interests (Article 21 GDPR)
- (vi) right to data portability: the Data Subject is entitled to receive personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller (Article 20 GDPR)

Where processing is based on consent, the Data Subject has the right to withdraw consent at any time without affecting the lawfulness of processing carried out prior to the withdrawal.

BitNext Kft. shall notify all recipients to whom personal data have been disclosed of any rectification, erasure or restriction, unless this proves impossible or involves disproportionate effort.

5. Data Processing and Data Transfers

Personal data of the Data Subject may be accessed by employees of BitNext Kft. or persons in other contractual relationships with the Company, all of whom are bound by confidentiality obligations and handle personal data in strict confidence.

BitNext Kft. engages the following data processors, who may access personal data in the course of their activities:

IT infrastructure and hosting services (data processors have no access to the servers or the data stored thereon, and have no login rights to the servers):

- (i) Magyar Telekom Nyrt., 1013 Budapest, Krisztina krt. 55., Hungary – server colocation and IT infrastructure (tax no.: 10773381-2-44; server room: 2040 Budaörs, Ipartelep u. 13-15.)
- (ii) Invitech ICT Services Kft., 2040 Budaörs, Edison utca 4., Hungary – server colocation and IT infrastructure (tax no.: 25568509-2-44; server room: 1108 Budapest, Kozma utca 2.)

Accounting and invoicing:

- (i) Notetax Kft., Hungary – accounting and financial record-keeping services
- (ii) KBOSS.hu Kft. (SzámLázz.hu), Hungary – electronic invoice issuance and invoicing system operation (www.szamlazz.hu)

Financial services:

- (i) Raiffeisen Bank Zrt., 1054 Budapest, Akadémia u. 6., Hungary – banking payment transactions (tax no.: 10198014-4-44)
- (ii) PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg – online payment transactions (EU VAT: LU22046007)

Postal and delivery services:

- (i) Magyar Posta Zrt., 1138 Budapest, Dunavirág u. 2-6., Hungary – delivery of postal items (tax no.: 10901232-2-44)

BitNext Kft. does not transfer personal data to third parties beyond the above, unless the Data Subject has given explicit consent or such transfer is required by law. BitNext Kft. does not carry out automated decision-making or profiling.

6. Location of Data Storage

BitNext Kft. stores the personal data specified above at its registered office (1114 Budapest, Bocskai út 11. Ground floor, Door 2, Hungary) and on the servers of the IT data processors named in Section 5 of this Privacy Notice. Data storage takes place within the European Economic Area.

7. Use of Cookies

The Website – as is generally the case with all websites – uses cookies. Cookies are small files placed on the visitor's computer, mobile device or tablet when visiting the Website. Their purpose is to facilitate browsing and to record information about the visit. Cookies may be disabled or modified in the visitor's browser settings; if a cookie is not disabled, the use of cookies is accepted upon using the Website.

The Website uses the following types of cookies:

- (i) Session cookies: temporary data stored only for the duration of the browsing session. Essential for the proper functioning of certain Website features; may be used without separate consent.
- (ii) Persistent cookies: stored in the browser's cookie file for a longer period depending on browser settings. These cookies enable the server to recognise the visitor's device on subsequent visits.
- (iii) Statistical cookies (Google Analytics): collect anonymous data on how visitors use the Website. May only be used with the visitor's consent. Maximum lifetime: 2 years.

7.1 Data Transfers to Third Countries (USA)

When using Google Analytics and other Google services, the Data Subject's data may be transferred to Google servers located in the United States of America, outside the European Union. Google LLC relies on Standard Contractual Clauses (SCC) approved by the European Commission to ensure the lawfulness of transfers to the USA, pursuant to Article 46 of the GDPR.

Further information on data protection settings and Google's data processing practices is available in Google's Privacy Policy: <https://policies.google.com/privacy>

The legal basis for this processing is the voluntary, specific and informed consent of visitors (Article 6(1)(a) GDPR). Withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal.

The Data Controller does not transfer cookies or data collected through cookies to third parties – other than the data processors listed above – and does not use them for identification purposes.

Browser cookie settings can be accessed at the following links:

- (i) [Google Chrome](#)
- (ii) [Firefox](#)
- (iii) [Safari](#)
- (iv) [Microsoft Edge](#)

8. Security Measures

BitNext Kft. ensures the security of personal data processing in accordance with the GDPR and implements the technical and organisational measures necessary to protect the collected, stored and processed data against destruction, unauthorised use and unauthorised modification.

Access to personal data is restricted to employees and authorised data processors who have accepted confidentiality obligations and hold the appropriate authorisations. Electronic systems are protected by passwords, firewalls and antivirus software. Regular data backups are performed on the servers.

However, the Data Controller cannot guarantee absolute data security – for example, in the event of an external security incident – and accepts no liability for damages arising from potential data loss in such circumstances.

This Privacy Notice and any questions or disputes arising therefrom are governed by Hungarian law.

9. Remedies

If the Data Subject considers that the processing of his or her personal data infringes applicable law, he or she may contact BitNext Kft. at the contact details provided above.

The Data Subject may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH):

Address: 1055 Budapest, Falk Miksa utca 9-11., Hungary

Postal address: 1363 Budapest, P.O. Box 9.

Phone: +36 (1) 391-1400

Email: ugyfelszolgalat@naih.hu

Website: www.naih.hu

Budapest, 20 March 2026