

# PRIVACY POLICY

*Last updated: Nov 27<sup>th</sup>, 2023*

We respect your privacy. This Privacy Policy describes our policies and procedures on the collection, use, purpose and disclosure of your information when you use our website (especially but not limited to BPO Database as defined in our EULA) or download BIMporter Software (as defined in our EULA) and it also informs you about your privacy rights and how you are protected by law.

BIMporter Kft. of Hungary, 1135 Budapest, Lehel utca 61. 6.em. 604. (“BIMporter, “we”, “us”, or the “Company”) is responsible for the processing of your Personal Information as described in this Privacy Policy and acts as the controller of such Personal Information.

## What Personal Information we collect?

- **Contact data**, such as your first and last name, email address, billing and mailing addresses, professional title and company name, and phone number.
- **Account data**, such as the username and password, Activation Code (as defined in our EULA) that you may set to establish an online account on our website and any other information that you add to your account profile.
- **Feedback and communications data** based on your communication with us including but not limited to as part of responding to a survey or for troubleshooting or debugging purposes, during a trial and/or demo or otherwise.
- **Transactional data**, such as information relating to or needed to complete your orders on or through the services we provide, including order numbers and transaction history.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Payment data**, such as information you provide in connection with your payment. Please note that we use third party payment processors to process payments made to us. As such, we do not retain any personally identifiable financial information such as credit card numbers. Rather, all such information is provided directly by you to our third-party processor. The payment processor’s use of your personal information is governed by their privacy policy.

**Automatic data collection.** Like most digital platforms, we, our service providers, and our business partners may automatically log information about you, your computer or mobile device depending on what you’re using, and your interaction over time with our services, such as:

- **Device data**, such as your computer or mobile device’s operating system type and version, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address (and, as such, general location information such as city, state, or geographic area), Hardware ID (as described in our EULA) and similar.

## For what purposes and on what basis do we process your Personal Information?

### Legal bases for processing

GDPR requires us to ensure we have a legal basis for each purpose that we use your Personal Information for. These are the following:

Where we need to perform a contract, we are about to enter into a contract or have entered into a contract with you (“**Performance of Contract**”).

Where we need to comply with a legal or regulatory obligation (“**Legal Obligation**”).

Where we have your specific consent to carry out the processing for the Purpose in question (“**Consent**”).

<b>Purpose</b>	<b>Personal Information</b>	<b>Legal Basis</b>
User or subscriber Registration: to register you as a user or a subscriber.	<ul style="list-style-type: none"> <li>● Contact data</li> <li>● Marketing data</li> </ul>	Performance of contract
Processing orders and managing payments: to process and deliver your orders, manage payments, manage subscriptions, including informing you about the expiration of your subscription.	<ul style="list-style-type: none"> <li>● Contact data</li> <li>● Account data</li> <li>● Transactional data</li> <li>● Payment data</li> <li>● Device data</li> </ul>	Performance of contract and legal obligation
Service delivery and operation: provide, operate and maintain our services, provide customer service.	<ul style="list-style-type: none"> <li>● Contact data</li> <li>● Account data</li> <li>● Feedback and communications data</li> <li>● Transactional data</li> <li>● Payment data</li> <li>● Device data</li> </ul>	Performance of contract and Consent
Direct marketing: to send you direct marketing communications and personalise these messages based on your needs.	<ul style="list-style-type: none"> <li>● Contact data</li> <li>● Marketing data</li> <li>● Feedback and communications data</li> </ul>	Consent

### **Retention of your Personal Information**

#### **Security of processed Personal Data.**

We understand that the security of your personal information is important. We employ reasonable administrative, technical, and physical security controls to protect your personal information. All information you provide us is stored on secure servers. However, please note that no transmission over the internet is 100% secure. In case we learn about a personal data breach, we will contact you without delay.

#### **How long do we store your Personal Information?**

We only retain Your Personal Information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In case there is no explicit need prescribed by law, we will process your data for the time while your licence is active and for further two (2) years. When we no longer require the Personal Information we have collected about you, we may either delete it, anonymize it, or isolate it from further processing.

## Cookies

For more information about which cookies and other tracking technology we use, see our Cookie Policy. We will also store a record of your preferences in respect of the use of these technologies in connection with the Service.

## Sharing With Third Parties

We do not sell, rent, distribute or otherwise make Personal Information commercially available to any third party, except that we may share information with our service providers for the purposes set out in this Privacy Policy. We will maintain the confidentiality of and protect your information in accordance with our Privacy Policy and all applicable laws.

## International Transfers of Personal Information

The transfer of your Personal Information may involve your Personal Information being sent outside of the EEA, to locations that may not provide the same level of protection as those where you first provided the information.

However, we will only transfer your Personal Information outside of the EEA:

- where the transfer is to a place that is regarded by the European Commission as providing adequate protection for your Personal Information; or
- where we have put in place appropriate safeguards to ensure that your Personal Information is protected (for example where both parties involved in the transfer have signed standard data protection clauses adopted by the European Commission).

## Children

We do not knowingly collect, store or in any other means process data of persons under 16 years of age. If you believe we have collected personal information of a child, please contact us and provide sufficient data about the use case.

## Your Rights under the GDPR

We undertake to respect the confidentiality of your Personal Information and to guarantee you can exercise your rights.

You have the right to:

- **Request access to your Personal Information.** The right to access, update or delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Information directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you. This also enables you to receive a copy of the Personal Information we hold about you.
- **Request correction of the Personal Information that we hold about You.** You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Object to processing of your Personal Information.** This right exists where we are relying on a legitimate interest as the legal basis for our processing and there is something about your particular situation, which makes you want to object to our processing of your Personal Information on this ground.
- **Request erasure of your Personal Information.** You have the right to ask us to delete or remove Personal Information when there is no legitimate reason for us to continue processing it.
- **Request the transfer of your Personal Information.** We will provide you, your Personal Information in a structured, commonly used, machine-readable format. Please note that this right only applies to

automated information which you initially provided consent for us to use or where we used the information to perform a contract with You.

- **Withdraw your consent.** You have the right to withdraw your consent on using your Personal Information. If You withdraw your consent, we may not be able to provide you with access to certain specific functionalities of the services we provide.

### **Exercising of Your GDPR Data Protection Rights**

You may exercise your rights of access, rectification, cancellation and opposition by contacting us or the National Authority. Please note that we may ask you to verify your identity before responding to such requests. If you make a request, we will try our best to respond to you as soon as possible.

You may write us:

- to the following email address: [info@bimporter.com](mailto:info@bimporter.com)  
Address: Hungary, 1135 Budapest, Lehel utca 61. 6. em. 604.
- by contacting the National Authority at:

#### **National Authority for Data Protection and Freedom of Information (NAIH)**

Mailing Address: 1363 Budapest, Pf.: 9.  
Head office: 1055 Budapest, Falk Miksa utca 9-11  
Phone: +36 (1) 391-1400  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

### **Changes to this Privacy Policy**

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.