

## PRIVACY POLICY

Last updated 1<sup>st</sup> of March, 2022

Thank you for choosing to be part of our community at BDN Automotive Kft. (“**Company**”, “**we**”, “**us**”, or “**our**”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us [info@bdn-automotive.com](mailto:info@bdn-automotive.com).

When you visit our website <https://bdn-automotive.com/>, and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites and our services. This privacy policy applies to all information collected through our website (such as <https://bdn-automotive.com/>), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the “**Services**”).

**Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.**

### 1. REFERENCES

“**Privacy and Data Protection Requirements**” means: the Data Protection Act 2018 (“**DPA**”), the General Data Protection Regulation 2016/679 (“**GDPR**”) or any equivalent provision which may replace the GDPR following the formal political separation of the United Kingdom from the European Union; the Electronic Communications Data Protection Directive (2002/58/EC) (as updated by Directive 2009/136/EC); the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2426/2003); and all applicable laws and regulations which may be in force from time to time relating to the processing of Personal Data and privacy, including where applicable the guidance and codes of practice issued by the Information Commissioners Office or any other supervisory authority, and the equivalent of any of the foregoing in any relevant jurisdiction; and

“**Personal Data**”, “**Data Controller**” and “**Data Processor**” and “**processing**” shall have the meanings given to them in the GDPR.

For the purposes of applicable Privacy and Data Protection Requirements, we (BDN Automotive) are a Data Controller and therefore we are responsible for, and control the processing of, your Personal Data in accordance with applicable Privacy and Data Protection Requirements. “**Personal Data**” has a legal definition but, in brief, it refers to information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. Such information must be protected in accordance with applicable Privacy and Data Protection Requirements.

## 2. WHAT INFORMATION MAY WE COLLECT ABOUT YOU?

When you use the Websites and/or when you otherwise deal with us we may collect the following information about you ("**Information**"):

- i. **Personal Information** including first and last name and username or similar identifier;
- ii. **Contact Information** including current business address, primary email address and/or primary phone number;
- iii. **Financial Information** including bank account and payment card details and details about payments to and from you and other details of services purchased by you from us;
- iv. **Technical Information** including IP address, operating system, browser type and related information regarding the device you used to visit the Websites, the length of your visit and your interactions with the Websites;
- v. **Usage Information** obtained through our correspondence and monitoring in accordance with clause 5.2 below including but not limited to your interests, preferences and feedback you provide;
- vi. **Details of any enquiries made by you through the Websites**, together with details relating to subsequent correspondence (if applicable); and
- vii. **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.

## 3. HOW DO WE COLLECT YOUR INFORMATION?

We use different methods to collect data from and about you including through direct interactions with you. You may give us your Information by filling in forms on the Websites or corresponding with us by phone, email or otherwise. This includes Information you provide when you:

- i. subscribe to our services provided through the Website such as download BDN documents or subscribe to certain publications and newsletters we provide;
- ii. apply to receive our services;
- iii. request marketing to be sent to you;
- iv. give us feedback or contact us.

We may monitor your use of the Websites through 'cookies' and similar tracking technologies. We may also monitor traffic, location and other data and information about users of the Websites. Such data and information, to the extent that you are individually identifiable from it, shall constitute Information as defined above. However, some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

'Cookies' and related software:

Our software may issue 'cookies' (small text files) to your device when you access and use the Websites and you will be asked to consent to this at the time (e.g. when you first visit our

websites). Cookies do not affect your privacy and security since a cookie cannot read data off your system or read cookie files created by other sites.

Our Websites uses cookies and other tracking and monitoring software to: distinguish our users from one another; collect standard Internet log information; and to collect visitor behaviour information. The information is used to track user interactions with the Websites and allows us to provide you with a good experience when you access the Websites, helps us to improve our Websites, and allows us to compile statistical reports on the Websites visitors and Websites activity.

You can set your system not to accept cookies if you wish (for example by changing your browser settings so cookies are not accepted), however please note that some of our Websites features may not function if you remove cookies from your system. For further general information about cookies please visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

3.3 Occasionally we may receive information about you from other sources, or from any third-party websites and applications that integrate or communicate with the Websites in relation to you. If so, we may add this information to the Information we already hold about you in order to help us carry out the activities listed below. This may include receiving Technical Information from analytics providers such as Google who may be based outside of the European Union.

## 4. HOW DO WE USE YOUR INFORMATION?

***In Short:** We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

Below are some definitions that will help you understand the roles and responsibilities of BDN Automotive Kft.:

- “data controller” means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be used.
- “data processor”, in relation to personal information, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

If you provide the data and the instructions, then you are the data controller and BDN Automotive Kft. is the data processor.

If we determine the purposes for which we collect and use your personal information, then we are the Controller.

Why we will process your Information:

- i. To investigate and address any comments, queries, for example, about our prices, or to answer any questions or complaints about the Website or any webinars attended by you, and any similar or related comments, queries or complaints from other customers.
- ii. To send you news and relevant updates about us by email, such as news and important changes to our business, our terms and conditions or this privacy policy.
- iii. To send you the newsletters, that you have subscribed for and to ensure that content from the Websites and in our webinars is presented in the most effective manner for you and for your device.
- iv. To understand and measure the effectiveness of the content from our Websites and webinars we present to you.
- v. To arrange billing, and administration of membership licences you purchase from us and
- vi. To research into usage and behaviour for improving and changing our services, including personalisation to your needs.
- vii. To operate, administer, maintain, provide, analyse and improve the Websites and the services available to you through the Websites.
- viii. To contact you for marketing purposes (see 'Marketing and opting out' in clause 6 below);(We send out marketing communications based on our legitimate interests of providing a professional services business and keeping people informed about the services we offer. The method of communication may vary as set out below: we will only contact you via your personal email address if: you have given your consent (see 'Marketing opting out' in clause 6 below); or you have previously bought services from us and we are contacting you to let you know about similar services that we offer. You have the right at any time to let us know that you no longer wish to receive marketing communications from us (see 'Marketing opting out' in clause 6 below).

## 5. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

***In Short:*** We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations.

We may process or share data based on the following legal basis:

- i. **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- ii. **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- iii. **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract.
- iv. **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- v. **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- i. **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- ii. **Third-Party Advertisers.** We may use third-party advertising companies to serve ads when you visit the Services. These companies may use information about your visits to our Website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.

## 6. DO WE USE MARKETING OPTING OUT?

Where you are dealing with us for business purposes, then we may contact you by email to your corporate email address about similar or related products that we offer. If you prefer not to receive any direct marketing communications from us, or you no longer wish to receive them, you can opt out at any time (see below).

Where you have previously purchased services from us, or have requested information from us, you may receive marketing communications from us in relation to similar or related services, promotions and special offers that may be of interest to you. If you prefer not to receive any direct marketing communications from us, or you no longer wish to receive them, you can opt out at any time.

We will get your express consent before we share your Personal Data with any third party for marketing purposes. If you have opted-in, we may share your Personal Data with carefully selected third party organisations, including knowledge and business partners who provide content for the Websites and they may contact you directly by mail, telephone and email about products, services, promotions and special offers they offer that may be of interest to you. If you prefer not to receive direct marketing communications from such third parties, or you no longer wish to receive them, you can opt out at any time (see clause 6.4 below).

**Opting out.** You have the right at any time to ask us, or any third party, to stop processing your Information for direct marketing purposes. If you wish to exercise this right, you should email us, or contact the relevant third party using their given contact details, giving us or them enough information to identify you and deal with your request. Alternatively, you can follow the unsubscribe instructions in emails you receive from us or them.

## 7. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

***In Short:** We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

## 8. DO WE USE GOOGLE MAPS?

***In Short:** Yes, we use Google Maps for the purpose of providing better service.*

This website, mobile application, or Facebook application uses Google Maps APIs. You may find the Google Maps APIs Terms of Service here. To better understand Google's Privacy Policy, please refer to this link.

By using our Maps API Implementation, you agree to be bound by Google's Terms of Service.

## 9. HOW LONG DO WE KEEP YOUR INFORMATION?

***In Short:** We keep your information for as long as necessary to fulfil the purposes outlined in this privacy policy unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 2 years.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal

information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 10. HOW DO WE KEEP YOUR INFORMATION SAFE?

***In Short:*** We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the services within a secure environment.

## 11. DO WE COLLECT INFORMATION FROM MINORS?

***In Short:*** We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at [info@bdn-automotive.com](mailto:info@bdn-automotive.com).

## 12. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:*** In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data

protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. To opt-out of interest-based advertising by advertisers on our Services visit <http://www.aboutads.info/choices/>.

### **13. DATA BREACH**

A privacy breach occurs when there is unauthorized access to or collection, use, disclosure or disposal of personal information. You will be notified about data breaches when BDN Automotive Kft. believes you are likely to be at risk or serious harm. For example, a data breach may be likely to result in serious financial harm or harm to your mental or physical well-being. In the event that BDN Automotive Kft. becomes aware of a security breach which has resulted or may result in unauthorized access, use or disclosure of personal information BDN Automotive Kft. will promptly investigate the matter and notify the applicable Supervisory Authority not later than 72 hours after having become aware of it, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

### **14. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

### **15. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?**

***In Short:*** *Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.



If you are under 18 years of age, reside in California, and have a registered account with the Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from our systems.

## 16. DO WE MAKE UPDATES TO THIS POLICY?

***In Short:*** Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

## 17. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, you may contact us at:

- i. [info@bdn-automotive.com](mailto:info@bdn-automotive.com)
- ii. post to: BDN Automotive Kft.  
Gnd/3, 3-5 Kereszt street  
Gyor, 9025  
Hungary

If you are a resident in the European Economic Area, the "data controller" of your personal information is BDN Automotive Kft. BDN Automotive Kft. has appointed Nimrod Ludescher to be its representative in the EEA. You can contact them directly regarding the processing of your information by BDN Automotive Kft., by:

- i. [nimrod.ludescher@bdn-automotive.com](mailto:nimrod.ludescher@bdn-automotive.com)
- ii. post to: 10 Koros street  
Diosd, 2049  
Hungary