**Privacy Notice**

This privacy notice (hereinafter: the "**Notice**") has been prepared and issued by **BerényiSoftware Tanácsadó és Szolgáltató Kft.** (registered office: 2724 Újlengyel, Petőfi Sándor utca 48., company registration number: 13-09-245641, tax number: 26320353-2-13, hereinafter: the "**Controller**") in order to duly inform its partners and customers, the visitors of **www.armester.com** (hereinafter: the **"Website"**) and the users of the ÁrMester software (hereinafter: the "**Data Subject**") about the processing of their personal data by the Controller and the rights they are entitled to in connection with such processing: *pursuant to Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC* (hereinafter: "GDPR"), in accordance with Articles 13 and 14 thereof.

**1. Controller:**

Company name: **BerényiSoftware Tanácsadó és Szolgáltató Kft.**
Registered office: 2724 Újlengyel, Petőfi Sándor utca 48.
Company registration number: 13-09-245641
Tax number: 26320353-2-13
Phone: +36 21 200 0797
E-mail: office@berenyisoft.com

**2. Scope of data processed, purpose, legal basis and duration of processing:**

| DATA PROCESSED | PURPOSE OF PROCESSING | LEGAL BASIS | DURATION OF PROCESSING |
|---|---|---|---|
| **Billing and online order data** | | | |
| Name, e-mail address and billing address of the Data Subject, transaction number and date, content of the receipt, and in the case of a VAT invoice, company name and tax number. | Issuing the accounting document related to the purchase | Compliance with the Controller's legal obligation pursuant to Article 6(1)(c) GDPR (Act C of 2000 on Accounting; Act CXXVII of 2007 on Value Added Tax) | For 8 years following the issue of the invoice. |
| Name, e-mail address and billing address of the Data Subject, ordered service | Administration of the order, provision of the service, sending notifications related to the ordering of the service | Performance of a contract pursuant to Article 6(1) (b) GDPR | For 5 years from the termination of the service |
| **Contact** | | | |
| Name and e-mail address of the Data Subject, time of contact, content of the message, optionally phone number | Responding to incoming inquiries and, where necessary, subsequent administration and communication | Consent of the data subject pursuant to Article 6(1)(a) GDPR | Until withdrawal of consent |
| **Newsletter** | | | |
| Name and e-mail address of the Data Subject | Sending newsletters | Consent of the data subject pursuant to Article 6(1)(a) GDPR | Until withdrawal of consent |

| DATA PROCESSED | PURPOSE OF PROCESSING | LEGAL BASIS | DURATION OF PROCESSING |
|---|---|---|---|
| **User account** | | | |
| User's e-mail address, password (in encrypted form), display name, billing data (billing name, billing e-mail address, address; in the case of a business customer, company name and tax number), currency used, and the API access data provided for the webshop integration (API URL, API username, API password or API key)<br>Source of the data: the Data Subject. Where the service is installed through the ShopRenter application, the account e-mail address and the name of the shop owner are transmitted by Shoprenter Kft. (ShopRenter platform) upon installation of the application; if these are not available, the account is assigned a technical e-mail address ([shopname]@shoprenter.armester.com). | Creation and operation of the user account, management of billing data, provision of the webshop integration (ShopRenter, Unas, PrestaShop, WooCommerce, Magento, Shoptet, Shopify, Gomag), permission management, provision of the service | Article 6(1)(b) GDPR – performance of a contract | No longer than 180 days from the termination of the service |
| **Prevention of trial-period abuse (ShopRenter application)** | | | |
| Name of the ShopRenter shop (the identifying part of the shop's ShopRenter address) and the date and time of the first installation of the application | Ensuring that the free trial period can be used only once: the trial period runs from the first installation by the shop; reinstalling the application or deleting and re-opening the account does not restart it. | Legitimate interest of the Controller pursuant to Article 6(1)(f) GDPR (prevention of abuse of the trial-period benefit) | For as long as the Controller offers the application on the ShopRenter platform |

Source of the data processed in connection with the ShopRenter application: the shop name and the installation time are transmitted to the Controller by Shoprenter Kft. (ShopRenter platform) upon installation of the application. The processing begins at installation and continues after the deletion of the user account or the removal of the application. The data is not linked to the user account: it contains no name, e-mail address or billing data. The Data Subject may object to processing based on legitimate interest as described in Section 6.

**3. Automated decision-making and profiling**

The Controller informs the Data Subjects that during the processing **no automated decision-making takes place**, including profiling, within the meaning of Article 22 of Regulation (EU) 2016/679 (GDPR).

**4. Information on data storage:**

The Controller selects and operates the IT tools used for the processing of personal data in the course of providing the service in such a way that the data processed are adequately protected, their integrity and unchanged nature are preserved, they are accessible only to those authorised, and they are protected against unauthorised access.

The Controller protects personal data by means of technical and organisational measures against unauthorised access, alteration, transfer, disclosure, erasure or destruction, as well as accidental destruction, which ensure a level of protection appropriate to the nature of the data processed and the risks involved in the processing.

When authenticating calls from the ShopRenter application, the Controller stores the signature of the call together with the shop name and the time of the call for a short period, so that the same call cannot be reused (replay protection). These records are deleted automatically by the system within a few hours at most. The legal basis for this processing is the Controller's legitimate interest in maintaining IT security (Article 6(1)(f) GDPR).

**5. Data processors:**

The Controller uses data processors for operating the Website and providing the service. The Controller's data processing partners are the following:

Company name: Nethely Kft.

Registered office: 1115 Budapest, Halmi utca 29.

Tax number: 23358005-2-43

Company registration number: 01-09-961790

- Hosting and web server provider; it provides the technical operation and hosting of the Website.

Company name: Tárhely.Eu Szolgáltató Kft.

Registered office: 1144 Budapest, Ormánság utca 4. X. em. 241.

Tax number: 14571332-2-42

Company registration number: 01-09-909968

- Hosting and server provider; it provides the technical infrastructure and hosting of the service.

Company name: Stripe Payments Europe, Limited

Registered office: 3 Dublin Landings, North Wall Quay, Dublin 1, D01 C4E0, Ireland

Registration number: 513174 (Irish Companies Registration Office)

- Online payment service provider. Our company uses the Stripe payment system to process card payments.

- The Stripe group may also process data outside the European Economic Area (EEA), in the United States; the guarantees for such transfers are provided by the EU–US Data Privacy Framework and the standard contractual clauses (SCC) adopted by the European Commission.

Company name: Anthropic Ireland, Limited

Registered office: 6th Floor, South Bank House, Barrow Street, Dublin 4, Ireland

Registration number: 760497 (Irish Companies Registration Office)

- Artificial intelligence service provider engaged for the operation of the AI-based competitor discovery function of the service. Only product information (product name, product link, publicly available competitor prices) is transferred to it; no personal data is transferred. The user's purchase prices, pricing rules and other business data are likewise not transferred; they are processed exclusively within the Controller's own system.

**6. Rights of the Data Subject:**

In connection with the processing of personal data specified in this Notice, we grant the data subjects the rights set out below, and the Data Subject may exercise the following rights at the address or e-mail address indicated in this Notice:

- Right of access, right to information;
- Right to rectification;

- Right to restriction of processing;
- Right to object
- Right to remedy.

**Right of access and right to information**

At the request of the data subject, the Controller shall inform them whether processing of their data is in progress. If so, the Controller shall, in addition to providing access (i.e. the Data Subjects may be present during the review of the data, may make their comments directly in the course thereof, may learn the findings of the review and may receive a copy), inform the Data Subject of the categories of data processed, the purpose of the processing, the recipients of the processing or the categories of recipients, the duration of the storage of the data or the criteria used to determine that duration, the exercise of data subject rights, the right to lodge a complaint with the competent supervisory authority, i.e. the Hungarian National Authority for Data Protection and Freedom of Information (NAIH), the source of the data, and the existence of automated decision-making, including profiling.
In the case of transfers of data outside the European Union or the European Economic Area, the data subject shall also be informed of the appropriate safeguards provided in connection with the transfer.

The data subject may exercise the following rights at the above address or e-mail address: they may request access to the personal data concerning them and information thereon (including whether processing of their personal data is in progress), and may request the rectification of the personal data, the restriction of their processing, and may object to the processing of their personal data.
Within the scope of the right of access, the data subject has the right to request a copy of the recording; however, the data subject may only receive a copy of a recording in which no other person appears, or appears only in an unidentifiable manner; if this cannot be fulfilled, the controller shall enable the data subject to view the recording containing them.

**Right to rectification**

If the personal data processed by the Controller need to be rectified or supplemented, the data subject may request in writing (by post or e-mail) the rectification or supplementation of the data, indicating the correct data.
The data subject shall notify the Controller in writing (by post or e-mail) of any change in any of their personal data processed by the Controller without delay, but no later than within 5 days of the change. If, due to the failure to provide or the late provision of such notification, the Controller is unable to comply, or to comply properly, with any of its obligations under law, the data subject shall be liable for all damages arising therefrom.

**Right to restriction of processing**

The data subject has the right to obtain from the Controller the restriction of processing where the data subject

- contests the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the data and requests the restriction of their use instead;
- the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to the processing.

**Notification obligation regarding the rectification of personal data or the restriction of processing**

The Controller shall communicate any rectification or restriction of processing to each recipient to whom the personal data concerning the data subject have been disclosed, unless this proves impossible or involves disproportionate effort. The data subject has the right to request information from the Controller about those recipients.

**Right to object**

The Data Subject has the right to object, on grounds relating to their particular situation, at any time to the processing of their personal data. In such a case, the Controller may no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject, or which relate to the establishment, exercise or defence of legal claims.

**Submission of data protection requests**

Requests concerning the exercise of data subject rights may be submitted by the data subject via the contact details specified in Section 1.
The Controller shall provide information on the measures taken in response to the request in writing, in a clear and intelligible form, without undue delay and in any event within one (1) month of receipt of the request. Where necessary, taking into account

the complexity and number of the requests, this period may be extended by a further two months. The Controller shall inform the data subject of any such extension, together with the reasons for the delay, within one month of receipt of the request.
If the Controller rejects the request submitted by the data subject, it shall inform the data subject without delay, and at the latest within one month of receipt of the request, of the reasons for not taking action, as well as of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

**Right to lodge a complaint with the data protection supervisory authority and to seek a judicial remedy:**

Complaints regarding the processing may be lodged with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) at the following contact details:
- address: 1055 Budapest, Falk Miksa utca 9-11.
- postal address: 1363 Budapest, Pf.: 9.
- phone: +36 (1) 391-1400
- fax: +36 (1) 391-1410
- e-mail: ugyfelszolgalat@naih.hu
- website: http://naih.hu

The Data Subject is entitled to bring the matter before a court in connection with the processing of their data in breach of the GDPR and, if they have suffered material or non-material damage as a result of an infringement of the GDPR by the Controller, to enforce a claim for compensation against the Controller. Court proceedings may also be initiated before the regional court of the data subject's place of residence or stay.

11 October 2026