

Privacy Policy

AimiGate AI Gateway Platform

BerenyiSoft Kft. • Effective: 1 March 2026

1. Data Controller

Company name: BerenyiSoft Kft.

Registered address: Petőfi Sandor utca 48, 2724 Ujlengyel, Hungary

Company registration number: 06-09-024347

Tax number: 26320353-2-13

Phone: +36 30 7777 529

E-mail: info@aimigate.com

Website: www.aimigate.com

2. Categories of Personal Data, Purposes, Legal Bases and Retention Periods

During the use of the AimiGate platform (hereinafter: the Service), the Data Controller processes the following personal data for the purposes and on the legal bases set out below:

Categories of Personal Data	Purpose of Processing	Legal Basis	Retention Period
1. Registration and User Account			
Display name, email address, password (stored in encrypted form)	Creating user accounts, authentication, access management, role-based authorisation	Art. 6(1)(b) GDPR - performance of a contract	Until account deletion; thereafter no longer than 30 days
Two-factor authentication data (stored in encrypted form)	Providing enhanced account security and preventing unauthorised access	Art. 6(1)(b) GDPR - performance of a contract	Until 2FA is disabled or the account is deleted

2. Billing and Subscription			
Billing name, email address, billing address (street, city, postcode, country), VAT number (companies only), Stripe Customer ID	Subscription management, issuing invoices and receipts, processing payment transactions	Art. 6(1)(b) GDPR - performance of a contract; Art. 6(1)(c) GDPR - legal obligation (Hungarian Accounting Act 2000/C, VAT Act 2007/CXXVII)	8 years from invoice issuance (statutory accounting requirement)
Subscription data: plan name, billing interval, status, subscription ID (Stripe), invoice number (Szamlazz.hu)	Subscription records, granting service access, managing monthly renewals	Art. 6(1)(b) GDPR - performance of a contract	5 years from termination of service
3. External System Credentials			
Access credentials for connected external systems (stored in encrypted form)	Enabling authenticated access to user-connected external systems on behalf of the AI assistant	Art. 6(1)(b) GDPR - performance of a contract	Until the credential is deleted or the account is closed
4. Audit Log (API Call Log)			
User ID and email address, called system and tool name, timestamp, call data, execution result, error message, response time	Ensuring service quality, detecting misuse, tracking usage limits, troubleshooting	Art. 6(1)(f) GDPR - legitimate interests (secure service operation)	Active logs: 30 days in the database. Thereafter archived; aggregated statistics for up to 1 year
5. OAuth 2.0 Access Tokens			
Access tokens, refresh tokens, authorisation codes, scope, expiry time	Providing secure, standards-based authentication for third-party applications	Art. 6(1)(b) GDPR - performance of a contract	Access token: until expiry; Refresh token: until revoked or account closure
6. Contact Enquiries			
Name, email address, message content, date of contact	Responding to incoming enquiries and, where necessary, follow-up communication	Art. 6(1)(a) GDPR - consent of the data subject	Until consent is withdrawn; no longer than 2 years

3. Automated Decision-Making and Profiling

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

4. Data Security Measures

The Data Controller selects and operates the IT systems used to process personal data in a manner that ensures adequate protection for the data processed. The AimiGate platform applies the following technical security measures:

- Passwords: stored in irreversible, encrypted form
- Two-factor authentication data: stored in encrypted form
- External system access credentials: stored in encrypted form
- Database: hosted on a dedicated server via an encrypted connection
- Web traffic: transmitted exclusively over encrypted HTTPS connections
- Access control: role-based authorisation management

5. Data Processors

The Data Controller engages the following data processors to provide the Service:

Stripe Technology Europe, Limited

Registered address: The One Building, 1 Grand Canal Street Lower, Dublin 2, Ireland

Activity: Online payment service provider. Processing card-based subscription payments and financial transactions.

Privacy policy: <https://stripe.com/privacy>

Szamlazz.hu (KBOSS.hu Kft.)

Registered address: Zahony utca 7, 1031 Budapest, Hungary

Tax number: 13421739-2-41

Activity: Online invoicing system. Issuance and storage of invoices for subscription fees.

Privacy policy: <https://www.szamlazz.hu/adatvedelmi-nyilatkozat/>

Tarhely.Eu Szolgáltato Kft.

Registered address: Ormansag utca 4, Floor X, Door 241, 1144 Budapest, Hungary

Company registration number: 01-09-909968

Tax number: 14571332-2-43

Activity: Hosting and server infrastructure services. All data is stored within the European Union.

Website: <https://tarhely.eu>

Nethely Kft.

Registered address: Halmi utca 29, 1115 Budapest, Hungary

Company registration number: 01-09-961790

Tax number: 23358005-2-43

Activity: Email delivery services. Sending transactional emails such as registration confirmations, password resets and invoice notifications.

Website: <https://nethely.hu>

6. Rights of Data Subjects

Data subjects may exercise the following rights through the contact details set out in this Privacy Policy:

Right of access and to information

Upon request, the Data Controller will confirm whether personal data concerning the data subject is being processed and, if so, will provide access to that data and information on the purpose, legal basis, retention period, data sources, recipients and the means of exercising data subject rights.

Right to rectification

Data subjects may request the correction of inaccurate personal data or the completion of incomplete data. Certain account details (display name, billing information) may also be updated directly within the AimiGate platform.

Right to erasure ('right to be forgotten')

Data subjects may request the erasure of their personal data where the purpose of processing has ceased, consent has been withdrawn, or the processing is unlawful. Erasure cannot be carried out where processing is required to comply with a legal obligation (e.g. statutory accounting retention requirements).

Right to restriction of processing

Data subjects are entitled to request restriction of processing where they contest the accuracy of personal data, the processing is unlawful, or the data subject has objected to processing.

Right to data portability

Data subjects are entitled to receive personal data they have provided in a structured, commonly used and machine-readable format (Art. 20 GDPR), where processing is based on consent or a contract and is carried out by automated means.

Right to object

Data subjects are entitled to object at any time to the processing of their personal data carried out on the basis of legitimate interests (Art. 6(1)(f) GDPR) on grounds relating to their particular situation.

7. Submitting Data Protection Requests

Data subjects may exercise their rights using the following contact details:

- By post: Petőfi Sandor utca 48, 2724 Ujlengyel, Hungary
- By email: info@aimigate.com

The Data Controller will respond in writing, in a clear and intelligible manner, without undue delay and in any event within one (1) month of receiving the request. Where necessary, taking into account the complexity and number of requests, this period may be extended by a further two months, of which the data subject will be informed within the initial one-month period together with the reasons for the delay.

8. Remedies

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

- Address: Falk Miksa utca 9-11, 1055 Budapest, Hungary
- Postal address: Pf.: 9, 1363 Budapest, Hungary
- Phone: +36 (1) 391-1400
- Email: ugyfelszolgalat@naih.hu
- Website: <https://naih.hu>

Data subjects are also entitled to bring legal proceedings before a court where they consider that their personal data has been processed in breach of the GDPR. Proceedings may be brought before the court of the data subject's place of residence or habitual residence.

9. Amendments to this Privacy Policy

The Data Controller reserves the right to amend this Privacy Policy unilaterally. Data subjects will be notified of any amendments via the Website and, in the case of registered users, by email, at least 15 days before the changes take effect. Continued use of the Service following notification shall constitute acceptance of the amended Privacy Policy.

Dated: Ujlengyel, 1 March 2026

BerenyiSoft Kft., as Data Controller