

PRIVACY POLICY

Effective from: 2 September 2026

The protection of personal data is important to BENO GOLD GmbH. This Privacy Policy explains what personal data BENO GOLD processes, for what purposes and on what legal bases, how long such data is retained, who may have access to it, and what rights data subjects have. The processing of personal data is governed in particular by Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR), the applicable Austrian data protection provisions and, in connection with the operation of the website, the Austrian Telecommunications Act 2021 (Telekommunikationsgesetz 2021 – TKG 2021).

1. Data Controller

Controller: BENO GOLD GmbH

Registered office: Tegetthoffstraße 8/3, 7100 Neusiedl am See, Austria

Company register number (Firmenbuchnummer): FN 678074 v

E-mail: office@benogold.at

Telephone: +43 677 6369 8125

Hereinafter: “BENO GOLD” or the “Controller”.

BENO GOLD does not identify a separate Data Protection Officer at the time of publication of this Privacy Policy. For data protection questions or requests concerning data subject rights, the Controller may be contacted at office@benogold.at.

2. Scope of this Privacy Policy

2.1. This Privacy Policy applies in particular to visitors to the BENO GOLD website, persons using the contact or callback form, persons making enquiries by e-mail or telephone, and customers and prospective customers using BENO GOLD's services in Austria, Hungary or another individually agreed location.

2.2. The website is informational in nature and is not an online shop. No direct purchase or online payment takes place through the website.

3. Principles of Data Processing

3.1. BENO GOLD processes personal data only for specified, explicit and lawful purposes and only to the extent necessary to achieve the relevant purpose.

3.2. BENO GOLD endeavours to ensure that processed data is accurate and up to date and is retained only for as long as necessary.

3.3. BENO GOLD protects personal data by appropriate technical and organisational measures against unauthorised access, alteration, disclosure, loss or destruction.

4. Contact, Callback Requests, E-mail and Telephone

4.1. If a data subject contacts BENO GOLD through the website form, by e-mail or by telephone, BENO GOLD may process in particular the data subject's name, telephone number, e-mail address, the content of the enquiry or message, and any other information voluntarily provided by the data subject and required for handling the matter.

4.2. The purposes of processing are to respond to the enquiry, carry out a requested callback, assess the customer's needs, prepare an offer, arrange an appointment or location, and prepare a possible subsequent contract.

4.3. Where the enquiry is aimed at concluding a contract or is necessary for its preparation, processing is based on Article 6(1)(b) GDPR. For other general enquiries, processing may be based on BENO GOLD's legitimate interest under Article 6(1)(f) GDPR in appropriate customer communication and the proper handling of enquiries.

4.4. Data relating to an enquiry is retained for as long as necessary to handle the matter and any follow-up questions. If the enquiry results in a contract, the data may continue to be processed as part of the contractual documentation in accordance with applicable statutory retention periods.

5. Offers, Valuations and Customer Consultation

5.1. In connection with investment gold, investment silver, precious metals, jewellery, watches, scrap gold, bespoke jewellery, repairs, restoration, alteration or the home jeweller service, BENO GOLD may process the customer's name and contact details, information concerning the relevant item or service, photographs, offer details, communications and other information necessary to carry out the transaction.

5.2. The purposes of processing are valuation, preparation of an offer, preparation of the service, and the conclusion and performance of a contract.

5.3. The primary legal basis is Article 6(1)(b) GDPR, namely taking steps at the request of the data subject prior to entering into a contract and/or performing a concluded contract.

6. Contract Conclusion, Invoicing and Legal Obligations

6.1. Where a transaction is concluded, BENO GOLD may process in particular the customer's identification and contact details, contractual and transaction data, product or service information, payment and invoicing data, and other data required by law.

6.2. The purposes of processing are performance of the contract, handling payments and settlements, issuing invoices or other accounting documents, complying with accounting and tax obligations, and establishing, exercising or defending legal claims.

6.3. The legal basis is Article 6(1)(b) GDPR for performance of a contract, Article 6(1)(c) GDPR for compliance with a legal obligation and, depending on the circumstances, Article 6(1)(f) GDPR for the handling of legal claims on the basis of legitimate interests.

6.4. Accounting, tax and other documents subject to mandatory retention are stored for the period required under applicable Austrian law and, where necessary, until the conclusion of ongoing legal or administrative proceedings.

7. Technical Data Related to Website Use

7.1. When the website is accessed, technical data may be processed as part of the operation of the web server. Such data may include in particular the IP address, time of access, page or resource accessed, technical information about the browser and operating system, and log data required for the operation and security of the server.

7.2. The purposes of processing are to ensure the technical operation of the website, maintain IT security, identify errors, and prevent and investigate unauthorised or harmful access.

7.3. Where personal data is processed, the legal basis is Article 6(1)(f) GDPR, based on the legitimate interest in maintaining a secure and functional website.

7.4. The retention period for technical log data is determined by the actual hosting and server settings. BENO GOLD and/or the hosting provider processes such data only for as long as objectively necessary for operation, security and required troubleshooting.

8. Hosting Provider and Technical Service Providers

8.1. The provider of web hosting for the BENO GOLD website and the technical provider of the @benogold.at business e-mail service is Rackhost Zrt.

8.2. Details of the service provider:

Company: Rackhost Zrt.

Registered office: 6722 Szeged, Tisza Lajos körút 41., Hungary

Company registration number: 06-10-000489

Tax number: 25333572-2-06

E-mail: info@rackhost.hu

Telephone: +36 1 445 1200

Website: www.rackhost.hu

8.3. In connection with the hosting and e-mail services, the provider may technically have access to personal data generated or transmitted during operation of the services, including in particular IP addresses, server logs, contact details and communications transmitted through the website, insofar as this is necessary to provide the services.

8.4. The service provider may act as a processor on behalf of BENO GOLD. Where required by the nature of the service, processing is governed by a data processing agreement pursuant to Article 28 GDPR.

8.5. According to official information published by Rackhost Zrt., the company operates its own server room connected to the Hungarian internet backbone and provides continuous technical supervision for server operations.

8.6. According to the information available at the time this Privacy Policy was prepared, BENO GOLD does not use Google Analytics, Meta/Facebook Pixel or a newsletter distribution system. If such or other external tracking, analytics or marketing services are introduced in the future, this Privacy Policy and, where required, the consent management system must be updated accordingly.

9. Cookies and Similar Technologies

9.1. The website may use technically necessary cookies or comparable technologies where these are required for basic functionality, security or a function expressly requested by the user.

9.2. Before technically non-essential cookies are used, in particular for statistical, analytics or marketing purposes, the user's prior active consent shall be obtained where required by applicable law.

9.3. According to the information provided by BENO GOLD, neither Google Analytics nor Meta/Facebook Pixel is currently used, and BENO GOLD does not currently operate a newsletter service.

9.4. If cookies requiring consent or external tracking services are introduced in the future, information concerning their purpose, provider and duration must be provided in the cookie settings and in this Privacy Policy.

9.5. Users may also manage or delete cookies through their browser settings. Blocking technically necessary cookies may restrict the functionality of certain parts of the website.

10. Marketing and Newsletter

10.1. BENO GOLD does not currently operate a newsletter service.

10.2. An e-mail address or telephone number provided in connection with an enquiry is not automatically treated by BENO GOLD as consent to receive general advertising.

10.3. If BENO GOLD introduces electronic direct marketing or a newsletter in the future, the applicable data protection and electronic communications requirements will be implemented separately in accordance with the relevant legislation.

11. Data Transfers and Recipients

11.1. Personal data may be accessed only by persons and service providers who require the relevant data to perform their tasks.

11.2. Recipients or categories of recipients may include in particular BENO GOLD employees and contractors, hosting and IT service providers, accounting and tax advisory service providers, banks and payment service providers, shipping or courier service providers, professional collaborators, and authorities and courts where required by law.

11.3. BENO GOLD does not sell personal data to third parties.

11.4. Where processing involves a transfer of personal data outside the European Economic Area, such transfer shall take place only on the basis of a transfer mechanism permitted under Chapter V GDPR and with appropriate safeguards.

12. Source of Personal Data

12.1. BENO GOLD generally obtains personal data directly from the data subject, for example during contact, requests for offers, telephone or e-mail communication, contract conclusion or on-site services.

12.2. If, in a specific case, BENO GOLD obtains personal data not directly from the data subject but from another lawful source, the data subject shall, in the cases and within the time limits provided for in Article 14 GDPR, be informed about the source of the data and the other required information.

13. Requirement to Provide Data

13.1. Apart from merely viewing the website, the data subject is not obliged to provide contact details.

13.2. However, if the data subject requests a callback, offer, valuation, service or conclusion of a contract, the provision of certain personal data may be necessary. Without such data, BENO GOLD may be unable to handle the enquiry, provide an offer, conclude a contract or perform it.

14. Automated Decision-Making and Profiling

14.1. BENO GOLD does not use solely automated decision-making, including profiling, in connection with the processing described in this Privacy Policy where such decision-making would produce legal effects concerning the data subject or similarly significantly affect them.

15. Rights of Data Subjects

15.1. Subject to the conditions of the GDPR, data subjects have the right of access: they may request information as to whether BENO GOLD processes their personal data and may request access to such data.

15.2. Data subjects may request the rectification of inaccurate personal data and the completion of incomplete data.

15.3. Where the conditions of the GDPR are met, data subjects may request erasure of their personal data (the “right to be forgotten”).

15.4. Subject to the conditions of the GDPR, data subjects may request restriction of processing.

15.5. In the cases specified in Article 20 GDPR, data subjects have the right to data portability.

15.6. Where processing is based on Article 6(1)(f) GDPR, the data subject may object to the processing on grounds relating to their particular situation.

15.7. Where processing is based on consent, consent may be withdrawn at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

15.8. Requests concerning data subject rights may be sent to office@benogold.at or to BENO GOLD’s postal address. BENO GOLD handles such requests within the time limits and subject to the conditions laid down in the GDPR.

16. Right to Lodge a Complaint with a Data Protection Supervisory Authority

16.1. If a data subject considers that the processing of their personal data infringes the GDPR, they have the right to lodge a complaint with a competent data protection supervisory authority.

16.2. In view of BENO GOLD’s registered office in Austria, the Austrian data protection supervisory authority is the Austrian Data Protection Authority (Österreichische Datenschutzbehörde). Under the GDPR, the data subject may also contact another supervisory authority competent for them, in particular in the Member State of their habitual residence or the place of the alleged infringement.

Austrian Data Protection Authority (Österreichische Datenschutzbehörde)

Barichgasse 40–42, 1030 Vienna, Austria

E-mail: dsb@dsb.gv.at

Telephone: +43 1 52 152-0

17. Data Security

17.1. BENO GOLD implements technical and organisational measures appropriate to the risks of the relevant processing in order to protect the security of personal data.

17.2. Completely risk-free transmission of data over the internet cannot be technically guaranteed. BENO GOLD therefore takes measures reasonably expected of it to protect personal data.

18. Amendments to this Privacy Policy

18.1. BENO GOLD is entitled to amend this Privacy Policy, in particular if its data processing practices, the technical operation of the website, service providers used or applicable legislation change.

18.2. The current version shall be made available by BENO GOLD on its website. In the event of material changes, data subjects may, where appropriate in view of the nature and circumstances of the processing, also be informed by other suitable means.

19. Contact for Data Protection Matters

BENO GOLD GmbH

Tegetthoffstraße 8/3

7100 Neusiedl am See

Austria

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