



Electronic copying regulation of Gamax Ltd.

**defining how to create electronic copies of paper
documents**

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1 Objective

Gamax Informatikai és Munkaerő-kölcsönző Korlátolt Felelősségű Társaság (hereinafter referred to as Gamax Ltd.) is implementing an electronic copy creation and archiving system to support the management of existing, plus also newly received and generated documents, which on one hand means the IT support of the authentic electronic copy creation process and on the other hand the authentic digital archiving of the generated electronic documents.

2 Scope of the copy regulation

2.1 Material scope

The scope of the copying policy covers the entire IT system preparing the copies, including:

- computer equipment and devices (computers, scanners, printers, network devices);
- software (operating systems, database management subsystems, databases, applications);
- data storage devices and media;
- the documentation used in the IT system;
- the physical environment of the IT system.

2.2 Personnel and organisational scope

The personnel and organisational scope of this Regulation covers all persons who are involved in the copying process in the roles defined in this Regulation and who implement, operate, modify and monitor the electronic copying information technology system.

2.3 Territorial scope

The territorial scope of copying are the premises where copies are made and original paper documents are kept.

2.4 Temporal scope

The period of validity of the Regulation is from its issue until its amendment or withdrawal.

3 Definition of certain terms used in the copy order

- Paper document: any text, series of figures, images or other data recorded on paper, produced by any means and by any process.
- Authentic electronic copy: a set of data which is a true electronic copy of a non-electronic document, prepared in accordance with the rules of Government Decree 451/2016 (XII. 19.) on the detailed rules of electronic administration, which is identical in terms of image or content and which can be interpreted by means of an electronic device.
- Image conformity: the feature of an electronic copy that ensures that the content and form of the paper document are recognisable as being relevant to its legal effect.
- Copy system: the hardware, software and combination of hardware and software used to make copies.
- Content compliance: the property of an electronic copy that, together with its associated metadata, it ensures the discoverability of the content of the paper document that is relevant to the legal effect of the document, but does not ensure visual compliance.

4 General rules for making copies

When making a certified electronic copy of a paper document, the copy maker shall ensure that the paper document and the electronic copy are identical in terms of image or content and that any changes made to the electronic copy after the electronic stamp has been affixed are detectable.

When making an electronic copy of a paper document, the copy maker makes the electronic copy, establishes the correspondence between the image or content of the paper document and the electronic copy, and then the metadata (name of the paper document, physical dimensions, name of the copying organisation (company), the name of the person responsible for the visual or content match, the exact name and version number of the copying system or copying policy, the time of copying and the availability of the applicable copying policy), the electronic copy shall be certified and signed by a qualified electronic signature. A qualified time stamp shall be affixed to the electronically signed copy.

5 How to make a copy

The certified electronic copies are made on the Gamax Ltd. copy production systems. The copying systems implement process-driven document and data processing, one but not the only function of which is the production of certified electronic copies of paper documents.

Copying is the electronic copying of paper documents.

The processes are implemented by different systems. Only employees pre-designated by Gamax Ltd. are authorised to access the copy system. Unauthorised persons may not legally access the system.

5.1 Copy making process

In the copy system, we distinguish between two user roles for copy creation:

- scanning role: digitilazing paper documents;
- authentication role: ensuring image compliance, authenticating electronic copies.

The document processing process, including scanning and authentication tasks, can be performed by the same or different people.

The copy system logs user and regular events.

When making electronic copies of paper documents, an employee pre-designated by Gamax Ltd. will follow the steps described in this section.

5.1.1 Digitalization

The scanning user, after logging into the copy system, digitalizes the documents in batches. When scanning, the user splits the scanned batch into documents in the copy-processing system. Depending on the type of document, digitalization can be done in either 24 bit colour or 1 bit colour depth (black and white) alternately per page. All pages of the documents, except blank pages, are digitalized, regardless of the size of the pages. The images on the scanned pages are automatically rotated in the reading direction and resized.

5.1.2 PDF production

After scanning, an automatic server-side process converts the scanned documents into PDF format. The PDF file produced is compliant with ISO 32000-1.

5.1.3 Authentication

After conversion to PDF, the scanned documents are sent to the authentication module of the copy creation system. The authenticating user logs into the authentication module of the copy authoring system. The user who authenticates the electronic copy is not necessarily the same person who physically digitised the

documents. Only users who have been authorised by the system administrators are entitled to use the module.

After logging in, the copy clerk selects the bundle of documents to be authenticated from the list displayed. The user is presented with the original paper documents of the opened digitised batch.

The authentication module of the copy system automatically opens the first document to be authenticated and displays its first page. This is done with a secure viewer, i.e. any malicious changes made to the original file after the viewer has been created will not be reflected in the electronic document that is displayed and subsequently authenticated.

The authenticating user verifies that the original paper document and the electronic copy are in order. In all cases, image conformity is determined on a document-by-document and page-by-page basis, and no automatic copying is performed.

If there is compliance, the document must be certified. The authentication module of the copy-editing system automatically generates the authentication clause based on the parameters set in the system and the data and metadata of the current document, and then attaches the authentication clause to the PDF file as a document-level attachment.

The PDF file with the authentication clause is sent to the authentication server via an encrypted data connection. Use of the authentication server is subject to authentication. Upon successful authentication, the authentication server will provide the file with a qualified organisation stamp and a timestamp from a qualified service provider.

The produced, now certified electronic copy is inserted into the copy system database. After the successful authentication, the authenticated version of the given document, together with the authentication clause, which contains the metadata specified in Government Decree 451/2016 (XII. 19.), can be viewed in the authentication module of the copy creation system.

If the authentication user detects a discrepancy between the electronic copy and the paper (original) document, the digitized file must be corrected, which may include the orientation, quality, completeness and, if necessary, deletion of content that is irrelevant to the legal effect (blank page), to the extent that this does not affect the conformity of the content. In the event that the discrepancy is detected after the authentication, i.e. when the electronic copy which is supposed to be legally effective has already been made, the authorised user shall initiate the deletion of the authenticated electronic copy and restart the electronic copy process for the paper document concerned, using the functionality provided by the system.

If the document requires correction with repeated scanning (e.g. missing page, scanned image not readable, page scanned for wrong document), the document will be rejected. The rejected document will be sent to the error handling module of the copy system.

Once all the documents in the batch have been authenticated or rejected, the batch is closed and archived.

Each document is treated as a separate entity, i.e. the authentication clause, signature and timestamp are embedded in the PDF file of each certified electronic copy separately, file by file.

5.1.4 Rescanning in the error handling module

Only those documents that have been instructed by the authenticating user to be repaired by scanning are sent to the error handling module of the copy system. The scanning user can rescan either the entire document or only the pages that were marked as defective during the validation process, as described in the Digitalization section. After scanning, the modified document is again passed through the processing procedure (PDF generation, validation).

5.1.5 Upload to archive

As the final step in the copy process, the authenticated documents are sent to the closed, high-reliability document management archive.

After successful transmission and archiving, transitory documents and related files and data that are no longer needed are deleted from the copy system.

5.2 Destruction of original paper documents

Certified electronic copies made under this regulatory document have the same legal effects as the original paper document. Where the retention of the original paper copy of a particular type of document is not required by law, regulation or internal regulatory document, the original paper documents may be destroyed after the copies have been made.

Destruction dates may vary according to the type of document, which Gamax Ltd. determines at its own discretion.

5.3 Checking the authenticity of copies

The authenticity of electronic copies can be easily checked by the authorities using the free downloadable Adobe Reader. The PDF files contain all the information needed for verification embedded. Both the certificate used for the signature and the time stamp can be traced back to the master certificates in the EU Trusted Lists, which are automatically downloaded by Adobe Reader versions 11 or later.

The authentication clause and metadata are included in the text file attached to each authentic PDF file.

6 Procedural conditions

The persons entrusted or authorised to make copies are defined in a separate internal instruction.

The detailed responsibilities of the person(s) authorised to make copies are set out in a job description.

7 Responsibility

All persons involved in the copying process are liable for their actions in accordance with the applicable legal provisions (Civil Code, Labour Code). Separate roles ensure that responsibility is shared when making certified copies.

8 Regulatory compliance

- 451/2016 (XII. 19.) Korm. decree on the detailed rules of electronic administration;
- 1/2018 (VI.29.) ITM Decree on the rules of digital archiving;
- Regulation 910/2014/EU on electronic identification and trust services for electronic transactions in the internal market (eIDAS Regulation);
- Act CCXXII of 2015 on the general rules of electronic administration and trust services.