

## PRIVACY NOTICE

regarding the data processing related to the hospitality services of HILDA Restaurant  
Effective from: April 1, 2025

### I. INTRODUCTION

The purpose of this Privacy Notice (hereinafter referred to as: *Notice*) is to provide clear and comprehensive information about the data processing practices of NádorCity Kft., as the data controller (hereinafter referred to as: *Data Controller*), in connection with the hospitality services provided by the HILDA Restaurant.

This Notice has been prepared in accordance with the General Data Protection Regulation of the European Union — Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (hereinafter: *GDPR*) — as well as other applicable data protection laws.

Its aim is to explain, in an understandable and transparent manner:

- the scope of the data processing activities,
- the purpose of processing,
- the sources of data,
- the categories of personal data processed,
- the legal bases and duration of processing,
- the rights of data subjects,
- available legal remedies,
- and the contact details of the Data Controller, through which data subjects may request information or exercise their rights.

This Notice applies to the data processing related to the hospitality services provided by the HILDA Restaurant operated by the Data Controller at 1051 Budapest, Nádor Street 5. (hereinafter: *Restaurant*), including services provided in person, via the website, or on social media platforms (Facebook, Instagram). It addresses customers, guests, users and visitors of the Restaurant's platforms (hereinafter collectively referred to as: *Clients* or *You*).

The Data Controller acknowledges the content of this Notice as binding and undertakes to ensure that all data processing activities relating to its Services are in full compliance with this Notice and the applicable data protection legislation.

The Privacy Notice is continuously available on the Restaurant's website ([www.hildapest.hu](http://www.hildapest.hu)). The Data Controller reserves the right to amend the Notice at any time. In such cases, data subjects will be informed in due time and the updated version will be published on the website.

### II. DATA CONTROLLER – IDENTIFICATION AND CONTACT DETAILS

**Company name:** NádorCity Limited Liability Company

**Short name:** NádorCity Kft.

**Registered seat:** H-1051 Budapest, Nádor utca 5., Hungary

**Company registration number:** Cg. 01-09-205909

**Registering authority:** Company Registry Court of the Budapest-Capital Regional Court

**Tax number:** 12836556-2-41

**Legal representative:** Ágnes Szalai, Managing Director entitled to represent the company individually

**Email address:** [szalai\\_a@yahoo.com](mailto:szalai_a@yahoo.com)

**Phone number:** +36 20 223 9722

### III. GENERAL PROVISIONS

#### 1. Definitions

The following key terms used in this Privacy Notice shall have the meanings set forth below, in line with the definitions provided by the GDPR:

**1.1 "Processing":** any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**1.2 "Data subject":** an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**1.3 "Personal data":** any information relating to an identified or identifiable natural person ("data subject").

**1.4 "Special categories of personal data":** personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**1.5 "Data concerning health":** personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.

**1.6 "Profiling":** any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

**1.7 "Controller":** the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

**1.8 "Processor":** a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**1.9 "Recipient":** a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

**1.10 "Third party":** a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

**1.11 "Data transfer":** making personal data available to a specific third party.

**1.12 "Data subject's consent":** any freely given, specific, informed and unambiguous indication

## **2. Principles Relating to the Processing of Personal Data**

**2.1** Personal data shall be:

- a) **processed lawfully, fairly and in a transparent manner** in relation to the data subject (*lawfulness, fairness and transparency*);
- b) **collected for specified, explicit and legitimate purposes** and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1) GDPR, not be considered incompatible with the initial purposes (*purpose limitation*);
- c) **adequate, relevant and limited to what is necessary** in relation to the purposes for which they are processed (*data minimisation*);
- d) **accurate and, where necessary, kept up to date**; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (*accuracy*);
- e) **kept in a form which permits identification of data subjects for no longer than is necessary** for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) GDPR, subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject (*storage limitation*);
- f) **processed in a manner that ensures appropriate security of the personal data**, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (*integrity and confidentiality*).

**2.2** The Controller shall be responsible for, and be able to demonstrate compliance with, the provisions set out in Section 2.1 (*accountability*).

## **3. Legal Framework**

In the preparation of this Privacy Notice, the following legal instruments — among others — have been taken into account:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (*General Data Protection Regulation – GDPR*);

- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (*Infotv.*);
- Act C of 2000 on Accounting (*Sztv.*);
- Act CXXVII of 2007 on Value Added Tax (*Áfa tv.*);
- Act CLV of 1997 on Consumer Protection (*Fgy.tv.*);
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (*Grtv.*);
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (*Ektv.*).

#### IV. INFORMATION ON INDIVIDUAL DATA PROCESSING ACTIVITIES

##### 1. Data Processing Related to Online Table Reservations

###### **Description of the processing activity:**

Clients may reserve a table at our Restaurant via the online reservation system (DISH Reservation) available on our website ([www.hildapest.hu](http://www.hildapest.hu)). Based on the online reservations submitted by Clients, we process personal data that are necessary for a valid reservation (mandatory data), as well as any additional data voluntarily provided by the Client (optional data).

###### **Source of personal data:**

Personal data are provided directly by the Client initiating the reservation through the online system. The data are transmitted to the Restaurant by the third-party service provider operating the reservation platform, DISH Digital Solutions GmbH.

###### **Data subject:**

The natural person who initiates the reservation in their own name and provides their personal data in the course of doing so, including any other natural person (e.g. guest) whose personal data the initiating person provides (e.g. dietary restrictions or allergies).

In the case of legal entities or other organizations without legal personality, the data subject is the natural person acting on their behalf or as a contact person.

If the person making the reservation provides the personal data of third-party guests (e.g. concerning allergies), they are responsible for ensuring that the concerned individual has been informed of this Privacy Notice and has consented to the processing of their data.

###### **Categories of personal data processed:**

- **Mandatory data:** surname, first name, e-mail address, telephone number, data relating to the reservation (date, time, number of guests).
- **Optional data:** purpose of visit; any additional information provided by the Client as a message via the reservation interface (e.g. dietary restrictions, nature of allergy, health-related data, seating preferences, name and address of company/institution making the reservation).

###### **Purpose of data processing:**

The purpose of processing is to fulfil the Client's request by providing a valid reservation and enabling

the use of the Restaurant’s services, including the identification of the Client and maintaining contact. Mandatory data are essential to secure a reservation for the requested time and party size, to place the reservation on a waitlist if needed, and to communicate with the Client regarding the reservation and any related services (e.g. consumption), including confirmation and reservation details. Optional data serve to enhance the Client's safety (e.g. food allergies) and to personalise, optimise, and improve the quality of the service.

**Consequences of failure to provide data:**

Failure to provide the mandatory data will result in the inability to create a valid reservation. Failure to provide optional data means that specific preferences or individual needs related to the reservation cannot be taken into account.

**Legal basis of processing:**

The processing of mandatory data is necessary for the performance of a contract to which the data subject is party or in order to take steps at the data subject’s request prior to entering into a contract (Article 6(1)(b) GDPR).

In the case of health-related data (e.g. food allergies, medical conditions), which are special categories of personal data, the legal basis is the data subject’s explicit consent (Article 9(2)(a) GDPR).

**Duration of data processing:**

In the case of invalid (non-completed) reservations, the provided personal data will be deleted without undue delay.

For valid reservations, the data shall be retained during the term of the contractual relationship and for the period during which legal claims may be enforced, but at least for 5 (five) years following the termination of the contract (general limitation period).

Where the processing is based on the data subject’s consent, the data will be processed until the consent is withdrawn, provided that no other legal basis for processing exists.

Withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

**Processor:**

In the context of confirming reservations via email, the service provider operating our email system may access (i.e. process) the relevant personal data:

| Name       | Registered seat  | Role in data processing             |
|------------|--|-------------------------------------|
| Google LLC | 1600 Amphitheatre Parkway,<br>Mountain View, CA 94043, USA | Provision of email account services |

**3. Data Processing Related to Payment of Deposit**

**Description of the processing activity:**

In the event that, based on an agreement with the Client, a deposit is required to validate a table reservation and/or in connection with the provision of further services, and such deposit is paid via bank transfer from the personal bank account of a natural person, the processing of certain personal data related to the transaction is necessary and unavoidable.

**Source of personal data:**

The personal data are provided to the Controller by the individual whose bank account is used to transfer the deposit, at the time of the transaction.

**Data subject:**

The natural person from whose bank account the deposit payment is made by bank transfer.

**Categories of personal data processed:**

- surname and first name of the transferring person,
- bank account number,
- transaction-related data such as reference number, address of the payer,
- any additional data voluntarily provided in the payment reference field (e.g. reservation details, name and data of the company/institution/organisation requesting the reservation).

**Purpose of data processing:**

The purpose of processing is to identify the Client who is required to pay the deposit, to verify the completion of the payment, and thereby to ensure the fulfilment of the reservation and/or access to additional services provided by the Restaurant.

**Consequences of failure to provide data:**

Failure to provide the required data (i.e. to make the deposit payment) will result in the inability to secure a valid reservation and/or to access further services.

**Legal basis of processing:**

Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the data subject's request prior to entering into a contract (Article 6(1)(b) GDPR).

**Duration of data processing:**

Personal data shall be retained during the term of the contractual relationship and for the period during which legal claims may be enforced in connection with said contract, but at least for 5 (five) years following the termination of the contract (general limitation period).

**4. Data Processing Related to Invoice Issuance****Description of the processing activity:**

Following the provision of our Services, we issue invoices (accounting documents) to Clients in accordance with applicable tax and accounting legislation. Where the Client is a private individual (natural person), the issuance of such an invoice necessarily involves the processing of personal data in order to comply with our legal obligations under tax and accounting laws.

**Source of personal data:**

Personal data are provided by the private individual Client who requests the invoice and in whose name the invoice is issued, in accordance with legal requirements.

**Data subject:**

The natural person Client who uses our Services and in whose name the invoice is issued.

**Categories of personal data processed:**

- full name,

- residential address (or registered seat for sole proprietors),
- tax identification number (if applicable),
- tax status (e.g. sole proprietor),
- other invoice-related data required by law: place and date of performance, amount due, VAT amount, total payable amount.

**Purpose of data processing:**

The purpose of processing is to document the performance of our Services as an economic transaction, to support our accounting records, and to fulfil our obligations under applicable tax and accounting laws.

**Consequences of failure to provide data:**

Failure to provide the required data will result in the inability to issue a personalised invoice to the private individual Client, which — except in cases where exemption from invoicing is permitted under the VAT Act — prevents the Client from using our Services (placing an order or making a purchase).

**Legal basis of processing:**

Processing is necessary for compliance with a legal obligation to which the Controller is subject (Article 6(1)(c) GDPR), based on Sections 166 and 167 of Act C of 2000 on Accounting (Sztv.), and Sections 159 and 169 of Act CXXVII of 2007 on Value Added Tax (VAT Act).

**Duration of data processing:**

Personal data shall be stored for 8 (eight) years from the date of invoice issuance, in accordance with the retention obligations set forth in Sections 166(6) and 169(2) of the Accounting Act.

**Processors:**

The following entities may access personal data as data processors for the purposes of providing invoicing and accounting services:

| <b>Name</b>                 | <b>Registered seat</b>                 | <b>Role in data processing</b>    |
|-----------------------------|--|-----------------------------------|
| KBOSS.hu Kft. (Számlázz.hu) | H-1031 Budapest,<br>Záhony u. 7.       | Operation of invoicing software   |
| DR Accounting Kft.          | H-2230 Gyömrő,<br>Zichy utca 1/A. A/1. | Provision of bookkeeping services |

**5. Data Processing Related to Contact Initiation**

**Description of the processing activity:**

Any individual may contact us through the phone number or email address published on our website ([www.hildapest.hu](http://www.hildapest.hu)) to submit inquiries, comments, or other messages. In the course of such contact, we process certain personal data of the natural person who initiates communication with us.

**Source of personal data:**

Contact is initiated voluntarily by the individual, who provides their personal data during the phone call or in the email message.

**Data subject:**

The natural person who contacts us via phone call or sends an email message.

**Categories of personal data processed:**

- name,
- address,
- e-mail address,
- telephone number,
- any data relating to the purpose, subject matter, and content of the contact initiated.

**Purpose of data processing:**

To identify the person initiating contact, to enable telephone and/or email communication, and to respond to, address, or handle the inquiry, comment, or request submitted.

**Consequences of failure to provide data:**

Failure to provide the necessary data may result in the inability to establish contact through the intended channel or in an unsuccessful communication attempt.

**Legal basis of processing:**

The data subject’s voluntary consent provided at the time of contact (Article 6(1)(a) GDPR).

**Duration of data processing:**

Personal data shall be processed until the consent is withdrawn, provided that no other legal basis for the processing exists. Consent may be withdrawn at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

**Processor:**

In the case of email-based communication, the service provider operating our email account may have access to the processed personal data:

| Name       | Registered seat  | Role in data processing             |
|------------|--|-------------------------------------|
| Google LLC | 1600 Amphitheatre Parkway,<br>Mountain View, CA 94043, USA | Provision of email account services |

**6. Data Processing Related to Complaint Handling**

**Description of the processing activity:**

In accordance with applicable legislation, Clients qualifying as consumers have the right to submit a complaint concerning our Services. Complaints may be submitted via telephone or in writing (including by electronic message), during which the consumer provides certain personal data.

We examine each complaint, take immediate action if necessary, and respond in writing within the applicable time limit.

In the case of verbal complaints received by phone, if the issue cannot be resolved immediately, we draw up a written record (with a unique reference number) and proceed as in the case of written complaints.



**Source of personal data:**

Personal data are provided by the consumer (natural person) Client during the submission of the complaint.

**Data subject:**

The natural person who, in their capacity as a consumer, submits a complaint related to our Services.

**Categories of personal data processed:**

- **For written complaints:** name, address, e-mail address, telephone number, method, location and date of complaint submission, subject and content of the complaint, data related to documents, attachments or evidence submitted by the consumer, essential information related to the service, response to the complaint.
- **For verbal complaints:** name, address, e-mail address, telephone number, method, location and date of complaint submission, subject and content of the complaint (including data relating to any evidence), our position in relation to the complaint if it is resolved immediately, and if a written record is prepared: unique reference number of the complaint, place and date of the record, content of the record, name and signature of the person who prepared the record, essential information related to the service, response to the complaint.

**Purpose of data processing:**

To receive, investigate, and respond to consumer complaints concerning our Services; to ensure communication with the complainant; and to provide evidence in the course of any authority proceedings (e.g. inspections) related to the complaint.

**Consequences of failure to provide data:**

Failure to provide the necessary data may prevent the consumer Client from exercising their rights granted by law in connection with submitting a complaint, and may render the receipt, investigation or resolution of the complaint impossible.

**Legal basis of processing:**

Processing is necessary for compliance with a legal obligation to which the Controller is subject (Article 6(1)(c) GDPR), based on Sections 17/A (2)–(9) of Act CLV of 1997 on Consumer Protection (*Fgy.tv.*).

**Duration of data processing:**

In accordance with Section 17/A (7) of the Consumer Protection Act, personal data shall be retained for 3 (three) years following the resolution of the complaint.

**Processor:**

In the case of complaints submitted by email, the service provider operating our email account may access the relevant personal data:

| Name       | Registered seat  | Role in data processing             |
|------------|--|-------------------------------------|
| Google LLC | 1600 Amphitheatre Parkway,<br>Mountain View, CA 94043, USA | Provision of email account services |

## **7. Data Processing Related to Direct Marketing Communications (Newsletters)**

### **Description of the processing activity:**

Clients have the option to subscribe to our newsletter by explicitly opting in via the checkbox titled “I would like to receive exclusive offers from HILDA food and mood via email” available in the user interface of the online reservation system, or independently by sending a direct email request. By doing so, the Client gives explicit consent to receive promotional newsletters and/or exclusive offers (hereinafter: *direct marketing communications*) to the email address provided.

The data subject may withdraw their consent at any time, without justification and free of charge, via the contact details set out in Section II of this Privacy Notice (by email or post), and may also request the rectification or erasure of their personal data.

### **Source of personal data:**

Personal data are provided either during the online reservation process or separately via email by the natural person Client subscribing to direct marketing communications, or by a natural person acting as a representative/contact person on behalf of a legal entity or an unincorporated organisation.

### **Data subject:**

The natural person receiving direct marketing communications, or, in the case of legal entities or unincorporated organisations, the natural person acting as their representative/contact person.

### **Categories of personal data processed:**

- email address,
- name,
- data relating to the provision or withdrawal of consent to receive direct marketing communications,
- technical/log data related to the delivery and opening of direct marketing emails (e.g. date and time of opening, IP address, etc.)

### **Purpose of data processing:**

To identify Clients who have subscribed to direct marketing communications, to send them newsletters and exclusive promotional offers, and to enable communication with them for such purposes.

### **Consequences of failure to provide data:**

Failure to provide the necessary data results in the Client not receiving newsletters or promotional offers from us.

### **Legal basis of processing:**

The data subject’s voluntary consent, pursuant to Article 6(1)(a) of the GDPR and Section 6(1) of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (*Gr.t.*).

### **Duration of data processing:**

Personal data shall be processed until the consent is withdrawn, provided there is no other legal basis for the processing. Consent may be withdrawn at any time without affecting the lawfulness of processing based on consent before its withdrawal.

**Processor:**

In relation to sending newsletters and promotional offers, the service provider operating the email account used for such communications may have access to the processed personal data:

| Name                    | Registered seat                                 | Role in data processing               |
|-------------------------|---|---------------------------------------|
| Intuit Inc. (Mailchimp) | 2700 Coast Avenue, Mountain View, CA 94043, USA | Provision of email marketing services |

**8. Data Processing Related to Server Logging on hildapest.hu****Description of the processing activity:**

When a Client visits and uses our website ([www.hildapest.hu](http://www.hildapest.hu)), the web server automatically logs user activity related to the visit. The logged data and statistical analyses thereof may allow for the identification of the user's device (e.g. computer), but are not, by themselves, sufficient to individually identify the user. These data are used strictly on an anonymised basis and are not linked to any other data provided by Clients. We do not draw conclusions regarding the user's identity, nor do we perform profiling or apply behaviour-based advertising based on this data.

**Categories of personal data processed:**

IP address, country, browser used, device and operating system type and version, language settings, date and time of visit, and site usage data.

**Purpose of data processing:**

To ensure and monitor the functionality of the website, enable retrospective error detection, and prevent misuse (such as unlawful use or content).

**Legal basis of processing:**

The legal basis for processing is the legitimate interest of the Controller in accordance with Article 6(1)(f) GDPR, as the Controller has a legitimate interest in ensuring the proper functioning of the website, detecting misuse, and enabling error tracing. The legal basis is further supported by Section 13/A(3) of Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (*Ektv.*).

**Duration of data processing:**

Personal data will be retained for a maximum period of 30 (thirty) days.

**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 cases, the Controller may no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or which are necessary for the establishment, exercise or defence of legal claims.

**Data processing by third-party service providers through embedded content:**

The website contains external embedded references (e.g. HTML code from third-party servers, such as Google). These third-party providers establish a direct connection with the user's browser and device, allowing them to collect user data independently, such as IP address, browser type, operating system, mouse movement, visited page URL, and time of access.

While this data, such as IP addresses, may allow for geolocation or user identification when combined

with other data, such data processing is the sole responsibility of the respective third-party providers. We disclaim all responsibility for their data processing and data protection practices.

**Processor:**

The following IT service provider, which operates the web server, may access the relevant personal data:

| Name                          | Registered seat                     | Role in data processing                |
|-------------------------------|-------------------------------------|--|
| Next Generation Solution Kft. | H-2040 Budaörs, Ébner György köz 4. | Operation of web server infrastructure |

### 9. Data Processing Related to Social Media Platforms

**Description of the processing activity:**

Our Restaurant maintains a presence on social media platforms, including Facebook (<https://www.facebook.com/hildapest>) and Instagram (<https://www.instagram.com/hildapest>). On these platforms, we publish content and advertisements. Clients and users may post comments or messages, interact with our content (e.g. by “liking” posts), or otherwise express their views related to our page. In doing so, certain publicly available personal data associated with the user's profile may become accessible to us.

Data processing related to our Facebook and Instagram pages is carried out as *joint controllership* with Meta Platforms Ireland Ltd. (Merrion Road, Dublin, D04 X2K5, Ireland, Company No. 462932), the service provider of the aforementioned platforms.

The joint controllership agreement is available at:

[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)

Detailed information regarding data processing by the social media providers in connection with the use of the platforms is available at:

- Facebook: <https://hu-hu.facebook.com/business/gdpr>
- Instagram: <https://privacycenter.instagram.com>

**Categories of personal data processed by us:**

- profile name of the individual posting or commenting,
- any personal data disclosed in the comment, post or reaction.

**Purpose of data processing:**

To manage and moderate comments, posts, and reactions (e.g. "likes") made by users on our social media pages, and to respond to such interactions when appropriate.

**Legal basis of processing:**

The data subject's voluntary consent pursuant to Article 6(1)(a) of the GDPR.

**Consequences of failure to provide data:**

Failure to provide the relevant data will result in the inability to post, comment, or react (e.g. “like”) on our social media pages.

**Duration of data processing:**

Personal data will be processed until consent is withdrawn, which may occur by deleting the relevant comment, post, or reaction (e.g. "like"). If no other legal basis exists, the data will no longer be processed after the withdrawal. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

**V. PROFILING AND AUTOMATED DECISION-MAKING**

In the course of the data processing activities detailed in Section IV of this Privacy Notice, the Controller does not engage in profiling based on the collected, processed or stored personal data, nor does it perform automated decision-making in individual cases as defined under Article 22 of the GDPR.

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**VI. RECIPIENTS OF PERSONAL DATA AND DATA DISCLOSURES**

Access to personal data processed by the Controller is granted solely to those individuals whose duties require such access in order to perform their tasks.

The personal data processed by the Controller may be accessed by the data processors and their authorised personnel, as specified for each data processing activity in Section IV of this Privacy Notice.

The Controller does not transfer personal data to any third party in the course of the data processing activities detailed in Section IV.

This does not affect the obligation of the Controller to comply with requests from courts, public prosecutors, investigating authorities, administrative or regulatory bodies, the National Authority for Data Protection and Freedom of Information (NAIH), or other entities authorised by law to request information, disclosure of data or submission of documents. In such cases, the Controller shall disclose the requested data within the limits set by applicable law.

Data shall only be disclosed to such authorities to the extent strictly necessary to achieve the specific purpose indicated in the official request, and only if the scope and legal basis of the request is clearly defined.

Third parties receiving personal data under such legal obligations shall act as separate data controllers with regard to the processing they carry out. The Controller disclaims all responsibility for such third-party processing, which is governed by their respective privacy policies.

**VIII. DATA STORAGE AND DATA SECURITY**

The Controller stores and processes personal data in full compliance with all applicable data protection legislation in force at the time.

All electronic and paper-based data management systems used or operated by the Controller in the course of processing and maintaining personal data are accessible only to authorised persons.

The Controller takes all necessary measures and has implemented all essential technical, organisational, and procedural safeguards to mitigate potential risks and to prevent the unlawful disclosure, unauthorised transfer, access, alteration, or destruction of personal data.

Access to personal data is strictly limited to the Controller and its employees, as well as to data processors and their employees acting on the Controller's behalf, to the extent required for the

performance of their tasks. No personal data will be disclosed to third parties not authorised to access such data.

Accordingly, the integrity and confidentiality of the processed personal data are fully ensured by the Controller.

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## **VII. RIGHTS OF THE DATA SUBJECTS**

### **1. Right of Access**

The data subject has the right to request confirmation from the Controller as to whether or not personal data concerning them are being processed, and, where that is the case, to access the following information:

- the purposes and legal basis of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- the envisaged period for which the personal data will be stored;
- the existence of the right to request rectification or erasure of personal data or restriction of processing, or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- the source of the personal data, where it was not collected directly from the data subject;
- the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;
- any further information relating to the processing of personal data.

The Controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs.

If the data subject submits the request electronically, the information shall be provided in a commonly used electronic format, unless otherwise requested by the data subject.

To ensure compliance with data security requirements and to protect the rights of the data subject, the Controller shall verify the identity of the person making the access request before disclosing any information. Consequently, access to, review of, or provision of copies of the personal data is conditional on successful identification of the data subject.

### **2. Right to Rectification**

The data subject has the right to obtain from the Controller, without undue delay, the rectification of inaccurate personal data concerning them. Taking into account the purposes of the processing, the data subject also has the right to have incomplete personal data completed, including by means of

providing a supplementary statement.

Where the data subject can credibly demonstrate the accuracy of the rectified data, the Controller shall comply with the request within no more than one (1) month and shall notify the data subject of the rectification using the contact details provided.

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### **3. Right to Restriction of Processing**

The data subject has the right to obtain restriction of processing from the Controller, with clear labelling and separation of the restricted data, where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data;
- the processing is unlawful, and the data subject opposes the erasure of the personal 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 processing pursuant to Article 21(1) GDPR pending the verification of whether the legitimate grounds of the Controller override those of the data subject.

Where processing has been restricted on the above grounds, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.

The Controller shall inform the data subject in advance before lifting any such restriction.

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### **4. 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 personal data concerning them based on Article 6(1)(e) or (f) GDPR, including profiling based on those provisions.

In such cases, the Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject or that relate to the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the data subject has the right to object at any time to the processing of personal data concerning them for such purposes, which includes profiling to the extent that it is related to such direct marketing.

If the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

If the processing for direct marketing purposes is based on the data subject's consent, the withdrawal of such consent has the same effect as exercising the right to object.

## 5. Right to Erasure (“Right to be Forgotten”)

The data subject has the right to obtain from the Controller the erasure of personal data concerning them without undue delay, and the Controller is obliged to erase such personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws the consent on which the processing is based and there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data must be erased for compliance with a legal obligation under Union or Member State law to which the Controller is subject;
- the personal data have been collected in relation to the offer of information society services referred to in Article 8(1) GDPR.

The right to erasure does not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation requiring processing under Union or Member State law or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
- for the establishment, exercise or defence of legal claims.

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## 6. Right to Withdraw Consent

The data subject has the right to withdraw their consent at any time.

The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

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## 7. Right to Data Portability

The data subject has the right to receive the personal data concerning them, which they have provided to a Controller, in a structured, commonly used and machine-readable format, and has the right to transmit those data to another controller without hindrance from the Controller to which the personal data have been provided, where:

- the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) GDPR, or on a contract pursuant to Article 6(1)(b) GDPR; and



- the processing is carried out by automated means.
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## **8. Rights Related to Automated Individual Decision-Making, Including Profiling**

The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

This shall not apply if the decision:

- is necessary for entering into, or the performance of, a contract between the data subject and the Controller;
- is authorised by Union or Member State law to which the Controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- is based on the data subject's explicit consent.

## **9. Procedural Rules**

The data subject may exercise their rights as described in this Privacy Notice by submitting a written request to the Controller via the contact details specified in Section II.

The Controller shall respond to the request of the data subject within one (1) month of receipt. If the request was submitted electronically, the response will also be provided electronically unless the data subject requests otherwise.

Where necessary—considering the complexity and number of requests—the Controller may extend the response deadline by a further two (2) months. The data subject shall be informed of the extension and the reasons for the delay within one (1) month of receipt of the request.

The Controller shall provide one (1) copy of the personal data undergoing processing free of charge. For any additional copies requested, the Controller may charge a reasonable fee based on administrative costs.

To ensure data security and protect the rights of the data subject, the Controller is obliged to verify the identity of the individual submitting the request before fulfilling it. Accordingly, access to data, the issuance of information, and the provision of copies shall be subject to the identification of the data subject.

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## **10. Right to Legal Remedies**

If the data subject considers that the Controller has infringed data protection legislation in the course of processing their personal data, they have the right to:

- **Lodge a complaint** with the **Hungarian National Authority for Data Protection and Freedom of Information (NAIH)**

Address: 1055 Budapest, Falk Miksa utca 9-11.

Mailing address: 1363 Budapest, Pf. 9.

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: [www.naih.hu](http://www.naih.hu)

- **Initiate court proceedings:**

The data subject may bring a case before the competent court. Such proceedings shall be conducted in an expedited manner. The lawsuit may be filed with the regional court (törvényszék) of the data subject's place of residence or habitual abode, or that of the Controller's registered seat.

The court competent according to the data subject's place of residence or habitual abode can be identified at: <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>

Based on the Controller's registered seat, the **Budapest-Capital Regional Court (Fővárosi Törvényszék)** shall have jurisdiction.