

## General provisions

### Purpose of the Information

The purpose of this information is to provide details on data processing by Alelí Budapest Dani Garcia Restaurant to its guests and associated Partners.

### Data controller details

Data controller name: Dorottya Étteremüzemeltető Corp.

Data controller address: 1012 Budapest, Várfook Street 12, 1st floor, door 3

Data controller email address: info@aleli.hu

### Principles of data processing

The data processing of Dorottya Étteremüzemeltető Corp. is designed to always comply with the principles laid down in applicable laws, and this should also be considered when modifying this information in the future. We guarantee the realization of the following principles during data processing:

#### **Legality, fairness, and transparency**

Personal data must be processed lawfully, fairly, and in a transparent manner in relation to the data subject.

#### **Necessity and proportionality**

A fundamental right can only be restricted as necessary and proportionally. Necessity means that data processing is absolutely essential to achieve the purpose of data processing. Proportionality defines the limits of this necessity by ensuring that the restriction of fundamental rights and freedoms necessary for data processing must also be proportional to the goal. The Fundamental Law states that a fundamental right may be restricted in favor of the realization of another fundamental right or the protection of a constitutional value, to the extent strictly necessary, proportionately to the intended goal, and with respect for the essential content of the fundamental right.

#### **Purpose limitation**

The collection of personal data should only be carried out for specified, explicit, and lawful purposes, and should not be handled in a way that is incompatible with those purposes; according to Article 89(1), further processing for archiving purposes in the public interest, for scientific and historical research purposes or statistical purposes shall not be considered incompatible with the initial purposes.

#### **Dataminimization**

Personal data must be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

#### **Accuracy**

Personal data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate for the purposes of the processing are erased or rectified without delay.

### **Storage limitation**

Personal data should be stored 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) of the GDPR, subject to implementation of the appropriate technical and organizational measures required by the regulation in order to safeguard the rights and freedoms of the data subject.

### **Integrity and confidentiality**

Personal data must be processed in a way that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

#### **Accountability**

The data controller is responsible for compliance with the data protection rules, and must be able to demonstrate this compliance.

## **Legal basis for data processing**

In designing our data processing operations, we always ensure that the processing complies with the principle of legality in accordance with section I.6.1. Our data processing is carried out based on the following legal bases, taking into account the detailed rules:

### **Consent**

The data subject has given consent to the processing of his or her personal data for one or more specific purposes. It is important that the consent is given voluntarily and that the consent is performed through an active act by the consenting party.

### **Performance of a contract**

The data processing is necessary for the performance of a contract to which the data subject is a party, or to take steps at the request of the data subject prior to entering into a contract.

### **Legal obligation**

The data processing is necessary for compliance with a legal obligation to which the controller is subject. We only process data based on legal obligation when there is a legal requirement. We do not apply legal obligation as a legal basis for data processing when legislation prescribes conditional data processing.

### **Vital interests**

The data processing is necessary to protect the vital interests of the data subject or another natural person. An important factor in choosing this legal basis is that data processing based on vital interests is temporary and can only last for the duration of those vital interests. The procedures for data handling after the cessation of vital interests are separately regulated.

### **Public interest or public authority**

In this case, the data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Our company does not qualify as a public authority and does not perform data processing in the public interest, therefore we do not use this legal basis for data processing.

### **Legitimate interests**

The data processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, especially if the data subject is a child. We often perform data processing based on this legal basis. In cases of data processing based on legitimate interests, an interest balancing test must always be carried out to examine the proportionality and necessity of the impact and limitations on the data subject's fundamental rights and freedoms.

## Rights of the data subjects

We have designed our data processing so that the rights of the data subjects are not violated and can always be exercised within the limits of the GDPR and applicable laws. Data subjects are entitled to the following rights:

### **Right to information**

The data controller must provide clear, easily accessible information in simple language about the essential aspects of data processing (what, for what purpose, how, and for how long the data is used, etc.) – and the GDPR precisely defines the scope of necessary information. The information must be provided before the collection of personal data whenever possible. If this is not feasible – for instance, if the data is acquired from a third party – it must be provided at the first possible opportunity. The right to information is regulated by Articles 13-14 of the GDPR. We discuss the information of the data subject in a separate section.

### **Right of access**

The data subject has the right to request information on whether data concerning them is being processed and, if so, which data and under what conditions. The data controller is obligated to provide a copy of the personal data undergoing processing to the data subject at their request, free of charge for the first copy. For any additional copies requested by the data subject, the data controller may charge a reasonable fee based on administrative costs, the current amount of which must be documented in the data processing information. If the data subject has made the request electronically, the information must be provided in a widely used electronic format, unless the data subject requests otherwise. The right to request a copy should not adversely affect the rights and freedoms of others.

### **Right to rectification**

The data subject may inform the data controller that the processed data are inaccurate and request their rectification. The data controller may only refuse to rectify the data in cases defined by law. The data subject has the right to have inaccurate personal data rectified without undue delay upon their request. Considering the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### **Right to erasure ('right to be forgotten')**

The data subject may request the deletion of their data from the database under the conditions and cases specified by law. For example, this can be when the personal data are no longer necessary for the purposes for which they were collected or otherwise processed, or when the data subject withdraws consent and there is no other legal ground for processing. There are situations when the deletion of data must be refused, such as when the law requires the data controller to retain the data (for example, data used for billing must generally be kept for a period of 8 years in accordance with the relevant laws), or it may be refused based on legitimate interest, for instance, for the purpose of proof within the limitation period. Of course, there are many cases where data processing against objections is lawful. As in data protection in general, each case is unique and must be individually assessed to determine if the refusal to delete data is lawful. If any of the reasons

specified by law applies, the data must be deleted without undue delay upon the data subject's request. If the data controller has made the personal data public and is obliged to erase it at the request of the data subject, reasonable steps must be taken, taking into account available technology and the cost of implementation, including technical measures, to ensure the permanent deletion of the data by other data controllers as well. The data controller is obligated to inform other data controllers handling the data that the data subject has requested the deletion of links to such personal data or copies or replications of such personal data. The obligation to delete does not apply and does not need to be fulfilled if data processing is necessary under the conditions defined by law.

### **Right to restriction of processing**

The data subject may request that we restrict the processing of their data (for a specified period) under the conditions and cases defined by law. Data under restriction may only be stored and no other processing is allowed, except under exceptions defined by law. If the restriction is lifted, the data subject must be informed. The data controller must inform the data subject who has requested the restriction, in advance, about the lifting of the restriction on processing.

### **Right to data portability**

The data subject has the right to receive their personal data, which they have provided to a controller, in a structured, commonly used, and machine-readable format (e.g., .doc, .pdf, etc.), and has the right to transmit that data to another controller without hindrance from the controller to which the personal data have been provided. The GDPR facilitates the data subject's situation in transferring their personal data from one controller to another. However, this is only possible if the processing is carried out by automated means and the processing is based on consent under Article 6(1)(a) or Article 9(2)(a), or on a contract under Article 6(1)(b). If the data subject requests and it is technically feasible, the data transmission between controllers must be carried out directly. The right to data portability does not apply if data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The right to data portability should not adversely affect the rights and freedoms of others.

### **Right to object**

The data subject has the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on Article 6(1)(e) or (f), including profiling based on those provisions. In such cases, the personal data must not be further processed unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject, or for the establishment, exercise, or defense of legal claims. In these cases, a balance test must be conducted, and processing can only be continued if the legitimate reasons justify the priority over the aforementioned rights. If personal data are processed for direct marketing purposes, the data subject has the right to object at any time to processing of personal data concerning them for such marketing, 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 must no longer be processed for such purposes. The data subject must be explicitly informed of this right no later than the time of the first communication with them, and the information about their right to object must be presented clearly and separately from other information. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the right to object may be exercised by automated means using technical specifications. If personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject has the right to object, on grounds relating to their particular situation, to processing of personal data concerning them, unless the processing is necessary for the performance of a task carried out for reasons of public interest. If there is a valid objection, the data must not be further processed.

### **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. Such decisions must not be based on special categories of personal data referred to in Article 9(1), unless Article 9(2)(a) or (g) applies and suitable measures to safeguard the data subject's rights, freedoms, and legitimate interests are in place.

## **Data processing by Dorottya Étteremüzemeltető Corp.**

During our company's data management audit, it was revealed that Dorottya Étteremüzemeltető Corp. conducts data processing in the following cases during its operations:

### **Handling the data of individuals requesting information, interested in services, requesting quotes, and seeking preliminary consultations (via email, online, by mail, phone, or in person):**

Dorottya Restaurant Management Corp. processes data in the cases of potential customer inquiries in accordance with the regulations set forth in this section. This point covers both online and offline inquiries, specifically those made in person, by mail, phone, or email.

These inquiries are made in the interest of fulfilling future contracts, thus the legal basis was selected accordingly. Our company also strives to minimize data processing during these activities.

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

Answering questions related to contract fulfillment for potential customers/guests/members, providing quotes as preparation for future contract signings.

#### **Legal basis for data processing:**

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

#### **Categories of data subjects:**

Individuals requesting information, interested in services/membership, requesting quotes.

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

Name, email address, telephone number.

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

Until withdrawal by the data subject.

At the time of product availability.

Until the response to an information request.

Until the acceptance or rejection of a quote, or until the validity of the quote expires.

#### **Obligation to provide personal data and consequences of failure to provide it:**

Providing personal data is not mandatory.

Without a name, we cannot address you.

Without an email address, we cannot notify you by email about product arrivals.

Without an email address, we cannot send you a quote.

Without a telephone number, we cannot call you back and coordinate in person.

#### **Recipients of personal data:**

Email service provider.

#### **Transfer of data to third countries or international organizations:**

The data transferred for this purpose are not transmitted to third countries or international organizations.

**Information about automated decision-making:**

No automated decision-making occurs in the handling of data transferred for this purpose.

## Data Processing Related to Contract Fulfillment

Dorottya Étteremüzemeltető Corp. provides its services based on contracts established between the parties. This section regulates the data processing necessary for fulfilling these contracts. This includes all data processing conducted due to a contractual relationship (whether in written, oral form, or implied by conduct), regardless of whether our company provides or receives services.

**Purpose of data processing:**

Contract conclusion and fulfillment of obligations under the contract, exercising contractual rights.

**Legal basis for data processing:**

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

**Categories of data subjects:**

Natural persons who are contracting parties.

**Categories of personal data:**

Name, address, place and date of birth, mother's name, telephone number, email address, and other data specified in the contract.

**Duration of data processing:**

Until the completion of the contract, or until the contract is terminated for any reason.

**Obligation to provide personal data and consequences of non-provision:**

Yes.

In the absence of the data, the contract cannot be concluded.

**Recipients of personal data:**

Accountant.

Postal and courier services.

Email and SMS service providers.

Other assistants and subcontractors involved in the fulfillment, with prior notification.

**Transfer of data to third countries or international organizations:**

Data transferred for this purpose are not transmitted to third countries or international organizations.

**Information about automated decision-making:**

No automated decision-making takes place in the handling of data transferred for this purpose.

In case of contract termination, with or without fulfillment, the data will continue to be processed based on legitimate interests.

## Invoicing and other accounting data processing

**Purpose of data processing:**

Retention of invoicing and accounting data to fulfill obligations under the accounting law.

**Legal basis for data processing:**

The data controller lawfully processes invoicing and other accounting data based on legal obligations - GDPR Article 6(1)(c): "Processing is necessary for compliance with a legal obligation to which the controller is subject."

Accounting Act of 2000 – Section 169(1) – (6).

**Categories of data subjects:**

Members, others involved in accounting processes (e.g., actual payers).

**Categories of personal data:**

Name, address, other data prescribed by law or requested by the client.

**Duration of data processing:**

As specified by law, typically for a duration of 8 years.

**Obligation to provide personal data and consequences of non-provision:**

Mandatory.

In the absence of data provision, we cannot meet our legal obligations.

**Recipients of personal data:**

Accountant, regulatory authorities, email service provider, postal services.

Our banking service provider is Gránit Bank Ltd., 1095 Budapest, Lechner Ödön fasor 8.

**Transfer of data to third countries or international organizations:**

Data transferred for this purpose are not transmitted to third countries or international organizations.

**Information about automated decision-making:**

No automated decision-making takes place in the handling of data transferred for this purpose.

## Handling of complaint data

**Purpose of data processing:**

To fulfill legal obligations arising from warranty claims, guarantees, and the management of other complaints.

**Legal basis for data processing:**

The data controller legally processes the data under GDPR because it is obligated by law.

Legal Obligation - GDPR Article 6(1)(c): "Processing is necessary for compliance with a legal obligation to which the controller is subject."

Accounting Act of 2000 – Section 17/A (7): "The business must retain the complaint record and a copy of the response for five years and must present it to the regulatory authorities upon request."

The general rules of faulty performance are contained in Chapter XXIV of the Civil Code, but other laws may also regulate this.

**Categories of data subjects:**

Individuals with warranty claims and other complaints.

**Categories of personal data:**

Name, Address, according to the legal obligation, based on Consumer Protection Act of 1997, Section 17/A (5), the complaint record must include: a) the consumer's name and address.

Other data prescribed by law or provided by the complainant may also be processed, about which the complainant will be informed in the complaint management record.

**Duration of data processing:**

As specified by law, typically for a duration of 5 years.

**Obligation to provide personal data and consequences of non-provision:**

Mandatory.

Without the data, we cannot resolve your complaint or fulfill our legal obligations.

**Recipients of personal data:**

Email service provider, postal and courier services, authorities, and courts.

**Transfer of data to third countries or international organizations:**

Data transferred for this purpose are not transmitted to third countries or international organizations.

**Information about automated decision-making:**

No automated decision-making occurs in the handling of data transferred for this purpose.

## Handling of data for job applicants

**Purpose of data processing:**

To advertise job opportunities and fill vacancies.

**Legal basis for data processing:**

The data controller legally processes the necessary data for the preparation of a future contract under GDPR.

GDPR Article 6(1)(b): "Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract."

Categories of Data Subjects:

Job applicants.

**Categories of personal data:**

Name, telephone number, and email address for notifications.

Necessary data according to the conditions advertised in the job application.

Other data voluntarily provided by the applicant beyond the conditions.

**Duration of data processing:**

Until the position is filled, or the job application process is closed, but no longer than 3 months, or until withdrawal by the data subject.

**Recipients of personal data:**

Email service provider.

**Obligation to provide personal data and consequences of non-provision:**

Not mandatory. In the absence of minimum data requested in the job announcement, we cannot evaluate the application; without contact details, we cannot notify you.

Voluntary provision of additional data is not mandatory and does not affect the application.

**Transfer of data to third countries or international organizations:**

Data transferred for this purpose are not transmitted to third countries or international organizations.

**Information about automated decision-making:**

No automated decision-making occurs in the handling of data transferred for this purpose.

## Data processing related to the use of social media platforms

The data controller uses the following social media platforms:

<https://www.instagram.com/aleli.budapest/>

<https://www.facebook.com/profile.php?id=61558052579583>

We would like to draw your attention to the fact that in addition to our company, the operators of these social media platforms also perform data processing. In most cases, we cannot influence the operators' activities; however, where possible, we facilitate appropriate data handling as per the available options.

The data you provide on our social media pages (links, images, comments, videos, news) is made public and accessible by the platform, and our company does not use it for any other purpose. If applicable, we share content on our pages (Share button) if the platform provides this capability.

**Purpose of data processing:**

To facilitate our communication activities.

**Legal basis for data processing:**

The legitimate interest of the hotel operator—GDPR Article 6(1)(f) for the purpose of facilitating communication.

**Categories of data subjects:**

Any natural person active on social media platforms.

**Categories of personal data:**

Links, images, videos, comments, profile name.

**Data processor:**

We Talk Digital Ltd.

1111 Budapest, Bercsényi u. 9.

BDPST Koncept Ltd.



1026 Budapest, Pasaréti út 122-124.

For more information on data handling by the operator and on how to object to data processing, see the following privacy notices of the service providers:

Facebook: <https://www.facebook.com/privacy/explanation>

Instagram: <https://help.instagram.com/519522125107875>

## Data processing related to web server logging

When visiting [www.aleli.hu](http://www.aleli.hu), the web server automatically logs the user's activities.

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

The service provider records visitor data during the website visit to monitor the operation of services and prevent abuses.

### **Legal basis for data processing:**

The legitimate interest of the restaurant operator—GDPR Article 6(1)(f) as our company has a legitimate interest in the secure operation of the website.

### **Categories of data subjects:**

Any natural person visiting the website.

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

Identifier number, date, time, address of the visited page.

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

Up to 90 days.

### **Data processing by external service providers in relation to logging:**

The HTML code of the portal contains links coming from and pointing to external servers, independent of our company. The servers of external service providers connect directly with the user's computer. We caution our visitors that these providers, due to direct connections to their servers and direct communication with the user's browser, are able to collect user data (e.g., IP address, browser details, operating system details, mouse movements, the address of the visited page, and the time of the visit). An IP address is a sequence of numbers that uniquely identifies the computers or mobile devices of users accessing the internet. IP addresses can even be used to geographically localize the visitor using the computer. The address of visited pages, along with date and time data alone, are not sufficient for identifying the individual, but when combined with other data (e.g., data provided during registration), they can be used to draw conclusions about the user.

## Dormant data processing (during the statutory limitation period)

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

To provide evidence in administrative and judicial proceedings following the fulfillment of contractual obligations.

### **Legal basis for data processing:**

The data controller has a legitimate interest in processing data following the fulfillment of a contract, which is lawful.

Legitimate Interest - GDPR Article 6(1)(f):

"Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party."

### **Presentation of legitimate interest:**

The data controller's legitimate interest is to be able to reconstruct events during an administrative or judicial proceeding and have adequate evidence. After defining the legitimate interest, we conduct an interest balancing test, based on which the data processing is deemed lawful.

### **Categories of data subjects:**

Private individuals who are contracting parties, representatives of non-private contracting parties, their authorized persons, contacts.

**Categories of personal data:**

Name, Address, Place and Date of Birth, Mother's Name, Email, Phone Number, Mailing Address, Other data provided for fulfillment and necessary for the assertion of claims, which may include special health-related data.

**Duration of data processing:**

Until the expiration of the limitation period, typically for 5 years. According to Civil Code Section 6:22(1), for five years following the fulfillment of a contract or its termination for any reason, or until the expiration of any different statutory limitation period, if prescribed by law. Other data acquired is retained only if it could be significant for the merits of the case or future evidence.

**Obligation to provide personal data and consequences of non-providing:**

Yes.

Without providing the data, we cannot enter into a contract.

**Recipients of personal data:**

Email service provider.

Authorities and courts.

Legal representatives.

**Transfer of data to third countries or international organizations:**

Data transferred for this purpose are not transmitted to third countries or international organizations.

**Information about automated decision-making:**

No automated decision-making occurs during the processing of data transferred for this purpose.

## Regulation of data processing related to cookies

A cookie is a small text file that is stored on your computer when you visit a website. Cookies have various functions including collecting information, remembering user preferences, and allowing the website owner to understand user habits to enhance the user experience. You can manage your cookie settings at any time in your browser settings. You will find more information about cookies when you visit our website.

## Informing the data subjects

Under the General Data Protection Regulation (GDPR) of the European Union, which is effective and binding, we are obligated to inform you about the processing of your data. The data processing information will include the types of data we collect, the purposes for which the data are processed, the duration of data storage, the legal basis for accessing the data, and your rights regarding the processing of your data. This information ensures that our data processing is fully compliant with the provisions of the GDPR and that you are aware of the principles of secure and responsible handling of your data.

It is important to note and individually regulate in the information provided for each data processing whether the data are processed based on the consent of the Data Subject, on a different legal basis, or when we collect the data directly from the Data Subject or receive it from someone else.

The GDPR also prescribes different information obligations for data controllers, as if the data subject themselves provides the data, appropriate information should be given at the start of data processing.

However, there are exemptions from the obligation to inform. These include cases where fulfilling this obligation proves "impossible" or would require a "disproportionately huge effort." However, this does not mean that the obligation can be dismissed with a general statement referring to the aforementioned reasons. Whenever it appears that these reasons may apply, the specifics of the

particular data processing should be examined to ensure that these reasons do not disproportionately restrict the rights, freedoms, and legitimate interests of the data subjects.

## Where to seek legal remedies

First, please contact us with confidence; we will certainly strive to resolve your issue! If this does not succeed, or if you prefer not to pursue this route, you may contact the data protection authority or initiate legal proceedings in court.

### **Contact details for the Hungarian Data Protection Authority:**

- Name: National Authority for Data Protection and Freedom of Information
- Mailing Address: 1530 Budapest, Pf.: 5.
- Physical Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c
- Phone: +36 (1) 391-1400
- Fax: +36 (1) 391-1410
- Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)
- Website: <https://naih.hu>
- Coordinates: N 47°30'56"; E 18°59'57"

### **Right to Approach the Courts:**

In case of a violation of your rights as a data subject, you may also take legal action against the Data Controller. The lawsuit can be initiated at the court competent according to your place of residence or stay.

Budapest, May 1, 2024