

# Data Protection Policy

This Data Protection Policy ("Information") is provided by Jégbüfé Vendéglátó és Szolgáltató Korlátolt Felelősségű Társaság (Jégbüfé Catering and Service Limited Liability Company); hereinafter referred to as the Data Controller) (the "Website") and to persons who fill out reservation, cake order, or event registration forms, as well as to persons who contact the Data Controller by email or telephone.

The Notice has been prepared in accordance with the provisions of Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council ("GDPR") and Act CXII of 2011 ("Infotv.") , taking into account the recommendations of the National Authority for Data Protection and Freedom of Information (NAIH).

The right to the protection of personal data is a constitutional fundamental right, the enforcement of which requires transparency in data processing. The Data Subject has the right to know who, where, when and for what purpose their personal data is used. The purpose of this Notice is to enforce this right.

## 1. Data Controller's details

**Data Controller** Jégbüfé Vendéglátó és Szolgáltató Korlátolt Felelősségű Társaság  
(hereinafter: Jégbüfé or Data Controller)

**Registered** 1121 Budapest, Szélső utca 5.

**Company registration number** 01 09 678707

**E** jegbufe@gmail.com

**Tax** 11828075-2-41

**Website** <https://jegbufe.hu>

**Data Protection Officer** The Data Controller has not appointed a data protection officer, as the data processing carried out does not involve the regular processing of large amounts of special data, which would be mandatory under Article 37 of the GDPR. For questions regarding the protection of personal data, please contact the Data Controller.

## 2. Scope of data processed, purposes and legal basis of data processing

### 2.1 Online forms (table reservation, cake order, event registration)

- **Data processed:** Name, email address, telephone number
- **Data subjects:** natural persons who place orders or register for events via the Website
- **Purpose of data processing:** establishing contact and processing orders, identifying the data subject, fulfilling and confirming orders. In the absence of the data necessary to fulfill orders, the conclusion of the contract may fail.
- **Legal basis:** the legal basis for data processing is the data processing necessary for the performance of the contract related to the reservation (GDPR Article 6(1)(b)). By submitting the form, the Data Subject consents to the processing of their data by implied conduct.
- **Storage period:** the Data Controller shall store personal data until the reservation, order or event has been fulfilled, or for a maximum of 24 hours from the date of contact, after which it shall be automatically deleted. In the case of billing or accounting obligations, the relevant data shall be stored for the period specified by law.

## 2.2 Contact by telephone and email

- **Data processed:** Name, email address, telephone number, subject of contact.
- **Data subjects:** persons who contact the Data Controller by telephone or email.
- **Purpose:** responding to inquiries, making offers, handling complaints.
- **Legal basis:** data processing necessary for the preparation or performance of a contract required to fulfill the Data Subject's request (GDPR Article 6(1)(b)), as well as the Data Subject's consent.
- **Storage period:** until the end of the contact, but no longer than 30 days after the closure of the inquiry; thereafter, the data will be deleted, unless their processing is required by law. In this case, the data will be retained within the period specified by law.

## 2.3 Newsletter, data processing for marketing purposes

The Website does not currently offer a newsletter subscription option. If such a service is launched in the future, data processing will only take place with the express consent of the Data Subject, which may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of data processing carried out prior to withdrawal.

## 3. Data processors and data transfers

The Data Controller may transfer the Data Subject's data only to the extent necessary for the provision of the service and for the purposes specified in this Notice:

1. **Website hosting provider, website administrator:** the Website is operated by the Data Controller's contractual hosting provider, which is responsible for the secure operation of the servers. The data is stored solely for the purpose of the technical operation of the service.
2. **Email service provider:** the Data Controller manages emails through a service provider (e.g. Gmail)  
; personal data received by e-mail is used solely for the purpose of responding to inquiries.
3. **Event organizer or courier service:** in the case of cake orders or events, the Data Controller passes on the Data Subject's data (name, telephone number, e-mail address, order details) to its employees involved in the organization, who perform the organizational tasks necessary for the implementation

The Data Controller shall not transfer personal data to third countries or international organizations, unless the Data Subject expressly requests it or there is a legal obligation to do so.

## 4. Cookie policy

The Website uses cookies to improve the user experience and ensure the functioning of the website. Cookies are small text files that are stored by the browser on the user's device. Cookies enable, for example, the online store to "remember" the contents of the shopping cart or the Website to store language settings.

### 4.1 Types of cookies

- **Session cookies:** temporary cookies that remain active until the browser is closed and ensure the basic functionality of the Website. These cookies are considered "necessary cookies" under the GDPR and do not require consent, but users must be informed about them.
- **Persistent cookies:** more permanent cookies that remain in the browser for a specified period of time. The Data Controller does not use third-party cookies for marketing or profiling purposes.

- **First-party and third-party cookies:** first-party cookies are placed by the Website, while third-party cookies are placed by external service providers. The Website does not currently use third-party statistical or marketing cookies.

**Legal basis for data processing:** Section 13/A (3) of the Act on Electronic Communications – necessary cookies; consent – statistical/functional cookies

**Data processed:** connect.sid, unique identifier, time

**Duration:** until the end of the session; 2 months in the case of statistical cookies

## **5. Source, processing and storage of personal data**

The Data Controller primarily collects personal data directly from the Data Subject: through forms filled out on the Website, telephone registration, or email contact. The provision of data by the Data Subject is voluntary; however, if the data necessary for the performance of the contract is not provided, the order or reservation cannot be fulfilled. In the case of online contact, the Data Subject provides the data via the form on the Website, which is sent from the server to the Data Controller; the Data Controller does not obtain personal data from any other source.

Personal data is processed in paper-based and electronic systems. The Data Controller ensures through internal regulations that only those employees who are required to do so have access to the data, and imposes an appropriate confidentiality obligation, furthermore, data controllers only have access to the data necessary for the performance of their tasks.

## **6. Rights of the Data Subject**

The Data Controller respects the right of Data Subjects to self-determination in relation to information and ensures the enforcement of the rights set out in Chapter III of the GDPR. Requests relating to the exercise of the rights of Data Subjects must be sent in writing to the Data Controller's contact details. The Data Controller shall respond without undue delay, but no later than one month after receipt of the request; if necessary, the deadline may be extended by two months in view of the complexity of the request or the number of Data Subjects concerned.

### **6.1 Right of access**

The Data Subject shall have the right to obtain confirmation as to whether or not personal data concerning him or her are being processed, and to have access to the data undergoing processing and to the circumstances of the data processing. This includes information about the purposes of the processing, the categories of personal data concerned, the categories of recipients, the envisaged period of storage, the rights of the Data Subject and the means of redress.

### **6.2 Right to rectification**

The Data Subject may request the rectification or completion of inaccurate personal data. In the case of incomplete data, the Data Controller may request the Data Subject to clarify and provide appropriate verification.

### **6.3 Right to erasure (the "right to be forgotten")**

The Data Subject may request the erasure of their personal data if the data is no longer necessary for the purposes for which it was collected by the Data Controller, if the processing is unlawful, or if the Data Subject has withdrawn their consent and there is no other legal basis for the processing. The Data Controller shall take all reasonable steps to inform the recipients to whom the personal data have been disclosed of the erasure. The Data Subject may submit a request for erasure in writing, indicating which data they wish to have erased and for what reason.

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

The Data Subject may request the restriction of their data if they dispute its accuracy; if the data processing is unlawful, but they request restriction instead of erasure; if the Data Controller no longer needs the data, but the Data Subject requires it for the establishment, exercise or defense of legal claims; or if the Data Subject has objected to the data processing and the examination of the legitimate interests is ongoing.

#### **6.5 Right to data portability**

The Data Subject has the right to receive the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format, or to request that it be transferred to another data controller, if the legal basis for the data processing is consent or the performance of a contract.

#### **6.6 Right to object**

If data processing is based on Article 6(1)(f) of the GDPR (legitimate interest), the Data Subject may object to the processing of their personal data at any time. In the absence of a legitimate interest, the Data Controller may no longer process the data.

#### **6.7 Withdrawal of consent**

The Data Subject may withdraw their consent to data processing based on consent at any time without giving any reason. The withdrawal does not affect the lawfulness of data processing prior to the withdrawal.

#### **6.8 Legal remedies**

1. **Complaint to the Data Controller:** In the first instance, we ask that the Data Subject submit their complaint directly to the Data Controller; the Data Controller will investigate the complaint and respond.
2. **Initiating official proceedings:** If the Data Subject believes that their rights have been infringed in the processing of their personal data, or that the Data Controller is restricting the exercise of the Data Subject's rights, they may request an investigation by the National Authority for Data Protection and Freedom of Information (NAIH). NAIH's contact details: 1055 Budapest, Falk Miksa utca 9-11.; postal address: 1396 Budapest, Pf. 9.; telephone: +36-1-391-1400; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu). The Authority may initiate an investigation or conduct official proceedings.
3. **Recourse to the courts:** The Data Subject may also appeal to the courts if he or she feels that his or her rights relating to the processing of personal data have been infringed. The lawsuit may be brought before the court of the Data Subject's place of residence, at the Data Subject's discretion.

#### **7. Data security measures**

The Data Controller shall protect personal data against unauthorized access, alteration, transfer, disclosure, deletion, or destruction by means of appropriate technical and organizational measures. Taking into account the state of the art, the costs of implementation, the nature and risks of data processing, the Data Controller shall ensure that:

- the processed data is accessible to authorized persons;
- the system provides protection against malware, viruses, and other harmful programs;
- regular backups are made;
- servers operate in a closed, protected environment;
- contracts with data processors guarantee appropriate data security measures.

In the event of a data protection incident (e.g., unauthorized access or data theft), the Data Controller shall immediately notify the Data Subject and the competent authority if the incident is likely to pose a risk to the Data Subject's rights.

## **8. Data processing procedures**

### **8.1 Table reservations, cake orders, event registration**

When the Data Subject makes a table reservation, orders a cake or registers for an event via the Website, they are required to provide the personal data indicated on the form. The fields must be filled in for identification and contact purposes; if the data provided is incomplete, the reservation cannot be fulfilled. By checking the "I consent to the processing of my data" box on the order form, the customer confirms that they have read the Privacy Policy and agree to the processing of their data. If the box is not checked, the order cannot be sent.

After processing the reservations, the Data Controller will confirm the date by phone or email.

The data provided will be stored until the reservation is fulfilled; the Data Controller will delete the data on the day after the reservation is fulfilled. Email contact (Contact menu item)

### **8.2 Email contact (Contact menu item)**

When the Data Subject sends an email message, the message is received by the Data Controller's email account, and the personal data contained therein will be processed exclusively for the purpose of responding to the Data Subject's request. When the Data Subject sends an email message, the message is received by the Data Controller's email account, and the personal data contained therein is used solely for the purpose of establishing contact. Emails are stored for a maximum of 30 days, unless a longer retention period is required by law.

## **9. Details of the legal basis and the necessity of data processing**

According to Article 6(1) of the GDPR, the processing of personal data is lawful if the Data Subject has given their consent or if the processing is necessary for the performance of a contract. The main legal bases for data processing under this Notice are as follows:

- **Data processing based on consent (Article 6(1)(a) of the GDPR):** with the voluntary and specific consent of the Data Subject. This applies, for example, to the use of cookies (except for necessary cookies) and newsletter subscriptions.
- **Data processing necessary for the performance of a contract (GDPR Article 6(1)(b)):** data processing necessary for the performance of an order in the case of table reservations, cake orders, and event registrations.
- **Compliance with a legal obligation (GDPR Article 6(1)(c)):** retention of billing data in accordance with the Accounting Act. The data contained in the invoices will be retained for the period specified by law.
- **Legitimate interest (GDPR Article 6(1)(f)):** The Data Controller may have a legitimate interest in, for example, maintaining the security of the Website, preventing attacks, or enforcing legal claims in exceptional cases. In such cases, the Data Controller shall perform a balancing test, the results of which may be requested by the Data Subject.

## **10. Handling of data protection incidents**

A data protection incident is any event that compromises the security of personal data (e.g., unauthorized access, accidental destruction). If a data protection incident occurs and is likely to pose a high risk to the rights of the Data Subject, the Data Controller shall notify the Data Subjects and the supervisory authority without undue delay. The notification shall include the nature of the incident, the scope of the data concerned, the steps taken to remedy the situation

and a proposal to the Data Subject on possible mitigating measures.

#### **11. Availability, scope, and modification of the information notice**

This Policy shall be effective from August 31, 2025. The Data Controller reserves the right to amend the Policy, in which case it shall notify the data subjects by publishing the new version on the Website. The Policy is available at all times under the "Privacy Policy" menu item. The amendment shall only apply to future data processing after its publication.

#### **12. Summary and recommendations**

The Data Controller aims to provide its services in a transparent manner and to keep guests' personal data secure. The Information Notice describes in detail what personal data we collect, how we use it, how long we store it, and what rights Data Subjects have. Please read the Policy carefully before filling out the forms and only provide your personal data if you agree with it. If you have any questions or comments about the Policy or our data processing practices, please contact the Data Controller at the above contact details.

09/03/2025 \*

\* This document has been prepared in both Hungarian and English language. In the event of any discrepancy or inconsistency between the Hungarian and English versions, the Hungarian text shall exclusively prevail.