

DATA MANAGEMENT POLICY

In order to use some of the services available on the website of ZAZIE Bistro&Bar and Virtu Étterem Kft. zaziebistro.hu, it may be necessary in certain cases for our Guests to provide us with their personal data in order to access our services.

These Data Management Regulations (hereinafter: Regulations) are the basic principles, purposes and other facts of data management, which determine for what purpose, for how long and how personal data can be processed, and what legal enforcement and legal remedies are available in relation to data management.

Available to our guests.

Definitions:-

- **Data processing:** any activity related to data management operations performed with personal data, which is performed on behalf of the Data Controller, regardless of the method and tool used to perform the operations, as well as the place of application, provided that the activity is performed on the data. Accordingly, a natural or legal person, public authority, agency or any other body that processes personal data on behalf of the data controller is considered a data processor.

- **Data handling:** regardless of the procedure used, any operation performed on the data or the set of operations, including in particular the collection, recording, recording, organization, storage, change, use, query, transmission, disclosure, coordination or connection, locking, deletion and destruction of the data, as well as preventing its further use.

- **Data controller:** the data provided by the Guest is managed by the Virtu Étterem Korlátolt Felelősségű Társaság Társaság (hereinafter: Virtu Étterem Kft.), which also operates ZAZIE Bistro&Bar, i.e. only Virtu Étterem Kft. can make and implement decisions related to the personal data of the Guests.

Data controller details:

- Headquarters and mailing address: 1024 Budapest, Margit körút 5. A. ép. 3rd em. 1. door 8.
- Company registration number: 01-09-299407 (registered by the Company Court of the Capital City Court)
- Tax number: 25973099-2-41
- E-mail address: info@zaziebistro.hu
- Phone number: +36 20 319 2230

- **Restaurant:** the ZAZIE Bistro&Bar

- Address: 1117 Budapest, Dombóvári út 28.
- E-mail address: info@zaziebistro.hu
- Website: zaziebistro.hu
- Phone number: +36 20 319 2230

- **Service:** services that can be used by the Guest personally in the Restaurant and via the Website, such as: table reservation, restaurant consumption, filling out a questionnaire, raffle, raffle, guest card, newsletter.

- **Guest:** any natural person who uses the services of ZAZIE Bistro&Bar in the Restaurant or on the Website and whose personal data is processed by the Data Controller.

- **Personal data:** Any information about the Guest on the basis of which the Guest is identified or identifiable. A natural person who can be identified directly or indirectly, especially on the basis of an identifier such as name, number, location data, online identifier or one or more factors, can be identified. The Data Controller collects personal data from the Guest indicated separately for each data management purpose in these regulations.

- **Computer:** all computing devices, mobile phones, computers, tablets at the disposal of the Guest that qualify as electronic communication terminal equipment according to § 188, point 21 of Act C of 2003 on electronic communications, which are so-called suitable for receiving cookies (data packages).

- **GDPR:** Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and the free flow of such data, as well as the repeal of Regulation 95/46/EC (General Data Protection Regulation).

- **Cookies:** a file (series of data) that can be created on the Website visitor's computer by the Website display program, and which stores information about the Guest and the connection between the Guest and its web server. The purpose of using the cookie is to identify (recognize) the Guest's computer, to ensure easier browsing and to monitor it, as well as to analyze and evaluate the usage habits of visitors to the Website, and to improve the user experience based on them.

- **Homepage:** the website of the Restaurant zaziebistro.hu, as well as all other websites related to the Restaurant (social media pages) individually or together, depending on the context

- **Data Protection Authority:** the National Data Management and Freedom of Information Authority
 - Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.;
 - E-mail address: ugyfelszolgalat@naih.hu ;
 - Website: <http://naih.hu>;
 - Telephone number: +36 (1) 391-1400).

Contact information of the Data Controller and its legal representative

Contact details of the Data Controller:

- a) Headquarters and mailing address: 1024 Budapest, Margit körút 5. A. ép. 3rd em. Door 1
- b) E-mail: info@zaziebistro.hu
- c) Telephone number: 36 20 319 2230

Name and contact information of the Data Controller's legal representative:

- a) Name: Zsolt Csaba Csetényi
- b) Mailing address: 1024 Budapest, Margit körút 5. A. ép. 3rd em. Door 1
- c) Email: info@zaziebistro.hu

Data management purposes, the process of data management

Camera usage

In order to protect the person and property of the Restaurant and the Guests, the Data Controller uses a security camera system ("closed circuit television"; CCTV) to record images in the Restaurant. Camera recording as a data management purpose is justified by both the legitimate interests of the Data Controller and the Guests in the nature of personal and property protection. The basis for the use of camera surveillance is therefore to ensure the monitoring of valuable movable property in the Restaurant, the valuables of the Guests, and the property for the purpose of property protection, as well as the supervision of personal safety in the Restaurant area. In order to fulfill these security goals, the Data Controller warns about the use of the camera with a sign displayed in clearly visible places both when entering the Restaurant and in the individual monitored rooms of the Restaurant. Based on the settings of the cameras, a recording is made only of a person with whom - due to the use of the Restaurant's services - the Data Controller has a relevant relationship. Based on the posted warning signs, it is possible for the Guest to calculate in advance the purpose and in which areas the data will be recorded. The Data Controller provides the Guest with the rights and guarantees specified below in the "rights enforcement and legal remedy" chapter with regard to data management in accordance with this paragraph.

The recordings of the cameras are in accordance with CXXXIII of 2005 on the rules for the protection of persons and property, as well as private investigative activities. according to the Act (Sztvtv.), it will be stored for the period allowed, the actual further use of the recordings will only take place in the event of an event threatening personal and property safety, to the extent necessary for official and court proceedings. In other cases, the recordings will be deleted after the period specified in the Sztvtv. The recorded images are therefore stored by the Data Controller exclusively digitally for the period specified in the Sztvtv., after which they are deleted. The angle of view of the installed camera can always be directed only to the area consistent with the purpose of personal and property protection, in such a way that it cannot violate human dignity. Cameras will not be placed in the toilets. No hidden camera will be installed. The Data Controller (except in cases specified by law) does not forward the recordings to third parties. Based on the above personal and property protection interests, the legal basis for camera surveillance as data management is Article 6 (1) of the GDPR. f) means the legitimate interests of the Data Controller and the Guests. Detailed data management rules and guarantees related to the use of cameras are prescribed and maintained by the Data Controller in a separate policy for its employees and the security service.

Database managed for the purpose of sending newsletters, regular guest program:

The purpose of the Data Controller is to - in accordance with XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activities. Act (hereinafter: Grt.) § 6, with regard to the Service - contact the Guest from time to time with information regarding its current events, promotions, program offers, and services via its email address. The legal basis for this data management is based on the express and voluntary consent of the Guest, which he gives in a separate statement or if he provides his personal data for this purpose. The Grt. Based on Section 6 (3), the Data Controller is entitled to data management until the Guest's consent is withdrawn. With the above, the Guest consents to the Data Controller sending him sms or email messages regarding the Restaurant Services, for the purpose of this paragraph. Personal data processed within the framework of the general newsletter service: name, e-mail address.

Personal data that can be provided in order to participate in the guest program: full name; e-mail address; telephone number.

The subscription can be unsubscribed by the Guest at any time, without limitation or justification, free of charge using the "Unsubscribe from the newsletter" button at the bottom of the newsletter, or by sending a message to the e-mail address info@zaziebistro.hu.

In accordance with the above, the legal basis for the relevant data management purpose is the voluntary, definite and informed consent of the Guest, Article 6 (1) of the GDPR. according to point a).

Questionnaire (Building a database for measuring consumer satisfaction)

When using the restaurant services, the Guest has the opportunity to fill out a short, paper-based questionnaire designed to assess consumer satisfaction. If the Guest does not provide personal data on the questionnaire, the questionnaire will be processed anonymously, without recording personal data. In other cases, personal data that can be provided when filling out the questionnaire: full name; e-mail address, mobile phone number. If the Guest provides certain personal data based on their own decision on the questionnaire, their processing is based on point a) of Article 6 (1) of the GDPR, i.e. the express, voluntary and informed consent of the Guest. After providing the Guest's personal data, the Guest has the right to withdraw their consent to the processing of their personal data at any time, after which the Data Controller is no longer entitled to process the personal data. The Data Controller manages the provided personal data until the consent is revoked.

Recording of technical data (cookie).

During the use of the Website and the Restaurant's Wi-Fi service, in addition to the Guest's personal data, the data of the Guest's computer (cookies) that are generated during the use of the Website and which are stored when viewing and leaving the Website (the Guest's separate statement or without its plot) records (diary). The purpose of this data is to create statistics related to the visitation and use of the Website, as well as the comprehensive development of the Website's IT system. These data are not connected by the Data Controller (except in cases made mandatory by law) with the Guest's personal data, and only the employees of the Data Controller and the System Administrator have access to them. The Guest can delete the cookie from his own computer at any time (using the browser's menu items for this purpose), or set the prohibition of the use of cookies in the browser (typically with the "Help" function). However, by prohibiting the use of cookies, the User acknowledges that the use of the Website is incomplete without cookies.

Reservation

The Data Controller provides the possibility for persons who wish to use the Service to book a table in the Restaurant in advance, for the time they have chosen, by telephone, e-mail, or via an Internet table reservation system operated by another service provider. The purpose of providing the data provided by the Guest during the table reservation is so that the Service can be used at the time specified by the Guest, and the steps for providing the contractual service provided by the Data Controller can be requested. In connection with this, you can enter your full name for identification purposes, as well as your phone number and e-mail address for contact purposes.

If a table reservation is made for a group of a significant number of people, the Data Controller may make the successful reservation dependent on the payment of an advance payment. In this case, the Data Controller sends an advance request by e-mail, and the Data Subject can authenticate his reservation by entering bank card details. In such circumstances, the Data Controller can confirm the table reservation by checking the provided bank card details and by using the deposit amount of the account concerned with the bank card.

finalizes it by encumbrance. In addition to the above, the range of processed data in the case of an advance is: bank card number, name of the issuing bank, name of the cardholder, expiration date, CVC2 or CVV2 code.

In view of the above, the legal basis for the processing of personal data is the taking of steps at the request of the Guest prior to the conclusion of the contract between the parties, according to Article 6 (1) point b) of the GDPR. Personal data will be stored by the Data Controller even after the provision of services at the selected time, a

It is handled by the guest until their request for deletion.

The table reservation cannot be finalized without providing the above personal data. When reserving a table, the Guest may also provide certain health information regarding their eating habits (e.g. indication of food allergies), which may be classified as special data, and to the processing of which they give their express, voluntary and informed consent at the same time as accepting these regulations. The purpose of the relevant data provision is for the Data Controller to provide the Service in a way that is appropriate to the Guest's health condition during the provision of the service. Data management is based on the Data Subject's consent, point a) of Article 9 (2) of the GDPR.

Enforcement and Remedies

Communication with the Data Controller

Communication between the Guest and the Data Controller takes place by telephone, e-mail, or by post, or verbally in person in the Restaurant. The e-mail address of the Data Controller for this purpose is: info@zaziebistro.hu ; mailing address: 1024 Budapest, Margit körút 5. A. ép. 3rd em. Door 1. The Guest is entitled to request feedback from the Data Controller at any time regarding whether their personal data is being processed, and if the data is being processed, the Guest has the right to access their personal data in the following scope.

In the context of access, the information related to data management provided by the Data Controller may in particular include the following:

- a) the purposes of data management;
- b) the processed personal data;
- c) recipients of data transmission;
- d) the expected duration of data management or, if it is not possible to determine this, the criteria for determining the duration;
- e) rights that can be exercised by the Guest;
- f) the right to submit a complaint to the Authority;
- g) the source and legal basis of the information collected by the Data Controller.

The Data Controller is obliged to provide the above information request without undue delay, but no later than one month from the date of the information request.

The Data Controller provides a copy of the personal data that is the subject of data management at the request of the Guest. The Data Controller may charge a reasonable administrative fee for additional copies requested by the Guest.

- a) The Data Controller only examines and responds to e-mails sent to the Guest in relation to data management if they are received from the e-mail address previously provided by the Guest (unless the Guest refers to a change of e-mail address in the message, or from the person of the Guest can be clearly identified).

b) The Data Controller shall inform the Guest of any measures taken concerning personal data without delay, but no later than one month after the measure was taken. If the Data Controller does not take measures following the request of the Guest, it shall inform the Guest without delay, but at the latest within one month of the receipt of the request, of the reasons for the failure to take action, as well as of the fact that the person concerned may file a complaint with the Authority and exercise his right to judicial redress.

Rectification

The Guest has the right to notify the Data Controller (according to the above by e-mail or postal mail) of any changes in their personal data. The Data Controller completes the data change within 8 days from the receipt of the request. If the Guest does not report the change in his personal data without delay, the Guest must bear the consequences. If the provided personal data does not correspond to the reality, and the personal data corresponding to the reality is available to the Data Controller, the personal data will be automatically corrected by the Data Controller.

Data deletion

The Guest has the right to request that the Data Controller delete the personal data relating to him without undue delay, and the Data Controller is obliged to delete the personal data relating to the Guest without undue delay, especially if one of the following reasons exists:

- a) the personal data are no longer needed for the purpose for which they were collected or otherwise processed;
- b) the Guest withdraws his consent to data management and there is no other legal basis for data management;
- c) the Guest objects to data processing based on legitimate interests;
- d) personal data was handled unlawfully by the Data Controller;
- e) the personal data must be deleted in order to fulfill the legal obligation prescribed by the EU or Member State law applicable to the data controller.

Even in the case of the above cases, the Data Controller is not obliged to delete the handled personal data, if the data management is necessary:

- a) for the purpose of exercising the right to freedom of expression and information;
- b) fulfillment of the obligation under EU or member state law applicable to the Data Controller requiring the processing of personal data, or in the public interest;
- c) for statistical or archiving purposes, as well as for scientific and historical research purposes, if deletion would likely make this data management impossible or seriously endanger it;
- d) to present, enforce and defend legal claims.

Objection to data processing

The Guest has the right to object at any time to the legitimate interest-based processing of his personal data in accordance with these regulations (according to these regulations, the provision of newsletters and data processing based on camera surveillance are based on legitimate interests) for reasons related to his own situation. In this case, the Data Controller may no longer process the personal data, except

if the Data Controller proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the Guest, or that are related to the submission, enforcement or defense of legal claims.

Right to restriction of data processing

The Guest is entitled to request that the Data Controller restricts data processing if one of the following conditions is met.

- a) the Guest disputes the accuracy of his personal data, in which case the restriction applies to the period that allows the Data Controller to check the accuracy of the personal data; b) the data management is illegal and the Guest opposes the deletion of personal data and instead requests the restriction of their use;
- c) the Data Controller no longer needs the personal data to fulfill the data management purpose, but a

The guest requires them to present, enforce or defend legal claims;

- d) the Guest objected to data processing, in this case the restriction applies to the period until it is determined whether the legitimate reasons of the Data Controller take precedence over the legitimate reasons of the Guest.

If data management is subject to restrictions in accordance with the above, such personal data, with the exception of storage, may only be processed with the consent of the Guest, or for the presentation, enforcement or defense of legal claims, or for the protection of the rights of other natural or legal persons, for reasons of important public interest. If the limitation of data management is lifted, the Data Controller will notify the Guest requesting the limitation of this fact in advance.

Right to data portability

On the basis of the Guest's consent, or with regard to the personal data processed for the purpose of fulfilling the contract, the Guest is entitled to have the personal data provided by him to the Data Controller transferred to him in a segmented, widely used, machine-readable format, and he is also entitled to have this data forward it to another data controller without being hindered by the Data Controller to which the personal data was made available. This right can only be exercised with respect to personal data processed on the basis of consent or contract performance.

Initiation of the procedure by the National Data Management and Freedom of Information Authority

The Guest may initiate an investigation by filing a report with the Authority, citing that a violation of rights has occurred in connection with the management of his personal data, or there is a direct risk of such violation. The Authority's investigation is free of charge, the costs of the investigation are advanced and borne by the Authority. No one may be disadvantaged by the notification to the Authority. The Authority may only reveal the identity of the whistleblower if the investigation could not be conducted without it. If the whistleblower requests it, the Authority cannot reveal his identity, even if the investigation cannot be continued without it.

Legal enforcement in court

In the event of a violation of their rights, the Guest may go to court against the Data Controller, the adjudication of the lawsuit falls under the jurisdiction of the court. As a general rule, the court at the seat of Virtu Étterem Kft. is competent for the lawsuit, but it can also be initiated before the court at the place of residence or residence of the Guest, according to the Guest's choice. The jurisdiction of the court is www.birosag.hu

can be checked with the "Court Search" application on the website. The court acts out of sequence in the case.

Compensation and damages

If the Data Controller illegally handles the Guest's personal data or violates data security requirements:

- a) causes damage to the Guest or others and is obliged to compensate for it (compensation);
- b) violates the Guest's right to privacy, the Guest may demand damages from the Data Controller.

The Data Controller is released from responsibility for the damage caused and from the obligation to pay damages if it proves that the damage or the violation of the Guest's privacy rights was caused by an unavoidable cause outside the scope of data management. There is no need to compensate for the damage and no damages may be claimed if the damage or violation of privacy rights resulted from the intentional or grossly negligent behavior of the Guest (damaged party).

Miscellaneous Provisions

33. The Data Controller reserves the right to unilaterally modify the Regulations at any time.

34. The rules of Hungarian law apply to the Regulations.

35. The Regulations are effective from November 1, 2023. The Regulations can be found at zaziebistro.hu on the website, as well as in a clearly visible place, posted in the Restaurant.

Budapest, November 1, 2023.