

Costes Group Privacy Notice

COSTES HUNGARY Kft., as the management company of Costes Group, provides the following information under 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 on the free movement of such data, repealing Directive 95/46/EC (the General Data Protection Regulation, hereinafter the "GDPR"), in relation to the processing of personal data associated with the use of services provided by companies belonging to the group and the use of websites operated by the group.

THE DATA CONTROLLER AND ITS CONTACT DETAILS

In respect of the processing of personal data associated with the use of services provided by companies belonging to Costes Group and the use of websites operated by the group, COSTES HUNGARY Kft., as the management company of Costes Group, is the data controller. It independently determines the purposes and means of processing personal data across all companies belonging to Costes Group.

Data controller: COSTES HUNGARY Kft. (1)

Registered office: 1051 Budapest, Zrínyi utca 9. 2. em. 21. ajtó

Company registration number: 01-09-336421

Representative: Tóth-Harsányi Kornél, Managing Director

Website operated: www.costes.group and the websites of all companies belonging to Costes Group

Restaurants operated: all restaurants belonging to Costes Group

E-mail: iroda@costes.hu

Companies belonging to Costes Group and managed by COSTES HUNGARY Kft. (1):

Company name: COSTES BRJ Kft. (1)

Registered office: 1051 Budapest, Zrínyi utca 9. 2. em. 21. ajtó

Representatives: Hodossy András and Rácz Jenő, Managing Directors acting jointly

Website operated: <https://rumour.restaurant>

Restaurant operated: Rumour Restaurant and Bar

Company name: COSTES Kft. (1)

Registered office: 1092 Budapest, Ráday u. 4.

Representative: Hodossy András, Company Director

Website operated: <https://costesrestaurant.hu>

Restaurant operated: Costes Restaurant

Company name: Costes DownTown Kft. (1)

Registered office: 1051 Budapest, Vigyázó Ferenc utca 5.

Representative: Hodossy András, Company Director

Website operated: <https://costesdowntown.hu/>

Restaurant operated: Costes Downtown Restaurant

Company name: MÁK Projekt Kft. (4)

Registered office: 1028 Budapest, Gazda utca 19.

Representatives: Biró Lejla Anna and Hodossy András, Managing Directors acting independently

Website operated: <https://mak.hu/>

Restaurant operated: Mák restaurant

Company name: Costes Kádár Kft. (1)

Registered office: 1072 Budapest, Klauzál tér 9. Fsz. 6. ajtó

Representatives: Tóth-Harsányi Kornél and Hodossy András, Managing Directors acting independently

Website operated: <https://kadaretkezde.hu>

Restaurant operated: Kádár Étkeзде

Company name: Costes Vibe Kft. (1)

Registered office: 1051 Budapest, Zrínyi utca 9. 2. em. 21. ajtó

Representatives: Hodossy András and Kühne Tamás, Managing Directors acting independently

Website operated: <https://vibebudapest.com>

Restaurant operated: Vibe Budapest restaurant

Company name: NAGYMEZŐ BISZTRÓ Kft. (3)

Registered office: 1065 Budapest, Nagymező utca 19.

Representatives: Tóth-Harsányi Kornél and Hodossy András, Managing Directors acting independently

Website operated: <https://kismezo.hu/>

Restaurant operated: Kismező Restaurant

Company name: KK Costes Catering Kft. (1)

Registered office: 1051 Budapest, Zrínyi utca 9. 2. em. 21. ajtó

Representative: Hodossy András, Managing Director acting independently

Website operated: <https://costes.catering>

Restaurant operated: catering services

Company name: Factory Promotion Kft. (2)

Registered office: 1137 Budapest, Katona József u. 6. fsz. 1.

Representatives: Hodossy András and Kazár Bálint, Managing Directors acting independently

Website operated: <https://www.hoppabistro.hu/>

Restaurant operated: Hoppá! Bistro

DEFINITIONS

“personal data” means any information relating to an identified or identifiable natural person (“data subject”); 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 or 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;

“processing” means any operation or set of operations performed on personal data or 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;

“controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of processing 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;

“processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

“recipient” means a natural or legal person, public authority, agency or another body to which personal data are disclosed, whether a third party or not. Public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law are not regarded as recipients; the processing of those data by such public authorities must comply with the applicable data protection rules according to the purposes of the processing;

“consent of the data subject” means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which the data subject, by a statement or a clear affirmative action, signifies agreement to the processing of personal data relating to them;

“personal data breach” means a breach of security leading to the accidental or unlawful destruction, loss or alteration of personal data transmitted, stored or otherwise processed, or to their unauthorised disclosure or access.

INFORMATION ON THE PROCESSING OF PERSONAL DATA

1. Processing the data of contracting natural-person partners – records of customers and suppliers

For this processing, the Costes Group company that enters into a contract with the natural-person partner, or communicates with that partner for the purpose of concluding a contract, is also an independent controller.

1.1 Purpose of processing: the Company processes the data of natural persons contracted with it as customers or suppliers for the purpose of concluding, performing or terminating the contract and providing contractual discounts.

1.2 Legal basis for processing: processing is necessary for the performance of a contract to which the data subject is a party.

1.3 Data subjects: natural persons who have contracted with the Company.

1.4 Recipients of the data: Company employees responsible for customer service and the processor responsible for accounting and tax matters.

1.5 Data processed concerning a natural person contracted as a customer or supplier:

- name;
- name at birth;
- date of birth;
- mother's name;
- residential address;
- tax identification number;
- tax number, sole-trader or agricultural-producer registration number;
- residential address and registered-office or business-premises address;
- telephone number, email address and website address;
- bank account number.

1.6 Such processing is also lawful where it is necessary to take steps at the request of the data subject prior to entering into a contract.

1.7 Before processing begins, the natural-person data subject must be informed that the processing is based on the performance of a contract. This information may also be provided in the contract. The data subject must be informed if their personal data are transferred to a processor.

1.8 Retention period: identification and contact details are retained until the limitation period expires for rights and obligations arising from the legal relationship in connection with which the Controller processes the personal data. For data included in accounting records that support accounting entries, the retention period is at least eight years under Section 169(2) of Act C of 2000.

1.9 Method of processing: electronically.

1.10 Processors:

Billingo Technologies Zrt. – invoicing service provider

registered office: 1133 Budapest, Árbóc utca 6.

email: hello@billingo.hu

(1) FaboMark Kft. – accounting service provider

registered office: 1097 Budapest, Vaskapu u. 1/E, Fsz. 2.

email: faboweb@fabomark.hu

(2) ZN Valore Kft – accounting service provider

registered office: 1138 Budapest, Népfürdő utca 21. F. ép. 2. em. 7. ajtó

email: info@znvalore.com

(3) LCSE accounting office

Registered office: 1044 Budapest, Váci út 83. 106. iroda

email: lorinczye@gmail.com

(4) Bíró Lejla Anna

Registered office: 1028 Budapest, Gazda u. 19.

email: leila.konyveles@gmail.com

2. Contact details of natural-person representatives of legal-entity customers and suppliers

For this processing, the Costes Group company that contracts with the legal-entity partner or communicates with it for the purpose of concluding a contract is also an independent controller.

2.1 Purpose of processing: performance of the contract concluded with the Company's legal-entity partner and business communications.

2.2 Legal basis for processing: processing is necessary for the performance of a contract to which the data subject is a party.

2.3 Data subjects: natural-person representatives of legal-entity customers and suppliers.

2.4 Recipients of the personal data: Company employees responsible for customer service, employees responsible for accounting and tax matters, and processors.

2.5 Data processed concerning the natural person:

- name;
- address;
- telephone number;
- email address.

2.6 Retention period: the data are erased immediately following termination of the contract or a change of contact person.

2.7 Method of processing: electronically.

2.8 Processors:

Billingo Technologies Zrt. – invoicing service provider

registered office: 1133 Budapest, Árbóc utca 6.

email: hello@billingo.hu

(1) FaboMark Kft. – accounting service provider

registered office: 1097 Budapest, Vaskapu u. 1/E, Fsz. 2.

email: faboweb@fabomark.hu

(2) ZN Valore Kft – accounting service provider

registered office: 1138 Budapest, Népfürdő utca 21. F. ép. 2. em. 7. ajtó

email: info@znvalore.com

(3) LCSE accounting office

Registered office: 1044 Budapest, Váci út 83. 106. iroda

email: lorinczye@gmail.com

(4) Bíró Lejla Anna

Registered office: 1028 Budapest, Gazda u. 19.

email: leila.konyveles@gmail.com

3. Processing of photographs, video recordings and audio recordings of data subjects and employees made at events

3.1 In compliance with Section 2:48(1) of the Hungarian Civil Code in force, the Controller creates audio, photographic and video recordings of or with the data subject only with the data subject's prior consent, and takes only those steps (such as transfer or publication) to which the data subject has consented in the relevant declaration.

3.2 Processing may take place only where the data subject has given voluntary and specific consent for that purpose.

3.3 Purpose of processing: to strengthen the Company's image and brand through marketing activities, including the creation and use of photographs taken at events.

3.4 Legal basis for processing: consent to the processing of personal data.

3.5 Data subjects: event participants and employees.

3.6 Recipients of the data: persons carrying out marketing tasks.

3.7 Data processed: the data subject's voice and likeness and any other data obtainable from the photograph.

3.8 Retention period: until consent is withdrawn.

3.9 The Controller may use a processor from time to time to create or process photographs, video recordings and audio recordings.

4. Processing of website visitor data – information on the use of cookies

4.1 Cookies are small data files placed on a user's computer by the website visited. Their purpose is to make an online service easier and more convenient to use. There are many kinds of cookies, but they generally fall into two broad groups. Session cookies are placed on the user's device only for a particular session (for example, during secure authentication for online banking). Persistent cookies (for example, a website's language setting) remain on the computer until the user deletes them. Under the European Commission's guidance, cookies may be placed on a user's device only with the user's permission, except where they are strictly necessary for use of the service concerned.

4.2 For cookies that do not require consent, information must be provided on the first visit to the website. The full cookie notice need not be displayed on the website; it is sufficient for the website operator to provide a brief summary and a link to the full notice.

4.3 For cookies that require consent, information may be provided on the first visit if the related processing begins as soon as the page is accessed. Where a cookie is used in connection with a function expressly requested by the user, the information may instead be provided when that function is used. In that case too, the full cookie notice need not be displayed on the website; a brief summary and a link to the full notice are sufficient.

4.4 The Cookie Notice on the website informs visitors about the use of cookies. Through that notice, the Company ensures that, before using the website's information-society services and at any time during their use, visitors can learn which categories of data the Company processes and for which purposes, including data that cannot be directly linked to the user.

5. Social media pages / processing on the Company's Facebook and Instagram pages

5.1 The Controller and Costes Group companies are present on Facebook and other social media platforms (TripAdvisor, YouTube, Instagram and TikTok).

5.2 Use of social media pages, particularly Facebook and Instagram, and contact, communications and other actions permitted by those platforms through which a user interacts with the Controller are based on voluntary consent.

5.3 Purpose of processing: to communicate with followers of Costes Group and/or its member companies via social media and present Costes Group's services, activities and programmes.

5.4 Data subjects: natural persons who voluntarily follow, share or like the Controller's social media pages or content, particularly its pages on facebook.com and instagram.com.

5.5 The Controller does not process personal data posted by visitors on its Facebook or Instagram pages. Visitors are subject to Facebook's and Instagram's privacy and terms of service.

5.6 If unlawful or offensive content is published, the Company may remove the data subject from the group or delete their comment without prior notice.

5.7 The Company is not responsible for unlawful content or comments posted by Facebook users. Nor is it responsible for errors, service outages or issues arising from changes to the operation of Facebook or Instagram.

6. Table reservations and appointment arrangements

6.1 The Controller enables data subjects to reserve a table in connection with Costes Group services and to discuss related matters by providing the data set out below.

6.2 Legal basis for processing: consent to the processing of personal data.

6.3 Purpose of processing: to provide the data subject with a table reservation and maintain contact.

6.4 Data subjects: natural persons who make a reservation by providing their data.

6.5 Recipients of the personal data: employees of the Controller and of the company operating the restaurant where the data subject makes the reservation.

6.6 Data processed concerning the natural person requesting a reservation:

- full name;
- mobile telephone number;
- email address;
- reservation details (date and time, duration, number of guests, dietary requirements or food allergies, and occasion).

6.7 Processing procedure:

- The data subject may arrange a table reservation by calling or emailing the Controller at the contact details provided, or may submit a reservation request through the website.
- During the arrangements, the Controller records the information disclosed to it in an electronic record system and confirms the reserved time to the data subject orally and/or in writing.
- By clicking the "Table Reservation" link on the website, the data subject can submit a reservation request through SevenRooms by providing the details needed for the reservation and for any payment due at the time of booking. Confirmation is sent through SevenRooms. The Controller may also contact the data subject by telephone before the reservation to clarify details. The Controller has no access to, and does not process, the payment-card details provided when booking.
- The data subject is expected to attend the restaurant at the reserved time to use the restaurant service.
- Consistent with the purpose of processing, the data subject voluntarily agrees that, if they provide contact details, the Controller may use them to inform the data subject of a possible cancellation, respond to a complaint or take other steps in relation to a complaint.

6.8 Retention period: until the purpose has been achieved or consent is withdrawn.

6.9 Method of processing: electronically.

6.10 Processors:

For Kádár Étkezde (Costes Kádár Kft.):

Company name: PG Info Kft.

Registered office: 9141 Ikrény, Sport u. 22.

email: support@asztalfoglalas.com

privacy notice: <https://asztalfoglalas.com/privacy>

Company registration number: 08-09-011910

EU VAT number: HU13208734208

For all other restaurants and companies:

Company name: Sevenrooms LLC

Registered office: 228 Park Ave South, PMB 33706, New York, NY 10003

email: privacy@sevenrooms.com

telephone: 1-212-242-5607

privacy notice: <https://sevenrooms.com/privacy-policy/>

7. Sending newsletters

7.1 The Controller sends advertising and other communications, information, offers and/or newsletters about the activities and services of Costes Group companies and restaurants to data subjects who have consented to receive them. The data subject may withdraw consent at any time by clicking the link provided in an email newsletter or by emailing the Controller.

7.2 Legal basis for processing: consent to the processing of personal data.

7.3 Purpose of processing: sending newsletters to the data subject and maintaining contact.

7.4 Data subjects: natural persons who unequivocally consent to receiving newsletters when making a table reservation or subscribing to the newsletter.

7.5 Recipients of the personal data: employees of the Controller and of the company operating the restaurant where the data subject books a table.

7.6 Data processed concerning a natural person subscribing to the newsletter:

- full name;
- email address.

7.7 Retention period: until consent is withdrawn.

8. Processing of declarations of consent

8.1 The Controller requests paper or electronic declarations of consent from data subjects for the collection, processing and, where applicable, transfer of their data.

8.2 Legal basis for processing: consent to the processing of personal data.

8.3 Purpose of processing: to maintain declarations of consent as evidence of the legal basis for processing and the implementation of consent (the accountability principle), and to maintain contact.

8.4 Data subjects: natural persons who provide the Controller with a declaration of consent to the processing of their data for any purpose.

8.5 Recipients of the personal data: employees of the department responsible for the processing concerned and processors.

8.6 Data processed: data included in the declaration of consent relating to the processing concerned.

8.7 Retention period: until withdrawal at the data subject's request or the end of the processing activity concerned.

8.8 Method of processing: on paper or electronically.

9. Event enquiries and related communications

9.1 Purpose of processing: to receive enquiries submitted through event enquiry forms on websites of Costes Group companies and restaurants, clarify requirements, prepare and send individual proposals, and conduct related communications.

9.2 Data subjects: natural persons requesting a proposal, and contact persons and representatives of corporate customers. The group company listed in this Notice that prepares the proposal or provides the service may process the data necessary for its own activities.

9.3 Data processed: the name or company name, contact person's name, email address and telephone number provided in the form; the type of event, planned date and any alternative date, expected number of guests, start and end times, services requested, ideas and special requests entered in free-text fields, optional budget, and correspondence relating to the enquiry.

9.4 Legal basis: where a natural person requests a proposal on their own behalf, the processing is necessary to take steps at the data subject's request prior to entering into a contract under Article 6(1)(b) GDPR. For corporate enquiries, the processing of the contact person's and representative's details is based on legitimate

interests under Article 6(1)(f) GDPR: establishing a business relationship between the enquiring organisation and Costes Group and handling the enquiry. The contact person may request information about the balancing of interests and may object to the processing on grounds relating to their particular situation.

9.5 Categories of recipients and processors: sales and event-planning staff with access to the enquiry, and IT service providers operating the website, form and electronic communications.

9.6 Retention period: where the proposal does not result in a contract, 12 months after the enquiry is closed. Where a contract is concluded, the relevant retention rules in this Notice apply to contractual and accounting data. Data necessary for a legal claim may be retained until the claim can no longer be pursued.

9.7 Without the contact details required for communication, the enquiry cannot be processed or a proposal sent. Optional fields may be left blank. Submitting an event enquiry does not, in itself, constitute a newsletter subscription or consent to marketing.

9.8 Please do not enter health information or other special categories of personal data in the form's free-text field, and provide other participants' personal data only if duly authorised. Dietary requirements should, where possible, be stated in aggregate form that does not identify individuals.

10. Processing of job applications

10.1 Purpose of processing: to receive introductions and CVs submitted in response to invitations published on the websites of Costes Group companies and restaurants, assess applicants' suitability, conduct recruitment and communicate with applicants.

10.2 Data subjects: natural persons applying for a position or collaboration. COSTES HUNGARY Kft. is the controller for group-level recruitment; where an application relates to a position at a specific group company, that company is also a controller in its own recruitment procedure.

10.3 Data processed: the applicant's name and contact details; professional experience, qualifications, language skills and other information relevant to the position provided by the applicant in their application, introduction and CV; and information from recruitment communications. A referee will be contacted only after the applicant has been informed in advance.

10.4 Legal basis: taking steps at the applicant's request prior to entering into a contract under Article 6(1)(b) GDPR. An application may be retained after the recruitment process for future opportunities only with separate, voluntary consent, which the applicant may withdraw at any time.

10.5 Retention period: until the end of the recruitment process and then for six months after the decision is communicated. An application retained with separate consent for future contact may be processed until consent is withdrawn, for a maximum of 12 months. If employment begins, the necessary data are subject to the separate notice and retention rules applicable to the employment relationship.

10.6 Categories of recipients and processors: HR staff and professional managers involved in recruitment, and IT service providers supporting electronic communications and storage of applications. Without the information needed to submit and assess an application, it cannot be considered.

10.7 Applicants should not provide health information, family information or other special categories of personal data that are unnecessary for recruitment. The Controller deletes such data where they are unnecessary for recruitment; they may be processed only where a separate appropriate legal basis and a condition under Article 9 GDPR apply.

DATA SECURITY

Taking into account the state of the art, the costs of implementation, the nature, scope, context and purposes of processing, and the risks of varying likelihood and severity to the rights and freedoms of natural persons, the Controller and processors acting on its behalf implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk.

RIGHTS OF DATA SUBJECTS

In accordance with the GDPR, the Controller provides data subjects with the following rights.

Right to be informed

The data subject is entitled to receive the following information from the Controller in a concise, transparent, intelligible and easily accessible form, using clear and plain language:

- a) the identity and contact details of the Controller and its representative;
- b) the contact details of the data protection officer;
- c) the purposes for which personal data are intended to be processed and the legal basis for processing;
- d) where processing is based on legitimate interests, the legitimate interests pursued by the Controller or a third party;
- e) where applicable, the recipients of the personal data;
- f) where applicable, the fact that the Controller intends to transfer personal data to a third country or international organisation;
- g) the period for which the personal data will be stored;
- h) the data subject's right to request access to and rectification of personal data concerning them, erasure or restriction of processing where applicable to the relevant legal basis, the right to object to processing where applicable, and the right to data portability;
- i) where the personal data were not collected from the data subject, their source and, where applicable, whether they came from publicly accessible sources;
- j) the right to withdraw consent at any time where processing is based on consent, without affecting the lawfulness of processing carried out before withdrawal;
- k) the right to lodge a complaint with a supervisory authority;
- l) whether the provision of personal data is required by law or contract, or is a requirement necessary to enter into a contract, whether the data subject is obliged to provide the data, and the possible consequences of failing to do so. The information must be provided in writing or by other means, including electronically where appropriate. At the data subject's request, information may be provided orally if the data subject's identity has been established by other means. The Controller will inform the data subject of action taken on a request concerning their personal data without undue delay and in any event within 30 days of receiving the request. Where necessary, taking into account the complexity and number of requests, that period may be extended by a further 60 days. The Controller will notify the data subject of an extension and the reasons for the delay within 30 days of receipt of the request. Information and action are provided free of charge. However, where a request is manifestly unfounded or excessive, particularly because of its repetitive character, the Controller may charge a reasonable fee based on the administrative cost of providing the information or taking the requested action, or may refuse to act on the request. If the Controller intends to process personal data further for a purpose other than that for which they were collected, it will inform the data subject of that other purpose and all relevant supplementary information mentioned above before doing so. The Controller fulfils its information obligation by publishing this Notice on its website.

Right of access

The data subject has the right to obtain confirmation from the Controller as to whether personal data concerning them are being processed and, if so, to access the personal data and the following information:

- a) the purposes of processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the Controller has disclosed or will disclose the personal data;
- d) where applicable, the envisaged retention period;
- e) the right to request rectification, erasure or restriction of processing of personal data concerning them, or to object to processing, where applicable to the relevant legal basis;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the data were not collected from the data subject, any available information as to their source;

h) the existence of automated decision-making, including profiling, and, at least in such cases, meaningful information about the logic involved and the significance and envisaged consequences of such processing for the data subject. The Controller will provide a copy of the personal data undergoing processing at the data subject's request. For additional copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs. Where the data subject submits a request electronically, the information must be provided in a commonly used electronic form unless the data subject requests otherwise. The right to obtain a copy must not adversely affect the rights and freedoms of others.

Right to rectification

At the data subject's request, the Controller will rectify inaccurate personal data concerning them without undue delay. The data subject has the right to have incomplete personal data completed, including by means of a supplementary statement.

Right to erasure (right to be forgotten)

The data subject has the right to request the erasure of their personal data from the Controller.

The Controller must erase the data subject's personal data without undue delay if any of the following grounds applies:

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws the consent on which processing is based, where processing relies on consent, and there is no other legal basis for processing;
- c) the data subject objects to processing and there are no overriding legitimate grounds for processing based on legitimate interests;
- d) the personal data have been processed unlawfully;
- e) the personal data must be erased to comply with a legal obligation under Union or Member State law to which the Controller is subject. The Controller informs everyone to whom the personal data were disclosed of the erasure obligation.

The Controller may refuse an erasure request where processing is necessary for:

- a) exercising the right of freedom of expression and information; or
- b) compliance with a legal obligation under Union or Member State law; or
- c) performing a task carried out in the public interest; or
- d) performing a task in the exercise of official authority vested in the Controller; or
- e) reasons of public interest in the area of public health; or
- f) archiving in the public interest; or
- g) scientific or historical research or statistical purposes; or
- h) establishing, exercising or defending legal claims.

Right to restriction of processing

The data subject has the right to request that the Controller restrict processing where any of the following applies:

- a) the data subject contests the accuracy of the personal data, for a period enabling the Company to verify their accuracy;
- b) the processing is unlawful and the data subject opposes erasure and requests restriction of use instead;
- c) the Controller no longer needs the personal data for processing, but the data subject requires them to establish, exercise or defend legal claims; or
- d) the data subject has objected to processing based on legitimate interests, pending verification of whether the Controller's legitimate grounds override those of the data subject. Where processing is restricted on the foregoing basis, apart from storage, the data may be processed only with the data subject's consent, to establish, exercise or defend legal claims, to protect the rights of another natural or legal person, or for

reasons of important public interest of the European Union or a Member State. The Controller informs everyone to whom the personal data were disclosed of the obligation to restrict processing.

Right to object

The data subject has the right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them in the public interest, in the exercise of official authority or on the basis of the legitimate interests of the Controller or a third party, including profiling based on those grounds. Following an objection, the Controller may no longer process the personal data unless it demonstrates compelling legitimate grounds that override the interests, rights and freedoms of the data subject, or grounds connected with establishing, exercising or defending legal claims. Where personal data are processed for direct marketing, the data subject may object to such processing at any time, after which the data may no longer be processed for that purpose.

Right to data portability

The right to data portability applies where processing is based on consent or a contract and is carried out by automated means. At the data subject's request, the Controller will provide the personal data concerning the data subject that the data subject has provided to the Controller in a structured, commonly used and machine-readable format, and will enable their transmission to another controller. Where technically feasible, the data subject may request direct transmission of the personal data between controllers. Exercising the right to data portability does not affect the right to erasure. The right to data portability does not apply where processing is necessary for a task carried out in the public interest or in the exercise of official authority vested in the Controller. It must not adversely affect the rights and freedoms of others.

Right to lodge a complaint

If the data subject considers that the Controller has infringed the GDPR or applicable Hungarian law when processing personal data concerning them, they may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, "NAIH") without prejudice to other administrative or judicial remedies, using any of the following contact details: Address: 1055 Budapest, Falk Miksa utca 9-11. Postal address: 1363 Budapest, Pf. 9. Website: <http://www.naih.hu>. Telephone: +36 (1) 391-1400, +36 (30) 683-5969, +36 (30) 549-6838. Fax: +36 (1) 391-1410. Email: ugyfelszolgalat@naih.hu. Without prejudice to other administrative or non-judicial remedies, the data subject has the right to an effective judicial remedy against a legally binding decision of the NAIH concerning them. The data subject also has the right to an effective judicial remedy if the NAIH does not handle a complaint or does not inform them of the progress or outcome of the complaint within three months.

Right to an effective judicial remedy against a controller or processor

Without prejudice to available administrative or non-judicial remedies, including the right to lodge a complaint with a supervisory authority, the data subject has the right to an effective judicial remedy where they consider that their rights under the GDPR have been infringed as a result of improper processing of their personal data. The Controller or the processor it has engaged must demonstrate that the processing complies with requirements for personal-data processing laid down in law or in a binding legal act of the European Union. At the data subject's option, proceedings may also be brought before the court with jurisdiction over their place of residence or habitual residence.