PRIVACY AND DATA PROCESSING POLICY

Effective as of: 1 September 2026.

1. Purpose and Scope of This Privacy Notice

1.1.

The purpose of this Privacy and Data Processing Notice (hereinafter referred to as the "Notice") is to set out the rules governing the processing of personal data by the operator of the Sisters by Gettó Gulyás online ordering system, acting as the data controller (hereinafter referred to as the "Data Controller"), and to inform data subjects of their rights and available remedies in relation to the processing of their personal data.

1.2.

The scope of this Notice extends to the processing of personal data carried out on the websites www.sistersbygettogulyas.hu and www.sistersbygettogulyas.com (hereinafter jointly referred to as the "Website"), as well as to the processing of personal data provided during the online ordering and purchasing process.

1.3.

The Notice applies in particular to the following data processing activities:

- Use of the Website;
- Placement of online orders;
- Order confirmations;
- Online credit and debit card payments;
- Order processing related to personal collection;
- Invoicing;
- Management of registered user accounts;
- Purchases made without registration;
- Customer service and complaint handling;
- Processing of comments and notes related to orders;
- Processing of technical and log data;
- Use of cookies;
- Use of analytics services;
- Use of marketing and remarketing tools, if introduced at a later date.

1.4.

This Notice does not cover data processing activities carried out by third parties accessible through external links provided on the Website, or data processing activities independently performed by service providers that operate separately from the Website or the Data Controller. The data processing activities of such service providers are governed by their own privacy policies.

2. Definitions

2.1. **Data Processing**

Data processing means any operation or set of operations performed on personal data or sets of personal data, whether by automated or non-automated means, including in particular the collection, recording,

organisation, storage, use, disclosure, retrieval, erasure or destruction of such data.

2.2. **Data Controller**

The natural or legal person, or organisation, which determines the purposes and means of the processing of personal data.

Data Controller:

Company name: **SZÓDA 1 Kft.**
Registered office:1075, Budapest Wesselényi utca 18.
Company registration number: 01-09-712126
Tax number: 12961885-2-42
Representativ: Kautezky Dávid
E-mail: sistersbygettogulyas@gmail.com
Website: www.sistersbygettogulyas.hu, www.sistersbygettogulyas.com

2.3. **Data Subject**

A natural person to whom the personal data relates, including, in particular, a visitor to the Website, a customer, a registered user or any person who contacts the Data Controller.

2.4. **User**

A natural person who visits the Website or uses its services or online ordering system.

2.5. **Personal Data**

Any information relating to an identified or identifiable natural person.

2.6. **Data Processor**

A natural or legal person who processes personal data on behalf of and in accordance with the instructions of the Data Controller.

2.7. **Data Transfer**

Making personal data accessible to a specific third party.

3. 1. Personal Data Processed by the Data Controller

3.1. **1.1. Online Orders**

When an online order is placed, the Data Controller processes the following personal data:

- Name;
- E-mail address;
- Telephone number;
- Order details;
- Selected products and quantities;
- Total order amount;
- Selected collection time;
- Payment status;
- Order identification number;
- Any comments provided by the customer;
- Data required for invoicing.

Providing an e-mail address is necessary to place an order, as the Data Controller uses it to send, among

other things, the order confirmation and receipt.

Providing a telephone number is also necessary for order fulfilment and for any communication that may be required in connection with the order.

3.2. Registration

User registration is not available on the Website. Users may place orders without registering.

3.3. Comments Related to Orders

The Website may allow customers to add comments to their orders, for example, to specify requests regarding food preparation.

At their own discretion, customers may provide information in the comments field relating to their health, food allergies or food intolerances.

The Data Controller asks customers to provide only information in the comments field that is strictly necessary for fulfilling the order, and to disclose special categories of personal data only where such information is necessary for food preparation or order fulfilment.

The processing of such information is related to ensuring the proper fulfilment of the order. The Data Controller processes such data only to the extent and for the period necessary.

4. Purpose, Legal Basis and Retention Period of Individual Data Processing Activities

4.1. Fulfilment of Online Orders

Purpose of data processing:
Receiving, processing and preparing online orders placed by customers, arranging personal collection, confirming orders and maintaining necessary contact with customers.

Data processed:

- Name;
- E-mail address;
- Telephone number;
- Order details;
- Order identification number;
- Collection time;
- Comments;
- Payment status.

Legal basis:
Performance of a contract pursuant to Article 6(1)(b) of the GDPR, or taking steps prior to entering into a contract.

Retention period:
For the period necessary to fulfil the order and, thereafter, until the expiry of the statutory retention period applicable to the individual data concerned.

4.2. **Invoicing**

In connection with invoicing, the Data Controller processes the data necessary for issuing receipts and invoices.

Invoicing is carried out through the **Számlázz.hu** system, and the receipt/invoice is sent to the customer electronically by e-mail.

Purpose of data processing:
Issuing and sending invoices and fulfilling accounting and tax obligations.

Legal basis:
Article 6(1)(c) of the GDPR, compliance with a legal obligation to which the Data Controller is subject.

Retention period:
For the period specified by applicable accounting and tax legislation.

Data Processor / Service Provider:
Számlázz.hu / KBOSS.hu Kft.

4.3. **Online Credit and Debit Card Payments**

The price of orders placed on the Website may also be paid by online credit or debit card.

The online payment service is provided by **Teya**.

The Data Controller does not process or store full payment card details. Payment transactions are carried out through the payment service provider's system.

Purpose of data processing:
Processing online payments for orders and managing payment transactions.

Legal basis:
Performance of a contract pursuant to Article 6(1)(b) of the GDPR.

The payment service provider's own data processing activities are governed by Teya's privacy notice in force at any given time.

4.4. **Order Confirmation and Communication**

The Data Controller may send automated messages related to the order to the e-mail address provided by the customer, including in particular:

- Order confirmation;
- Order identification number;
- Notifications regarding the status of the order;
- Invoices related to the purchase.

Legal basis:
Performance of a contract pursuant to Article 6(1)(b) of the GDPR.

E-mails relating to the fulfilment of orders do not constitute newsletters or marketing communications.

5. FruitSys Integration

The Website's online ordering system will be integrated with the **FruitSys system**.

The purpose of this integration is to coordinate order data and catering operations, and to support the processing and fulfilment of orders.

Data necessary for order fulfilment may be transferred to the FruitSys system.

Purpose of data processing:

- Processing orders;
- Supporting order preparation;
- Managing order statuses;
- Coordinating catering operations.

Legal basis:
Performance of a contract pursuant to Article 6(1)(b) of the GDPR.

6. Technical Data Related to the Use of the Website

When visiting the Website, certain technical data may be automatically recorded for technical reasons, including:

- IP address;
- Date and time of the visit;
- Type of browser used;
- Operating system;
- Pages viewed;
- Technical log data;
- Technical information relating to the device.

The purpose of this data processing is to ensure the secure and proper functioning of the Website, identify errors and facilitate technical improvements to the service.

Legal basis:
Article 6(1)(f) of the GDPR, legitimate interests relating to the secure operation and protection of the IT system.

Retention period:
90 days.

7. Google Analytics

The Website uses **Google Analytics 4** to analyse website traffic and user behaviour.

The purposes of using Google Analytics include, in particular:

- Measuring Website traffic;
- Analysing user behaviour;
- Monitoring Website performance;
- Improving the user experience;

- Developing the Website's content and functionality.

The use of Google Analytics on the Website is subject to the cookie settings implemented on the Website and the User's consent.

The data processed through Google Analytics is also subject to Google's applicable Privacy Policy.

8. Marketing and Remarketing Tools

The Data Controller does not necessarily use all marketing and remarketing tools on the Website at present, particularly at the time of launch.

The following services may be introduced at a later date:

- Google Ads;
- Google Remarketing;
- Meta Pixel;
- Google Tag Manager;
- Other online marketing and analytics services.

If these services are implemented, the related data processing activities and use of cookies will be carried out following appropriate notification to the User and, where required, subject to the User's prior consent.

Consent to data processing for marketing and remarketing purposes may be withdrawn by the User at any time.

9. Use of Cookies

The Website uses cookies.

Cookies are small data files that may be placed on the User's device by the Website.

The Website uses **CookieYes** for cookie management.

Cookies may serve the following purposes:

- Essential Website functionality;
- Security;
- Session management;
- Remembering user preferences;
- Analytics;
- Marketing;
- Remarketing.

The use of strictly necessary cookies does not always require the User's consent.

The use of analytics, marketing and remarketing cookies may be subject to the User's consent.

The User may provide, modify or withdraw their consent to the use of cookies at any time through the CookieYes interface.

10. Data Processors and External Service Providers

The Data Controller may use external service providers to operate the Website and the online ordering system.

The currently known service providers are:

Service Provider	Role	Purpose of Data Processing
Teya	Online payment service provider	Processing card payments
Számlázz.hu	Invoicing service provider	Issuing and sending invoices
FruitSys	Ordering/catering system	Order processing
CookieYes	Cookie management provider	Managing cookie consent
Google Analytics	Analytics service provider	Analysing Website traffic and usage
Google Ads	Marketing service that may be introduced at a later date	Advertising and remarketing
Meta Pixel	Marketing service that may be introduced at a later date	Tracking and remarketing
Google Tag Manager	Technical service that may be introduced at a later date	Managing tags and tracking tools
Challenger-Solution-it Kft.	Hosting provider	Website hosting and operation

With regard to data processing carried out within the systems of individual service providers, the provisions of each provider's own privacy policy shall also apply.

The Data Controller endeavours to engage only data processors that provide appropriate guarantees for the lawful and secure processing of personal data.

11. Data Transfers

The Data Controller shall transfer personal data to third parties only:

- To comply with legal obligations;
- To the extent necessary for the fulfilment of orders and contractual obligations;
- To data processors;
- On the basis of the User's consent;
- Or for the purposes of pursuing the Data Controller's legitimate interests, in accordance with the provisions of the GDPR.

In particular, the Data Controller is entitled to transfer the necessary data to payment service providers, invoicing service providers, ordering system providers and technical service providers.

In the event of a request from an authority or court, the Data Controller shall, where required by law, provide the available data to the competent authority or body.

12. Data Security

The Data Controller ensures the security of personal data by implementing appropriate technical and organisational measures.

The Data Controller endeavours to prevent:

- Unauthorised access to personal data;
- Unauthorised alteration of personal data;
- Unauthorised disclosure or transfer of personal data;
- Loss of personal data;
- Destruction of personal data;
- Unauthorised use of personal data.

The Data Controller also takes data security requirements into account when selecting data processors.

13. Rights of Data Subjects

Pursuant to the provisions of the GDPR, data subjects are entitled, in particular, to exercise the following rights:

13.1. **Right to Information**

Data subjects have the right to request information as to whether their personal data is being processed and, if so, which personal data concerning them is being processed.

13.2. **Right of Access**

Data subjects have the right to request access to the personal data processed about them.

13.3. **Right to Rectification**

Data subjects have the right to request the rectification of inaccurate personal data or the completion of incomplete personal data.

13.4. **Right to Erasure**

Under certain conditions, data subjects have the right to request the erasure of their personal data.

The right to erasure may not apply where the Data Controller is required by law to retain the data, for example, for accounting or tax purposes.

13.5. **Right to Restriction of Processing**

In certain circumstances, data subjects may request the restriction of the processing of their personal data.

13.6. **Right to Data Portability**

Where the statutory conditions are met, data subjects have the right to receive the personal data they have provided to the Data Controller in a structured, commonly used and machine-readable format.

13.7. Right to Object

Data subjects have the right to object to the processing of their personal data where the legal basis for processing is Article 6(1)(e) or Article 6(1)(f) of the GDPR.

In the case of processing for direct marketing purposes, data subjects may object at any time to the processing of their personal data for such purposes.

13.8. Right to Withdraw Consent

Where the legal basis for processing is the data subject's consent, the data subject has the right to withdraw their consent at any time.

Withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal.

14. Handling Data Subject Requests

Data subjects may submit requests relating to the processing of their personal data to the Data Controller using the following contact details:

E-mail: sistersbygettogulyas@gmail.com

The Data Controller shall respond to data subject requests within the time limits specified in the GDPR.

Where necessary, the Data Controller may request additional information to adequately verify the identity of the data subject.

The exercise of data subject rights is generally free of charge.

15. Personal Data Breaches

A personal data breach includes, in particular, the accidental or unlawful destruction, loss or alteration of personal data, the unauthorised disclosure of or access to such data.

In the event of a personal data breach, the Data Controller shall act in accordance with the provisions of the GDPR and, where required by law, shall notify the competent supervisory authority and the affected data subjects.

16. Remedies Before the Data Protection Authority

If a data subject considers that the processing of their personal data infringes the GDPR or applicable data protection laws, they may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information.

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

Registered office: 1055 Budapest, Falk Miksa utca 9–11., Hungary
Postal address: 1363 Budapest, P.O. Box 9., Hungary
E-mail: ugyfelszolgalat@naih.hu
Website: www.naih.hu

According to the official information provided by NAIH, data subjects may also initiate data protection authority proceedings if their rights relating to the protection of their personal data have been violated.

Data subjects are also entitled to bring proceedings before a court.

17. Amendments to the Privacy Notice

The Data Controller reserves the right to amend this Notice, in particular in the event of changes in legislation, the introduction of new services, new data processing activities or technical changes.

The amended version of this Notice shall be published by the Data Controller on the Website.

Amendments shall take effect upon publication.

18. 3. Final Provisions

Matters not regulated in this Notice shall be governed, in particular, by the following legislation:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR);
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information;
- Act V of 2013 on the Civil Code;
- Act CVIII of 2001 on Electronic Commerce Services;
- Act CLV of 1997 on Consumer Protection;
- Act C of 2003 on Electronic Communications;
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities;
- And other applicable Hungarian and European Union legislation.

This Notice sets out the data processing rules applicable to the use of the Website, the online ordering system and the related data processing activities.

Date: Budapest, 1 September 2026.