RODOLFO RÉSERVE
MEMBERSHIP CARD

PRIVACY NOTICE

ON THE RIGHTS OF THE DATA SUBJECT
REGARDING THE PROCESSING OF PERSONAL DATA

Effective date: 15 May 2025

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INTRODUCTION

This Privacy Notice has been prepared for members, registrants, website visitors, clients and partners of the Rodolfo Réserve Membership Card programme. If you fall into any of the above categories, you share personal data with us. We are responsible for the protection and security of that data in accordance with applicable law.

Please read this Notice, which has been prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (**GDPR**) and Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (**Info Act**).

You – the reader of this Notice – may also be referred to as **Data Subject**, **Member** or **User**. Your fundamental rights are described in detail in Chapters VI, VII and VIII.

For any questions, comments or complaints, please contact us. The Data Controller primarily receives requests at the following dedicated e-mail address:

adatvedelem@hungarianexperience.hu

The Data Controller reserves the right to amend this Notice at any time. If an amendment affects the use of personal data provided by the Data Subject, the Data Controller will notify the Data Subject by e-mail. If the details of the processing also change, the Data Controller will separately request the Data Subject's consent to the amended processing.

CHAPTER I

IDENTITY OF THE DATA CONTROLLER

The issuer of this Notice and the Data Controller:

Name:	Dorottya Experience Kft.
Data Protection Officer:	Petra Berecz-Fischer
E-mail:	adatvedelem@hungarianexperience.hu
Registered address:	Dorottya utca 6, 2nd floor, office 206, 1051 Budapest, Hungary

This Notice may be amended or withdrawn unilaterally by the Data Controller at any time, with simultaneous notification to Data Subjects. Notification is effected by publication on the Data Controller's website and, depending on the nature of the change, by direct notification to Data Subjects.

CHAPTER II

MEMBERSHIP CARD REGISTRATION AND MEMBERSHIP DATA

1. Registration for the Rodolfo Réserve Membership Card Programme

1.1 A natural person wishing to register for the Rodolfo Réserve Membership Card programme may give their consent to the processing of their personal data by ticking the relevant checkbox on the registration interface (website or physical registration point). The checkbox is not pre-ticked.

1.2 Categories of personal data that may be processed:

- full name (first name and surname)
- year of birth
- telephone number
- e-mail address
- date of registration and unique membership identifier

1.3 Purposes of processing:

- Maintaining a register of members and identifying them within the Rodolfo Réserve Membership Card programme.
- Issuing and delivering the membership card (in physical or digital form).
- Providing members with discounts, exclusive offers and benefits.
- Contacting members electronically or by telephone within the scope of the membership.
- Informing members about the Data Controller's events, promotions and programme changes.
- Analysing and developing the effectiveness of the membership programme.

1.4 **Legal basis for processing:** the freely given consent of the data subject (Article 6(1)(a) GDPR).

1.5 **Recipients of personal data:** employees of the Data Controller responsible for customer service and marketing activities, and – as data processors – employees of the Data Controller's IT service providers for the purpose of hosting services.

1.6 **Retention period:** for the duration of the membership relationship, or until the data subject withdraws consent (deletion request), but for no longer than **5 years** from the date of registration. After termination of membership, data will be deleted without delay, unless a statutory obligation requires longer retention (e.g. accounting and tax data).

1.7 **Consequences of not providing data:** registration and issuance of the membership card will not be possible.

2. Newsletter and Direct Marketing

2.1 In connection with Membership Card registration, the Data Subject may separately and voluntarily subscribe to newsletters and marketing communications. The subscription checkbox is not pre-ticked. The data subject may unsubscribe at any time by clicking the Unsubscribe link in the newsletter, or by written or e-mail notification. Upon unsubscription, marketing data will be deleted without delay.

2.2 Categories of personal data that may be processed: name, e-mail address.

2.3 Purposes of processing:

- Sending newsletters regarding the Data Controller's products, services and events.
- Informing members about news and exclusive member-only offers within the membership programme.
- Conducting satisfaction surveys and requesting feedback.

2.4 **Legal basis:** the freely given consent of the data subject (Article 6(1)(a) GDPR).

2.5 **Retention period:** for the duration of the newsletter subscription or until the data subject withdraws consent.

3. Visitor Data Processing on the Registration Website (Cookies)

3.1 In line with general internet practice, the Data Controller may use cookies on the registration website. Detailed information about cookies is available in the Cookie Settings document on the website.

3.2 During the use of the website, the Data Controller may record the following data: the visitor's IP address, browser type, characteristics of the device's operating system, the time of the visit, and the sub-page visited.

3.3 **Strictly necessary session cookies:** legal basis is Act CVIII of 2001 on Electronic Commerce Services, Section 13/A(3) (legitimate interest). Retention period: until the browser is closed.

3.4 **Consent-based cookies** (analytical, marketing): legal basis is the freely given consent of the data subject (Article 6(1)(a) GDPR). Consent may be given on the first visit and may be withdrawn at any time.

4. Social Media

4.1 The Data Controller may maintain Facebook, Instagram and TikTok pages for the purpose of promoting and publicising the Rodolfo Réserve programme. Questions posted on social media pages do not constitute formally submitted complaints.

4.2 Data protection complaints and enquiries should be sent to **adatvedelem@hungarianexperience.hu**.

4.3 Meta Platforms Ireland Ltd. (Facebook, Instagram) is a joint data controller with the Data Controller in respect of Insights data relating to the Facebook page. The applicable agreement is available at: https://www.facebook.com/legal/controller_addendum

5. Processing Related to Reviews, Feedback and Complaints

5.1 **Complaints book:** the legal basis for processing data in the complaints book maintained at the Data Controller's business premises is a legal obligation (Act CLXIV of 2005 on Commerce, Section 5(4)). Data processed: name, address, telephone number, e-mail address, signature. Retention period: 3 years from the date of the complaint.

5.2 **Other feedback:** the Data Controller processes reviews and feedback submitted by members on the basis of legitimate interest, for the purpose of improving the quality of the membership programme. Retention period: 3 years.

CHAPTER III

DATA OF PARTNERS AND LEGAL ENTITY CLIENTS

6. Processing of Contracting Partners' Data

6.1 On the legal basis of contract performance, the Data Controller processes – for the purposes of concluding, performing and terminating contracts – the name, home address, mother's name, place and date of birth, tax identification number, registered/business address, telephone number, e-mail address, bank account number and sole trader registration number of natural persons who have entered into a contract with it.

6.2 **Legal basis:** contract performance; legal obligation (invoicing); and the data subject's consent (telephone number, e-mail address).

6.3 **Retention period:** 5 years after termination of the contract; 8 years for accounting documents.

7. Contact Details of Representatives of Legal Entity Clients

7.1 **Data processed:** name, address, telephone number, e-mail address.

7.2 **Purpose:** maintaining business contact. **Legal basis:** the data subject's consent. **Retention:** 5 years after the end of the business relationship.

CHAPTER IV

PROCESSING BASED ON LEGAL OBLIGATIONS

8. Processing for Tax and Accounting Purposes

8.1 On the legal basis of compliance with a legal obligation, the Data Controller processes – for the purpose of fulfilling statutory tax and accounting obligations (bookkeeping, taxation) – the data prescribed by law of natural persons who enter into a business relationship with it as buyers or suppliers (name, address, tax number, tax identification number, signature, etc.).

8.2 **Legal basis:** compliance with a legal obligation (Article 6(1)(c) GDPR). **Retention period: 8 years** after termination of the underlying legal relationship.

CHAPTER V

DATA PROCESSORS

A data processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller (Article 4(8) GDPR). Data processors carry out processing in accordance with the instructions of the Data Controller, may not make substantive decisions regarding processing, and must store and retain personal data solely in accordance with the Controller's instructions.

9. IT Service Providers

Purpose:	Operation of the website and registration interface
Company name:	Fribbit Kft.
Registered address:	Templom tér 19, 2040 Budaörs, Hungary
E-mail:	richard@fribbit.com
Website:	www.fribbit.com

Purpose:	Operation of the enterprise management system
Company name:	FITS Magyarország Kft.
Registered address:	Szent László utca 89/A ground floor 3, 8600 Siófok, Hungary
E-mail:	tamas.munkacsy@fits.hu
Website:	www.fits.hu

Purpose:	Newsletter delivery
Company name:	Mailchimp c/o The Rocket Science Group, LLC
Registered address:	675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA

E-mail:	–
Website:	www.mailchimp.com
Note:	For EU–USA data transfers, the processor applies the standard contractual clauses approved by the European Commission, which constitute appropriate safeguards under the GDPR.

Purpose:	Member register and CRM system
Company name:	Banktech Safe Kft.
Registered address:	Hegyalja út 154, 1124 Budapest, Hungary
E-mail:	–
Website:	–

Purpose:	Cloud hosting services
Company name:	Microsoft Ireland Operations Limited
Registered address:	One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland
E-mail:	–
Website:	https://azure.microsoft.com

Purpose:	Processing of online payment transactions
Company name:	Worldline Financial Services (Europe) S.A. Hungarian Branch
Registered address:	Budafoki út 91–93, Building C, ground floor, 1117 Budapest, Hungary
E-mail:	info.hu@six-payment-services.com
Website:	https://www.six-payment-services.com

Purpose:	Website visitor analytics and user experience improvement
Company name:	sxm-Network Kft.
Registered address:	Petőfi utca 16, 2636 Tésa, Hungary
E-mail:	hello@adamic.hu
Website:	https://adamic.hu/

10. Accounting Service Provider

Company name:	KBOSS.hu Kft.
Registered address:	Záhony utca 7, 1031 Budapest, Hungary
E-mail:	info@szamlazz.hu
Website:	www.szamlazz.hu

CHAPTER VI

SUMMARY OF DATA SUBJECT RIGHTS

The Data Controller primarily receives requests at the dedicated e-mail address: **adatvedelem@hungarianexperience.hu**

Right to prior information (Articles 13–14 GDPR)

The data subject has the right to receive information about the facts and details relating to the processing before it begins.

Right of access (Article 15 GDPR)

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

Right to rectification (Article 16 GDPR)

The data subject has the right to request that the Data Controller rectify inaccurate personal data concerning them without undue delay, and to have incomplete personal data completed.

Right to erasure – right to be forgotten (Article 17 GDPR)

The data subject has the right to request that the Data Controller erase personal data concerning them without undue delay where one of the grounds set out in the GDPR applies.

Right to restriction of processing (Article 18 GDPR)

The data subject has the right to request that the Data Controller restrict processing where the conditions laid down in the GDPR are met.

Right to data portability (Article 20 GDPR)

The data subject has the right to receive their personal data in a structured, commonly used, machine-readable format and to transmit those data to another controller.

Right to object (Article 21 GDPR)

The data subject has the right to object at any time, on grounds relating to their particular situation, to processing of their personal data which is based on legitimate interest or a public task, including profiling based on those provisions.

Automated individual decision-making, including profiling (Article 22 GDPR)

The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects them.

Right to lodge a complaint with a supervisory authority (Article 77 GDPR)

The data subject has the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH) if they consider that the processing of their personal data infringes the GDPR.

Right to an effective judicial remedy (Articles 78–79 GDPR)

The data subject has the right to an effective judicial remedy against a legally binding decision of the supervisory authority, or against the controller or processor.

Contact details of the National Authority for Data Protection and Freedom of Information (NAIH):

Address:	Falk Miksa utca 9–11, 1055 Budapest, Hungary
Postal address:	P.O. Box 9, 1363 Budapest, Hungary
Website:	www.naih.hu
Telephone:	+36 (30) 683-5969 | +36 (1) 391-1400
E-mail:	ugyfelszolgalat@naih.hu

CHAPTER VII

DETAILED INFORMATION ON DATA SUBJECT RIGHTS

11. Right to Prior Information

The data subject has the right to receive information about the facts and details relating to the processing before it begins (Articles 13–14 GDPR).

12. Right of Access

The data subject has the right to obtain confirmation from the Data Controller as to whether personal data concerning them are being processed, and if so, to obtain access to those personal data and the following information: the purposes of processing; the categories of personal data concerned; the recipients or categories of recipients; the envisaged retention period; the data subject's rights; the right to lodge a complaint; information on automated decision-making (Article 15 GDPR).

13. Right to Erasure

The data subject may request the Data Controller to erase personal data concerning them without undue delay, in particular where: (a) the data are no longer necessary for the purposes for which they were collected; (b) the data subject withdraws consent; (c) the data subject objects to processing; (d) the data have been unlawfully processed; (e) erasure is required by a legal obligation. (Article 17 GDPR)

14. Right to Restriction of Processing

The data subject may request the Data Controller to restrict processing where: (a) the accuracy of the data is contested; (b) the processing is unlawful but the data subject requests restriction rather than erasure; (c) the Data Controller no longer needs the data but they are required by the data subject for legal claims; (d) the data subject has lodged an objection. (Article 18 GDPR)

15. Right to Data Portability

The data subject has the right to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used and machine-readable format, and to transmit those data to another controller, where the processing is based on consent or a contract and is carried out by automated means. (Article 20 GDPR)

16. Right to Object

The data subject has the right to object at any time, on grounds relating to their particular situation, to processing of their personal data based on Article 6(1)(e) or (f) GDPR, including profiling based on those provisions. In the case of direct marketing, the right to object is absolute and the data may no longer be processed for that purpose. (Article 21 GDPR)

17. Automated Individual Decision-Making, Including Profiling

The data subject has the right not to be subject to a decision based solely on automated processing – including profiling – which produces legal effects concerning them or similarly significantly affects them (Article 22 GDPR). The Data Controller does not apply solely automated decision-making within the Rodolfo Réserve Membership Card programme.

18. Notification of a Personal Data Breach

Where a personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Data Controller shall communicate the personal data breach to the data subject without

undue delay. (Article 34 GDPR)

CHAPTER VIII

SUBMISSION OF REQUESTS AND THE CONTROLLER'S MEASURES

19. Submission of Requests and the Controller's Measures

19.1 The Data Controller primarily receives requests at the following dedicated e-mail address: **adatvedelem@hungarianexperience.hu**. The Data Controller shall inform the data subject of the action taken on a request without undue delay and in any event within **one month** of receipt of the request.

19.2 Where necessary, taking into account the complexity and number of requests, this period may be extended by a further two months. The Data Controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

19.3 Where the data subject submits the request by electronic means, the information shall be provided by electronic means where possible, unless the data subject requests otherwise.

19.4 If the Data Controller does not take action on the request, it shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

19.5 The Data Controller shall provide information and measures free of charge. Where requests are manifestly unfounded or excessive, in particular because of their repetitive character, the Data Controller may charge a reasonable fee based on administrative costs, or refuse to act on the request. The burden of demonstrating the manifestly unfounded or excessive character of the request lies with the Data Controller.

19.6 Where the Data Controller has reasonable doubts concerning the identity of the natural person submitting a request, it may request additional information necessary to confirm the identity of the data subject.