

GDPR Privacy Policy

DoubleShot First Kft. – www.doubleshot.hu

The purpose of this Policy is to provide transparent information regarding the personal data collected and processed by DoubleShot First Vendéglátó Korlátolt Felelősségű Társaság (1053 Budapest, Veres Pálné utca 33., hereinafter: Data Controller) in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR). When drafting up this Policy, the company took into account, in addition to the GDPR, the Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Infotv.), the Act V of 2013 on the Civil Code (Ptk.), and the Act XLVIII of 2008 on the basic conditions and certain restrictions of economic advertising activities (Grtv.).

The Policy and any subsequent amendments shall become effective upon publication.

The scope of this Policy does not include the data processing operations to which any link on the website associated with this document may lead. The Data Controller is not liable for such data processing operations.

1. Information of the Data Controller

Name: DoubleShot First Kft.
Registered Office: 1053 Budapest, Veres Pálné utca 33.
E-mail: info@doubleshot.hu
Website: www.doubleshot.hu
VAT number: 25196331-2-41
Represented by: Bullás Norbert managing director

2. Definitions

2.1. Data Processing: Regardless of the method used, any operation or set of operations performed on Personal Data, in particular the collection, recording, organizing, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing, transmitting, disseminating or otherwise making available, publishing, aligning or combining, restricting, erasing, and destroying Personal Data.

2.2. Data Controller: The entity that determines the purposes and means of data processing, either alone or jointly with others. In the case of the Services referred to in this Policy, the Data Controller is: DoubleShot First Kft., registered office: 1053 Budapest, Veres Pálné utca 33., (registered by the Company Registry Court of the Capital City), VAT number: 25196331-2-41; hereinafter referred to as the Data Controller. The Data Controller is a business association registered in Hungary.

The Data Controller is the operator of the Website, which primarily provides online database management and content publishing services and, in connection with this main activity, provides the Services available through the Website.

The data processing described in this Policy does not constitute joint data processing, as the Data Controller does not transfer or disclose the User's Personal Data to other Data Controllers, and therefore does not define the tasks and responsibilities related to joint data processing.

2.3. Personal data or information: Any data or information that makes it possible to identify a natural person User, either directly or indirectly.

2.4. Data processor: The service provider who processes personal data on behalf of the Data Controller.

In the case of the services referred to in this Policy, Data Processor may be: DoubleShot First Kft. (registered office: 1053 Budapest, Veres Pálné utca 33.; registered by the Company Registry Court of the Capital City, VAT number: 25196331-2-41)

2.5. Website: The website www.doubleshot.hu operated by the Data Controller and the subpages of this website.

2.6. Service(s): Services operated and provided by the Data Controller, which are available on the Website.

2.7. User: a natural person who registers for the Services and provides the data listed in Section 3.

2.8. External service provider: Third-party service partners used by the Data Controller, either directly or indirectly, in connection with the operation of the Website or the provision of services available through the Website, to whom Personal Data is or may be transferred for the purpose of providing their services, or who may transfer Personal Data to the Data Controller. External service providers also include service providers who do not cooperate with the Data Controller but who, by accessing the Website of the Services, collect data about Users that may be suitable for identifying the User, either independently or in combination with other data.

2.9. Policy: The Data Controller's current GDPR Privacy Policy.

2.10. Data subject: A person living in or outside the EU who is connected to an organization operating in the EU. Such individuals are considered "data subjects" and have rights under the GDPR regarding the processing of their personal data.

3. Scope of Personal Data Processed

3.1. The server does not automatically record data when you visit the Website.

Any personalized content for users is provided by the servers of external service providers, and the relevant data controllers can provide information about the data processing involved. (Google Analytics and Google Ads servers).

The service provider code available at www.facebook.com and www.instagram.com and www.tiktok.com has been posted on the Website.

3.2. Additional data processed by the Data Controller:

3.2.1. In order to provide a customized service, the Data Controller places a small data package (a so-called “cookie”) on the User’s computer. The purpose of the cookie is to ensure the highest possible quality of the website, to provide personalized services, and to enhance the user experience. The User can delete the cookie from their computer or set their browser to disable cookies. By disabling cookies, the User acknowledges that the website will not function fully without cookies.

Cookies are managed by the Cookiebot (Usercentrics A/S, Denmark) system, which allows consent to be given, withdrawn, and logged.

The website may use the following types of cookies:

- **Necessary cookies:** these are essential for the basic functioning of the website.
- **Statistical cookies:** for analyzing visitor behavior and traffic (e.g., Google Analytics 4).
- **Marketing cookies:** for displaying personalized ads (e.g., Google Ads, Meta Pixel, TikTok Pixel).

3.2.2. Service providers used and data processing purposes

Service provider	Purpose of Data processing	Legal basis	Forwarded data
Google Tag Manager	Managing tracking codes used on the website	Legitimate interest / consent	Browsing data
Google Analytics 4 (Google Ireland Ltd.)	Website traffic and visitor analysis	GDPR Article 6(1)(a) – consent	Cookie ID, IP address, browsing data
Google Ads (Google Ireland Ltd.)	Remarketing and conversion analysis	GDPR Article 6(1)(a)	Cookie ID, IP address, browsing data
Meta Platforms Ireland Ltd.	Social media advertising and remarketing	GDPR Article 6(1)(a)	Cookie ID, browsing data
TikTok Technology Ltd.	Campaign analysis and targeted advertising	GDPR Article 6(1)(a)	Cookie ID, IP address, device information

Usercentrics A/S (Cookiebot)	Managing cookie preferences	GDPR Article 6(1)(c) – legal obligation	User consent settings
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3.3.3. Data transfer, data processors

The Data Controller shall transfer data to third parties only on the basis of a legal obligation or with the express consent of the data subject.

During data processing, some personal data may be transferred outside the European Union (in particular to the United States).

In such cases, data transfer is based on the Standard Contractual Clauses (SCC) adopted by the European Commission.

4. Rights of data subjects under the GDPR

According to the GDPR, data subjects have the following specific rights:

- transparent information
- access to one's own data
- correction of inaccurate data
- the right to erasure (to be forgotten) under certain circumstances
- withdrawal of consent
- requesting restriction of data processing
- objection to data processing
- not to be subject to automated decision-making
- data portability
- lodge a complaint with a supervisory authority
- the right to effective judicial remedy against a Data Controller or Data Processor

We will respond to any of these requests without undue delay, but within one month at the latest. We will send our response electronically, free of charge, but we reserve the right to charge an administrative fee for handling repeated requests within one year or requests that are clearly unfounded or excessive.

4.1. Transparent information

All information required by the GDPR is provided in a concise, transparent, intelligible, and easily accessible form, using clear and plain language. The information is provided in writing or electronically. We can also provide verbal information at your request.

4.2. Access to one's own data

You have the right to request confirmation as to whether we process personal data concerning you and, if so, you may request access to the data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients to whom the personal data have been or will be disclosed, in particular recipients in non-EU countries;
- the period for which the personal data will be stored;

- your right to request the rectification or erasure of your personal data, or to restrict the processing of your personal data, or to object to such processing;
- your right to lodge a complaint with a supervisory authority;
- if we do not collect personal data directly from you, the source of such data;
- and whether automated decision-making has taken place on the basis of the data and, if so, the logic applied and understandable information about the significance of such data processing and its expected consequences for you.

4.3. Correction of inaccurate data

If we store inaccurate or incomplete personal data about you, we will correct it without delay upon receipt of your request.

4.4. The right to erasure (to be forgotten)

You have the right to have your personal data deleted and to request that we comply with this request without delay if one of the following reasons applies:

- your personal data is no longer necessary in relation to the original purposes of data processing;
- you have withdrawn your consent and we no longer have a legal basis for processing the data;
- the processing is based on our legitimate interests, and you claim that there is no legitimate reason for the processing that takes precedence over your interests, rights, and freedoms;
- the purpose of the processing is direct marketing, and you object to it;
- we have processed your data unlawfully;
- your data must be erased in order to comply with a legal obligation under EU or Member State law to which we are subject;
- the lawfulness of our processing of the data is based on the consent of a child's guardian, and either I) you are the child's guardian and the child concerned has not yet reached the age of consent, or II) you are the child who has already reached the age of consent. (In Hungary, the minimum age for consent to the processing of personal data is 18 years.)

Please note that we cannot delete your personal data if data processing is necessary for the following reasons:

- for the purpose of exercising the right to freedom of expression and information;
- to comply with a legal obligation that requires the processing of personal data;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, insofar as such a request is likely to render impossible or seriously impair such processing; or
- for the establishment, exercise or defense of legal claims.

4.5. Withdrawal of consent

If you have given your consent to our data processing, you can withdraw your consent at any time. You can do this by sending a request to our email address, listing the activities for which we have processed your personal data.

The withdrawal of your consent does not affect the data processing we have already carried out.

4.6. Requesting restriction of data processing

You may request that we restrict the processing of your personal data if any of the following applies:

- you contest the accuracy of the personal data;
- our processing is unlawful, but you oppose the erasure of the data and request the restriction of its use instead;
- we no longer need the personal data for the original purpose, but you require it for the establishment, exercise, or defense of legal claims;
- You object to our processing of the data on the basis that we have cited our “legitimate interests” as the legal basis, but you claim that your “interests, rights, and freedoms” override those interests.

If the processing is restricted based on your objection, such personal data may only be processed with your consent, except for storage:

1. for the establishment, exercise, or defense of legal claims
2. for the protection of the rights of another person, or
3. for reasons of important public interest of the Union or of a Member State.

In the event of a restriction on data processing, we will inform you in advance of the lifting of this restriction.

Practical operational considerations may prevent us from restricting data processing in exactly the manner prescribed by the GDPR, but in such cases we will endeavor to find a solution in cooperation with you.

4.7. Objection to data processing

You have the right to object to our processing of your personal data if:

- Our “legitimate interests” serve as the basis for the lawfulness of the data processing, but you claim that your “interests, rights, and freedoms” take precedence over them.
- We process your data for direct marketing purposes, including profiling, where it is related to direct marketing. (Profiling is automated decision-making that analyzes or predicts characteristics related to economic situation, personal preferences, or location.) In the event of such an objection, we will no longer be able to process your personal data for the aforementioned purposes.

4.8. Not to be subject to automated decision-making

You have the right not to be subject to a decision based solely on automated processing that produces legal effects concerning you or similarly significantly affects you.

However, this does not apply if:

- the decision is necessary for entering into, or performance of, a contract between you and us; or

- the automated process is authorized by Union or Member State law to which you are a subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests.

In case a), we must implement appropriate measures to protect your rights, freedoms, and legitimate interests, including at least your right to request human intervention on our part, to express your point of view, and to object to the decision.

4.9. Data portability

Under the GDPR, the data subject has the right to receive personal data concerning him or her in a “structured, commonly used and machine-readable format” under certain circumstances. The data subject also has the right to have the data transferred directly from one data controller to another, if this is technically feasible.

If you request access to your personal data on the basis of the above, we will generally provide it to you in a widely used electronic format, unless you specifically request that we send you the data in written form.

4.10. Lodge a complaint with a supervisory authority

If you believe that we have acted unfairly or unlawfully towards you under the GDPR, you may lodge a complaint with the Data Protection Supervisory Authority. If you do not reside in Hungary but in another EU member state, you have the right to lodge a complaint with the Supervisory Authority of the country concerned. You can find the names and contact details of the data protection authorities at the following link:

http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm

If you reside in Hungary or in a country outside the EU, you can submit your complaint to the Hungarian authorities:

National Authority for Data Protection and Freedom of Information

H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mailing address: 1530 Budapest, Pf.: 5.

Telephone: +36 -1-391-1400

Fax: +36-1-391-1410

Email address for Hungarian inquiries: ugyfelszolgalat@naih.hu

Web: <https://naih.hu>

4.11. The right to effective judicial remedy against a Data Controller or Data Processor

If, in your opinion, we have violated your rights under the GDPR as a result of the improper processing of your personal data, you are entitled to effective judicial remedy.

Proceedings against the data controller or data processor must be brought before the courts of the EU Member State where the data controller or data processor is established. Such proceedings may also be brought before the courts of the EU Member State in which you have your habitual residence.

In Hungary, the case will be heard by the court with jurisdiction. The case may also be brought before the court of the data subject's place of residence or habitual residence, at the data subject's discretion.

In addition to the provisions of the GDPR, the provisions of Book Two, Part Three, Title XII (Sections 2:51–2:54) of Act V of 2013 on the Civil Code, as well as other legal provisions relating to court proceedings, shall apply to court proceedings.

4.12. Contact us regarding GDPR

In order to exercise the rights described above, or in the case of a complaint addressed directly to us, or in the case of a general inquiry regarding the GDPR or data protection, the email address and postal address required for contact are as follows:

E-mail: info@doubleshot.hu

Address: DoubleShot First Kft., 1053 Budapest, Veres Pálné utca 33.

5. Instances of Data Processing

5.1. Table reservation

You can reserve a table via online, in person, or by phone. Table reservations are recorded via email.

Purpose of data processing: The purpose of our data collection is to be able to identify the guest who made the reservation during a subsequent reservation and to keep a record of the reservation.

Legal basis for data processing: Your consent. You may withdraw your consent at any time, but this does not affect the lawfulness of the data processing that took place prior to the withdrawal. Please note that if you do not consent to the processing of your data, we will not be able to secure your reservation.

Data processing period: We will retain your booking details for one (1) year after the current year.

5.2. Social Media Platforms (Facebook, Instagram, Tiktok)

We are available on Facebook, Instagram, and TikTok. You can subscribe to our news feed on the message board by clicking “like”; You can subscribe by clicking on the “follow” link and unsubscribe by clicking on the “dislike” link located there, or you can delete unwanted news appearing on the message wall using the message wall settings. We have access to the profiles of our “followers,” but we do not record or process them in our own internal system.

Purpose of data processing: To inform you about current information and news concerning us.

Legal basis for data processing: Your consent, which you can withdraw at any time by unsubscribing.

Withdrawal does not affect the lawfulness of data processing prior to withdrawal. In the event of withdrawal, you will not receive notifications from our news feed, our news will not appear on your news feed, but you will still have access to the news feed as our site is public.

Data processing period: Data processing will continue until you unsubscribe.

Data processor: Our social media pages are edited by a social media manager commissioned by DoubleShot First Kft.

The companies operating social media sites are separate data controllers. Information about data processing on the given site can be found at the following location:

- Facebook: Facebook Ireland Ltd. (head address: 4 Grand Canal Square Grand Canal Harbour Dublin 2, Ireland) GDPR Policy: <https://www.facebook.com/privacy/explanation>
- Instagram: Facebook Ireland Ltd. (head address: 4 Grand Canal Square Grand Canal Harbour Dublin 2, Ireland) GDPR Policy: <https://www.facebook.com/help/instagram/155833707900388/>
- TikTok: TikTok Technology Ltd. (head address: 10 Earlsfort Terrace, Dublin, D02 T380, Ireland) GDPR Policy: <https://www.tiktok.com/legal/page/eea/privacy-policy/hu>

By following us, your profile becomes available to us, but we do not process or record any data in our internal system. We do not use it for any purpose other than communicating our news. Facebook also sends us aggregated statistical data, which helps us understand how Facebook users use our Facebook page.

5.3. Camera System

Cameras are in operation in the hospitality areas for the personal and property safety of guests. Camera surveillance is indicated by a pictogram and warning text.

Information about data processing related to the camera system is provided on site.