

# PRIVACY POLICY

## HelloLine application

### Table of contents

#### **1. The use of HelloLine application**

1.1. Downloading the HelloLine application and sign-up	2
1.2. Customer service	7
1.3. Invoicing	12
1.4. Data transfer to the USA or other third countries	17

#### **2. Marketing activities**

2.1. Sending push messages to the users of the application for marketing purposes	22
---	----

## **PRIVACY POLICY**

### 1. The use of HelloLine application

---

#### 1.1. Downloading the HelloLine application and sign-up

Before data processing it is needed to inform the data subject.

Upon request it is necessary to provide the Privacy Policy to the data subject.

## 1.1. Downloading the HelloLine application and sign up

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the 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, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

### 1. DATA CONTROLLER:

Name of data controller:		HelloLine Kft.
Address of data controller:		Registered office: Király 31. Str. 4. floor 7. door, 1077 Budapest, Hungary
Contact details of data controller:	e-mail	info@hellolineapp.com
	phone number	+36 30/491-3688
	website	hellolineapp.com
Data Protection Officer (if available)		
Contact details of Data Protection Officer (if available)		

### 2. DATA PROCESSED

#### Scope, purpose and legal basis of data processing

Personal data	Purpose of data processing	The legal basis for processing data
The IP address of the user's computer, the user's name, password, email address, telephone number, Facebook and Apple profile information if the user registers through Facebook or Apple. Approximate age.	In order to ensure the provision of services: secure login to the user account by the user, identification of the user during the ordering process, provision of the service. Sending push messages about the realization or failure of the ordering. Bank card payment.	Processing is necessary for the performance of a contract - GDPR Article 6 Paragraph 1 Section b) (Based on GTC)

#### Data processing (storage) period:

The storage period of data (name, address) closely related to invoicing is 8 years. Other data will be deleted on the day of registration, but no later than 1 month.

#### Is data profiling conducted during data processing?

Answer	Options	A short description of profiling
Yes		
No	<input checked="" type="checkbox"/>	

#### Is automatic decision-making conducted during data processing?

Answer	Options	A short description of automation
Yes		
No	<input checked="" type="checkbox"/>	

*If yes, the Data subject has the right to request manual, human intervention.*

**Source of processed personal data:**

The data subject
------------------

**The data will be transmitted:**

Category	Answer	Company's name, registered office address, business activity
To Data Processors (performing technical tasks related to data processing)	x	<p>DigitalOcean, LLC, 101 6th Ave, New York, NY 10013 Storage of personal data and performance of server service tasks (the data is stored in the EU - Amsterdam, Netherlands)</p> <p>System administrator. Contact the Data Controller about the current partner. Providing system administration and IT services.</p> <p>MiniCRM, 13-15. Madách Imre Str. 1075 Budapest, Hungary. Partner register and task management software.</p> <p>Barion Payment Zrt, 1. Infopark sétány 1117 Budapest Hungary, Credit card acceptance network, financial execution of the transaction.</p>
Recipients		
To third (non-EU) country	x	<p>Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland / Facebook, Inc., 1601 Willow Road, Registration in the HelloLine app with the users' Facebook profile</p> <p>Apple Inc. One Apple Park Way, Cupertino, California, USA, 95014. Registration in the HelloLine app with the users' Apple profile</p>

**Joint data processing takes place:**

Answer	Options	A short description of joint data processing
Yes	x	Joint data management is implemented only during registration with the Facebook profile
No		

Name of joint data processor	Registered office address
Facebook Ireland Ltd.	4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland / Facebook, Inc., 1601 Willow Road

**Data access and data security measures:**

Restriction of access:	The personal data of the person ordering through the application will not be transferred to the restaurants. The order is placed anonymously, the order can be identified using a unique code. Access to data is logged by the company. The number of people with access is minimal.
Data security measures:	HelloLine Ltd stores customer data on the European server (Netherlands, Amsterdam) of DigitalOcean LLC. The Ltd. uses encryption and password protection that provides adequate database protection.

### 3. THE RIGHTS OF THE DATA SUBJECT:

The data subject rights under legal basis and their clarification	
<input checked="" type="checkbox"/>	The right to be informed - The data subject shall have the right to be informed about the means and the purposes of processing of personal data before it occurs.
<input checked="" type="checkbox"/>	The right to rectification - The data subject shall have the right to request the rectification of their personal data if the data stored by the data controller is incorrect and evidence submitted by the data subject.
<input checked="" type="checkbox"/>	The right of access - The data subject shall have the right to obtain their stored personal data from the controller.
<input type="checkbox"/>	The right to object - If the legal basis is based on legal interest or on public authority, the data subject shall have the right to object to processing their personal data, but it does not necessarily mean immediate erasure of their data.
<input type="checkbox"/>	The right to erasure ('right to be forgotten') - The data subject has the right to request the permanent deletion of his / her data, unless the data processing is based on the performance of a contract, the fulfillment of a legal obligation or a public authority license.
<input type="checkbox"/>	Withdrawal of consent - The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.
<input type="checkbox"/>	The right to restrict processing - If the data subject does not consider the controller as an authorized entity, they can request the suspension of data processing during the investigation.
<input checked="" type="checkbox"/>	The right to data portability - The data subject shall have the right to request a copy of their personal data stored in digital tabular form.
<input checked="" type="checkbox"/>	The right to review automated decision-making - The data subject shall have the right to request manual review of each data management process, where the controller applied such automated decision-making which has a legal effect on the data subject.

### 4. FILING A COMPLAINT

The data subject shall have the right to file a complaint to the supervisory authority.

You can appeal to the National Authority for Data Protection and Freedom of Information.

Registered office:

<b>Name</b>	National Authority for Data Protection and Freedom of Information (NAIH)
<b>Registered office</b>	9-11 Falk Miksa Str. 1055 Budapest
<b>Address</b>	1374 Budapest, Pf.: 603.
<b>E-mail</b>	ugyfelszolgalat@naih.hu
<b>Phone</b>	+36 (1) 391-1400
<b>Fax</b>	+36 (1) 391-1410
<b>website</b>	http://naih.hu

### 5. JUDICIAL REMEDY

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self- Determination and on Freedom of Information.

Where the data subject objected to processing data, the data controller shall investigate the objection in the shortest possible time but within 15 days of the reception of the request, make a decision on its validity and inform the applicant in writing of its decision. If the data subject does not agree with the controller's decision, or if the controller fails to meet the deadline specified above, the data subject shall be entitled to turn to court within 30 days from the announcement of the decision or on the last day of the deadline.

In the event of violation of their rights and in the above cases, the data subject may take legal action against the data collector. The court will deal with the matter out of turn. The data subject may bring action before the court having jurisdiction over their place of residence or stay by their choice. A party who does not have procedural legal capacity may also be a party to the lawsuit. The Data Protection Authority may intervene in support of the success of the data subject.

If the data controller causes damage to the data subject by unlawful data processing or by violating data security requirements, they are obliged to compensate it. If the data controller violates the data subject's right to privacy by unlawfully processing the data subject's data or by violating data security requirements, the data subject may claim restitution from the data controller. The controller shall be liable to the data subject for the damage caused by the controller and the controller is obliged to pay restitution to the data subject in case of violation of personality rights. A controller shall be exempt from liability of the damage caused and from the restitution if they prove that the damage or the violation of the data subject's rights to privacy was caused by an unavoidable event outside the scope of data processing. No damages shall be paid, and no restitution shall be claimed, if the damage or the infringement occurred due to the violation of personal rights is the consequence of the data subject's wilful misconduct or gross negligence.

## **PRIVACY POLICY**

### 1. The use of HelloLine application

---

#### 1.2. Customer service

Before data processing it is needed to inform the data subject.

Upon request it is necessary to provide the Privacy Policy to the data subject.

## 1.2. Customer service

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the 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, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

### 1. DATA CONTROLLER:

Name of data controller:		HelloLine Kft.
Address of data controller:		Registered office: Király 31. Str. 4. floor 7. door, 1077 Budapest, Hungary
Contact details of data controller:	e-mail	info@hellolineapp.com
	phone number	+36 30/491-3688
	website	hellolineapp.com
Data Protection Officer (if available)		
Contact details of Data Protection Officer (if available)		

### 2. DATA PROCESSED

#### Scope, purpose and legal basis of data processing

Personal data	Purpose of data processing	The legal basis for processing data
The user's name, password, email address, and telephone number. The date and text of the claims, or other messages. Information about the order. The age of the user. Facebook and Apple profile information if the user registers through Facebook or Apple profile.	To manage the problems emerging during the usage of HelloLine application. To receive and reply to user messages through a chat window. To deal with complaints about the service. To manage the customer database.	With the consent of the data subject - GDPR Article 6 Paragraph 1 Section a)

#### Data processing (storage) period:

2 years after the receipt of the message, the message will be permanently deleted. In the case of personal data related to invoicing, the storage period is 8 years from the termination of the contract.

#### Is data profiling conducted during data processing?

Answer	Options	A short description of profiling
Yes	<input checked="" type="checkbox"/>	It is important to identify the age of the user since alcoholic beverages cannot be purchased by users under the age of 18 in line with current legislation.
No	<input type="checkbox"/>	

#### Is automatic decision-making conducted during data processing?

Answer	Options	A short, understandable description of automation
Yes	<input type="checkbox"/>	
No	<input checked="" type="checkbox"/>	

*If yes, the Data subject has the right to request manual, human intervention*



**Source of processed personal data:**

The data subject
------------------

**The data will be transmitted:**

Category	Answer	Company's name, registered office address, business activity
To Data processors (performing technical tasks related to data processing)	x	DigitalOcean, LLC, 101 6th Ave, New York, NY 10013 Storage of personal data and performance of server service tasks (the data is stored in the EU - Amsterdam, Netherlands)  System administrator. Contact the Data Controller about the current partner. Providing system administration and IT services.  MiniCRM, 13-15. Madách Imre Str. 1075 Budapest, Hungary. Partner register and task management software.  Google Ireland Ltd.Gordon House, Barrow Street, Dublin 4, Ireland//Google Llc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA Providing G Suite applications.
Recipients	x	
To third (non-EU) country	x	Google Ireland Ltd.Gordon House, Barrow Street, Dublin 4, Ireland//Google Llc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA Providing G Suite applications.

**Joint data processing takes place:**

Answer	Options	A short description of joint data processing
Yes		
No	X	

Name of joint data processor	Registered office address

**Data access and data security measures:**

Restriction of access	The personal data of the person ordering through the application will not be transferred to the restaurants. The order is placed anonymously, the order can be identified using a unique code. Access to data is logged by the company. The number of people with access is minimal.
Data security measures:	HelloLine Ltd stores customer data on the European server (Netherlands, Amsterdam) of DigitalOcean LLC. The Ltd. uses encryption and password protection that provides adequate database protection.

### 3. THE RIGHTS OF THE DATA SUBJECT:

The data subject rights under legal basis and their clarification	
<input checked="" type="checkbox"/>	The right to be informed - The data subject shall have the right to be informed about the means and the purposes of processing of personal data before it occurs.
<input checked="" type="checkbox"/>	The right to rectification - The data subject shall have the right to request the rectification of their personal data if the data stored by the data controller is incorrect and evidence submitted by the data subject.
<input checked="" type="checkbox"/>	The right of access - The data subject shall have right to obtain their stored personal data from the controller.
<input type="checkbox"/>	The right to object - If the legal basis is based on legal interest or on public authority, the data subject shall have the right to object to processing their personal data, but it does not necessarily mean immediate erasure of their data.
<input checked="" type="checkbox"/>	The right to erasure ('right to be forgotten') - The data subject has the right to request the permanent deletion of his / her data, unless the data processing is based on the performance of a contract, the fulfillment of a legal obligation or a public authority license.
<input checked="" type="checkbox"/>	Withdrawal of consent - The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.
<input checked="" type="checkbox"/>	The right to restrict processing - If the data subject does not consider the controller as an authorized entity, they can request the suspension of data processing during the investigation.
<input checked="" type="checkbox"/>	The right to data portability - The data subject shall have right to request a copy of their personal data stored in digital tabular form.
<input checked="" type="checkbox"/>	The right to review automated decision-making - The data subject shall have the right to request manual review of each data management process, where the controller applied such automated decision-making which has a legal effect on the data subject.

### 4. FILING A COMPLAINT

The data subject shall have the right to file a complaint to the supervisory authority.

You can appeal to the National Authority for Data Protection and Freedom of Information.

Registered office:

<b>Name</b>	National Authority for Data Protection and Freedom of Information (NAIH)
<b>Registered office</b>	9-11 Falk Miksa Str. 1055 Budapest
<b>Address</b>	1374 Budapest, Pf.: 603.
<b>E-mail</b>	ugyfelszolgalat@naih.hu
<b>Phone</b>	+36 (1) 391-1400
<b>Fax</b>	+36 (1) 391-1410
<b>website</b>	<a href="http://naih.hu">http://naih.hu</a>

### 5. JUDICIAL REMEDY

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

Where the data subject objected to processing data, the data controller shall investigate the objection in the shortest possible time but within 15 days of the reception of the request, make a decision on its validity and inform the applicant in writing of its decision. If the data subject does not agree with the controller's decision, or if the controller fails to meet the deadline specified above, the data subject shall be entitled to turn to court within 30 days from the announcement of the decision or on the last day of the deadline.

In the event of violation of their rights and in the above cases, the data subject may take legal action against the data collector. The court will deal with the matter out of turn. The data subject may bring action before the court having jurisdiction over their place of residence or stay by their choice. A party who does not have procedural legal capacity may also be a party to the lawsuit. The Data Protection Authority may intervene in support of the success of the data subject.

If the data controller causes damage to the data subject by unlawful data processing or by violating data security requirements, they are obliged to compensate it. If the data controller violates the data subject's right to privacy by unlawfully processing the data subject's data or by violating data security requirements, the data subject may claim restitution from the data controller. The controller shall be liable to the data subject for the damage caused by the controller and the controller is obliged to pay restitution to the data subject in case of violation of personality rights. A controller shall be exempt from liability of the damage caused and from the restitution if they prove that the damage or the violation of the data subject's rights to privacy was caused by an unavoidable event outside the scope of data processing. No damages shall be paid, and no restitution shall be claimed, if the damage or the infringement occurred due to the violation of personal rights is the consequence of the data subject's wilful misconduct or gross negligence.

## **PRIVACY POLICY**

### 1. The use of HelloLine application

---

#### 1.3. Invoicing

Before data processing it is needed to inform the data subject.

Upon request it is necessary to provide the Privacy Policy to the data subject.

## 1.2. Invoicing

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the 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, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

### 1. DATA CONTROLLER:

Name of data controller:		HelloLine Kft.
Address of data controller:		Registered office: Király 31. Str. 4. floor 7. door, 1077 Budapest, Hungary
Contact details of data controller:	e-mail	info@hellolineapp.com
	phone number	+36 30/491-3688
	website	hellolineapp.com
Data Protection Officer (if available)		
Contact details of Data Protection Officer (if available)		

### 2. DATA PROCESSED

#### Scope, purpose and legal basis of data processing

Personal data	Purpose of data processing	The legal basis for processing data
The user's name, email address, billing address	To invoice the service fee. Credit card payment.	Processing is necessary for compliance with a legal obligation - GDPR Article 6 Paragraph 1 Section c)

#### Data processing (storage) period:

The storage period for contractual data is 8 years from the termination of the contract.
--

#### Is data profiling conducted during data processing?

Answer	Options	A short description of profiling
Yes		
No	<input checked="" type="checkbox"/>	

#### Is automatic decision-making conducted during data processing?

Answer	Options	A short description of automation
Yes		
No	<input checked="" type="checkbox"/>	

*If yes, the data subject has the right to request manual, human intervention.*

**Source of processed personal data:**

The data subject
------------------

**The data will be transmitted:**

Category	Answer	Company's name, registered office address, business activity
To Data processors (performing technical tasks related to data processing)	x	<p>DigitalOcean, LLC, 101 6th Ave, New York, NY 10013 Storage of personal data and performance of server service tasks (the data is stored in the EU - Amsterdam, Netherlands)</p> <p>System administrator. Contact the Data Controller about the current partner. Providing system administration and IT services.</p> <p>MiniCRM, 13-15. Madách Imre Str. 1075 Budapest, Hungary. Partner register and task management software.</p> <p>KBOSS.hu Kft, , 7/C Záhony Str. 1031 Budapest, providing the szamlazz.hu account for online invoicing.</p> <p>Riport Applications Korlátolt Felelősségű Társaság , 3. Deák Ferenc Pl. (MEYER &amp; LEVINSON floor) 1052 Budapest, Quick cost accounting software.</p>
Recipients		
To third (non- EU) country		

**Joint data processing takes place:**

Answer	Options	A short description of joint data processing
Yes		
No	X	

Name of joint data processor	Registered office address

**Data access and data security measures:**

Restriction of access	The personal data of the person ordering through the application will not be transferred to the restaurants. The order is placed anonymously, the order can be identified using a unique code. Access to data is logged by the company. The number of people with access is minimal.
Data security measures:	HelloLine Ltd stores customer data on the European server (Netherlands, Amsterdam) of DigitalOcean LLC. The Ltd. uses encryption and password protection that provides adequate database protection.

### 3. THE RIGHTS OF THE DATA SUBJECT:

The data subject rights under legal basis and their clarification	
<input checked="" type="checkbox"/>	The right to be informed - The data subject shall have the right to be informed about the means and the purposes of processing of personal data before it occurs.
<input checked="" type="checkbox"/>	The right to rectification - The data subject shall have the right to request the rectification of their personal data if the data stored by the data controller is incorrect and evidence submitted by the data subject.
<input checked="" type="checkbox"/>	The right of access - The data subject shall have right to obtain their stored personal data from the controller.
<input type="checkbox"/>	The right to object - If the legal basis is based on legal interest or on public authority, the data subject shall have the right to object to processing their personal data, but it does not necessarily mean immediate erasure of their data.
<input type="checkbox"/>	The right to erasure ('right to be forgotten') - The data subject has the right to request the permanent deletion of his / her data, unless the data processing is based on the performance of a contract, the fulfillment of a legal obligation or a public authority license.
<input type="checkbox"/>	Withdrawal of consent - The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.
<input type="checkbox"/>	The right to restrict processing - If the data subject does not consider the controller as an authorized entity, they can request the suspension of data processing during the investigation.
<input checked="" type="checkbox"/>	The right to data portability - The data subject shall have right to request a copy of their personal data stored in digital tabular form.
<input checked="" type="checkbox"/>	The right to review automated decision-making - The data subject shall have the right to request manual review of each data management process, where the controller applied such automated decision-making which has a legal effect on the data subject.

### 4. FILING A COMPLAINT

The data subject shall have the right to file a complaint to the supervisory authority.

You can appeal to the National Authority for Data Protection and Freedom of Information.

Registered office:

<b>Name</b>	National Authority for Data Protection and Freedom of Information (NAIH)
<b>Registered office</b>	9-11 Falk Miksa Str. 1055 Budapest
<b>Address</b>	1374 Budapest, Pf.: 603.
<b>E-mail</b>	ugyfelszolgalat@naih.hu
<b>Phone</b>	+36 (1) 391-1400
<b>Fax</b>	+36 (1) 391-1410
<b>website</b>	<a href="http://naih.hu">http://naih.hu</a>

### 5. JUDICIAL REMEDY

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

Where the data subject objected to processing data, the data controller shall investigate the objection in the shortest possible time but within 15 days of the reception of the request, make a decision on its validity and inform the applicant in writing of its decision. If the data subject does not agree with the controller's decision, or if the controller fails to meet the deadline specified above, the data subject shall be entitled to turn to court within 30 days from the announcement of the decision or on the last day of the deadline.

In the event of violation of their rights and in the above cases, the data subject may take legal action against the data collector. The court will deal with the matter out of turn. The data subject may bring action before the court having jurisdiction over their place of residence or stay by their choice. A party who does not have procedural

legal capacity may also be a party to the lawsuit. The Data Protection Authority may intervene in support of the success of the data subject.

If the data controller causes damage to the data subject by unlawful data processing or by violating data security requirements, they are obliged to compensate it. If the data controller violates the data subject's right to privacy by unlawfully processing the data subject's data or by violating data security requirements, the data subject may claim restitution from the data controller. The controller shall be liable to the data subject for the damage caused by the controller and the controller is obliged to pay restitution to the data subject in case of violation of personality rights. A controller shall be exempt from liability of the damage caused and from the restitution if they prove that the damage or the violation of the data subject's rights to privacy was caused by an unavoidable event outside the scope of data processing. No damages shall be paid, and no restitution shall be claimed, if the damage or the infringement occurred due to the violation of personal rights is the consequence of the data subject's wilful misconduct or gross negligence.



## **PRIVACY POLICY**

### 1. The use of HelloLine application

---

#### 1.4. Data transfer to the USA or other third countries

Before data processing it is needed to inform the data subject.

Upon request it is necessary to provide the Privacy Policy to the data subject.

#### 1.4. Data transfer to the USA or other third countries

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the 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, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

#### 1. DATA CONTROLLER:

Name of data controller:		HelloLine Kft.
Address of data controller:		Registered office: Király 31. Str. 4. floor 7. door, 1077 Budapest, Hungary
Contact details of data controller:	e-mail	info@hellolineapp.com
	phone number	+36 30/491-3688
	website	hellolineapp.com
Data Protection Officer (if available)		
Contact details of Data Protection Officer (if available)		

#### 2. DATA PROCESSED

##### Scope, purpose and legal basis of data processing

Personal data	Purpose of data processing	The legal basis for processing data
Name, email address, profile information and profile photos set in Facebook or Apple profile.	To register for the HelloLine application with an Apple and Facebook profile.	With the consent of the data subject - GDPR Article 6 Paragraph 1 Section a)

##### Data processing (storage) period:

The data is stored according to the protocol of Facebook Inc. or Apple Inc.
---

##### Is data profiling conducted during data processing?

Answer	Options	A short description of profiling
Yes		
No	<input checked="" type="checkbox"/>	

##### Is automatic decision-making conducted during data processing?

Answer	Options	A short description of automation
Yes		
No	<input checked="" type="checkbox"/>	

*If yes, the data subject has the right to request manual, human intervention.*

**Source of processed personal data:**

The data subject
------------------

**The data will be transmitted:**

Category	Answer	Company's name, registered office address, business activity
To Data processors (performing technical tasks related to data processing)	<b>x</b>	DigitalOcean, LLC, 101 6th Ave, New York, NY 10013 Storage of personal data and performance of server service tasks (the data is stored in the EU - Amsterdam, Netherlands)  System administrator. Contact the Data Controller about the current partner. Providing system administration and IT services.
Recipients		
To third (non-EU) country	<b>x</b>	Apple Inc. One Apple Park Way, Cupertino, California, USA, 95014. Registration in the HelloLine app with the user's Apple profile.  Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland / Facebook, Inc., 1601 Willow Road, Registration in the HelloLine app with the user's Facebook profile

**Joint data processing takes place:**

Answer	Options	A short, understandable of joint data processing
Yes	<b>X</b>	Joint data management is implemented only during registration with the Facebook profile
No		

Name of joint data processor	Registered office address
Facebook Ireland Ltd.	4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland / Facebook, Inc., 1601 Willow Road.

**Data access and security measures:**

Restriction of access	The personal data of the person ordering through the application will not be transferred to the restaurants. The order is placed anonymously, the order can be identified using a unique code. Access to data is logged by the company. The number of people with access is minimal.
Data security measures:	HelloLine Ltd stores customer data on the European server (Netherlands, Amsterdam) of DigitalOcean LLC. The Ltd. uses encryption and password protection that provides adequate database protection.

### 3. THE RIGHTS OF THE DATA SUBJECT:

The data subject rights under legal basis and their clarification	
<input checked="" type="checkbox"/>	The right to be informed - The data subject shall have the right to be informed about the means and the purposes of processing of personal data before it occurs.
<input checked="" type="checkbox"/>	The right to rectification - The data subject shall have the right to request the rectification of their personal data if the data stored by the data controller is incorrect and evidence submitted by the data subject.
<input checked="" type="checkbox"/>	The right of access - The data subject shall have right to obtain their stored personal data from the controller.
<input type="checkbox"/>	The right to object - If the legal basis is based on legal interest or on public authority, the data subject shall have the right to object to processing their personal data, but it does not necessarily mean immediate erasure of their data.
<input checked="" type="checkbox"/>	The right to erasure ('right to be forgotten') - The data subject has the right to request the permanent deletion of his / her data, unless the data processing is based on the performance of a contract, the fulfillment of a legal obligation or a public authority license.
<input checked="" type="checkbox"/>	Withdrawal of consent - The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.
<input checked="" type="checkbox"/>	The right to restrict processing - If the data subject does not consider the controller as an authorized entity, they can request the suspension of data processing during the investigation.
<input checked="" type="checkbox"/>	The right to data portability - The data subject shall have right to request a copy of their personal data stored in digital tabular form.
<input checked="" type="checkbox"/>	The right to review automated decision-making - The data subject shall have the right to request manual review of each data management process, where the controller applied such automated decision-making which has a legal effect on the data subject.

### 4. FILING A COMPLAINT

The data subject shall have the right to file a complaint to the supervisory authority.

You can appeal to the National Authority for Data Protection and Freedom of Information.

Registered office:

<b>Name</b>	National Authority for Data Protection and Freedom of Information (NAIH)
<b>Registered office</b>	9-11 Falk Miksa Str. 1055 Budapest
<b>Address</b>	1374 Budapest, Pf.: 603.
<b>E-mail</b>	ugyfelszolgalat@naih.hu
<b>Phone</b>	+36 (1) 391-1400
<b>Fax</b>	+36 (1) 391-1410
<b>website</b>	<a href="http://naih.hu">http://naih.hu</a>

### 5. JUDICIAL REMEDY

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

Where the data subject objected to processing data, the data controller shall investigate the objection in the shortest possible time but within 15 days of the reception of the request, make a decision on its validity and inform the applicant in writing of its decision. If the data subject does not agree with the controller's decision, or if the controller fails to meet the deadline specified above, the data subject shall be entitled to turn to court within 30 days from the announcement of the decision or on the last day of the deadline.

In the event of violation of their rights and in the above cases, the data subject may take legal action against the data collector. The court will deal with the matter out of turn. The data subject may bring action before the court having jurisdiction over their place of residence or stay by their choice. A party who does not have procedural

legal capacity may also be a party to the lawsuit. The Data Protection Authority may intervene in support of the success of the data subject.

If the data controller causes damage to the data subject by unlawful data processing or by violating data security requirements, they are obliged to compensate it. If the data controller violates the data subject's right to privacy by unlawfully processing the data subject's data or by violating data security requirements, the data subject may claim restitution from the data controller. The controller shall be liable to the data subject for the damage caused by the controller and the controller is obliged to pay restitution to the data subject in case of violation of personality rights. A controller shall be exempt from liability of the damage caused and from the restitution if they prove that the damage or the violation of the data subject's rights to privacy was caused by an unavoidable event outside the scope of data processing. No damages shall be paid, and no restitution shall be claimed, if the damage or the infringement occurred due to the violation of personal rights is the consequence of the data subject's wilful misconduct or gross negligence.

## **PRIVACY POLICY**

### **2. Marketing activities**

---

#### **2.1. Sending push messages to the users of the application for marketing purposes**

Before data processing it is needed to inform the data subject.

Upon request it is necessary to provide the Privacy Policy to the data subject.

### 3.1. Sending push messages to the users of the application for marketing purposes

In compliance with the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the 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, and repealing Directive 95/46/EC (General Data Protection Regulation), we hereby inform you about the processing of personal data provided by you:

#### 1. DATA CONTROLLER:

Name of data controller:		HelloLine Kft.
Address of data controller:		Registered office: Király 31. Str. 4. floor 7. door, 1077 Budapest, Hungary
Contact details of data controller:	e-mail	info@hellolineapp.com
	phone number	+36 30/491-3688
	website	hellolineapp.com
Data Protection Officer (if available)		
Contact details of Data Protection Officer (if available)		

#### 2. DATA PROCESSED

##### Scope, purpose and legal basis of data processing

Personal data	Purpose of data processing	The legal basis for processing data
Name, email address, address and age of the user, place of order and ordering patterns.	To send targeted offers	With the consent of the data subject - GDPR Article 6 Paragraph 1 Section a)

##### Data processing (storage) period:

The data related to the registration is stored by the data controller until the cancellation of the registration.  
 Maximum of one year after the targeted offer was sent, the message will be permanently deleted.  
 Maximum of one month following the cancellation of the registration, the push messages will be permanently deleted.

##### Is data profiling conducted during data processing?

Answer	Options	A short description of profiling
Yes	<input checked="" type="checkbox"/>	HelloLine Kft. compiles the user's preferred items based on their previous orders and via using this data sends messages with marketing purposes.
No	<input type="checkbox"/>	

##### Is automatic decision-making conducted during data processing?

Answer	Options	A short description of automation
Yes	<input type="checkbox"/>	
No	<input checked="" type="checkbox"/>	

*If yes, the data subject has the right to request manual, human intervention.*

**Source of processed personal data:**

The data subject
------------------

**The data will be transmitted:**

Category	Answer	Company's name, registered office address, business activity
Data processors (performing technical tasks related to data processing)	x	<p>DigitalOcean, LLC, 101 6th Ave, New York, NY 10013 Storage of personal data and performance of server service tasks (the data is stored in the EU - Amsterdam, Netherlands)</p> <p>System administrator. Contact the Data Controller about the current partner. Providing system administration and IT services.</p> <p>MiniCRM, 13-15. Madách Imre Str. 1075 Budapest, Hungary. Partner register and task management software.</p> <p>Google Ireland Ltd.Gordon House, Barrow Street, Dublin 4, Ireland//Google Llc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA Providing G Suite applications.</p>
Recipients		
To third (non-EU) country	x	<p>Google Ireland Ltd.Gordon House, Barrow Street, Dublin 4, Ireland//Google Llc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA Providing G Suite applications.</p>

**Joint data processing takes place:**

Answer	Options	A short description of joint data processing
Yes		
No	x	

Name of joint data processor	Registered office address

**Data access and data security measures:**

Restriction of access	The personal data of the person ordering through the application will not be transferred to the restaurants. The order is placed anonymously, the order can be identified using a unique code. Access to data is logged by the company. The number of people with access is minimal.
Data security measures:	HelloLine Ltd stores customer data on the European server (Netherlands, Amsterdam) of DigitalOcean LLC. The Ltd. uses encryption and password protection that provides adequate database protection.



### 3. THE RIGHTS OF THE DATA SUBJECT:

The data subject rights under legal basis and their clarification	
<input checked="" type="checkbox"/>	The right to be informed - The data subject shall have the right to be informed about the means and the purposes of processing of personal data before it occurs.
<input checked="" type="checkbox"/>	The right to rectification - The data subject shall have the right to request the rectification of their personal data if the data stored by the data controller is incorrect and evidence submitted by the data subject.
<input checked="" type="checkbox"/>	The right of access - The data subject shall have right to obtain their stored personal data from the controller.
<input type="checkbox"/>	The right to object - If the legal basis is based on legal interest or on public authority, the data subject shall have the right to object to processing their personal data, but it does not necessarily mean immediate erasure of their data.
<input checked="" type="checkbox"/>	The right to erasure ('right to be forgotten') - The data subject has the right to request the permanent deletion of his / her data, unless the data processing is based on the performance of a contract, the fulfillment of a legal obligation or a public authority license.
<input checked="" type="checkbox"/>	Withdrawal of consent - The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.
<input checked="" type="checkbox"/>	The right to restrict processing - If the data subject does not consider the controller as an authorized entity, they can request the suspension of data processing during the investigation.
<input checked="" type="checkbox"/>	The right to data portability - The data subject shall have right to request a copy of their personal data stored in digital tabular form.
<input checked="" type="checkbox"/>	The right to review automated decision-making - The data subject shall have the right to request manual review of each data management process, where the controller applied such automated decision-making which has a legal effect on the data subject.

### 4. FILING A COMPLAINT

The data subject shall have the right to file a complaint to the supervisory authority.

You can appeal to the National Authority for Data Protection and Freedom of Information.

Registered office:

<b>Name</b>	National Authority for Data Protection and Freedom of Information (NAIH)
<b>Registered office</b>	9-11 Falk Miksa Str. 1055 Budapest
<b>Address</b>	1374 Budapest, Pf.: 603.
<b>E-mail</b>	ugyfelszolgalat@naih.hu
<b>Phone</b>	+36 (1) 391-1400
<b>Fax</b>	+36 (1) 391-1410
<b>website</b>	<a href="http://naih.hu">http://naih.hu</a>

### 5. JUDICIAL REMEDY

Provisions for the judicial remedy are included in the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

Where the data subject objected to processing data, the data controller shall investigate the objection in the shortest possible time but within 15 days of the reception of the request, make a decision on its validity and inform the applicant in writing of its decision. If the data subject does not agree with the controller's decision, or if the controller fails to meet the deadline specified above, the data subject shall be entitled to turn to court within 30 days from the announcement of the decision or on the last day of the deadline.

In the event of violation of their rights and in the above cases, the data subject may take legal action against the data collector. The court will deal with the matter out of turn. The data subject may bring action before the court having jurisdiction over their place of residence or stay by their choice. A party who does not have procedural legal capacity may also be a party to the lawsuit. The Data Protection Authority may intervene in support of the success of the data subject.

If the data controller causes damage to the data subject by unlawful data processing or by violating data security requirements, they are obliged to compensate it. If the data controller violates the data subject's right to privacy by unlawfully processing the data subject's data or by violating data security requirements, the data subject may claim restitution from the data controller. The controller shall be liable to the data subject for the damage caused by the controller and the controller is obliged to pay restitution to the data subject in case of violation of personality rights. A controller shall be exempt from liability of the damage caused and from the restitution if they prove that the damage or the violation of the data subject's rights to privacy was caused by an unavoidable event outside the scope of data processing. No damages shall be paid, and no restitution shall be claimed, if the damage or the infringement occurred due to the violation of personal rights is the consequence of the data subject's wilful misconduct or gross negligence.