Privacy Notice

This Privacy Notice is provided by **Padthai Holding Limited Liability Company** (registered office: 1122 Budapest, Bíró Street 7., company registration number: 01-09-286081, hereinafter referred to as the "**Controller**"), to inform all individuals concerned about the data processing carried out through the website <u>https://padthaiwokbar.com/</u> (hereinafter referred to as the "Website").

This Privacy Notice is effective from **April 8**, **2024**. The Controller will make the current version of the Privacy Notice available on the Website at all times.

This Privacy Notice is prepared in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter referred to as the "**GDPR**"), taking into account the provisions of Act CXII of 2011 on the Right to Informational Self-Determination and on the Freedom of Information (hereinafter referred to as "**Infotv**."). Its terminology is consistent with the definitions set out in Article 4 of the GDPR, supplemented in certain respects by the interpretative provisions of Section 3 of Infotv. For matters not defined in this Privacy Notice, the GDPR and, where permitted by the GDPR, the provisions of Infotv. shall apply as a supplementary source.

1. Principles of Data Processing

We pay particular attention to the protection of personal data, compliance with mandatory legal provisions, and the secure and fair processing of data during the provision of our services. In accordance with Section 2 of this Privacy Notice, we treat the personal data provided to us confidentially and adhere to the principles of legality, fair procedure, and transparency as defined by the GDPR. We process personal data for specific purposes, in accordance with the principle of data minimization, and adhere to the principle of limited storage. We protect the confidentiality and integrity of personal data and consider the principle of accuracy as per the GDPR.

2. Methods and Security of Data Processing

We ensure the security of your data and we will take the technical and organisational measures and establish the procedural rules necessary to enforce the data protection and confidentiality rules required by the GDPR and the Infotv. and other legislation. We protect personal data from unauthorised access; alteration; transmission; disclosure to the public; or accidental deletion, destruction; corruption; and inaccessibility due to changes in the technology used.

We place special emphasis on protecting data processed electronically in various registries to ensure that, except as permitted by law, data stored in different registries cannot be directly linked and attributed to the concerned individual.

3. Personal Data Processed by Us

3.1. Data Processing Related to Contact

We provide an opportunity to contact us through the "Contact" section of the Website (i.e., the <u>https://padthaiwokbar.com/contact/</u> subpage), for partner relations, offers, requests for offers,

complaints, feedback, or other inquiries related to our services, products, or operations (hereinafter referred to as "**Inquiries**").

We emphasize that you can only submit your Inquiry by providing your name, email address, and the subject of the inquiry, and by checking the "*I have read the Privacy Notice and consent to the processing of my personal data related to this Inquiry*" checkbox, followed by clicking the "SEND" button.

If you wish to contact us via electronic or postal mail, please include in your letter that "*I have read and understood the Privacy Notice available on the Padthai Holding Kft. website* (<u>https://padthaiwokbar.com/contact/</u>) and consent to the processing of my personal data related to this Inquiry." If this is not included, we will send you this Privacy Notice upon receipt of your application and ask you to provide your consent as described above if you want the Controller to address your Inquiry. If you do not provide your consent, we will delete your email without reviewing its content 15 days after sending the notice.

Purpose of Data Processing	Recording Inquiries related to partner relations, offers, requests for offers, complaints, feedback, or other inquiries related to our services, products, or operations through the Website, and maintaining contact.
Scope of Data Processed	 Name, Email address, Content of the Inquiry, Additional personal data arising in connection with the Inquiry (e.g., additional personal data may be requested during complaint handling).
Data Subjects	Anyone who submits an Inquiry to the Controller.
Legal Basis for Data Processing	Consent of the data subject as per Article $6(1)(a)$ of the GDPR.
Data Retention Period	Until the purpose related to the Inquiry is achieved; if the purpose cannot be achieved and there is no legal obligation for the Controller to store personal data, the data subject's personal data will be deleted 6 months after the Inquiry.

3.2. Career – Job Opportunities – Application

We inform you that we publish **job advertisements** under the "**Application**" section of our Website (i.e., the <u>https://karrier.padthaiwokbar.com/jobs</u> subpage).

Applications for job advertisements are accepted and evaluated substantively only after filling in the data provided below and consenting to the data processing described in this section of the Privacy Notice on the <u>https://karrier.padthaiwokbar.com/jobs</u> subpage.

If you send your application directly to <u>info@padthaiwokbar.com</u> instead of the referenced career page, you will receive an automatic email requesting a data protection statement. Your application will be considered submitted only if you accept this Privacy Notice by clicking the "DECLARATION" button within 24 hours. If you do not declare acceptance of the Privacy Notice and do not finalize its acceptance during the subsequent two reminders, your application

will be anonymized, and your personal data will be deleted on the 25th day from receipt without substantive evaluation.

Purpose of Data	Evaluation of submitted applications/resumes, organization of			
Processing	personal interviews, and selection of a suitable candidate.			
Scope of Data	- Last name,			
Processed	- First name,			
	- Email address,			
	- Phone number,			
	- Preferred restaurants indicated,			
	- Resume (especially: place and year of birth, educational			
	background, professional qualifications, work experience,			
	language proficiency level, diplomas/certificates/language exams			
	and other knowledge-related data),			
	- Additional documents uploaded by the applicant (data subject).			
Data Subjects	All natural persons who validly apply for a job advertisement under			
	the "Application" section.			
Legal Basis for Data	Consent of the data subject as per Article $6(1)(a)$ of the GDPR; for			
Processing	special data voluntarily provided by the data subject, consent as per			
	Article 9(2)(a) of the GDPR.			
Data Retention	1.5 years from the receipt of the application.			
Period				

3.3. Creation of Padtalk Account, Ticket Purchase, and Data Processing Related to Participation in Padtalk Events

We inform you that we regularly organize events named "*Padtalk*" in our hospitality units, which you can participate in by purchasing a ticket on the <u>https://padthaiwokbar.com/padtalk</u> subpage and presenting the email confirming the successful purchase.

Tickets can be finalized only after registering a user account on the <u>https://padthaiwokbar.com/padtalk/account/</u> subpage.

During Padtalk events, still and moving images are created, which the Controller uses for advertising and marketing purposes.

Purpose of	Data	Online ticket sales, event organization, and marketing use of Padtalk		
Processing		events.		
Scope of	Data	1. In connection with Padtalk registration:		
Processed		- Username		
		- Email address		
		- Password		
		2. In connection with Padtalk ticket purchase:		
		- Full name		
		- Address		
		3. In connection with participation in Padtalk events:		
		- Image of the data subject		
Data Subjects		1. Natural persons registering a Padtalk user account		
		2. Natural persons purchasing a ticket for Padtalk events		

	3. Natural persons participating in Padtalk events		
Legal Basis for Data Processing	 For Padtalk user account registration, consent as per Article 6(1)(a) of the GDPR. For Padtalk ticket purchase, contract performance as per Article 6(1)(b) of the GDPR. For personal data processing related to recording images at Padtalk events, legitimate interest as per Article 6(1)(f) of the GDPR. 		
Data Retention Period	 Until the deletion of the user account. For Padtalk ticket purchase, the data retention period is 8 years from the date of the accounting document, as per Section 169(2) of Act C of 2000 on Accounting. For images and videos recorded at Padtalk events, until the legitimate interest ceases. 		

3.4. Data Processing Related to Newsletter Subscription

The Controller provides an opportunity for all individuals on the Website to subscribe to the regularly published newsletter by providing their name and email address and accepting this section of the Privacy Notice.

Purpose of Data	To inform you about our marketed products, discounts, events, and		
Processing	offers in the form of a newsletter.		
Scope of Data	- Full name		
Processed	- Email address		
Data Subjects	All natural persons subscribing to the newsletter.		
Legal Basis for Data	Explicit consent as per Article $6(1)(a)$ of the GDPR.		
Processing			
Data Retention	Until the time of unsubscribing from the newsletter.		
Period			

4. Engagement of Data Processors

4.1. Data Transfer Within the Controller's Affiliated Companies

We inform you that the personal data recorded under "3.1 Data Processing Related to Contact" and "3.2 Career – Job Opportunities – Application" may be forwarded to the company operating the respective Padthai-Wokbár restaurant for processing or investigation purposes.

Company Name	Registered Office	Company	Tax Number
		Registration	
		Number	
Padthai Kft.	1122 Budapest, Bíró utca 7.	01 09 185359	24842321-2-43
Foodport Kft.	1122 Budapest, Bíró utca 7.	01 09 205941	25280900-2-43
Kardos Étterem Kft.	1122 Budapest, Bíró utca 7.	01 09 209573	25342855-2-43
Padthaiwokbar Kft.	1122 Budapest, Bíró utca 7.	01 09 279618	25515862-2-43
Padwok Étterem Kft.	1122 Budapest, Bíró utca 7.	01 09 304630	26151144-2-43
Padarka Food Kft.	1122 Budapest, Bíró utca 7.	01 09 304632	26151168-2-43

Padörs Wokbar Kft.	1122 Budapest, Bíró utca 7.	01 09 309719	26241850-2-43
Chilibrands Kft.	1122 Budapest, Bíró utca 7.	01 09 334072	26595056-2-43
Padnyolc Kft.	1122 Budapest, Bíró utca 7.	01 09 337109	26649100-2-43
Paduna Kft.	1122 Budapest, Bíró utca 7.	01 09 342139	26739191-2-43
Padthai Franchise	1122 Budapest, Bíró utca 7.	01 09 349875	27108778-2-43
Kft.			
Pad Stories Kft.	1122 Budapest, Bíró utca 7.	01 09 384350	29231214-2-43
Padka Kft.	1122 Budapest, Bíró utca 7.	01 09 997688	24248318-2-43
Street Kitchen Kft.	1122 Budapest, Bíró utca 7.	01 09 997799	24250144-2-43
R.T.B. Étterem Kft.	1122 Budapest, Bíró utca 7.	01 09 201806	24103114-2-43

4.2. Data Processors Employed by the Controller

During various data processing operations, we use data processors who act solely based on our instructions and do not process personal data for their own purposes.

Task	Name/Company Name	Registered Office	Company Registration Number	Tax Number
Developer and	Mediadigital	1146 Budapest, Thököly	01 09 963950	23401639-2-42
Hosting Service	Visual Agency	út 31-33. A. lház. VI. em.		
Provider	Kft.	602.		
Developer and	Németh Roland	Budapest.,	-	57774253-1-42
Hosting Service	ev.	Futórózsa u. 85.		
Provider				
Padtalk	Raconteur Zrt.	2030 Érd, Kankalin utca	13 10 041846	14399451-2-13
operator		1/a		

5. Exercising Your Rights

You are entitled to exercise your rights regarding your personal data by submitting your request to the Company via email at <u>info@padthaiwokbar.com</u>.

Upon fulfilling your request concerning the processing of your personal data, the Controller will verify your identity according to this Privacy Policy and will only be authorized to comply with your request after appropriately verifying your identity.

If you do not submit your request regarding the processing of personal data as stipulated in this Privacy Policy and the Controller cannot perform the necessary identification (could not identify you as the data subject) required for data security and/or confidentiality according to this Privacy Policy, the request cannot be fulfilled.

The time elapsed from the Controller's request for the necessary personal data or incomplete activity until the provision of personal data shall not be counted towards the deadline for responding to the request.

The Controller lists below the rights you may exercise against the Controller during the processing of your personal data.

5.1 Right to Withdraw Consent

The data processing operations defined in point 3 are based on your consent, which you are entitled to withdraw at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal. Please send your request to withdraw consent to the email address specified in point 5.

5.2 Right of Access to and Rectification of Personal Data

You have the right to access your personal data at any time, request a copy, and request its rectification or updating. Under the right of access, you are entitled to receive information on: a) the purposes of data processing;

b) the categories of personal data concerned;

c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, including recipients in third countries or international organizations;

d) where possible, the envisaged period for which the personal data will be stored;

e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning you, and to object to such processing;

f) the right to lodge a complaint with a supervisory authority; and

g) the existence of automated decision-making, including profiling (in this case, determining personal preferences and interests based on personal data in the database and sending direct marketing).

If you wish to exercise these rights, please contact us via the email address specified in point 5.

5.3 Right to Data Portability

You have the right to receive your personal data which you have provided to us, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller without hindrance from us.

If you wish to exercise your right to data portability, please contact us via the email address specified in point 5.

5.4 Right to Erasure of Personal Data

You have the right to request the erasure of your data if:

a) your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

b) you withdraw your consent on which the processing is based, and there is no other legal ground for the processing;

c) you object to the processing of your personal data;

d) your personal data have been unlawfully processed; or

e) your personal data have to be erased for compliance with a legal obligation.

However, the Controller is not obliged to fulfill your request if processing is necessary: a) for exercising the right of freedom of expression and information; b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

c) for reasons of public interest in the area of public health;

d) for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, where erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or

e) for the establishment, exercise, or defense of legal claims.

If you wish to exercise this right, please contact us via the email address specified in point 5.

5.5 Right to Restriction of Processing

You have the right to obtain from the Controller restriction of processing where:

a) you contest the accuracy of your personal data, for a period enabling the controller to verify the accuracy of the personal data;

b) the processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead;

c) the controller no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise, or defense of legal claims; or

d) you have objected to processing pending the verification whether the legitimate grounds of the controller override yours.

If you wish to restrict the processing of your personal data, please contact us via the email address specified in point 5.

5.6 Right to Object

You have the right to object at any time to the processing of your personal data. If you intend to exercise this right, please contact us via the email address specified in point 5.

The Controller shall compensate you for any damage caused by unlawful processing of your data or breach of data security requirements.

If the unlawful processing of your data or breach of data security requirements also infringes your personal rights, you may claim compensation from the Controller.

5.7 Right to Lodge a Complaint with a Supervisory Authority

If the Controller denies your request to excercise any rights, or if you are dissatisfied with our response, or wish to file a complaint, you may seek redress through the civil courts or the Hungarian National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11.; mailing address: 1363 Budapest, Pf.: 9.; phone number: +36 (1) 391-1400; email: ugyfelszolgalat@naih.hu), as the supervisory authority.