



**Progress Restaurant Chain Ltd.
Progress Promotion Ltd.**

PRIVACY NOTICE

February 20, 2025

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1 Introduction

Progress Restaurant Chain Ltd. (H-1027 Budapest, Bem József utca 1/B, hereinafter: provider, controller) as a controller, and regarding the data processing operations specified in chapters 2.2.1; 2.2.2; 2.4.1; 2.4.2; 2.4.3; 2.5.1; 2.6.1; 2.6.3. Progress Promotion Ltd. (H-1027 Budapest, Bem József utca 1/B.) as a joint controller with Progress Restaurant Chain Ltd. hereby accept the contents of this legal notice as binding upon themselves. They shall ensure that all data processing related to their operations meet the requirements specified in this policy and in the effective laws. The Privacy Notice on data processing by Progress Restaurant Chain Ltd. is continuously available at <https://www.mcdonalds.com/hu/hu-hu/adatkezesi-tajekoztato-.html>.

The essence of the joint processing agreement made between Progress Restaurant Chain Ltd. and Progress Promotion Ltd. is that in the case of certain processing operations, the two controllers shall process the personal data jointly, based on their joint purposes. As regards the specified processing operations, they shall make processing decisions together, and share the implementation tasks. As a general rule, any requests by data subjects will be handled by Progress Étteremhálózat Kft. and they will keep contact with the data subjects, but the implementation of the task itself can be shared with the controller partner, and data subjects are also entitled to enforce their rights with either controller. The controllers state in agreement that they can be reached via the contact details published in Chapter 4 of this notice.

Where this notice refers to Progress Restaurant Chain Ltd., the same applies mutatis mutandis to Progress Promotion Ltd. in the scope of the joint processing operations.

We hereby inform data subjects that regarding data processing operations related to the McDonald's® mobile app (chapter 2.5 of this notice), besides the joint controllers listed above, the companies operating specific McDonald's® restaurants also count as further joint controllers. Controllers involved in joint processing and processing operations are further introduced to data subjects in chapter 2.5.

Progress Étteremhálózat Kft. reserves the right to amend this notice at any time. If any changes are made, it shall naturally notify its audience in due course.

Should you have any questions regarding this communication, please let us know in writing and our colleague will reply.

Progress Étteremhálózat Kft. is committed to the protection of the personal data of its clients and partners. It is a priority for them to respect the informational self-determination rights of its clients. Progress Étteremhálózat Kft. shall process personal data confidentially, and take all safety, technical and organisational measures required to ensure data safety. Progress Étteremhálózat Kft. describes its data processing practices as follows:

2 Type of personal data, purpose, legal ground and duration of processing

The data processing principles of Progress Étteremhálózat Kft. are in line with the effective data protection laws, in particular with:

- Regulation (EU) 2016/679 (27 April 2016) 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 (hereinafter: General Data Protection Regulation, GDPR);
- Act CXII of 2011 on Informational Self-Determination and the Freedom of Information (Information Act);
- Act V of 2013 on the Civil Code;
- Act CLV of 1997 on Consumer Protection;
- Act XC of 2017 on Criminal Procedures;
- Act XCIII of 1993 on Work Safety;
- Act C of 2000 on Accounting;
- Act CVIII of 2001 on Electronic Commerce and on Information Society Services;
- Act C of 2003 on Electronic Communications;
- Act CLXIV of 2005 on Trade;
- Act CXXXIII of 2005 on the Rules on Personal and Property Protection Activities and Private Investigation;
- Act CXXVII of 2007 on Value-Added Tax (VAT Act);
- Act XLVIII of 2008 Essential Conditions of and Certain Limitations to Business Advertising Activity;
- Act XXV of 2023 on Complaints, Notifications of Public Interest and Rules on the Notification of Abuse (Complaints Act);
- Decree No. 19/2014 (IV. 29.) NGM on the Procedural Rules of the Enforcement of Warranty and Guarantee Claims on Objects Sold by B2C Contracts (Warranty Decree)

2.1 Restaurant data processing

2.1.1 Purchase-related data

Purpose of data processing: to make purchases and use services, document purchases and payments, perform accounting obligations, issue invoices in the McDonald's restaurants owned by Progress Restaurant Chain Ltd.

Legal ground for processing: processing is necessary for the performance of a contract [Article 6(1) (b) of the GDPR], compliance with a legal obligation [Article 6(1) (c) of the GDPR with consideration to Section 169(2) of the Accounting Act].

Type of personal data processed: identifier, date, time, in case of ask for invoice name and address, designation, quantity, purchase price of the purchased products and used services, payment method, details of the card and the transaction for card payments and confirmation of the transaction by the financial provider; in case of necessity of bank transfer name of the owner of the bank account, name of the bank, bank account number, the amount and purpose of transfer.

Duration of data processing: eight years pursuant to Section 169(2) of the Accounting Act.

Possible consequences of failure to provide data: the guest cannot receive an invoice issued to their name, under circumstances they cannot pay by card, the transfer cannot be completed .

Data Transfers:

1. Data transfer to bank:

For card payments (bank card, credit card, Edenred gift card and SZÉP Card, SZÉP OTP, SZÉP K&H, SZÉP MKB):

payer ID, and the amount, date and time of the transaction to OTP Bank Nyrt. (H-1051 Budapest, Nádor u. 16.).

For bank transfer the name of the owner of the bank account, name of the bank, bank account number, the amount and purpose of transfer.

Legal ground for data transfers: processing is necessary for the performance of a contract [Article 6(1) (b) of the GDPR].

2. Data provision to NAV:

If the data subject is a taxable natural person (e.g. sole trader, agricultural producer), the following data are provided to the National Tax and Customs Administration):

- o if an invoice is issued to the taxpayer (Section 169 VAT Act): tax number of the purchaser of the product, user of the service, under which the product was sold or the service was provided to the taxable person, or the tax number under which the tax-exempt goods were sold to them within the Community, or the first eight digits of their tax number, or for group VAT-taxpayers, of the group ID under which the product was sold or the service was performed to them as a domestically registered taxpayer provided that the seller or service provider is established in Hungary for business purposes; in the absence of such establishment for business purposes, it is domiciled or habitually resident in Hungary, name and address of the person who uses the service, date of invoice, an invoice number which identifies the invoice beyond doubt, designation of the product sold, if the issuer of the invoice opts for this, the designation used in the VAT Act (vtsz.), quantity; designation of the service provided, if the issuer of the invoice opts for this, the designation used in the VAT Act (TESZOR'15), quantity, if it can be expressed in natural units, due date, date of tax assessment for advances if not the same as the date of issue, name, address and tax number of the fiscal representative, if any;
- o for documents treated as invoices (Section 170 of the VAT Act): date of document, document number which identifies the document beyond doubt, reference to the invoice the data of which is modified by the document, designation of the invoice data affected by the modification, and the nature and quantitative impact of the modification.

For natural persons not subject to taxation it shall be transferred to the National Tax and Customs Administration of Hungary (H-1054 Budapest, Széchenyi u. 2.):

- o if an invoice is issued (Section 169 of the VAT Act): date of invoice, an invoice number which identifies the invoice beyond doubt, designation of the product sold, if the issuer of the invoice opts for this, the designation used in the VAT Act (vtsz.), quantity; designation of the service provided, if the issuer of the invoice opts for this, the designation used in the VAT Act (TESZOR'15), quantity, if it can be expressed in natural units, due date, date of tax assessment for advances if not the same as the date of issue;
- o for documents treated as invoices (Section 170 of the VAT Act): date of document, document number which identifies the document beyond doubt, reference to the invoice the data of which is modified by the document, designation of the invoice data affected by the modification, and the nature and quantitative impact of the modification.

Legal ground for data transfers: processing is necessary for compliance with a legal obligation of the controller [Article 6(1) (c) of the GDPR], pursuant to Sections 1, 2 and 4 of Annex 10 of the VAT Act.

Processors:

Name	Registered office	Data processing task
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Pannon Support Rendszerház Kft.	H-1119 Budapest, Petzvál József u. 50.	Administrator tasks in restaurants
BBOX Solutions Kft.	H-2040 Budaörs, Gyár u. 2.	Maintenance of the POS and the cash register systems of the restaurants
Díjbeszedő Informatikai Kft.	H-1117 Budapest, Budafoki út 107-109.	Operation of the POS-terminals in the restaurants
Iron Mountain Magyarország Kft.	H-1093 Budapest, Czuczor u. 10. IV and V	Document retention and disposal

2.1.2 Events (birthday reservations)

Purpose of processing: organising a birthday party in the restaurants of Progress Étteremhálózat Kft.

Legal ground for processing: processing is necessary for the performance of a contract [Article 6(1) (b) of the GDPR].

Type of processed data: booking ID number, time of order and time of event, customer's name, telephone number, email address, number of participating children, parent supervisor's name, the birthday child's name/nickname, age, gender, name of the hostess taking the order and managing the party, any special requests, food intolerance data, other details provided when placing the order (e.g. number of cakes ordered, consumption volumes for the event); for event bookings made via the website <https://szulinap-foglalo.mcdonalds.hu/> the same personal data, plus the personal data listed in section 2.4 below.

Duration of processing: One month after the event, 90 days for online bookings.

Data transfers: Progress Étteremhálózat Kft. transfers the event orders submitted online via <https://szulinap-foglalo.mcdonalds.hu> to its franchise partner operating the relevant restaurant.

Legal ground for data transfers: processing is necessary for the performance of a contract [Article 6(1) (b) of the GDPR].

Possible consequences of failure to provide data: the data subject will not be able to submit an event order (if the data subject does not wish to provide their personal data via <https://szulinap-foglalo.mcdonalds.hu>, they may still place an order directly in the restaurant without using the online method).

Processors for online orders:

Name	Registered office	Data processing task
fps ecosystem Kft.	H-3525 Miskolc, Dayka Gábor utca 1-7. Fsz. 2. ajtó	performance of tasks related to development and the database

2.1.3 Proof of the right to use the toilet for free

Purpose of data processing: age-based verification of the right to use the toilettes provided free of charge to those under 16 in some restaurants of Progress Étteremhálózat Kft.

Legal ground for data processing: data processing is necessary for the performance of a contract [Article 6(1) (b) of the GDPR].

Type of personal data processed: view of the date of birth and photo of the person entitled to the benefit as shown in the photo ID.

Duration of processing: no data retention, the verification is made only for the time of showing the photo ID.

Possible consequences of failure to provide data: the data subject is not entitled to use the toilette for free.

2.1.4 Handling of quality claims

An employee of Progress Étteremhálózat Kft. shall record in writing all quality claims indicated in person, via email or by post.

Purpose of data processing: to handle quality claims related to the products or services offered by Progress Étteremhálózat Kft., comply with regulations on statutory guarantee and the procedural rules related to warranty and legal claims, as well as facilitate official controls related to consumer protection.

Legal ground for data processing: processing is necessary for compliance with a legal obligation of the controller [Article 6(1) (c) of the GDPR], with regard to Section 4 (1) of the Warranty Decree.

Type of personal data processed: unique identification number of the complaint, name and address of the consumer, place, date and mode of submission of the claim, files, documents and other evidence submitted by the consumer, description of the claim, place and date of the records, name and signature of the person drawing the records, and for withdraws, data of the product.

Duration of processing:
pursuant to Section 4 (6) of the Warranty Decree, three years.

Possible consequences of failure to provide data: the data subject may not be able to exercise their consumer rights.

Data transfer: complaints, quality claims delivered to the central email address and postal address of Progress Étteremhálózat Kft. to the franchise partner operating the relevant restaurant.

Legal ground for data transfer: processing is necessary for compliance with a legal obligation of the controller [Article 6(1) (c) of the GDPR], with regard to Section 4 (1) of the Warranty Decree.

Processors:

Name	Registered office	Data processing task
Iron Mountain Magyarország Kft.	H-1093 Budapest, Czuczor u. 10. IV and V	Document retention and disposal
Microsoft Corporation	One Microsoft Way. Redmond, WA 98052-7329, United States of America. Compliance of the data transfer is ensured with the data protection guarantees under Article 46 (2) (c) of the GDPR.	data storage in email application
Protocall 2009 Kft.	H-2724 Újlengyel, Ady Endre u. 41.	cooperation in the handling of quality claims
VCC Live Hungary Kft.	H-1112 Budapest, Balatoni út 2/A. 5. em.	hosting service

2.1.5 Consumers' book, complaint handling

A Consumers' book has been placed in each restaurant of Progress Étteremhálózat Kft. in order to record the consumers' feedback, but they may also indicate their complaints and recommendations in person, via email or by post.

Purpose of data processing: to record the complaints and recommendations of the consumers of Progress Étteremhálózat Kft. related to the operation of the business, as well as to the commercial activities and provision of services.

Legal ground for data processing: Article 6(1) (c) of the GDPR, processing is necessary for compliance with a legal obligation of the controller, taking into account Section 17/A (5) of the Act CLV of 1997 on Consumer Protection and Section 5 (4) of Act CLXIV of 2005 on Trade.

Type of the personal data processed: personal data provided when writing comments in the consumers' book or using a different method, especially via email.

Duration of processing: copies of the feedback written in the consumers' book will be immediately removed after provision of the feedback, and will be retained in a locked storage for three years in accordance with the continuous numbering order, and complaints, recommendations submitted in any other way, as well as replies to them will also be stored for three years, pursuant to Section 17/A (7) of Act CLV of 1997 on Consumer Protection.

Possible consequences of failure to provide data: Progress Étteremhálózat Kft. will not be able to reply personally to the consumer who wrote the feedback.

Processors:

Name	Registered office	Data processing task
Iron Mountain Magyarország Kft.	H-1093 Budapest, Czuczor u. 10. IV and V	document retention, physical destruction of documents
Microsoft Corporation	One Microsoft Way. Redmond, WA 98052-7329, United States of America. Compliance of the data transfer is ensured with the data protection guarantees under Article 46 (2) (c) of the GDPR.	data storage in email application
Protocall 2009 Kft.	H-2724 Újlengyel, Ady Endre u. 41.	cooperation in the handling of complaints written in the consumers' book and other complaints
VCC Live Hungary Kft.	H-1112 Budapest, Balatoni út 2/A. 5. em.	hosting service

2.1.6 Extraordinary events, accidents

Purpose of data processing: to handle extraordinary events, draw up written records thereof.

Legal ground for data processing: it is the legitimate interest of the controller or other persons to handle the extraordinary events [Article 6 (1) f) of the GDPR]; if any data related to the data subject's health is recorded, the legal ground for this shall be the data subject's consent [Article 6 (1) a) of the GDPR], for employees, the legal ground is compliance with a legal obligation [Article 6 (1) c) of the GDPR], taking into account Section 64 (4) of Act XCIII of 1993 on Work Safety.

Type of data processed: name, address, phone number of the parties involved in the event, name, contact details of the parent/guardian, date and time of the event, description of the injury and accident, description of the measure the restaurant has taken, name of any person providing first aid, name, address, phone number and contact details of any witness, and location of the accident.

Duration of processing: five years.

Processor:

Name	Registered office	Data processing task
Iron Mountain Magyarország Kft.	H-1093 Budapest, Czuczor u. 10. IV and V	Document retention and disposal

Possible consequences of failure to provide data: exercising the rights arising from the extraordinary event may become impossible.

2.1.7 Lost and found objects

Purpose of data processing: registration of any objects lost and found in the restaurants of Progress Étteremhálózat Kft., notification of the owner and the person who found the object.

Legal ground for data processing: processing is necessary for compliance with a legal obligation of the controller [Article 6(1) (c) of the GDPR], with regard to Section 5:54-55. of the Civil Code.

Type of personal data processed: date and time of discovery, the person finding the object, designation of the lost and found object, the fact whether it was possible to notify the owner, place of storage, signature of the person who found the object and in the case of delivery, signature of the recipient.

Duration of processing: data are erased and destroyed after delivery to the owner of the lost and found object or in the case of delivery to the municipal registrar, they are erased after the delivery, in the case of selling the object, one year after the object was found.

Processor:

Name	Registered office	Data processing task
Iron Mountain Magyarország Kft.	H-1093 Budapest, Czuczor u. 10. IV and V	Document retention and disposal

Possible consequences of failure to provide data: the controller may not be able to comply with its statutory obligations.

2.1.8 Restaurant WiFi

Progress Étteremhálózat Kft. provides internet for its guests and employees in its restaurant via WiFi, through the services of Invitech ICT Services Kft. (H-2040 Budaörs, Edison u. 4.).

The free WiFi network may be used for 30 minutes.

Progress Étteremhálózat Kft. does not store the data related to the WiFi distribution or the visited pages.

Purpose of data processing: to provide good quality WiFi service in the restaurants of Progress Étteremhálózat Kft., while limiting access to the service.

Legal ground for data processing: Article 6 (1) f) of the GDPR, as it is the legitimate interest of Progress Étteremhálózat Kft. to provide fast and good quality WiFi service.

Type of personal data processed: the unique network identifier of the devices connected to the WiFi network (MAC address) and the date of connection.

Duration of processing: the data of the device will be deleted upon expiry of the 30-minute time limit.

Processor:

Name	Registered office	Data processing task
Invitech ICT Services Kft.	H-2040 Budaörs, Edison u. 4.	provision of the infrastructure, performing the above logging in this respect..

2.2. Market survey database

2.2.1 Market survey database

For occasional market surveys, Progress Étteremhálózat Kft. processes the personal data of data subjects jointly with Progress Promotion Kft. (H-1027 Budapest, Bem József utca 1/B).

Purpose of data processing: to register and segment the participants of market surveys, send out invitations to market surveys, organize market surveys.

Legal ground for data processing: voluntary consent of the data subject [Article 6 (1) (a) of the GDPR]. Only people above the age of 16 may participate in market surveys.

Type of personal data processed: identification number, name, address, email address, phone number, other personal data provided by the data subject during the market survey.

Duration of processing: until withdrawal of the data subject's consent.

Possible consequences of failure to provide data: the data subject may not be able to participate in the market survey.

Processors: for each market survey, a different processor participates in the processing of personal data; we inform the data subjects of the relevant processor before the data processing operation in question.

There are regular market surveys which are anonymous and do not allow the personal identification of the data subject. In such cases, we inform the person providing their data of the anonymous data collection and analysis separately.

2.3 Protection of property

2.3.1 Electronic surveillance system

An electronic surveillance and recording system is functioning in the restaurants of Progress Étteremhálózat Kft., as part of which cameras were placed in the parking lot, the drive way, the entrances, the counters, the waiting areas and the corridors of the restaurant, as well as at the main cash desk office or the accounting office. Further information concerning the exact location of the cameras and the areas under surveillance are included in the camera information notice placed next to the Consumers' Book in the restaurant.

Joint controllers of the personal data: Progress Étteremhálózat Kft. (H-1027 Budapest, Bem József utca 1/B.) and Shield Protection Service Kft. (H-2093 Budajenő, Fő utca 50., info@shieldsecurity.hu) which provides manned security service.

According to the agreement on joint data processing between Progress Étteremhálózat Kft. and Shield Protection Service Kft., the two joint controllers perform the processing of personal data with respect to the camera system jointly, in pursuit of their joint purposes. They make decisions related to the processing of personal data jointly, and they share the tasks concerning the enforcement thereof. Demands related to the exercise of data subjects' rights are served and data subjects are contacted by Shield Protection Kft., but its controller partner may also participate in the solution of the task, and the data subject may enforce their rights towards any of the controllers.

Processor:

Name	Registered office	Data processing task
MS Technika Kft.	H-1152 Budapest, Kiss Ernő u. 10.	maintenance of the electronic surveillance and recording system, burning of the recordings

Purpose of data processing: protect human life, bodily integrity and property, and cash of significant value, prevent and detect infringements in order to protect hazardous material, catch the perpetrator in the act, and prove infringements.

Legal ground for data processing: Article 6 (1) (f) of the GDPR, as it is the legitimate interest of Progress Étteremhálózat Kft. to protect property.

Type of personal data processed: facial images of persons entering the area of a McDonald's restaurant or using McDrive, and their other personal data recorded by the surveillance system, as well as the date and time of the recording.

Duration of processing: if such data are not used, up to 10 days.

Information related to the storage of data: the recordings are stored on the servers located in the restaurant, subject to enhanced data security measures, therefore, it is ensured that no unauthorized persons may view or copy the recordings.

Access to images: the authorized employees of Progress Étteremhálózat Kft. and Shield Protection Service Kft. may view the current image and the recordings of the cameras, whereas certain employees of MS Technika Kft. may burn the recordings on a data carrier in order to ensure that the purposes of data processing described herein are met.

Logging: the person who views the recordings and makes copies thereof records such actions in writing together with their name, the reason for and the time of consulting such data.

Data subjects are entitled to receive information concerning the processing of their personal data, and may request rectification of certain data recorded in relation to the recording due to the specificities of the data processing (such as date and time).

Data subjects may request erasure of their personal data, restriction of data processing, and may enforce towards the controller their right to data portability and their right to object.

Data subjects are entitled to obtain from the controller confirmation as to whether or not personal data concerning them are being processed, and, where such personal data are being processed, access to such personal data and information related to data processing in the form of a copy of the recording. Data subjects may only receive copy of the recordings which do not display any other person or display them in an unrecognizable manner. If the above conditions may not be met, the controller allows the data subject to view the recording which displays them (among others).

Data transfer: in the case of infringement or criminal proceedings, towards the authorities or courts conducting such proceedings.

Type of shared data: recordings made by the camera system, containing relevant information.

Legal ground for data transfer: Article 6(1) (c) of the GDPR, with regard to the provisions of Section 261 (1), Section 308 (2) a) and Section 376 (2) and (3) of Act XC of 2017 on Criminal Procedures, as well as Section 75 (1) a) and Section 78 (3) of Act C of 2000 on Accounting.

2.4. Data processing activities related to the Hungarian page of mcdonalds.com

If the visitor consults <https://www.mcdonalds.com> from a Hungarian IP address, <https://www.mcdonalds.com/hu/hu-hu.html>, the Hungarian restaurant chain's website will be loaded automatically.

When visiting <https://www.mcdonalds.hu>, <https://www.mcdonalds.com/hu/hu-hu.html> will be loaded automatically, regardless of the IP address.

The following information concerns the Hungarian website.

2.4.1 Logging the mcdonalds.com server

Joint data processing with Progress Promotion Kft. (H-1027 Budapest, Bem József utca 1/B). When visiting the website available at www.mcdonalds.hu and <https://www.mcdonalds.com/hu/hu-hu.html>, the web server does not record any user data (such as IP address).

Data processing of external service providers

The html code of the portal contains links embedded in the website and directing to external servers independent from Progress Étteremhálózat Kft., including tracking pixels. In such cases the user's device directly connects to the server of the external service provider. Please note that the service providers of such links are able to collect user data (such as IP address, browser, operation system, movement of cursor, address of the visited website and date of visit) and to place cookies on the user's device in order to ensure direct connection to their server and direct communication with the user's browser.

The servers of the external service providers may provide the users with personalized content.

When visiting the website, if consent is given with the help of the CMP service provider described in the following chapter, the user's device may connect to the following service providers.

Users may read further details on the data processing by the different service providers in the following notices:

Name of the service provider	Function implemented by the service provider	Access to the privacy notice of the service provider
Google	Operation of the advertisement services of Google Ads and	https://policies.google.com/privacy?hl=hu

	DoubleClick, and display of personalized ads in Google's ad network	
Adobe	Creation of statistical and web analytical analyses with Adobe Analytics	https://www.adobe.com/hu/privacy.html
Adobe	Creation of statistical and web analytical analyses with Adobe Audience Manager	https://www.adobe.com/hu/privacy.html
Adobe	Creation of statistical and web analytical analyses with Adobe Marketing Cloud	https://www.adobe.com/hu/privacy.html
Microsoft	Display of relevant ads in the search engine Bing	https://privacy.microsoft.com/hu-hu/privacystatement
Google	Provision of the map information service of Google Maps	https://policies.google.com/privacy?hl=hu
Google	Access to YouTube videos embedded in the website	https://policies.google.com/privacy?hl=hu
Google	Preparation of statistics concerning job applicants with Google Campaign Manager Floodlight Tag	https://policies.google.com/privacy?hl=hu
Meta (Facebook and Instagram)	Display of personalized ads on Facebook and Instagram	https://www.facebook.com/privacy/guide/collection/ and https://privacycenter.instagram.com/policy/
Pinterest	Display of personalized ads on Pinterest	https://policy.pinterest.com/hu/privacy-policy
OneTrust	Operation of the Consent Management Platform which manages cookies and provides information	https://www.onetrust.com/privacy-notice/ in Hungarian: https://www.onetrust.com.translate.google/privacy-notice/? x tr sl=en& x tr tl=hu& x tr hl=hu& x tr pto=wapp

2.4.2 Cookie management on mcdonalds.com

Joint data processing with Progress Promotion Kft. (H-1027 Budapest, Bem József utca 1/B). The website available at www.mcdonalds.com and www.mcdonalds.hu manages cookies.

Cookies are alphanumeric information sets with variable content sent by the web server, which are stored at the user's computer for a previously defined validity period. By using cookies, retrieval of certain user data and tracking their internet use become possible. Consequently, cookies help to determine the interests of users, their internet using habits and their history with the website. Since cookies function as labels with which users may be recognised by the website, if they are used, a valid user name and password may be stored for the website. When viewing the website, the user's browser sends back the previously saved cookie to the storage space of the user's device, the service provider sending such cookie may connect the current visit to the previous ones, however, as cookies are connected to the domain, it may only do so with regard to its own content. Cookies alone are not able to identify users, they may only recognize the visitor's computer or device, from which it may be possible to deduce user activities.

Cookies include cookies downloaded partly from our own server, partly from the partner service provider's server. In such cases the server of the external service provider is directly connected to the user's computer.

While the legal ground for processing cookies essential to the operation of the website is Article 6 (1) (f) of the GDPR, that is, the legitimate interest of the controller (appropriate functioning of the website),

we process statistical cookies and cookies for advertising purposes with the explicit consent of the website's visitor (Article 6 (1) (a) of the GDPR).

Please note that if you consent to the use of cookies, data of such cookies may be processed outside the European Union or the European Economic Area. In certain countries (such as the United States), this may result that data may be accessed for security and surveillance purposes without you being informed or having the opportunity to enforce any legal claims. Furthermore, we are not able to ensure that you can exercise your rights towards such providers. The legal ground for the transfer of data to an unsafe third country is Article 49 (1) (a) of the GDPR.

You may get information on the processing of different cookies at the bottom of the websites, or by clicking on the 'Cookie Setting' link below where you can give or withdraw your consent to the use of cookies:

Cookie Settings

The controller informs the visitors of website on the different cookies by using the Consent Management Platform (CMP).

OneTrust is the CMP service provider of the controller.

Availability: <https://www.onetrust.com>

Data subjects shall have the same rights concerning data processing described in this chapter as the ones described in chapter 5 hereto.

2.4.3 McDonald's on social media

The Hungarian McDonald's is registered on several social media platforms, publishes content and runs ads. We aim to present our services and products to the users of such platforms, communicate with them, and provide them with the opportunity to contact each other.

McDonald's is registered on the following social media platforms:

Facebook and Messenger: <https://www.facebook.com/mcdonaldshungary>

Instagram: <https://www.instagram.com/mcdonaldsmagyarorszag/>

LinkedIn: <https://hu.linkedin.com/showcase/mcdonald%27s-hungary/>

TikTok: <https://www.tiktok.com/@mcdonaldshu>

YouTube channel: <https://www.youtube.com/@McDonaldsMagyarorszag>

Facebook page of Bringamánia: <https://www.facebook.com/BringaMania>

When operating the social media platforms, operators directly connect to the users' computers or mobile devices, and therefore become familiar with their device's network identifiers (IP address), place and retrieve cookies on their devices, request data during registration, and collect further data during the use of their services. Users consent to the contractual terms, data protection policies and cookie policies of such service providers independently of McDonald's®. Progress has no influence on such documents, service providers provide the necessary information via the online contact details indicated below.

Data processing activities are **joint** data processing with Progress Promotion Kft. (H-1027 Budapest, Bem József utca 1/B).

Considering that the operation of such websites is a mutual interest with the service providers operating such websites, Progress Étteremhálózat Kft. and Progress Promotion Kft. perform **joint data processing** with the following companies, respectively:

Data processing involving the services of **Facebook**, **Messenger** and **Instagram** is a joint data processing with Meta Platforms Ireland Ltd. (Serpentine Avenue, Block J, Dublin 4, Ireland).

Access to the contract on joint data processing:

https://www.facebook.com/legal/terms/page_controller_addendum

The detailed privacy notice of Facebook and Messenger is available at <https://hu-hu.facebook.com/business/gdpr>.

Access to the privacy notice of Instagram: <https://privacycenter.instagram.com>

With respect to the operation of the **LinkedIn** page, there is joint data processing with LinkedIn Ireland Unlimited Company (Wilton Place, Dublin 2, Ireland).

Its privacy notice is available at <https://www.linkedin.com/legal/privacy-policy>, whereas the contract on joint data processing may be consulted here: <https://legal.linkedin.com/pages-joint-controller-addendum>, or in Hungarian, with Google Translate, at the following address: [https://legal-linkedin-com.translate.google/pages-joint-controller-addendum? x tr sl=en& x tr tl=hu& x tr hl=hu& x tr pto=wapp](https://legal-linkedin-com.translate.google/pages-joint-controller-addendum?x_tr_sl=en&x_tr_tl=hu&x_tr_hl=hu&x_tr_pto=wapp)

With respect to **TikTok**, the following entities are involved in the joint data processing: TikTok Information Technologies UK Ltd. (6th Floor, One London Wall, London, EC2Y 5EB, United Kingdom) and TikTok Technology Ltd. (10 Earlsfort Terrace, Dublin, D02 T380, Ireland).

The privacy notice of TikTok is available at <https://www.tiktok.com/legal/page/eea/privacy-policy/hu-HU>.

The contract concluded with TikTok on joint data processing may be available at <https://ads.tiktok.com/i18n/official/policy/jurisdiction-specific-terms>, the essence of which is that the parties make decisions related to the processing of personal data described in the privacy notice of TikTok jointly, and they share the tasks concerning the enforcement thereof. Demands related to the exercise of data subjects' rights are served and data subjects are contacted by TikTok, but its controller partner may also participate in the solution of the task, and the data subjects may enforce their rights towards any of the controllers.

We operate the **YouTube** channel together with Google. Google Ireland Limited is located in Ireland, at Gordon House, Barrow Street, Dublin 4.

Detailed information concerning data processing with respect to YouTube may be available here:

https://www.youtube.com/intl/ALL_hu/howyoutubeworks/our-commitments/protecting-user-data.

Access to the contract on joint data processing with Google:

<https://privacy.google.com/businesses/gdprcontrollerterms/>

With respect to the data processing activities related to the different services, users may find information at the above links which are regularly updated in accordance with the service providers' service developments.

The following partner helps us with the administration of these systems.

Processor:

Name	Registered office	Data processing task
feat. Kft	H-1013 Budapest, Pauler utca 11.	Answering comments, posts, messages, receiving complaints, quality claims and data protection claims, and transferring them to Progress Étteremhálózat Kft. or Progress Promotion Kft
Artificial Group Kft.	H-1053 Budapest, Ferenciek tere 2. 1. em.	Handling and moderating comments and posts, answering messages, receiving complaints, quality claims and data protection claims, and transferring them to Progress Étteremhálózat Kft. or Progress Promotion Kft, management of requests to unsubscribe from newsletters and other requests.

2.5 McDonald's mobile application

As regards data processing related to the McDonald's mobile app, Progress Promotion Kft. and the following companies operating the McDonald's® restaurants are the joint controllers:

Name	Registered office
Progress Étteremhálózat Kft.	H-1027 Budapest, Bem József utca 1/B.
Cserhádi Family Kft.	H-4025 Debrecen, Piac utca 53.
Tarján Food Kft.	H-1132 Budapest, Nyugati tér 4. 2. em. 23.
Tresser Restaurants Kft.	H-1095 Budapest, Boráros tér 7. fszt. 9.
LIC-2000 Kft.	H-2484 Gárdonyi-Agárd, Kinizsi út 1/A
CLEAR '97 Gyorsétterem Kft.	H-9700 Szombathely, Semmelweis utca 2. 1. em. 12.
KisSzabó Kft.	H-4400 Nyíregyháza, Zrínyi u. 4-6.
Shark 95 Kft.	H-1053 Budapest, Múzeum krt. 1/B.
Ba-Li Gyorsétterem Kft.	H-1153 Budapest, Szentmihályi út 131.
Full-Pack Kft.	H-1213 Budapest, Szentmiklósi u 73.
SZMF Restaurant Kft.	H-1211 Budapest, Kossuth Lajos u. 99/A
Színarany Kft.	H-7400 Kaposvár, Berzsenyi u. 11.
PEKI Restaurant Kft.	H-6000 Kecskemét, Izsáki út 3.

According to the agreement on joint data processing between the above-named companies, these joint controllers perform the processing of personal data with respect to the McDonald's mobile app jointly, in pursuit of their joint purposes. As regards the specified processing operations, they shall make processing decisions together, and share the implementation tasks. Demands related to the exercise of data subjects' rights are served and data subjects are contacted by Progress Promotion Kft., but its controller partner may also participate in the solution of the task, and the data subject may enforce their rights towards any of the controllers. The controllers state in agreement that they can be reached via the contact details published in Chapter 4 of this notice.

The McDonald's mobile app may be used with a mobile phone or any other mobile devices, with certain functions being available without registration, while others may only be used with registration or explicit consent.

It is possible also without registration to find information on specific offers, products and services, or view the main data of McDonald's® restaurants in Hungary.

Several functions of the application are only available after registration, such as:

For the basic registration, as the first step of registration, it is necessary to switch on the first (top) toggle. After that, the user will be able to access general coupon offers. For further information on data processing related to registration, please consult chapter 2.5.1 of this notice.

The basic registration also gives access to the Mobile order and pay functionality (hereinafter: "MOP") (see: chapter 2.5.2 of this notice).

If during registration, users also switch on the second (middle) toggle, they connect to the MyMeki loyalty program in order to collect points after their purchases, and to receive segmented (classified into the same category based on certain data) or personalized (personally tailored to a specific User) offers. Depending on the User's authorisation and the device settings, marketing communication occurs in the formats of a push notification (popup in the application), in-app banner (ad tile within the application) and email.

For further information concerning data processing with respect to the MyMeki loyalty program, please consult chapter 2.5.3.

The registration form also offers a possibility to subscribe to email marketing communication notices on McDonald's@ offers, rewards and promotions. It is necessary to switch on the third (bottom) toggle for

subscription. After registration, the consent can be changed at any time in the “Communication Settings” under the “My profile” menu item of the Application.

Data processing shall be governed by chapter 2.5.5 of this notice.

Frequently asked questions related to registration on the mobile app (among others) may be available here: <https://www.mcdonalds.com/hu/hu-hu/mcdonald-s-app/mobil-rendeles.html>

When using certain functions of the mobile app, further data processing activities may take place which are detailed in the following chapters.

2.5.1 Registration to the McDonald’s mobile app

Purpose of data processing: to provide discount or other offers via general customer coupons for the registered users of the app, possibility to join the MyMeki loyalty program, possibility to join the MyMeki loyalty program, possibility to access the Mobile Order and Pay (MOP) functionality, create statistics, weather, date and time), monitor its use, document and log the users’ statements and activities made during the use of the app.

Legal ground for data processing: voluntary consent of the data subject [Article 6 (1) a) of the GDPR].

Type of personal data processed:

(a) information provided by you

You may provide us with the following information:

- your name and email address, your date of birth (day/month/year - optional), your gender (optional);
- the country and language selected by you;
- your password with which you enter the application (we store it in an encrypted form);
- your statement whether you are over 16;
- other legal statements related to the use of the app;
- other personal information provided by you in the course of your interactions with us.

(b) information collected by automated means

Subject to your consent, we use certain information collected during your purchase under sections 2.1.1, 2.5.2 and 2.5.3 hereto (date and time of purchases with mobile coupons, name and code of the restaurant, value of the purchase, name and code of the purchased product, redemption of loyalty offer, time of redemption, name and code of the restaurant, number of redeemed points, name and code of the product acquired using the loyalty offer) for creating anonymous statistics, and if you have joined the MyMeki loyalty program, for targeting ads to be displayed or sent out in order to ensure that you receive offers which are relevant to your interest.

We collect information from your mobile device with automated technologies when you use the app. Automated technologies may include cookies, locally shared objects or web beacons.

We collect the following information about you:

- date and time of downloading the application, registration and last access to it;
- date and time of legal statements made by you;
- date, time and location of the redemption of an offer;
- product category of redeemed offers, designation and value of the product;
- offers provided to you, coupons (with an identification number with a QR code), their status, date and place of their view and redemption;
- if you participate in the MyMeki loyalty program, place, date, time of use of your MyMeki loyalty card, as well as the number of points redeemed, balance of the loyalty points, number of points;

- display and view of push messages, clicks on push messages, number of clicks;
- geographical location and time;
- type of the operation system and browser used on your computer or mobile device;
- type and settings of your mobile device;
- your unique device ID (UDID) or mobile device ID (MEID);
- serial number of your computer and its parts;
- IDFA, IFA or other similar identifiers;
- referring website (the page that directed you to our website) or application; and
- all of your activities related to the use of our mobile app, such as the pages you visit in our mobile app.

(c) the identification number of your MyMeki loyalty card which is displayed by the app with a QR code.

Deadline for erasure of data: After 3 years of user inactivity, the user account will become inactive and data will be available in the archives for two more years. If you delete your registration related to the app, the account becomes inactive, and will be stored in the archives for two years. After this period, data will automatically be erased. Data are immediately erased if a data subject specifically requests so.

Possible consequences of failure to provide data: data subjects may not use certain services of the app, may not benefit from the McDonald's coupon discounts, and may not use the related services, such as the MOP and MyMeki services.

Two-factor authentication:

In order to ensure safety of the user accounts, logging in to the mobile app may only be possible following a two-factor identification. The app sends a six-digit numerical code via email to the user, and the user shall enter it in the app in order to successfully log in.

The safety code is valid for 4 hours, after that, it will be deleted. The user may request a new code at any time which will also be valid for 4 hours.

After entering the correct code, the system enables logging in and logs the time thereof.

If you attempt to log in with a wrong code for several times, the system will block the account for 10 minutes.

In order for you to be able to use the app, we recommend you regularly maintain your email account and update it in the McDonald's app. If the system notices when sending out the code that delivery of the email is permanently unsuccessful, the registration may be cancelled.

If a user does not receive the code for any reason, and cannot log in to the app, they may create a new account, and their existing registration profile will be deleted in accordance with the above.

Connecting data processing activities:

Because of the accounting of loyalty points, data processing is also connected to the data processing related to the clearing house mentioned in chapter 2.5.4 of this notice.

2.5.2 Mobile Order and Pay (or 'MOP')

The MOP function is available only after registration (2.5.1), if the user consents to the general terms and conditions for the use of the mobile app.

If you place an order via the McDonald's mobile app in a McDonald's® restaurant operated by Progress Étteremhálózat Kft or any of its franchisees and take over the food items, drinks, products or services ordered in the selected restaurant (e.g. at the counter, in the guest area, at the Drive or curbside), the agreement is made with the legal person operating the restaurant (that is Progress Étteremhálózat Kft or its franchisee).

Restaurants are operated either by Progress Étteremhálózat Kft., or its franchisees. Their full list is available in the introduction to chapter 2.5 of this notice.

You are required to present the order number identifying the order on your mobile phone screen upon request by the McDonald's employee serving the order.

Purpose of data processing: for registered users of the app, fulfilment of orders submitted in the McDonald's mobile app by using the MOP function.

Legal ground for processing: performance of a contract [Article 6(1) (b) of the GDPR].

Type of personal data processed: name, email address, designation of the ordered food, drink and other products, their price, amount of the order, the final amount paid, date of the order, the selected restaurant, selected mode of delivery, selected mode of payment, order number, confirmation of the order, bank card details (the user may decide whether they wish to provide card data only for the transaction in question or for permanent storage), except for ApplePay and GooglePay where card data are saved on the device and are transferred therefrom to the payment service provider, invoice data if an invoice is requested, confirmation message related to the order and email communication, information and feedback received from payment and anti-fraud service providers (see Data Transfers) related to the transaction; data related to previous orders.

Deadline for erasure of data: two years.

Data Transfers:

1. Payment service provider

Please note that when using the MOP function in the McDonald's mobile app, for the payment of the order the Controller uses the payment service of Adyen N.V. (registered office: Simon Carmiggelstraat 6-50, 1011DJ, Amsterdam, The Netherlands).

Type of data transferred: name of the data subject and amount of their order, restaurant involved in the purchase, bank card data provided by the user, order identification number, date of order. The card data provided by the data subject are not stored in the McDonald's mobile app (except for the type of card and its last four digits), the card data are processed by the payment service providers.

The payment service provider shall be considered as independent controller.

The privacy notice related to Adyen may be available at the following link: <https://www.adyen.com/policies-and-disclaimer/privacy-policy>

Legal ground for data transfers: processing is necessary for the performance of a contract [Article 6(1) (b) of the GDPR].

2. Fraud prevention

The controllers share certain personal data with Sift Science, Inc. (registered office: 525 Market St 6th Floor San Francisco, CA 94105, United States of America, hereinafter: 'Sift'), which is in connection with Progress, for fraud prevention purposes.

Type of data transferred: name of the data subject, email address, last four digits of the bank card, type of the card, data of the order (type, amount and price of products).

Sift shall be considered as an independent controller.

The privacy notice of Sift may be available at the following link: <https://sift.com/service-privacy>

Legal ground for data processing: the data processing is the legitimate interest of the controllers, as it is necessary to check the transactions and prevent any fraud in the case of card payments [Article 6 (1) (f) of the GDPR].

It is important to note that in the context of data processing based on legitimate interest, data subjects may have the right to object:

Data subjects are entitled to object to the processing of their personal data at any time due to a reason related to their own situation. In that case, the Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Connecting data processing activities:

The data processing activities related to mobile orders (MOP) are connected to the data processing related to in-restaurant purchases of the Party concerned, as the invoicing procedure in the course of the preparation of the ordered products is the same as described therein.

The data processing activities related to mobile orders (MOP) are connected to MyMeki data processing under chapter 2.5.3 of this notice, given that if the data subject consented to the participation in the MyMeki loyalty program, MyMeki loyalty points are automatically added to their loyalty card after MOP purchases, and under the MOP functionality, it is possible to redeem loyalty points during purchases.

Because of the accounting of loyalty points, data processing is also connected to the data processing related to the clearing house mentioned in chapter 2.5.4 of this notice.

2.5.3 MyMeki loyalty program

If during registration to the mobile app, users also switch on the second (middle) toggle, they connect to the MyMeki loyalty program in order to collect points after their purchases, and to receive segmented (classified into the same category based on certain data) or personalized (personally tailored to a specific User) offers; depending on the User's authorisation and the device settings, marketing communication occurs in the formats of a push notification (popup in the application), in-app banner (ad tile within the application) and email.

You may participate in the MyMeki loyalty program based on your voluntary consent. After registration, the consent can be changed at any time in the "personalised deals" menu item under "MyMeki loyalty program" in the "Profile" within the Application.

Purpose of processing: to provide the discounts of the MyMeki loyalty program for users, to enforce rights and fulfil obligations arising from the conditions of the loyalty program, to enable collection and redemption of points after each purchase, to send out segmented or personalized offers related to the loyalty program. Data processing involves the display of push messages based on a separate consent given on the mobile device, and if the user has specifically authorised so, the sending of marketing communication via the email. Data processing is based on the data and preferences provided upon registration, the use of their mobile device and the app. The purposes of data processing also include surveillance of the use, documentation and logging of the user's statements and activities when using the app.

Legal ground for data processing: voluntary consent of [Article 6 (1) a) of the GDPR].

Type of personal data processed: MyMeki ID , points earned and used, the date, time and place of obtaining points, using points and loyalty offers, the name and content (including its alphanumerical code/QR code' downloadable file, if any) of the redeemed offer, the number of the redeemed points, code of the redeemed coupon, total amount of the purchase, balance of loyalty points.

Deadline for erasure of data: two years.

Connecting data processing activities:

Data processing activities related to the MyMeki loyalty program are connected to the data processing described in chapter REF_Ref146107466 \h * MERGEFORMAT 2.1 of this notice. (*Data processing in restaurants*), as the number of points received and redeemed is connected to the purchase.

Therefore, MOP purchases involve the transfer and reception of personal data, so the data processing is connected to the data processing described in chapter 2.5.2. of this notice.

Because of the accounting of loyalty points, data processing is also connected to the data processing related to the clearing house mentioned in chapter 2.5.4 of this notice.

Data transfer, joint data processing:

The loyalty offers appearing within the MyMeki loyalty program may involve joint data processing or data transfer, if a partner company is also involved in providing the offer. In such cases, the individual information can be accessed by clicking on the "Privacy Notice" located under the description of the given loyalty offer. By participating in the loyalty offer, the data subject declares that he/she has become familiar with the data processing conditions included in the individual notice.

Consequences of failure to provide data: the data subject may not use all MyMeki discounts, points and may not receive segmented or personalised marketing communication offers.

2.5.4 Clearing house

Progress Promotion Kft. operated a Clearing House to facilitate settlement between controllers related to the MyMeki program. Although the Clearing House uses anonymous data, it is being fed from resources containing personal data processed by the controllers, with the aim to realise the purpose of joint controllership.

Purpose of processing: to enable and perform the settlement between controllers related to the collection and use of MyMeki points.

Legal ground for data processing: the controller's legitimate interest [Article 6 (1) (f) of the GDPR].

It is important to note that in the context of data processing based on legitimate interest, data subjects may have the right to object:

Data subjects are entitled to object to the processing of their personal data at any time due to a reason related to their own situation. In that case, the controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Data sources: data under chapters 2.5.1, 2.5.2 and 2.5.3; crediting MyMeki points earned in restaurants, expiration, number of total points, including franchisee databases.

Type of personal data processed: although the Clearing House uses anonymous data, it is being fed from resources containing personal data processed by the controllers.

Duration of processing: anonymous data are stored indefinitely.

Deadline for erasure of data: anonymous data are stored indefinitely.

2.5.5 Customer programs, customised app and communication (CRM)

The CRM system makes it possible for controllers to manage customer relationships professionally. Controllers can send marketing communication messages to users registered in the MyMeki loyalty program (section 2.5.3).

Purpose of processing: sending general offers or segmented offers (classified to the same category based on certain data; based on data provided on registration – such as date of birth, coupon and other activities, MyMeki, mobile app use, MOP and restaurant purchase activities) or personalised offers (personally tailored to the specific user) to mobile app users registered in the MyMeki loyalty program, depending on their authorisation. Marketing communication occurs in the formats of a push notification (popup in the application), in-app banner (ad tile within the application) and email, depending on the user's authorisation and on device settings.

Legal ground for data processing: consent of the data subject [Article 6 (1) a) of the GDPR].

Data sources: data under chapters 2.5.1, 2.5.2 and 2.5.3.

Type of personal data processed:

- a) basic data required for identification (email address and identification numbers; customer ID, tag ID)
- b) data managed in and transferred from the above mentioned data sources such as name, date of birth (YY/MM/DD – optional), gender (optional)
- c) data of identified transaction – for example date and place of transaction
- d) data provided by the data subject in a questionnaire

e) data automatically captured by the system during the operation of the CRM system (customer program, date and time, contents of communication, communication channel, user activity).

Deadline for erasure of data: After 3 years of user inactivity, the user account will become inactive and data will be available in the archives for two more years. If you delete your registration related to the app, the account becomes inactive, and will be stored in the archives for two years. After this period, data will automatically be erased. Data are immediately erased if a data subject specifically requests so.

Automated display of ads:

Ads within the app, displayed on the mobile device are served based on automated decision-making.

Logic applied during automated decision-making: the personal data provided by the user, the geographical location, the external factors (such as weather or time of day), as well as data related to the user activity during purchases (including MOP purchases, coupon redemptions, receipt and redemption of loyalty points) and performed in the mobile app are used for targeting ads and displaying customized marketing messages.

Impact of the profiling on data subjects: display of different marketing messages customized for each user.

Users may request human intervention on behalf of the controller pursuant to Article 22 (3) of the GDPR; may express their views and may submit an objection against the decision.

Modifying settings related to the CRM system, exercising data protection rights:

You can modify the data provided, including consents, or withdraw consents in the “My Profile” menu. You can also request the withdrawal of consent related to send messages managed with the CRM system and the deletion or modification of personal data at the following contact details:

- by e-mail at mekihirlevel@hu.mcd.com,
- by post at Progress Promotion Kft. 1027 Budapest, Bem József utca 1/B., and
- by clicking on the link at the bottom of each e-mail.

2.5.6 Customer relationship notifications

Controllers can send notifications to users registered in the McDonald’s mobile app (chapter 2.5.1), regardless of whether they have consented to email communications, if the contract terms, services or technical solutions undergo a change that means relevant information for the users. This type of processing is necessary for the maintenance of contact under the contractual relationship existing with the users and for the safe and undisturbed operation of services.

Purpose of processing: notifications of changes to contractual terms, communication of technical developments or changes, sharing important information related to the service.

Legal ground for data processing: the controller’s legitimate interest [Article 6 (1) (f) of the GDPR].

It is important to note that in the context of data processing based on legitimate interest, data subjects may have the right to object:

Data subjects are entitled to object to the processing of their personal data at any time due to a reason related to their own situation. In that case, the controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Data sources: processing under chapter 2.5.1.

Type of personal data processed: email address, date, time and contents of customer contact.

Deadline for erasure of data: data processing for this purposes ceases on deletion of the registration.

2.5.7 Other data processing activities of the mobile app

Please be informed that the data processed during the use of the mobile app may be accessed by the service provider of the operation system of your device and/or the manufacturer of the device. For further information on the data processing, please contact the controller.

During the use of the mobile app, whether or not with registration, the use of the following functionalities entails data processing:

Location data:

With the use of the mobile app, we collect data about the exact or approximate location of the device, provided that the user has specifically authorised us to do so. We use geolocation and other technologies, such as GPS, wifi, bluetooth or the proximity of a mobile tower to support certain functionalities of the app. Most mobile devices make it possible for the affected user to withdraw the authorisation granted before for the collection of such information in the device or browser settings. When turning on geolocation, the app offers you to use the app which corresponds to the country of residence, offers the position within the restaurant finder service, and also helps to determine the distance of the selected restaurant when using the MOP function.

If you would like to know how to prevent us from collecting data on your precise location, please contact your mobile service provider, the manufacturer of your device or the developer of the operation system running on your device. Certain services may not work without the geolocation. **For example when turning on geolocation, the app offers you to use the app which corresponds to the country of residence, and helps to determine the distance of the selected restaurant when using the MOP function.** If you would like us to erase the already collected data which may allow the identification of your location, please contact us.

Restaurant finder service:

With the geolocation data of your mobile device, if you previously gave your explicit consent to it as described above, McDonald's® restaurant will be displayed with the help of Google Maps and iOS map. For further information on data processing by Google Maps, please consult <https://policies.google.com/?hl=hu>, and for further information on data processing by iOS map, please consult <https://www.apple.com/legal/privacy/hu>.

Display of web information within the app:

By clicking on the menu items 'Products', 'Newsletter', 'Experience meter' and 'Information on data management' of the app, the app will direct you to the relevant page of the mcdonalds.com website. Detailed information on data processing by mcdonalds.com are available in chapter 2.4 of this Notice (including information on cookies).

Analytics:

Pursuant to the above data processing activities, Plexure Analytics prepares statistical reports. The reports are not suitable for personal identification, controllers may only access anonymous data in the analytical systems.

Using the toilette gates:

We inform our guests that in case of using McDonald's mobile application to open toilette gates in the restaurant, the use of the toilette gates is not logged.

Fraud prevention:

We monitor any eventual abusive activities (such as suspicious, irregular user attempts, or large volumes of user attempts) with Microsoft Azure Storage Explorer, an app of Microsoft Corporation which hosts the MyMeki loyalty program. Irregular users maybe excluded from the MyMeki loyalty program or some parts of it. When investigating an abuse, we may check whether the abuse was committed by an employee of the restaurant network (including the restaurants operated by the franchise partners: <https://www.mcdonalds.com/hu/hu-hu/Rolunk/franchise-partnereink.html>) or a person employed in a cooperative legal relationship.

Legal ground for data processing: the data processing is the legitimate interest of the joint controllers, as it is necessary to prevent any fraud in order to protect the interests of the loyalty program [Article 6 (1) f) of the GDPR].

It is important to note that in the context of data processing based on legitimate interest, data subjects may have the right to object:

Data subjects are entitled to object to the processing of their personal data at any time due to a reason related to their own situation. In that case, the controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Display of customized offers

When you use our mobile app, or otherwise contact us, we may collect your personal data. If you sign in to the McDonald's® mobile app from a device on which the operation system is iOS, or Android 10 or above, we may not process the mobile advertising identifier code of the application (IDFA for iOS or Google Ad ID for Android) and your personal data related to the use of the app automatically, and we may not send you customized offers in push messages, except if you give your consent when we requested it in a pop-up window in the app. We may still send you offers in the absence of such consent, but they will not be customized, and will not reflect your interests.

Processors involved in the operation of the mobile app:

Name	Registered office	Processor's task
Plexure Limited	Level 3, 104 Quay St Auckland 1010, New Zealand Compliance of the data transfer is ensured based on the decision of the European Commission under Article 45 (1) of the GDPR.	provision of the technological background of the mobile app
fps ecosystem Kft.	H-3525 Miskolc, Dayka Gábor utca 1-7. Fsz. 2. ajtó	performance of tasks related to development and the database
feat. Kft.	H-1013 Budapest, Pauler utca 11.	performing tasks related to development and the database, supporting the application, processing guest opinions related to the app, providing recommendations for registered users in relation to technological issues, answering questions of the registered users, monitoring fraud-suspicious cases in the database of the loyalty program and transferring information on perceived cases to the competent McDonald's experts, sending notifications
Hetzner Online GmbH	Industriestr. 25, 91710 Gunzenhausen, Germany. Data processing activities performed as subprocessor: List of authorised subprocessors: https://www.hetzner.com/AV/subcontractors.pdf	virtual server ("VPS"), additional storage ("Volume") and virtual server backup ("Backup") services
McDonald's Global Markets, LLC	110 N Carpenter St, Chicago, IL, 60607-4106, United States of America. Compliance of the data transfer is ensured with the data protection guarantees under Article 46	provision and hosting of strategic support services (provision and storage of online reaches; support of e-commercial functions; global

	(2) (c) of the GDPR.	payment and fraud prevention services, incident management and partner support; partner administration.
Microsoft Corporation	110 N Carpenter St, Chicago, IL, 60607-4106, United States of America. Compliance of the data transfer is ensured with the data protection guarantees under Article 46 (2) (c) of the GDPR.	provision and hosting of strategic support services (provision and storage of online reaches; support of e-commercial functions; global payment and fraud prevention services, incident management and partner support; partner administration
Microsoft Corporation	One Microsoft Way Redmond, WA 98056, United States of America. Compliance of the data transfer is ensured with the data protection guarantees under Article 46 (2) (c) of the GDPR.	storage and hosting of buyer data, monitoring potentially fraudulent activities
Amazon Web Services, Inc	410 Terry Avenue North, Seattle, WA, United States of America. Compliance of the data transfer is ensured with the data protection guarantees under Article 46 (2) (c) of the GDPR. List of authorised subprocessors: https://aws.amazon.com/compliance/sub-processors/	storage and hosting of buyer data.
Capgemini America, Inc	79 Fifth Avenue, 3rd Floor, New York, NY 10003, United States of America, and India. Compliance of the data transfer is ensured with the data protection guarantees under Article 46 (2) (c) of the GDPR.	incident management and market support
ApeGroup	Ljusslingan 4 120 31 Stockholm, Sweden	management and authentication of authorised users
Google, LLC	1600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America. Compliance of the data transfer is ensured with the data protection guarantees under Article 46 (2) (c) of the GDPR.	administration related to hosting, monitoring potentially fraudulent activities
SAP Hungary Kft.	H-1031 Budapest, Záhony u. 7. List of authorised subprocessors: https://help.sap.com/docs/ariba/ariba-data-protection-and-privacy/subprocessors?version=2405	Provision of the SAP Engagement Cloud cloud-based service platform, operation of storage and a system that supports CRM operations Sending transactional and personally tailored marketing email and newsletters
Twilio Ireland Limited	70 Sir John Rogerson's Quay Dublin 2, D02 R296, Ireland List of authorised subprocessors: https://www.twilio.com/en-us/legal/sub-processors	Sending and managing mass emails using the SendGrid service
Cloudflare Inc	101 Townsend St, 94107 San Francisco, California, United States of America. Compliance of the data transfer is ensured with the data protection guarantees under Article 46 (2) (c) of the GDPR. List of authorised subprocessors:	provision of cloud-based cybersecurity services

Data modification, erasure, application support:

The provided data, including data related to the amendment or withdrawal of consents may be modified in 'My Profile', the password may be modified in 'My Profile', under 'Change my password'.

The history of the MyMeki loyalty card may be viewed by clicking on 'View History' on the loyalty card available with the use of the app.

The registration can be cancelled starting from the "Cancel profile" menu item under "My Profile" in the Application. The registration may be deleted on <https://mcdonaldsapps.com/hu-HU/account> when logged in, or you may indicate your request to delete your registration via mcdonaldsapp@hu.mcd.com.

You can also request the withdrawal of consent related to send messages managed with the CRM system and the deletion or modification of personal data at the following contact details:

- by e-mail at mekihirlevel@hu.mcd.com,
- by post at Progress Promotion Kft. 1027 Budapest, Bem József utca 1/B., and
- by clicking on the link at the bottom of each e-mail.

The app is supported by feat. Kft. on weekdays, between 9 a.m. and 5 p.m. Users can send any questions related to the operation of the application to the email address: mcdonaldsapp@hu.mcd.com, which queries will be answered by feat. Kft. within the time period specified above.

2.6. Contact

2.6.1 Customer relationship, correspondence

If you wish to contact our company, you may do so via the contact details specified herein and available under 'Contact' on mcdonalds.com website, and also using the McDonald's mobile app.

If you contact us via the "Report a Problem" page under "Help & Support" by clicking on the "More" menu item on the main screen of the McDonald's mobile app, reporting an error becomes easier because information essential for troubleshooting (e.g. the phone's technical data) will be automatically inserted into the message.

We inform you that if you contact our company, our employees may access the available data to the extent necessary to respond to your inquiry and handle your case.

Purpose of data processing: answering inquiries, differentiating between them, ensuring their retrievability.

Legal ground for data processing: it is the controller's legitimate interest to answer such inquiries, differentiate between them and ensure their retrievability [Article 6 (1) (f) of the GDPR].

Type of data processed: name, email address, date, time and other personal data provided in the messages, and additionally – if reporting an error is made using the McDonald's mobile app – the data of the user's mobile device (operation system, app version, type, language, status (e.g. logged in) of the device, user name (e-mail address given in the app), library versions (version number of the software content)).

Duration of processing: three years.

Possible consequences of failure to provide data: the data subject may not be able to contact the data controllers.

Processors:

Name	Registered office	Data processing task
Protocall 2009 Kft.	H-2724 Újlengyel, Ady Endre u. 41.	cooperation in answering emails
feat. Kft.	H-1013 Budapest, Pauler utca 11.	cooperation in answering queries
VCC Live Hungary Kft.	H-1112 Budapest, Balatoni út 2/A. 5. em.	hosting service

Subprocessor for paper-based inquiries:

Name	Registered office	Data processing task
Iron Mountain Magyarország Kft.	H-1093 Budapest, Czuczor u. 10. IV and V	document retention, physical destruction of documents

2.6.2 Application for a job – selection procedure

On the <https://karrier.mcdonalds.hu> portal, it is possible to browse for and apply for the Hungarian job offers of McDonald's®.

You may find further information on <https://karrier.mcdonalds.hu> and on <https://karrier.mcdonalds.hu/adatkezelesi-tajekoztato> concerning the data processing related to applications for job offers.

Progress Étteremhálózat Kft. stores only the applications submitted to it. If Progress Étteremhálózat Kft. is the selected employer-controller, we hereby inform you of the conditions for data processing:

Progress Étteremhálózat Kft. stores the CVs submitted by the applicants electronically or on paper. The submitted applications may only be accessed by HR employees of Progress Étteremhálózat Kft. and the contractual partner of Progress Étteremhálózat Kft. In the course of the selection procedure, the employer verifies the eligibility of the candidates during a personal or online interview. Notes may be made during the procedure.

Purpose of data processing: application for job offers at Progress Étteremhálózat Kft., organization of the selection procedure, including personal and online interviews, as well as the necessary contact keeping; logging of the applications, and retention of logging data in a database.

Legal ground for data processing: voluntary consent of the data subject [Article 6 (1) a) of the GDPR].

Type of personal data processed: name (family name, first name) (mandatory), phone number (mandatory), email address, position, type of work (mandatory), restaurant involved, date of application, and if the applicant attaches a CV (optionally) and/or writes a comment, data included in the CV and/or the comment (optional) (the comment typically involves information on assignability); especially and typically the following data in the CV: name/name at birth, place of residence, phone number, email address, place of birth, time, nationality, source of learning about the job offer, number of hours and time of day when the applicant can work, time and duration of regular activities which may influence the work, highest completed level of education (name of the school, faculty, year of graduation), data on ongoing studies, data on language skills, field of work experience, as well as data on job search and plans, acceptable travel time, acceptable net salary, characteristics related to the job, working and sociability, as well as cover letters, CVs, applications and other personal data provided therein, the fact that a personal or online interview has taken place and other information recorded during the interviews.

The applications are logged by the system with the following data: identification number, job offer identification number, restaurant identification number, company identification number, date and time of creation and modification, pseudonymized version of the applicant's data (first and last letter of their name, first and last digit of their phone number, first two and last five letters of their email address), student association identification number, type of employment, job role identification number).

Possible consequences of failure to provide data: the data subject may not be able to apply for the job offers published by Progress Étteremhálózat Kft.

Duration of processing:

- up to one year from submission of the application;
- one year with respect to the data recorded in the course of logging;
- 30 days for CVs personally submitted at the restaurants.

Data Transfer:

- (i) the electronically submitted applications are transferred via an automatic email to Hireify Kft; and
- (ii) in the case of application to a student association, they are transferred to the student association, via an automatic email, and the personal data are not stored in the database of Progress Étteremhálózat Kft. The data listed in 'The applications are logged by the system with the following data' of the chapter 'Personal data processed' are stored for one year.

Profiling in the course of data processing:

We process the data of applications submitted electronically to Progress Étteremhálózat Kft. with the system of Hireify Kft. The system creates a personal data sheet based on the data included in the submitted applications, and provides search functions by keywords and labels, preferences, interests or other data of the candidates. This ensures a more efficient selection procedure.

Processors:

Name	Registered office	Data processing task
Progress Promotion Kft.	H-1027 Budapest, Bem József utca 1/B.	It provides the technical background of the career portal on behalf of the partner employers/student associations. Performing backups on the website, performance of tasks related to development and the database
fps ecosystem Kft.	H-3525 Miskolc, Dayka Gábor utca 1-7. Fsz. 2. ajtó.	Performance of operative and support activities related to the Website. For applications for vacancies at McDonald's restaurants submitted via the Website, collection of data necessary for the selection procedure, and transfer of such data to Hireify Kft. which has concluded a contract with Progress Étteremhálózat Kft., and to the relevant student association, and in this context, logging the applications, and retention of data related to the logging in the database.
Invitech ICT Services Kft.	H-2040 Budaörs, Edison u. 4.	server hosting service
Zerris Kft.	H-2094 Nagykovácsi, Fejér György utca 16/A.	Administrator activities, domain management, IT consultancy and support, system surveillance
Hireify Kft.	H-2045 Törökbálint, Kossuth Lajos utca 40.	Automated processing of the data of applications submitted electronically to Progress Étteremhálózat Kft.

Microsoft Corporation	One Microsoft Way. Redmond, WA 98052-7329, United States of America. Compliance of the data transfer is ensured with the data protection guarantees under Article 46 (2) (c) of the GDPR.	Data storage in Microsoft 365 applications (including among others: Microsoft Office applications, OneDrive cloud service, Teams).
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Processor in the case of paper-based application:

Name	Registered office	Data processing task
Iron Mountain Magyarország Kft.	H-1093 Budapest, Czuczor u. 10. IV and V	Document retention and disposal

Processor when the online videoconference system, Google Meet is used:

Name	Registered office	Data processing task
Google Ireland Limited	Gordon House, Barrow Street, Dublin 4, Ireland	Data storage and provision of videoconference services through Google Meet

It is important to note that in the context of profiling mentioned in this chapter, data subjects may have the right to object:

Data subjects are entitled to object to the processing of their personal data at any time due to a reason related to their own situation. In that case, the Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

2.6.3 Satisfaction survey ('Experience meter')

Progress Étteremhálózat Kft. processes the personal data of data subjects participating in the satisfaction survey **jointly** with Progress Promotion Kft. (H-1027 Budapest, Bem József utca 1/B).

For McDonald's®, it is of utmost importance to ensure the highest quality of service for its guests. For this, we need feedback from our guests.

In some of our restaurants, we provide our guests with a code of 12 letters and digits on the receipt issued upon certain purchases, which allows them to participate anonymously in our satisfaction survey available at www.mcdonalds.hu/velemenyed.

The 12-digit code includes the place, date and time of purchase, the order identification number and the identification number of the counter used.

After filling out the questionnaire, people receive a coupon which may be redeemed to our current gifts in our restaurants.

The codes used when filling out the questionnaire and the answers are stored for two years.

Detection of unusual, abusive answering methods will take place manually.

LOGGING OF THE MCDONALDS.HU/VELEMENYED SERVER

When users visit www.mcdonalds.hu/velemenyed, the web server automatically logs users' activities.

Purpose of data processing: when visiting the website, the service provider records visitors' data in order to monitor the operation of the services, provide customized service and prevent abuses.

Legal ground for data processing: it is the controller's legitimate interest to identify users, provide customized service and prevent abuses [Article 6 (1) f) of the GDPR], taking into account Section 13/A (3) of Act CVIII of 2001 on Electronic Commerce and on Information Society Services.

Type of data processed: identification number, date, time, address of the page visited and IP address of the user's device, data related to their device, browser and operation system (such as type of device used for browsing, screen size and resolution, name, language and version of the browser).

Duration of processing: three months.

Processor:

Name	Address	Data processing task
INTERNATIONAL SERVICE CHECK / Multisearch AG	Aeschenvorstadt 71 Switzerland – 4051 Basel	Operation of the interface for the electronic satisfaction survey.
Amazon Web Services Inc	410 Terry Avenue North Seattle, WA 98109 United States of America. Compliance of the data transfer is ensured with the data protection guarantees under Article 46 (2) (c) of the GDPR.	Recording, storing and processing data

Access to servers:

Name	Address
INFOMINDS AG/SPA	Via Brennero 72 Italy –39042 Bressanon
Equinix's Datacenter	10 5030 Str., Druzhba-1 district Bulgaria – 1592 Sofia

Progress Étteremhálózat Kft. does not connect data used for the analysis of log records with other information, it does not seek to personally identify users.

The addresses of the websites visited, and the data related to the date and time alone are not suitable for the personal identification of data subjects.

2.7. Data processing activities related to delivery services

2.7.1 Foodora

Cooperation with Foodora (Delivery Hero Hungary Kft.)

The Controller and Delivery Hero Hungary Kft. (hereinafter the 'Service Provider' or 'Foodora') are independent controllers concerning the electronic commercial services provided on the www.foodora.hu website ('Website') or the Foodora application (hereinafter the Website and the Foodora Application are collectively referred to as: Foodora Interfaces) through which McDonald's® products are ordered by

natural or legal persons (hereinafter: 'Users'), and concerning the home delivery activities performed by the Service Provider in relation to McDonald's® products.

The Controller's data processing activities mentioned above are governed by the following conditions: Annex 2 of 'General terms and Conditions for CONSUMERS USING FOODORA AND FOODORA DELIVERY SERVICES', that is 'General terms and conditions governing orders from McDonald's® restaurants', which is available at the following link: <https://www.foodora.hu/contents/aszf> (hereinafter: GTC).

Personal data related to users are processed by the Controller for the conclusion and performance of the contract between the Service provider and the Controller, and the contract between the User and the Controller in the following cases:

2.7.1.1 Order and delivery

After submitting an order, in addition to the information related to the order (order number, date, time, name and price of the ordered product), the Service Provider transfers the User's name and phone number to the Controller.

Data transfer is necessary for the identification of the order, coordination with the courier and delivery of the products.

The Controller does not store the received data after transferring them to the courier, unless the User requests a VAT invoice for their own name. If the User requests a VAT invoice, Foodora will transfer the User's address to the Controller.

If a VAT invoice is requested, Progress will process the data received this way for 8 years in its own cash register system in order to document purchases and payments, and comply with its accounting obligations, pursuant to Article 6 (1) (b) and (c), taking into account Section 169 (2) of Act C of 2000 on Accounting.

Processors:

Name	Registered office	Data processing task
Pannon Support Rendszerház Kft.	H-1119 Budapest, Petzvál József u. 50.	Administrator tasks in restaurants
BBOX Solutions Kft.	H-2040 Budaörs, Gyár utca 2.	Maintenance of the cash register systems of restaurants

2.7.1.2 Handling of complaints

The Service Provider transfers the Users' personal data to the Controller for the purposes of complaint handling subject to Section 4.3 of the GTC, pursuant to Article 6 (1) (b) of the GDPR. The Service Provider shall inform the User on the fact that their data have been transferred concurrently or in advance, indicating the name and registered office of the recipient, as well as the link to the privacy notice.

If the Controller becomes aware of a complaint attributable to the Service Provider (Section 4.4 of the GTC), or if the Complaint is attributable to the Controller (Section 4.3 of the GTC), but may also affect the Service Provider, the Controller shall transfer the User's personal data to the Service Provider for the handling of the Complaint and/or responding to the Complaint, in accordance with Article 6 (1) (b) of the GDPR.

The controller receiving the data may process the data received and created during handling of the case for 3 years in order to handle complaints and quality claims, pursuant to Article 6 (1) (b) and (c) of the GDPR and taking into account Section 17/A (7) of Act on Consumer Protection.

2.7.1.3 Monitoring

Users acknowledge that data transfers to the Controller performed by the Service Provider for monitoring purposes take place pursuant to the legitimate interests of the parties. The Service Provider informs Users of the data processing in its [privacy notice](#).

2.7.2 Cooperation with Wolt (Wolt Magyarország Kft.)

The Controller and Wolt Magyarország Kft. (hereinafter the 'Service Provider' or 'Wolt') are independent controllers concerning the electronic commercial services provided on the www.wolt.com website ('Website') or the Wolt application (hereinafter the Website and the Wolt Application are collectively referred to as: Wolt Interfaces) through which McDonald's® products are ordered by natural or legal person users (hereinafter: 'Users'), and also concerning the delivery of McDonald's® products by the Service Provider.

The Controller's data processing activities mentioned above are governed by the following conditions: Annex 1 of 'General Terms and Conditions for Services', that is 'General terms and conditions governing orders from McDonald's® restaurants', which is available at the following link: [General Terms and Conditions for Services and Privacy Notice - Wolt](#) (hereinafter: GTC).

Personal data related to users are processed by the Controller for the conclusion and performance of the contract between the Service provider and the Controller, and the contract between the User and the Controller in the following cases:

2.7.2.1 Order and delivery

After submitting an order, in addition to the information related to the order (order number, date, time, name and price of the ordered product), the Service Provider transfers the the first letter of the User's last name and their first name and phone number to the Controller. Data transfer is necessary for the identification of the order, the coordination with the courier and the delivery of the products. The Controller does not store the received data after transferring them to the courier.

In accordance with its General terms and Conditions for Services and its Privacy Notice, the Service Provider may transfer certain personal data to its courier partners.

2.7.2.2 Compliance with accounting obligations

With respect to invoicing, the Service Provider shall provide the Controller with the data included in the invoice or the document equivalent to an invoice for the performance of the Controller's obligations under the Act on VAT. The party receiving the data will process the data received this way for 8 years in its own cash register system in order to document purchases and payments, and comply with its accounting obligations, pursuant to Article 6 (1) (b) and (c) of the GDPR, taking into account Section 169 (2) of Act C of 2000 on Accounting.

Processors:

Name	Registered office	Data processing task
Pannon Support Rendszerház Kft.	H-1119 Budapest, Petzvál József u. 50.	Administrator tasks in restaurants
BBOX Solutions Kft.	H-2040 Budaörs, Gyár utca 2.	Maintenance of the cash register systems of restaurants

2.7.2.3 Handling of complaints

The Service Provider transfers the Users' personal data (full name and email address, and other data in possession of the Service Provider related to the handling of the complaint) to the Controller for the

purposes of complaint handling subject to Section 4.3 of the GTC, pursuant to Article 6 (1) (b) of the GDPR. The Service Provider shall inform the User on the fact that their data have been transferred concurrently or in advance, indicating the name and registered office of the recipient, as well as the link to the privacy notice. If the Controller or its franchise partner becomes aware of a complaint attributable to the Service Provider (Section 4.4 of the GTC), or if the Complaint is attributable to the Controller or to its franchise partner (Section 4.3 of the GTC), but may also affect the Service Provider, the Controller shall transfer the User's personal data to the Service Provider for the handling of the Complaint and/or responding to the Complaint, in accordance with Article 6 (1) (b) of the GDPR. Should the Service Provider receive a complaint regarding the products which is not related to a quality issue (such as products missing from the order, incorrect products or incomplete products) (Section 4.5 of the GTC), the Data Controller or its franchise partners are entitled to take over the handling of the complaint or dismiss the complaint; in the absence thereof the Service Provider is entitled to handle such complaints towards the Users. The controller receiving the data may process the data received and created during handling of the case for 3 years in order to handle complaints and quality claims, pursuant to Article 6 (1) (b) and (c) of the GDPR and taking into account Section 17/A (7) of Act on Consumer Protection.

2.7.2.4 Monitoring

Users acknowledge that data transfers to the Controller performed by the Service Provider for monitoring purposes take place pursuant to the legitimate interests of the parties. The Service Provider informs Users of the data processing in its privacy notice.

2.8. Handling of complaints from Budapest Park

The Controller and Kultúrpark Zrt. operating Budapest Park (H-1095 Budapest, Fábrián Juli tér 1.) cooperate with each other in several areas. Consequently, the Parties may receive complaints or other inquiries with regard to which the other party is the competent one.

The receiving party shall transfer inquiries falling within the competence of the other party to the other party.

The party receiving the inquiry and - depending on its competence – the other party shall handle the inquiry.

The incompetent party receiving the inquiry shall process the personal data in accordance with this notice, whereas the competent party shall process the personal data in accordance with the relevant legal provisions and its own privacy notice. The privacy notice of Kultúrpark Zrt. is available at <https://www.budapestpark.hu/pages/adatkezelesi-tajekoztato>.

Joint controllers: Progress Promotion Kft. and Kultúrpark Zrt.

Essence of the agreement between the joint controllers: According to the agreement on joint data processing between Progress Promotion Kft. and Kultúrpark Zrt., the two joint controllers perform the processing of personal data concerning certain data processing activities jointly, in pursuit of their joint purposes. As regards the specified processing operations, they shall make processing decisions together, and share the implementation tasks. Demands related to the exercise of data subjects' rights are served and data subjects are contacted by Progress Promotion Kft., but its controller partner may also participate in the solution of the task, and the data subject may enforce their rights towards any of the controllers. The controllers state in agreement that they can be reached via the contact details published in Chapter 4 of this notice.

Purpose of data processing: handling of complaints and other inquiries.

Legal ground for data processing: consent of the data subject [Article 6 (1) a) of the GDPR]; the data subject can withdraw consent at any time.

Type of data processed: date and time, name, email address, as well as the inquiry or the complaint.

Duration of processing: three months.

Processor:

Name	Address	Data processing task
Microsoft Corporation	One Microsoft Way. Redmond, WA 98052-7329, United States of America. Compliance of the data transfer is ensured with the data protection guarantees under Article 46 (2) (c) of the GDPR.	data storage in email application

2.9. Whistleblowing system

Progress Étteremhálózat Kft. operates a whistleblowing system under the Complaints Act. Information on the data processing related to the whistleblowing system may be available at page 43 of the company's Business Policy:

<https://www.mcdonalds.com/content/dam/sites/hu/nfl/pdf/uzletviteli-szabalyzat.pdf>

2.10. Other data processing activities

We provide information on data processing activities not listed herein when collecting the data. We hereby inform our clients that the court, the prosecutor, the investigation authority, the authority dealing with administrative offences, the administrative authority, the National Authority for Data Protection and Freedom of Information and other bodies with statutory authorisation may request the controller to provide information, disclose or transfer data and hand over documents.

Progress Étteremhálózat Kft. shall disclose personal data with the authorities – if the authority indicated the exact purpose and scope of data – in the scope and to the extent which is absolutely necessary for the purpose of the inquiry.

3. Storage of personal data, security of the data processing

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, Progress Étteremhálózat Kft. and its processors shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk.

Progress Étteremhálózat Kft. shall select and operate the IT tools applied for the processing of personal data so as to ensure that the processed data:

- are available to the authorized persons (availability);
- are authentic and authenticated (authenticity of the data processing);
- are justifiably unmodified (data integrity);
- are protected against unauthorized access (confidentiality of data).

The primary objective of the measures applied by Progress Étteremhálózat Kft. is to avoid and prevent unauthorised access to and unauthorised modification, transmission, disclosure, deletion or corruption of the processed data, and unavailability due to accidental destruction, damage, or change in the technology applied.

In order to protect the data sets processed electronically in its different registries, Progress Étteremhálózat Kft. shall use appropriate technological solutions to ensure that the stored data cannot be directly linked and connected to the data subjects, unless allowed by the law.

Taking into account the state of the art of technology, Progress Étteremhálózat Kft. shall use technical and organisational measures to ensure safety of the data processing, which provide an appropriate level of protection compared to the risks related to the data processing.

In the course of data processing, Progress Étteremhálózat Kft. shall preserve

- confidentiality: protect the information in order to ensure that they can only be accessed by those who are authorized;
- integrity: protect the accuracy and integrity of information and method of processing;
- availability: ensure that when the authorized users need them, they can access to the relevant information and related tools are available.

The IT systems and networks of Progress Étteremhálózat Kft. and its partners who are involved in the data processing are protected against computer-assisted fraud, espionage, sabotage, vandalism, fire and flood, as well as against computer viruses, computer intrusions and attacks resulting in denial of service. The operator shall ensure safety with server-level and application-level protection procedures. Please note that regardless of the protocol used (email, web, ftp, etc.), electronic messages transferred electronically are vulnerable to network threats which result in fraudulent activities, the challenging of the contract, or the detection or modification of information. The controller will take all reasonable precautions to provide protection against such threats. It monitors its systems so that any security discrepancies can be logged and that it has evidence in case of security incidents. In addition, system monitoring also allows for the efficiency of the precautions applied to be verified.

Progress Étteremhálózat Kft. as data controller documents any personal data breaches, if any, comprising the facts relating to the personal data breach, its effects and the remedial action taken. In the case of a personal data breach, the controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the National Authority for data Protection and Freedom of Information, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

Enforcement of the above requirements is guaranteed by the Information Safety Policy of the Controller.

4. Data and contact details of the controllers

Name: **Progress Restaurant Chain Ltd.**

Registered office: **H-1027 Budapest, Bem József utca 1/B.**

Company registration number: **01-09-078924**

Designation of the registering court: **Companies Court of the Metropolitan Court of Budapest**

Tax number: **10624500-2-44**

Phone number: **+36 1 455 2400**

E-mail: info@hu.mcd.com

Exceptions: mekihirlevel@hu.mcd.com in Chapter 2.2.1, and mcdonaldsapp@hu.mcd.com in Chapter 2.5.1.

Joint controllership with respect to the data processing activities under Chapters 2.2.1; 2.2.2; 2.4.1; 2.4.2; 2.4.3; 2.5.; 2.6.3:

Name: **Progress Promotion Kft.**

Registered office: **H-1027 Budapest, Bem József utca 1/B.**

Company registration number: **01-09-705195**

Designation of the registering court: **Companies Court of the Metropolitan Court of Budapest**

Tax number: **12824256-2-41**

E-mail: info@hu.mcd.com

Exceptions: mekihirlevel@hu.mcd.com in Chapter 2.2.1, and mcdonaldsapp@hu.mcd.com in Chapter 2.5.

We inform data subjects that as regards Chapter 2.5, the operators of Hungarian McDonald's restaurants are also to be regarded as joint controllers. The list of franchise restaurant operators, i.e. the joint controller partners of the above-named controllers can be found in the introduction of Chapter 2.5.

Contact details of the data protection officer:

Name of the data protection officer: PPOS Audit Kft.

Name of the person entrusted with the role of data protection officer: Dr. Zoltán Kulcsár

Address: H-2120 Dunakeszi, Szabadka u. 26.

Email address: kulcsar.zoltan@ppos.hu

5. Data subject rights, available remedies

Data subjects may request information on the processing of their personal data, rectification of their personal data, and with the exception of statutory data processing activities, erasure or cancellation of their personal data, restriction of data processing, and may enforce towards the controller their right to data portability and their right to object as indicated upon collection of such data or via the controller's customer service. In the context of data processing activities indicated in the Introduction, Progress Promotion Kft. shall also be considered as controller so the persons concerned by the data processing activities of Progress Promotion Kft. are also entitled to exercise of the following rights.

5.1 Right to information:

Progress Étteremhálózat Kft. will take the appropriate measures to ensure that all the information on the processing of personal data referred to in Articles 13 and 14 of the GDPR and the information as per Articles 15-22 and Article 34 are provided in a concise, transparent, comprehensible and easily accessible form, and in a clear and straightforward, but precise manner.

5.2 Right to access:

Data subjects have the right to obtain confirmation from the controller as to whether or not personal data concerning them is being processed by the controller. If this is the case, they can request the following information from the Controller: the purposes of the processing of your personal data; the categories of personal data involved; the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; where possible, the envisaged period for which the personal data will be stored; the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing; information on data sources; the existence of automated decision-making, including profiling, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject. Furthermore, data subjects shall have a right to obtain information as to whether personal data are transferred to a third country or an international organisation

Progress Étteremhálózat Kft. shall provide the data subject with a copy of the personal data subject to data processing. In the event of further copies requested by the data subject, the data controller may charge an administrative fee based on administrative costs.

Upon the data subject's request, Progress Étteremhálózat Kft shall provide the data in electronic form.

The right to information may be exercised via the contact details indicated in the Introduction and Section 4.

At the request of the data subject, information may be given orally, following the credible identification and identification of his/her identity.

5.3 Right to rectification:

The data subject has a right to request Progress Étteremhálózat Kft. to rectify the inaccurate and incomplete personal data concerning the data subject.

5.4 Right to erasure:

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to the offer of information society services.

The erasure of data may not be initiated if the data processing is necessary for the following: for exercising the right of freedom of expression and information; 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; 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; or for the establishment, exercise or defence of legal claims.

5.5 Right to restriction of processing:

Upon the data subject's request, Progress Étteremhálózat Kft. shall restrict data processing if one of the following conditions is met:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A data subject shall be informed by Progress Étteremhálózat Kft. before the restriction of processing is lifted.

5.6 Right to data portability:

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

5.7 Right to objection:

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning them for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or for the purposes of the legitimate interests pursued by the controller or by a third party, including profiling based on those provisions.

In case of objection, the Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed by Progress Étteremhálózat Kft. for such purposes.

5.8. Automated individual decision-making, including profiling:

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The above shall not apply if the decision

- is necessary for entering into, or performance of, a contract between the data subject and a data controller;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- is based on the data subject's explicit consent.

5.9 Right to withdraw consent:

The data subject is entitled to withdraw their consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

5.10 Rules of procedure:

The controller shall provide information on action taken on a request under Articles 15 to 22 of the GDPR to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

The 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. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

If the controller does not take action on the request of the data subject, the controller 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 on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

Progress Étteremhálózat Kft. shall provide the requested data and information free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested, or refuse to act on the request.

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out by it to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

The controller shall provide a copy of the personal data undergoing processing. In the event of further copies requested by the data subject, the data controller may charge an administrative fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

5.11 Right to compensation and liability:

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A processor shall be liable for the damage caused by processing only where it has not complied with the legal obligations specifically directed to processors or where it has acted outside or contrary to lawful instructions of the controller.

Where more than one controller or processor, or both a controller and a processor, are involved in the same processing and where they are responsible for any damage caused by processing, each controller or processor shall be held liable for the entire damage in order to ensure effective compensation of the data subject.

A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

5.12 Complaint to the data protection officer:

Should you have any questions or issues regarding the data processing activities performed by Progress Étteremhálózat Kft. or Progress Promotion Kft., please do not hesitate to contact our data protection officer:

Name of the data protection officer: PPOS Audit Kft.

Name of the person entrusted with the role of data protection officer: Dr. Zoltán Kulcsár

Address: H-2120 Dunakeszi, Szabadka u. 26.

Email address: kulcsar.zoltan@ppos.hu

5.13 Right to access to the courts:

In the event of violation of his or her rights, the data subject may turn to the court (according to the choice of the defendant's domicile or domicile). The court shall hear the case without delay. Cases brought in connection with the protection of personal data are duty free.

5.14 Data protection authority procedure:

You may lodge a complaint with the National Authority for Data Protection and Freedom of Information: Name: National Authority for Data Protection and Freedom of Information

Registered office: H-1055 Budapest, Falk Miksa utca 9-11.

Correspondence address: H-1363 Budapest, Pf. 9.

