

PRIVACY POLICY

In order to use certain services available at Virtu Restaurant and on the website of Virtu Étterem Kft. (virturestaurant.com), it may be necessary for our Guests to provide certain personal data so that they can access our services.

This Privacy Policy (hereinafter: “Policy”) sets out the principles, purposes and other facts relating to data processing, which determine for what purpose, for how long and in what manner personal data may be processed, and what legal remedies and enforcement options are available to our Guests in relation to data processing.

Definitions

Data Processing (Processor Activity):

Any activity carried out on personal data in connection with data processing operations on behalf of the Data Controller, regardless of the method and tools used and the place of application, provided that the activity is performed on the data. Accordingly, a data processor is any natural or legal person, public authority, agency or other body that processes personal data on behalf of the controller.

Data Processing (Processing Activity):

Any operation or set of operations performed on personal data, regardless of the procedure applied, including collection, recording, organization, storage, alteration, use, retrieval, transmission, disclosure, alignment or combination, restriction, erasure, destruction, and prevention of further use.

Data Controller:

The personal data provided by the Guest is processed by Virtu Étterem Korlátolt Felelősségű Társaság (Virtu Restaurant Ltd.) (hereinafter: “Virtu Étterem Kft.”), which operates Virtu Restaurant. Only Virtu Étterem Kft. is entitled to make and implement decisions regarding Guests’ personal data.

Data Controller details:

- Registered seat and mailing address: 1024 Budapest, Margit körút 5. A. building, 3rd floor, Door 1/8, Hungary
- Company registration number: 01-09-299407 (registered by the Company Court of the Metropolitan Court of Budapest)
- Tax number: 25973099-2-41
- Email: info@virturestaurant.com
- Phone: +36 20 319 2230

Restaurant: Virtu Restaurant

- Address: 1117 Budapest, Dombóvári út 28, Hungary
- Email: info@virturestaurant.com

- Website: virturestaurant.com
- Phone: +36 20 319 2230

Service:

Any service used by the Guest either in person at the Restaurant or through the Website, including but not limited to: table reservation, restaurant dining, questionnaire completion, prize games, raffles, guest card, newsletter.

Guest:

Any natural person who uses the services of Virtu Restaurant either at the Restaurant or via the Website and whose personal data is processed by the Data Controller.

Personal Data:

Any information relating to the Guest by which the Guest can be identified or is identifiable, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, online identifier, or one or more factors. The Data Controller collects personal data separately specified per processing purpose in this Policy.

Computer:

Any electronic communications terminal equipment within the meaning of Act C of 2003 on Electronic Communications, including mobile phone, computer, tablet, under the Guest's control and capable of receiving cookies.

GDPR:

Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation).

Cookie:

A file (data set) created by the Website on the Guest's computer that stores information about the Guest and their interaction with the web server. Its purpose is to identify the Guest's device, facilitate browsing, track website usage, analyze user habits and improve user experience.

Website:

virturestaurant.com and any other website or social media page related to the Restaurant.

Supervisory Authority:

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

- Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c., Hungary
- Email: ugyfelszolgalat@naih.hu
- Website: <http://naih.hu>
- Phone: +36 (1) 391-1400

Contact Details of the Data Controller and its Legal Representative**Data Controller:**

- Address: 1024 Budapest, Margit körút 5. A. building, 3rd floor
- Email: info@virturestaurant.com
- Phone: +36 20 319 2230

Legal Representative:

- Name: Gréta Orsolya Moss
 - Address: 1024 Budapest, Margit körút 5. A. building, 3rd floor
 - Email: info@virturestaurant.com
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Purposes and Process of Data Processing**Newsletter and Loyalty Program**

Purpose: To periodically inform Guests via email or SMS about events, promotions and service-related updates in accordance with Act XLVIII of 2008 on Economic Advertising.

Legal basis: Explicit and voluntary consent of the Guest under Article 6(1)(a) GDPR.

Processed data:

- Newsletter: name, email address
- Loyalty program: full name, email address, phone number

Retention: Until withdrawal of consent, but no longer than 3 years following withdrawal for evidentiary purposes.

Unsubscription: Via the “Unsubscribe” link in newsletters or by emailing info@virturestaurant.com.

Customer Satisfaction Questionnaire

Guests may complete a paper-based satisfaction survey.

If no personal data is provided → anonymous processing.

If provided → full name, email, phone number.

Legal basis: Article 6(1)(a) GDPR (consent).

Retention: Up to 6 months after survey closure.

Technical Data (Cookies)

Purpose:

- Website traffic statistics
- IT system development

Cookies may be deleted or disabled by the Guest via browser settings. Without cookies, Website functionality may be limited.

Table Reservation

Reservations may be made:

- By phone
- By email
- Through the SevenRooms Inc. online system

Data processed:

- Full name
- Email address
- Phone number
- Bank card details

Legal basis: Article 6(1)(b) GDPR (performance of contract).

Special data (e.g., food allergies): Article 9(2)(a) GDPR (explicit consent).

Data processors:

- SevenRooms Inc.
- Stripe Inc.

Stripe stores payment data. Virtu Étterem Kft. does not access card details.

Retention: Maximum 1 year after service provision unless otherwise required by law.

Event Reservations – Tripleseat

Platform: Tripleseat Software, LLC (USA)

Processed data:

- Name
- Email
- Phone
- Reservation details
- Special requests (e.g., allergies)
- Payment-related data (tokenized via Stripe)

Legal basis:

- Article 6(1)(b) GDPR (contract)
- Article 6(1)(f) GDPR (legitimate interest)
- Article 9(2)(a) GDPR (special data consent)

International transfer:

EU–US Data Privacy Framework + Standard Contractual Clauses (SCC).

Retention: Max. 1 year after service provision.

Telephone Customer Service – QUALITY-CALL Kft.

Purpose:

- Reservation handling
- Complaint management
- Call documentation

Processed data:

- Name
- Phone number
- Email (if provided)
- Call recording

Legal basis:

- Article 6(1)(b) GDPR
- Article 6(1)(f) GDPR (quality assurance)

Retention: Up to 1 year.

No transfer outside EU.

Data Security

The Data Controller ensures data security through:

- Encrypted data transmission
 - Role-based access control
 - Logging systems
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Data Subject Rights

Guests may request:

- Access to their personal data
- Rectification
- Erasure
- Restriction
- Objection (where processing based on legitimate interest)
- Data portability (where based on consent or contract)

Requests are fulfilled within 1 month.

Complaint and Legal Remedies

Guests may file a complaint with:

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

Guests may also initiate court proceedings before the competent Hungarian court.

Compensation

If unlawful processing causes damage or infringes personality rights, the Data Controller is liable for damages or non-material compensation, unless it proves the damage resulted from unavoidable external causes.

Final Provisions

The Data Controller reserves the right to amend this Policy unilaterally. Amendments are published on the Website and displayed in the Restaurant.

Governing law: Hungarian law.

Effective date: 27 February 2025.

Published: virturestaurant.com and at the Restaurant premises.

Budapest, 27 February 2026.