

Privacy Policy	
1. Who is who in this privacy policy?	<ul style="list-style-type: none"> We, i.e. AmRest Kávészó Kft. (registered seat: 1138 Budapest, Dunavirág utca 2-6., 3. torony, 2. emelet Budapest, Hungary) You, i.e. our Customer – a natural person whose personal data we process for at least one purpose indicated in the privacy policy.
2. What is the purpose of this privacy policy?	<ul style="list-style-type: none"> It is very important for us to protect your privacy and your personal data. We take care of the security of your personal data when processing. In the privacy policy, we explain how we use your personal data via our websites (https://www.starbucks.hu/, card.starbucks.hu, rewards.starbucks.hu, www.facebook.com/StarbucksMagyarország), when you purchase our products and use our services, participate and register in Starbucks Rewards program, create and maintain your account related to your Starbucks Card, use the Starbucks Card, during customer satisfaction surveys and promotions, as well as during answering queries, complaints and suggestions you have submitted. You will also find information about your rights regarding processing of your personal data and about how you can exercise these rights.
3. Who is the controller of your personal data and what are its contact details?	<ul style="list-style-type: none"> The controller of your personal data is AmRest Kávészó Kft. (registered seat: 1138 Budapest, Dunavirág utca 2-6., 3. torony, 2. emelet). Our contact details: Dunavirág utca 2-6, 3rd tower, 2nd floor, 1138 Budapest, Hungary, e-mail: starbuckshungary@amrest.eu, telephone: +36 (1) 423 4101.
4. What personal data do we process and where do we get it from? For what purpose do we process your personal data and on what basis?	<p><u>Registering and maintaining the Starbucks Rewards user account</u></p> <p>➤ If you register the Starbucks Card in the Starbucks Rewards program and thus you create a user account, we process your personal data provided to us on the registration form for participation in the Starbucks Rewards program (as fulfilling our obligations arising from an agreement) and for maintaining your user account.</p>

	<p>➤ The legal basis for processing the above-mentioned data is the necessity to perform the Starbucks Rewards and user account contract and to take actions at your request (art. 6 sec. 1 letter b) of the GDPR).</p> <p>• <u>Processing purchases made by using Starbucks Card in the Starbucks Rewards program</u></p> <p>➤ To process your purchase of products and services made by using Starbucks Card, we will process information on the transaction and the products you purchased, information on your Starbucks Card, the type of the card (virtual or physical), the number and expiration date of your Starbucks Card.</p> <p>➤ The legal basis for processing the above-mentioned data is the necessity to perform the sale and purchase agreement and to take actions at your request (art. 6 sec. 1 letter b) of the GDPR).</p> <p>• <u>Performing legal obligations</u></p> <p>➤ To fulfill the obligations imposed on us by law, e.g. by the Accounting Act or tax regulations (e.g. invoicing and storage of invoices and accounting documents), we will process your data from the transaction made by using the Starbucks Card, from the user account (if you have one) and the data connected to a complaint.</p> <p>➤ The legal basis for the processing of the above-mentioned data is a legal obligation imposed on us (art. 6 sec. 1 letter c) of the GDPR).</p> <p>• <u>Direct marketing</u>: We will direct marketing messages to you about products, offers and new products offered by us and our business partners in the restaurant and café industry, as well as serving payments for orders via communication channels (e.g. e-mail, text message), to which you have previously freely given consent. You can withdraw your consent at any time, as easily as it has been given. Withdrawal of consent does not affect the lawfulness of activities carried out before its withdrawal.</p> <p>The legal basis for processing the above-mentioned data is your consent (art. 6 sec. 1 letter a) of the GDPR).</p>
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	<ul style="list-style-type: none"> • <u>Establishing, exercising or defending against legal claims</u> <ul style="list-style-type: none"> ➤ To establish or exercise claims, as well as to defend against claims, we will process your order data, user account (if you have one), as well as data related with the complaint. ➤ The legal basis for the processing of the above-mentioned data is legitimate interest in establishment and exercise claims and defending against claims (art. 6 sec. 1 letter f) of the GDPR). • <u>Answering queries, complaints and suggestions</u> <ul style="list-style-type: none"> ➤ In order to answer your queries, complaints and suggestions, we will process your data provided in the queries, complaints and suggestions. ➤ The legal basis for processing the above-mentioned data is the necessity to perform the contract (art. 6 sec. 1 letter b) of the GDPR) or our legitimate interest in giving response (art. 6 sec. 1 letter f) of the GDPR). • <u>Customer satisfaction survey and determination of the quality of our services</u> <ul style="list-style-type: none"> ➤ To examine our Customers' satisfaction and determine the quality of our services, we will process your data indicated in a survey which we can ask you to fill out. ➤ The legal basis for processing the above-mentioned data is our legitimate interest in obtaining relevant information to improve the quality of our products and services (art. 6 sec. 1 letter f).
5. Automated decision making	<ul style="list-style-type: none"> • We will not make decisions regarding your person that are based solely on the automated processing of your data and produce legal effects or similarly significantly affect you.
6. To whom do we transfer your personal data?	<ul style="list-style-type: none"> • We will transfer your personal data to entities that act on our behalf, i.e. service and IT solutions providers, marketing agencies, couriers, entities providing accounting and administrative services, entities conducting customer satisfaction surveys on our behalf, and entities supporting us in customer service (e.g. call centers).

	<ul style="list-style-type: none"> We will also transfer your identification and contact data to entities serving payments to enable them to process your payment with the Starbucks Card.
7. Will your personal data be transferred to a third country (i.e. countries outside the European Economic Area)?	<ul style="list-style-type: none"> We will not transfer your data to third countries (i.e. countries outside the European Economic Area).
8. How long will we store your personal data?	<ul style="list-style-type: none"> We store your personal data for period which is not longer than it is necessary in relation to the achievement of purposes for which data is processed. We will store your data: For the purpose of managing and operating your user account, for participation in the Starbucks Rewards program and for the purpose of using the Starbucks Card: until your withdrawal (withdrawal can be submitted by deleting your account (an option in your account available after logging in), sending a message to starbuckshungary@amrest.eu, or sending a letter to postal address AmRest Kft., 1138 Budapest, Dunavirág utca 2-6., 3. torony, 2. emelet) or until you are excluded from the Starbucks Rewards program in accordance with the Terms of Use or until the Starbucks Rewards program is terminated. We may extend this period for a period of limitation of your or our claims under applicable law, if the processing of this data will be necessary to establish or exercise claims and defend against claims. For the purpose of processing the transaction (including the products and services purchased by using a Starbucks Card): for the duration of the contract for this transaction, providing that we may extend this period for the period of limitation of your or our claims under applicable law, if the processing of this data will be necessary to establish or exercise claims and defend against claims. For the purpose of complying with our legal obligations (e.g. from the Accounting Act or tax regulations) – for a period resulting from such provisions (for example, we are required to store your billing data for 8 years).

	<ul style="list-style-type: none"> • For the performance of legitimate interests referred to in point 5 of the policy: for the duration of the legitimate interest, unless you exercise your right and object to the processing of this data for marketing purposes. In this case, we may extend this period for the period of limitation of your or our claims under applicable law, if the processing of this data will be necessary to establish or exercise claims and defend against claims. • For the performance of our legitimate interests, i.e. establishment or exercising claims and defending against claims: for the period of limitation of your or our claims under applicable law (e.g. the general limitation period for claims related to your business is 5 years, and the general period of limitation for consumer claims against us is 5 years, the above periods of personal data storage may change as applicable general legal regulations change). • For the performance of our legitimate interests, i.e. answering your queries, complaints and suggestions: for a period necessary to give such answer, no longer than 30 days, providing we may extend this period for the period of limitation of your or our claims under the law, if the processing of this data will be necessary to establish or exercise claims and defend against claims. • For the performance of our legitimate interests, i.e. our Customer satisfaction survey and determination of the quality of our services: for the duration of our legitimate interest, but no longer than 24 months.
<p>9. Do you have the right to object to the processing of your data?</p> <p>What other rights do you have according to the processing of your personal data?</p> <p>How you can exercise your rights?</p>	<p>Objection to data processing for marketing purposes: You have the right to object at any time to the processing of your data for marketing purposes, including profiling.</p>

• **Objection due to your particular situation:** You have the right to object at any time to the processing of your data for the purposes of our legitimate interest (other than marketing) for reasons related to your particular situation. In this case, you should indicate the particular situation which in your opinion justifies discontinuing processing of your data.

- Beside this, you have the following rights:
 - The right to obtain confirmation of whether we process your personal data, as well as the right to obtain access to such data and copies thereof.
 - The right to request the rectification (correction) or supplementation of your personal data if incomplete or incorrect.
 - The right to obtain restriction of processing of your personal data if, for example:
 - you contest the accuracy of your data processed by us
 - the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
 - we no longer need the personal data for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims;
 - you have objected to the processing of your personal data for reasons related to your particular situation – in such case you may require restriction of processing pending the verification whether our legitimate grounds override the grounds for your objection.

	<p>If you restrict the processing of your personal data, we will be able to store it and, additionally, use it only to establish, exercise or defend legal claims, to protect the rights of another natural or legal person, or for important reasons of public interest of European Union or member state. We will only be able to take other actions with your consent.</p> <p>➤ The right to obtain the erasure of personal data, if e.g.:</p> <ul style="list-style-type: none"> ○ your personal data is no longer necessary in relation to the purposes for which it was collected and processed; ○ if you withdraw your consent and there is no other legal basis for processing; ○ if you object to the processing of your personal data for reasons related to your particular situation, and we do not have a legal basis to process data which would override your objection; ○ you object to processing for marketing purposes; ○ your personal data has been unlawfully processed. <p>➤ Right to data portability: Due to the fact that your data is processed in an automated manner on the basis of consent or contract, you have the right to receive from us your data that you provided to us on the basis of consent or contract, in a structured, commonly used, machine-readable and interoperable format (e.g. for reading on a computer). You also have the right to request that your personal data is sent directly to another controller, if technically possible.</p> <ul style="list-style-type: none"> ● The right to withdraw, at any time, consent to the processing of your personal data in relation to the data that we process on the basis of consent. Withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent prior its withdrawal.
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	<ul style="list-style-type: none"> • The right to withdraw consent or change the form of marketing communication: At any time, you can withdraw or change the scope of consent regarding how we contact you for marketing purposes (depending on the option you choose, we can contact you electronically, e.g. via e-mail, text message or MMS). The easiest way to do this is to write to us at the following e-mail address: starbuckshungary@amrest.eu. • Complaint to the supervisory authority: You also have the right to lodge a complaint with the National Data Protection and Freedom of Information Authority.
10. Do you have to provide us with your personal data?	Providing personal data to get in touch with you is necessary. If you do not provide this data, we will not be able to create and operate your user account or answer your queries, complaints or suggestions from the contact form.
11. What is the GDPR?	The GDPR is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (the General Data Protection Regulation)
12. From when does this privacy policy apply?	<p>This privacy policy applies from September 25, 2018.</p> <p>Any change or modification of this Privacy Policy enters into force upon publishing thereof (on the website and in the application, if applicable).</p>