

## Privacy Policy

### Our Customers

**Kifli.hu Shop Kft.** (registered seat: 1106 Budapest, Jászberényi út 45., Tax number: 26693075-2-44) (hereinafter referred to as "**Kifli.hu**" or "**We**"), as the data controller, hereby informs you, our customers purchasing goods or services offered in our webshop available through the <https://www.kifli.hu> web portal or the "Kifli" mobile application (hereinafter referred to as "Kifli"), about the processing of personal data and the Privacy Policy.

To help you navigate through our Privacy Notice, we have provided an overview of the following sections, outlining the main points.

### 1. THE SCOPE OF THE PROCESSING OF PERSONAL DATA, THE PURPOSES AND LEGAL BASIS OF THE PROCESSING

Purpose of the processing of personal data:

- respond to requests, questions, suggestions, delete accounts
- order fulfilment
- create a customer account
- sending commercial communications
- satisfaction questionnaires
- recording phone calls
- sale of tobacco and alcohol products
- marketing analyses, statistics
- the operation of the Kiflicske Club
- customising the content of Kifli
- refusal to provide services

### 2. WHO HAS ACCESS TO YOUR PERSONAL DATA?

Information on access to personal data:

- in general
- partial access to the Pharmacy
- partial access to Nespresso

### 3. THE DURATION OF THE PROCESSING OF PERSONAL DATA

Information on the duration of the processing of personal data:

- to perform the contract, to comply with legal obligations
- on the basis of legitimate interest
- within the customer account
- proof of age
- to send commercial communications
- refusal to provide services

### 4. INFORMATION ABOUT COOKIES

Information about cookies and links to social media is provided below extent:

- third-party assets
- setting cookies
- social media buttons
- a link to cookie information containing detailed information

## **5. WHAT RIGHTS DO YOU HAVE IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA?**

Information about your rights regarding your personal data:

- right of access
- right to rectification
- right of erasure
- right to restriction of processing
- right to object
- right to lodge a complaint with the supervisory authority

## **6. THE SCOPE OF THE PROCESSING OF PERSONAL DATA, THE PURPOSES AND LEGAL BASIS OF THE PROCESSING**

This section tells you what personal data we process about you. For your convenience, the section is divided according to the purposes for which the data is processed. For each purpose of processing, the legal ground on which the processing is based is listed. The legal basis is based on Article 6 of the General Data Protection Regulation (EU) 2016/679 (GDPR).

### **6.1. Reply to requests, questions, suggestions**

When you contact us with a request, question or suggestion, we may ask for certain information about you or your company. This information may include, for example:

- a) surname, first name,
- b) address,
- c) the company name,
- d) the company's registered office,
- e) company registration number and tax number,
- f) phone number,
- g) email address.

We use the information you provide to contact you and provide you with the information you request. The personal information you provide is necessary to respond to your requests, answer your questions or provide you with the information you need, otherwise we may not be able to respond to you.

The legal basis for this processing is our legitimate interest in processing your requests, needs and suggestions.

### **6.2. Data processing in relation to the order**

When you buy goods through Kifl, we need your personal data to conclude and fulfil the contract.

This personal data:

- a) surname, first name,
- b) delivery address,

- c) phone number,
- d) email address,
- e) information about the goods ordered,
- f) information on how to choose the payment method,
- g) credit card details,
- h) communications with you, including photographs you provide to us (for example, in the event of a complaint).

Providing personal data for the purpose of performing the contract is a contractual obligation, failure to do so may result in the contract not being concluded. In the case of a purchase on Kifli, the data you provide (in particular your surname and forename, delivery address, telephone number and e-mail address) will be saved for the next purchase so that you do not have to re-enter them. We also save the products you have purchased to your "My Favorites" list so that you can find these products in one place on Kifli more quickly the next time you shop. If you want to access your order history for your email address, you can set a password.

The legal basis for the processing is the performance of a contract with you, the fulfilment of legal obligations to which we are subject and the protection of our legitimate interests, which consist primarily of documenting the material aspects of our contractual relationship with you.

### **6.3. Create a customer account (customer account)**

If create password-protected customer account on Kifli or use a customer account created by us, we will also process the personal data you provide in your account, including your purchase history on Kifli, manage your customer account, compile a list of your favourite products for your next purchase, customize the content of the website to make your purchase more convenient and faster (see section 1.9. Customizing the content of the webshop).

You can also access your account from Facebook or your Google, Apple account. In this case, you do not need to fill in your details manually, we will receive your personal details (first and last name, email address) which are necessary for us to properly create an account for you. We will use the personal data you provide to us in this way within the scope and for the purposes set out in the account settings you have made on Facebook or in your Google, Apple account.

The legal basis for this processing is the performance of a contract with you.

### **6.4. Send commercial communications (newsletters)**

When you become our customer, we are entitled to use your first and last name, e-mail address and telephone number to send you newsletters by electronic means (e-mail, SMS, and other electronic channels, including but not limited to: push messages, IM messages, Viber, WhatsApp, Facebook Messenger, Signal, Telegram), i.e. to inform you about goods or services we offer.

With your consent, we can prepare special offers based on the categories of goods you have already purchased from us. In this case, we will send you a newsletter to your e-mail address about our products and services, as well as those of our partners, taking into account your purchases and preferences in order to select the goods and services that best meet your needs.

You can change your preferences for receiving newsletters at any time in your account, i.e. you can refuse to receive newsletters, withdraw your consent or change your preferences for receiving newsletters at any time through your account notification settings or by sending an email to [dpo@kifli.hu](mailto:dpo@kifli.hu). You can also unsubscribe from our newsletter by clicking on the link in the newsletter.

We may contact you with information about our offers, news, discounts or other commercial communications

- a) by post and
- b) phone.

Please let us know if you do not wish to receive our newsletter by phone or post.

The legal basis for processing is your consent and our legitimate interest, which is primarily to facilitate the sale of our goods and services to our customers.

#### **6.5. Satisfaction questionnaires**

If you fill in a satisfaction questionnaire, market research questionnaire, questionnaire on the suitability of our product range, etc., we will process the data provided in the questionnaire/survey in order to improve the quality of our services. The completed satisfaction questionnaire will be added to your order details after your purchase. Completing the questionnaire/survey is completely voluntary.

The legal basis for the processing is your consent, which is based on the fact that you voluntarily provide us with feedback.

#### **6.6. Recording phone calls**

When you communicate with us by phone, all our calls are recorded for quality assurance purposes. The recordings of your call are stored in our internal system and, if you are a registered customer, we link you to your account. The call recordings are primarily used to document our contractual obligations, fulfil your requests and answer your questions. If you do not consent to call recording, please do not call us, contact us by email.

The legal basis for this processing is our legitimate interest, which is primarily to document the material circumstances of our contractual (or other) relationship.

#### **6.7. Sale of tobacco products and alcohol**

When you buy tobacco products and e-cigarettes from us, we are legally obliged to check your age. We must ensure that we do not sell tobacco products, smoking-related devices, herbal tobacco products or e-cigarettes to anyone under the age of 18.

When delivering an order containing tobacco and/or alcohol, the courier must ask for the identity card of the person receiving the purchase in order to verify age. In order to verify the age verification system to the verification authorities, the courier will record in our internal system the surname, first name, date of birth and the last four numbers of the ID card (the full ID card number is not processed).

The legal basis for this processing is the performance of a legal obligation to which we are subject.

#### **6.8. Marketing analysis and statistics**

If you give your consent on Kifli, we will also process the personal data you provide, including your purchase history, for the purposes of marketing analysis and statistics. Your consent is voluntary and you are not obliged by law to give it. You may withdraw your consent at any time, and the withdrawal of consent does not affect the lawfulness of the processing of your personal data prior to the withdrawal.

The legal basis for processing is your consent.

#### **6.9. Data management of the Kiflicske Klub**

To register for the Kiflicske Club, you must provide details of your newborn or expected child:

- the name of the child,
- date of birth / expected date of birth,
- gender.

Providing this information is completely voluntary, it is required for membership of the Kiflicske Club, without filling in this information you will not become a member of the Kiflicske Club.

If you give us your consent, we will also process the information you provide about your child, including purchase history and information about whether you are expecting a child, have a child under 12 years of age, date of birth and the sex of the child, for the following purposes:

- a) producing marketing analyses and statistics;
- b) send newsletters about our goods and services and those our partners to your email address, taking into account your purchases, preferences or other criteria, so that we can select the goods and services that are most appropriate to your needs.

You may withdraw your consent at any time, without prejudice to the lawfulness of the processing of your personal data prior to withdrawal. Further information on the processing of personal data of Kiflicske Club members is available in a separate document, the current version of which is [available here](#).

#### **6.10. Customise the content of Kifli**

Kifli uses your customer account and purchase history to display personalised content. Displaying personalised content simply means that your favourite products appear at the top of every product category to make it easier for you to shop.

The purpose of data processing is to enable you to make a purchase with as few clicks as possible. Please note that Kifli is an integral part of the least-click shopping service. The purpose of displaying personalised content is not to engage in marketing activities, to distribute advertising or to encourage the purchase of specific products.

We have carried out a Data Protection Impact Assessment on this processing in cooperation with our Data Protection Officer to verify that this processing, which is intended to provide you with a time-saving, functional service, does not present an increased risk to the protection of your privacy.

The legal basis for this processing is the performance of a contract with you.

#### **6.11. Refusal to provide services**

In the event that you are our customer and you have repeatedly failed to pay for your orders, engaged in unlawful conduct or caused us significant damage in any way, we have the right to refuse to provide the service. In order to do this, we will process your basic identifying information, in particular your surname, first name, address, email address, telephone number and history of misconduct.

The legal basis for processing is our legitimate interest, which includes protecting our legal claims, safeguarding our business and preventing further harm.

#### **6.12. „Helló Győr 2026”**

Purpose of processing: If you sign up on the “[Helló Győr 2026](#)” landing page, we will process the email address and zip code you provide in order to send you an email notification when delivery in the Győr region becomes available.

Legal basis: Your consent (Article 6(1)(a) GDPR). You may withdraw your consent at any time; this

will not affect the lawfulness of processing carried out prior to the withdrawal.

Categories of personal data: Email address, zip code.

Retention period: Until one month after delivery in the Győr region becomes available, or until you withdraw your consent (whichever occurs first).

## **7. Processing of personal data in order to tailor our advertising and our partners' advertising to your interests**

If you consent to us using your information (see below for the specific uses) to tailor [our partners'](#) advertising to your interests, you allow us to display ads to you that we think may be of interest to you. Such consent is called "**marketing consent**".our and

When you provide us with marketing consent, we measure the success of our marketing campaigns by analysing your behaviour and ensuring that our messages reach the right people, using pseudonymised data. Once you have given your consent, we may also use a unique identifier (user ID) to track your activity on different websites, browsers or devices.

Please note that giving marketing consent is completely voluntary and failure to give consent will not affect our business relationship in any way.

### **7.1. What personal data do we use in connection with marketing consent?**

The specific data used to better target and personalise ads depends on how the ad is targeted/personalised. In most cases, these are the following categories of personal data:

- The data on the place of purchase is mainly used for **geographic targeting**.
- Information about your previous purchases, your use of our online store, your favourite product categories, whether you like special offers, how often you shop, the average value of your orders, whether you are a member of one of our clubs (Premium, Tickle), whether you shop on the website or through the app, etc. is used to train **interest and behaviour targeting**.

In addition, we also process the reactions to the displayed ads (e.g. clicks, visits to the online shop, etc.) to evaluate the success of the campaigns.

We use pseudonymised data to target and personalise ads. Pseudonymisation is the processing of personal data whereby the data can no longer be linked to an individual without the use of additional information, and whereby this additional information is stored separately and secured by technical and organisational measures to ensure that the data cannot be unlawfully linked to an individual.

### **7.2. How do we get the marketing contribution?**

On the banner or on the webshop pages, you can decide whether you want to give your marketing consent by checking the "Yes" active box or the "No" active box. Once you have made your choice, the banner will disappear. If you do not provide us with your consent, we will offer you the opportunity to provide your marketing consent again after 30 days from the date of refusal. From then on, we will leave it up to you. If you change your mind at any time, you can change your preferences as described below.

### **7.3. Where can you change your marketing consent settings?**

You can manage (grant/revoke) your marketing consent at any time by going to the Notification settings of your Kifli profile on kifli.hu. You can find the Notification Settings under your initials (top right corner of kifli.hu) and click on "My Account". When the page opens, you will find the "Notification Settings" tab on the left.

### **7.4. Who are our partners and what data do we share with them?**

Our partners are: endemic advertisers (suppliers), such as FMCG, and non-endemic advertisers

(non-suppliers), such as automotive, telecoms, travel and hospitality, media and entertainment, consumer electronics and technology, financial services (banking, payments, insurance) and retail.

We do not pass on any individual data to our partners. The above categories of personal data (within the scope of the advertising targeting method) are only used to create the so-called audience segments for displaying a specific advertisement according to the parameters we choose (if it is our advertisement) or our partner gives us. All this is based on the data available to us and collected in the course of your purchase from Kifli and movement on Kifli. We classify you (through your device) into one of the target groups and display the ad of your choice (our ad or your partner's ad). We then use the data on your reaction to the display of the ad to evaluate the success of a particular advertising campaign and to improve the effectiveness of the targeting/application of the ads.

#### **7.5. How long do we use personal data on the basis of marketing consent?**

If you give consent for marketing purposes, we will process your personal data for the duration of that consent (i.e. until you withdraw it).

Please note that if you give your marketing consent, we will include all the data we hold about you (see categories above) from the start of our business relationship with you.

#### **7.6. What tools do we use for targeted and personalised advertising?**

We use Criteo's tools to target and personalise your ads outside of the kifli.hu online store. However, we only process pseudonymised data through Criteo's tools. [Criteo](#) is our data processor.

### **8. WHO HAS ACCESS TO YOUR PERSONAL DATA?**

The sharing of personal data for internal administrative and operational purposes within the Group, which is wholly based in the EU, is based on Article 6(1)(f) of the GDPR, i.e. legitimate interest, in accordance with paragraph 48 of the Preamble to the GDPR.

Such sharing of your personal data is subject to an intra-group data sharing and data processing agreement which sets out the shared and individual data protection responsibilities within the Group (including in the event of a data breach), the responsibilities of the members of the Group towards you as a data subject, in particular the specific obligations of the lead controller within the Group to ensure group-wide coordination on data protection matters when exercising your rights, the responsibilities towards data protection authorities, the responsibilities of the members of the Group for any processing of personal data and the confidentiality of data within the Group. For further details on the data sharing and data processing agreement within the group, please contact us by e-mail.

We will disclose your personal data only authorized employees and cooperating persons or individual contract processors or other data controllers, but only to the extent necessary for the purposes for which they are collected and on the basis of an appropriate legal basis for processing your personal data.

For example:

- a) external accounting firms;
- b) contracted suppliers, couriers;
- c) external law firms;
- d) third that provide us with server, web, marketing or IT services.

#### **8.1. "BENU Pharmacy" section**

If you purchase goods in the "BENU Pharmacy" section, your selected data will be forwarded to BENU Hungary Kft., located at 1095 Budapest, Soroksári út 30-34., to process your pharmacy

order.

The data transmitted includes information about the products you have purchased from the Pharmacy, your first and last name, telephone number, e-mail address and delivery address.

## **8.2. "Nespresso" section**

If you purchase goods in the "Nespresso" section, certain data will be transferred to Nestlé Hungária Kft., located at 1095 Budapest, Lechner Ödön fasor 7., in order to complete your purchase. Unless you explicitly declare otherwise, by providing your data you authorise Nestlé Hungária Kft. to send you its own newsletter.

The data transmitted includes information about the products purchased in the "Nespresso" section, your first and last name, telephone number, e-mail address and delivery address, as well as an indication of your subscription/unsubscription to the Nespresso newsletter.

For detailed information about the processing and protection of your personal data by Nestlé Hungária Kft., please see the Nestlé Hungária Kft. privacy policy at <https://www.nespresso.com/hu/hu/adatvedelem>.

## **9. THE DURATION OF THE PROCESSING OF PERSONAL DATA**

We will process your personal data for as long as we provide you with our services or perform a contract, or for as long as necessary to comply with our filing or other relevant legal obligations (such as the Tax Administration Act, the Accounting Act or the Value Added Tax Act).

We will continue to process your personal data after the contract has been fulfilled (payment of the purchase price and delivery of the goods) for as long as necessary, but for a maximum of 4 years, in order to protect our legitimate interests and claims.

Personal data processed on the basis of your consent will be processed until your consent is withdrawn. To withdraw your consent, please send an e-mail with this request to [dpo@kifli.hu](mailto:dpo@kifli.hu).

### **9.1. Customer service**

Personal data relating to your account, the data contained therein, will be processed for the purposes of managing your account for as long as your account is active.

For the purpose of sending you an offer for our goods, we will process this personal data until you delete your account or refuse to accept our offers. If you create a customer account (or sign in via Facebook, Google, Apple) and do not purchase from us, we will process your data for 5 months from the date of creation.

We will keep the data about your purchases in your account for 4 years, after which we will delete it :

- a) bought from us in the last 6 months; or
- b) logged into your account in the last 12 months; or
- c) if you have given your consent to the processing of your personal data.

### **9.2. Proof of age**

We keep personal data necessary to verify age for the sale of tobacco products and alcoholic beverages for 4 years from the last purchase of tobacco products or alcoholic beverages.

### **9.3. Sending newsletters and other commercial communications**

We process your personal data for the purpose of sending you commercial communications



(newsletters) based on legitimate interests for the duration of our contractual relationship, for a maximum period of 12 months after its termination or until you object to the processing.

We will process your personal data for the purpose of sending you commercial communications (newsletters) based on your consent for as long as you give us your consent. You may object to the processing of your personal data for the purpose of sending you commercial communications at any time. You may unsubscribe from newsletters by clicking on the link in the newsletter or by sending an email to [dpo@kifli.hu](mailto:dpo@kifli.hu) or, in the case of electronic IM messages or push messages, through the relevant application.

You can also easily set up how we contact you and the areas that interest you through your profile in the "Notification settings" section.

#### **9.4. Refusal to provide services**

If we are forced to refuse to provide our services to you for the reasons described in section 6.11, we will retain the necessary data for up to 3 years to protect our rights and our enforceable legal claims.

### **10. ONLINE SERVICES AND SOCIAL MEDIA**

We use both our own online services and third party services on our website. These services generally use cookies or similar technologies. Cookies are small text files containing short pieces of information that are stored on a user's device when they visit a website. At Kifli we use cookies for the following purposes:

- a) remembering the logged-in user;
- b) adding to cart and ordering;
- c) convenient web features;
- d) anonymised evaluation of user movement on the web;
- e) customer chat;
- f) obtaining voluntary feedback from users, and
- g) personalisation of advertisement impressions.

All personal data is processed in a lawful and transparent manner; we only need relevant data that is necessary for the purpose for which it is processed. For more information, please see our Cookie Policy, [available here](#).

#### **10.1. Online services settings**

You can set which online services you allow us to use in your consent settings. You can change the settings for online services at any time by reopening the consent settings. You can also control cookies in your browser settings. You can find out how to set cookies in the most commonly used browsers by following the links below:

- a) [Google Chrome](#)
- b) [Firefox](#)
- c) [Microsoft Internet Explorer](#)
- d) [Opera](#)
- e) [Microsoft Edge](#)

#### **10.2. Social media feedback buttons**

The social media buttons on Kifli are placed primarily for the purpose of possible interaction with social media to make Kifli more interesting for you as a user. The interaction with the relevant

social media is only established when you actively click on the corresponding button. In this case, your web browser will initiate a connection with the relevant social media servers.

## **11. YOUR RIGHTS CONCERNING THE PROCESSING OF PERSONAL DATA**

You have the following rights regarding the processing of your personal data:

- a) the right of access to personal data;
- b) the right to rectification;
- c) the right to erasure ("the right to be forgotten");
- d) the right to restriction of processing;
- e) the right to object to processing; and
- f) the right to lodge a complaint about the processing of personal data.

Your rights are explained below to give you a clearer idea of what they mean.

To exercise any of rights, please send an email to [dpo@kifli.hu](mailto:dpo@kifli.hu) or [privacy@rohlikgroup.com](mailto:privacy@rohlikgroup.com).

If you consider that the processing of your personal data infringes the provisions of the GDPR, you have the right to lodge a complaint with the supervisory authority, which in Hungary is the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11.; Tel: +36 1 391 1400; Fax: +36-1-391-1410, E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); Website: <http://naih.hu/>; "NAIH"), and to exercise your right to judicial remedy. You have the right to an effective judicial remedy against a legally binding decision of the supervisory authority concerning you. You also have the right to an effective judicial remedy if the competent supervisory authority does not deal with your complaint or does not inform you within three months of the procedural developments or the outcome of the complaint you have lodged.

In addition to the above, you also have the right to an effective judicial remedy. Such a claim is subject to the jurisdiction of the courts, which you can choose to bring before the court of the place where you live or stay. Information on the jurisdiction and contact details of the court (tribunal) can be found at [www.birosag.hu](http://www.birosag.hu).

### **11.1. Right of access**

At any time, you can ask us to confirm whether we are processing personal data about you, if so, for what purposes, to what extent, whether there is joint processing, data portability, for how long we process it, where we obtained the personal data from, and whether automated decision-making, including profiling, is taking place based on the processing of your personal data.

You also have the right to receive a copy of your personal data, the first supply of which is free of charge, and any further supply may be subject to a reasonable administrative charge.

### **11.2. Right to rectification**

You may request the correction or completion of your personal data at any time if it is inaccurate or incomplete.

### **11.3. Right to erasure**

We must erase your personal data if (i) it is no longer necessary for the purposes for which it was collected or otherwise processed, (ii) the processing is unlawful, (iii) you object to the processing and there is no overriding legitimate ground for the processing, or (iv) we are required by law to do so.

#### **11.4. Right to restriction of processing**

Until we have resolved the issues relating to the processing of your personal data, we must restrict the processing of your personal data so that we can only store it and use it to bring, enforce or defend legal claims, where appropriate.

#### **11.5. Right to object**

You may object to the processing of your personal data that we process for direct marketing purposes or for legitimate interests. If you object to the processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

#### **11.6. Our other privacy policies:**

On this [link](#) you will find our information notice on the processing of **candidates'** data.

On this [link](#) you will find our information notice on data management **by our suppliers**.

On this [link](#) you will find our privacy notice for the **Kiflicske club**.

### **12. FINAL PROVISIONS**

If you need us to explain any part of this notice, give you advice or discuss how we further process your personal data, please contact us at any time at [dpo@kifli.hu](mailto:dpo@kifli.hu) or [privacy@rohlikgroup.com](mailto:privacy@rohlikgroup.com).

#### **12.1. Contact details of the Data Protection Officer**

If you have any questions about the processing of your personal data, please contact our Data Protection Officer:

Name of the Data Protection Officer: Tamás Lengré

Contact: [dpo@kifli.hu](mailto:dpo@kifli.hu)

#### **12.2. Effectiveness, updates**

This Privacy Policy is effective as of May 25, 2018 and is continuously updated.

Last update: 15 January 2026