

## NOTICE ON DATA PROCESSING FOR SZIGET WEB SHOP PURCHASING

Upon subscription to a newsletter on sites [www.sziget.hu](http://www.sziget.hu), [www.szigetfestival.com/hu](http://www.szigetfestival.com/hu), [www.volt.hu](http://www.volt.hu), [www.balatonsound.com/hu](http://www.balatonsound.com/hu), [www.gourmetfesztival.hu](http://www.gourmetfesztival.hu), and [www.strandfesztival.com](http://www.strandfesztival.com) you provide personal information that we process in accordance with Act CXII of 2011 on Informational Self-determination and Freedom of Information (Hereinafter „**Infotv.**”), Regulation 2016/679 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 „**GDPR**”), Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Hereinafter „**Eker. tv.**”), as well as Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (Hereinafter „**Grt.**”), Act C of 2000 on Accounting („**Számv. tv.**”), Act CXXVII of 2007 on value added tax (hereinafter “**Áfa tv.**”), Act V. of 2013 on the Civil Code (“**Ptk**”), and Act CLV of 1997 on consumer protection (hereinafter “**Fgy. tv.**”). According to the provisions of the aforementioned laws and regulations, we hereby inform you on the details of the processing of your personal data and your corresponding rights.

**1. The controller of the data: Sziget Cultural Management Private Company Limited by Shares** (H-1033 Budapest, Hajógyári sziget, lot number 23796/58., company register no. 01-10-049598, phone: +36 (1) 372 0681, e-mail: [hello@sziget.hu](mailto:hello@sziget.hu), web address: [www.sziget.hu](http://www.sziget.hu) and [www.szigetfestival.com/hu](http://www.szigetfestival.com/hu); , hereinafter: “**SZIGET**”)

For the purposes described under clauses 3-4., SZIGET determines the range, purpose and duration of data collected while making a purchase at the web shop, as well as other important conditions of data processing.

**2. Providing your data is voluntary.** You are not required to submit your personal data; however, without it you are unable to purchase the products and services available at the web shop.

**3. The scope of processed data, the purposes, duration and legal basis of data processing:**

The processed data	Purpose of data processing	Duration of data processing	Legal basis of data processing
<p><b><i>Personal information provided during purchasing at the web shop</i></b></p> <p>Mandatory: first name, last name, e-mail address, date of birth, address (country, town, postal code, street, number)</p> <p>Optional: tax ID number, EU tax ID number, bank account number.</p> <p>In case of purchase with Facebook account: full name, email address, profile picture.</p> <p>If the data subject participates in the Student Ticket program organized by SZIGET and Festival Travel International Limited Liability Company (1095 Budapest, Soroksári Road, 48., corporate register number: 01-09-991628), then within this framework, name of institution of middle or higher education provided by the data subject, where he/she is studying, and the number of his/her student identification number.</p>	<p>Online ticket sales, Documentation of purchase and payment, satisfaction of accounting requirements, Identification of the user as ticket purchaser, and keeping contact with him or her, Determination of which international SZIGET reseller is entitled to commission after the buyer in case of purchasing from abroad, Satisfaction of the product or service order Billing, possibility of payment processing, identification of suspicious transactions during online payment</p>	<p>Until contract performance, withdrawal of consent of data subject, in absence of this, SZIGET shall delete data 5 years following the purchase pursuant to section 6:22 of Ptk. If SZIGET is mandated to keep the data pursuant to Számv. tv, then SZIGET only deletes the data 8 years after the termination of the user account, regardless of data subject's consent. Consent can be withdrawn at any time by sending an email to hello@sziget.hu.</p>	<p><b>in case of online ticket sales,</b> the data subject's expressed consent pursuant to Info.tv. 5.§ (1) a), GDPR Article 6 Paragraph (1) a), and the performance of the contract pursuant to GDPR Article 6 paragraph (1) b)</p> <p><b>in case of online payment during documentation of purchase and payment, moreover, satisfaction of accounting requirements, furthermore, during billing and payment processing</b> satisfaction of legal obligation pursuant to GDPR Article 6 Paragraph (1) c), Áfa tv. 169.§, Számv. tv. 169.§ Paragraph (2)</p> <p><b>in case of identification of the user as ticket purchaser and keeping contact with them,</b> the expressed consent of data subject, pursuant to Info. tv.</p>

			<p>Paragraph 5. (1) a), GDPR Article 6 (1) a), and the performance of the contract pursuant to GDPR Article 6 Paragraph (1) b)</p> <p><b>in case of determination of which international SZIGET reseller is entitled to commission after the buyer in case of purchasing from abroad, and in case of the satisfaction of the product or service order,</b> the performance of contract pursuant to GDPR Article 6 Paragraph (1) b)</p> <p><b>in case of identification of suspicious transactions during online payment</b> legitimate interest pursuant to GDPR Article 6 Paragraph (1) f)</p>
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<p><b>Personal data provided during personal check-in:</b> Photo, last name, first name, date of birth, country, nationality, gender</p>	<p>The protection of the personal safety of the visitors at the mass event by identifying the entering persons, the identification of abuse concerning the entry.</p>	<p>SZIGET automatically deletes the personal data 72 hours after the official ending of the event.</p>	<p>Legitimate interest pursuant to GDPR Article 6 Paragraph (1) f)</p>
<p><b>Personal data provided during online check-in:</b> E-mail address, photo, last name, first name, date of birth, country, nationality, gender, in case the data subject is under 16: name and availability of custodian</p>	<p>The protection of the personal safety of the visitors at the mass event by identifying the entering persons, the identification of abuse concerning the entry.</p>	<p>SZIGET automatically deletes the personal data 72 hours after the official ending of the event. In case of ticket transferring online check-in data can be deleted immediately before the event (initiated by the user online).</p>	<p>Legitimate interest pursuant to GDPR Article 6 Paragraph (1) f)</p>

<p><b>Personal data and other relevant data and facts provided during email and phone customer service operations:</b></p> <p>E-mail address, name, address (country, town, postal code, street, and number), phone number, and other personal data received by the customer service via email regarding the user or other data subject, and the circumstances of the case.</p>	<p>Examination and detailed administration of cases received via contact email addresses located at <a href="https://szigetfestival.com/hu/elerhetosegek">https://szigetfestival.com/hu/elerhetosegek</a> link, during the customer service activity, or the detailed administration of calls made with the call center to make requests and observations on SZIGET activity available for SZIGET. Communication via e-mail is archived so the information is available in their original form in the event of a subsequent question or debate, and, if necessary, SZIGET may get into contact with the user in relation to the case.</p>	<p>Until withdrawal of consent of data subject; in absence of this, SZIGET deletes the data pursuant to section 6:22 of Ptk. 5 years following the phone conversation or the receipt of the request via email to the customer service.</p> <p>If SZIGET is mandated to keep the data pursuant to Számv. tv., then SZIGET only deletes the data 8 years after the arrival of the case to SZIGET, or the phone conversation, regardless of data subject's consent. Consent can be withdrawn at any time by sending</p>	<p>Data subject's expressed consent pursuant to Info. tv. 5. § (1) a), GDPR Article 6 Paragraph (1) a), performance of contract pursuant to GDPR Article 6 Paragraph (1) b), satisfaction of legal obligation and data retention pursuant to GDPR Article 6 Paragraph (1) c),</p>
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		an email to <a href="mailto:hello@sziget.hu">hello@sziget.hu</a> .	
<p><b>Personal data and other relevant data and facts provided during handling customer complaints:</b></p> <p>a) name, address of consumer,  b) place, time, method of filing complaint,  c) detailed description of consumer complaint, log of documents, records and other proofs submitted by consumer,  d) SZIGET's statement regarding its position on the consumer complaint, if an immediate investigation of the consumer complaint is possible,  e) signature of consumer and the person registering the complaint (except if complaint is submitted via email or phone)  f) place and time of registering consumer complaint,  g) Unique identification number of complaint.</p>	<p>Examination and detailed administration of circumstances of complaints received via contact email addresses located at <a href="https://szigetfestival.com/hu/elerhetosegek">https://szigetfestival.com/hu/elerhetosegek</a> link, during the customer service activity, or the precise documentation of calls made with the customer service center or the documentation in the book of complaints in order to make requests and observations on SZIGET activity available for SZIGET. Communication via e-mail is archived so the information is available in their original form in the event of a subsequent question or debate, and, if necessary, SZIGET may get into contact with the user in relation to the case.</p>	<p>SZIGET is mandated to keep the record of the complaint and a copy of the response for 5 years, and to submit them to the supervisory authorities upon request.</p> <p>If SZIGET is mandated to keep the data pursuant to Számv. tv, then SZIGET only deletes the data 8 years after filing complaint, regardless of data subject's consent.</p>	<p>Data subject's expressed consent pursuant to Info. tv. 5. § (1) a), GDPR Article 6 Paragraph (1) a), performance of contract pursuant to GDPR Article 6 Paragraph (1) b), in case of data retention satisfaction of legal obligation pursuant to GDPR Article 6 Paragraph (1) c) and Számv. tv. 169.§ Paragraph (2), legitimate interest pursuant to GDPR Article 6 Paragraph (1) f)</p>

<p><b>Personal data provided during promotions, campaigns and organizing of media appearances:</b></p> <p>Scope of personal data is determined case by case, according to the stipulations of the conditions of participation of the promotion.</p>	<p>Management of promotions, campaigns and media appearances</p>	<p>Duration of processing is determined case by case, according to the stipulations of the conditions of participation of the promotion.</p>	<p>Legitimate interest of data processing during promotional activity is determined in the notice on data processing attached to the stipulations of the conditions of participation of the promotion.</p>
<p><b>Personal data provided at the following Facebook pages:</b></p> <p>Comments and messages at the SZIGET Official Facebook page (<a href="https://www.facebook.com/SzigetFestival/">https://www.facebook.com/SzigetFestival/</a> )</p> <p>VOLT Festival Official Facebook page (<a href="https://www.facebook.com/VOLTfesztival/">https://www.facebook.com/VOLTfesztival/</a> )</p> <p>Balaton Sound Official Facebook page (<a href="https://www.facebook.com/BalatonSound/">https://www.facebook.com/BalatonSound/</a> )</p> <p>Gourmet Festival Facebook page (<a href="https://www.facebook.com/GourmetFesztival/">https://www.facebook.com/GourmetFesztival/</a>)</p> <p>Children Island Facebook page (<a href="https://www.facebook.com/GyerekSziget/">https://www.facebook.com/GyerekSziget/</a> )</p> <p>Strand Festival Facebook page (<a href="https://www.facebook.com/StrandFesztival/">https://www.facebook.com/StrandFesztival/</a> )</p>	<p>Consumers can send messages and comments to SZIGET through Facebook. SZIGET may answer the questions or comments if it is necessary. (Facebook is not considered an official forum of handling consumer complaints).</p>	<p>Until withdrawal of consent of data subject, in absence of this, SZIGET shall delete data 5 years following the first data collection pursuant to section 6:22 of Ptk.</p>	<p>Data subject's expressed consent pursuant to Info. tv. 5. § (1) a), GDPR Article 6 (1) a),</p>

#### 4. Profiling

SZIGET creates a user profile based on consent in order to provide offers based on the user's needs, preferences and interests. The offers will be sent by e-mail, via newsletters. Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

#### 5. Persons with access to personal data:

The data may be accessed by SZIGET marketing staff, SZIGET promoters (ticket promoters), SZIGET remarketing agencies, as well as data processors specified in this Notice, in order to carry out their tasks. Accordingly, for instance, personal data may be accessed for the purposes of administration and data processing by the system administrator of SZIGET and the Data Processors specified in this Notice. SZIGET uses web analytics services provided by **Google LLC**, (1600 Amphitheatre Parkway Mountain View CA 94043), which is part of the EU-U.S. privacy shield (address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) Google Analytics, the **Hotjar Ltd.** (Level 2 St. Julians Business Centre, 3, Elia Zammit Street, St. Julians STJ 1000, Malta) the **Facebook Ireland Ltd.** (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland), **the Optimonster** (optimonster.com) and the **Monday.com** ( address: 33 West 17th Street New York, New York 10011) – the latter which is part of the EU-U.S. privacy shield. The web analytics services use cookies, which are used to assist in analyzing the use of the online platforms. Via the online platforms, the user provides specific and expressed consent to Google Analytics to transfer data created by cookies in relation to online platform usage to Google servers located in the United States; Optimonster is to transfer and store information related to online platform usage to its servers located in Florida, United States.

The cookies processed by Hotjar and Facebook are stored on their servers located in the European Union. For the purposes and in the manner described above, the user consents to the collection and analyses of his/her data via specific consent provided on the web site. Google, Hotjar and Facebook uses this information for the evaluation and analysis of the data subject's use of the online platforms, to create reports on the data subject's activities on the online platforms, as well as to provide other services related to online use and activity on the online platforms. Given that Optimonster is not part of the EU-US Privacy Shield, SZIGET takes measures necessary to provide the appropriate level of privacy protection via entering into a model contract under 2010/87/EU Decision in the addendum of Optimonster's data processing contract.

In order to present personalized offers as well as to track users, [www.sziget.hu](http://www.sziget.hu), [www.szigetfestival.com/hu](http://www.szigetfestival.com/hu), [www.volt.hu](http://www.volt.hu), [www.balatonsound.com/hu](http://www.balatonsound.com/hu), [www.gourmetfesztival.hu](http://www.gourmetfesztival.hu), [www.strandfesztival.com](http://www.strandfesztival.com), and [www.gyereksziget.hu](http://www.gyereksziget.hu) sites include embedded code from the following providers. Tracking and analytics applications implemented via Google Tag Manager: Google Analytics, Facebook pixel, Appnexus, Double Click floodlight, Conversion linker, Adwords Conversion Tracking, OneTag pixel, Sizmek pixel, Snapchat pixel, Optimonster, Hotjar, Google Optimize. The code provides



targeting opportunities for different advertising modes using cookies stored with the user. Please be aware that through direct connection to their servers, and direct communication with the user's browser, these providers can collect user data (such as IP address, browser, operating system information, cursor movement, address and time of visited site).

## **6. Transfer of data:**

We transfer data to the following recipients:

- a) In relation to the processing purpose of online ticket sales, data related to purchases made on the internet are transferred to OTP Mobil Kft. (Simple) (address: 1093 Budapest, Közraktár u. 30-32., CRNo.: 01-09-174466, tax ID: 24386106-2-43), through the bank card accepting network of OTP Mobil Kft. (Simple), as well as OTP Bank Nyrt. (1051 Budapest, Nádor u. 16.), to ensure the processing, security and tracking of purchase transactions. Transferred data are: user's last name, first name, shipment address, billing address, telephone number, e-mail address and data related to the purchase transaction.
- b) In relation to the processing purpose of online ticket sales, data related to purchases made on the internet are transferred to B-Payment Szolgáltató Zrt. (registered office: Váci road. 4., Budapest, 1132, company register no. Cg. 01-10-047882), who makes electronic payment services available, to ensure the execution, security and tracking of purchase transactions. The transferred data are: user's name, birth name, mother's name, place and time of birth, address, contact details, necessary financial data (bank account number, bank card transactions).
- c) If the user purchases with a card or voucher offering a special discount (OTP SZÉP Card, MKB SZÉP Card, K&H SZÉP Card, Erzsébet Card, Edenred voucher), SZIGET transfers the required customer data to the company supplying the discount (OTP Pénztárszolgáltató Kft. (Mérleg u. 4., Budapest, 1051), MKB Nyugdíjpénztárt és Egészségpénztárt Kiszolgáltató Kft. (Dévai u. 23., Budapest, 1134), K&H Csoporszolgáltató Központ Kft. (Lechner Ödön fasor 9., Budapest, 1095), Erzsébet Utlványforgalmazó Zrt. (Hermina road 63. I/1., Budapest, 1146), Edenred Kft. (Kéthly Anna square 1., Budapest, 1075)). The user may request information on the applying data management rules directly from the respective service provider company. SZIGET automatically processes identifiers and other data of such cards/vouchers only to the extent the service provider company requires it to execute the purchase and to supply the discounts.

In addition to section 5. and subsections a)-c) of section 6, personal data are not transferred to any third party. Data are transferred to a third party or recipient if you are informed on the potential recipient in advance, and a prior consent is given by you or it is required by law. During such data processing activity, personal data are not transferred to any third countries or international organizations.

## **7. Links to social media service providers, social media browser extensions:**

SZIGET's web pages contain links directing to Facebook, Instagram, and Youtube.

In these cases, data transfer to the aforementioned social media operators only occurs when you click on the given icon (for instance, the “F” icon in case of Facebook). When you click on the given icon, the page of the specific social media operator opens up in the form of a pop up window. On these pages, you may publish information related to our products, in accordance with the regulations of the specific social media operator.

## **8. Data security**

SZIGET shall ensure security of the personal data and shall implement appropriate technical and organizational measures to ensure that the collected, stored and processed data are secure, in addition to preventing destruction, unauthorized use, and unauthorized alteration of the data. In addition, SZIGET shall notify third parties -to whom the data subject’s information is transferred- that they are obligated to meet data security requirements.

SZIGET shall prevent unauthorized access to personal data, as well as their publication, transfer modification or erasure. SZIGET will take all reasonable measures in order to prevent damage or destruction of data. SZIGET shall impose the aforementioned obligation to its employees partaking in data processing, as well as processors acting under the authority of SZIGET.

SZIGET uses the operating services of Netpositive Ltd. for the storage of your personal data on servers located in the Budapest server rooms of GTS Datanet in district XIII of Budapest, Victor Hugo street 18-22. In order to prevent unauthorized persons to access your data, SZIGET and its partners ensure the protection of personal information and prevents unauthorized access as follows: Access to personal information stored on the servers are recorded in a journal by SZIGET and the data processor on SZIGET’s behalf, so it can always be monitored who and when accessed what kind of personal information. Access to the computers and the server is password protected.

### **8.1 Communication of a personal data breach to the data subject**

Personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, SZIGET shall communicate the personal data breach to the data subject without undue delay in a clear and easy to understand manner.

The communication to the data shall not be required if any of the following conditions are met:

- a) SZIGET has implemented appropriate technical and organizational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorized to access it, such as encryption;

- b) SZIGET has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialize;
- c) the communication would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

## **9. The rights and legal remedies of data subjects**

In addition to data subject's rights regarding the use of recordings above, data subjects may exercise the following rights related to data processing under this notice:

### **Right to information and to access the data:**

You have the right to receive feedback from SZIGET on whether your personal information is being processed, and if such processing of your data is under way, you have the right to access the personal data and the following information:

- a) the purposes of the data processing
- b) the categories of the personal data concerned,
- c) 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,
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period ,
- e) the existence of the right to request from SZIGET rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object such processing
- f) the right to lodge a complaint with a supervisory authority
- g) where the personal data are not collected from the data subject, any available information as to their source.
- h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant relating to the transfer.

SZIGET shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, SZIGET may charge a reasonable 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 by SZIGET in a commonly used electronic form.

The right to obtain a copy referred to in the paragraph above shall not adversely affect the rights and freedoms of others.

The aforementioned rights may be exercised via the contact information specified in article 10.

**Right to rectification:**

The data subject shall have the right to obtain from SZIGET without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

**Right to erasure ('to be forgotten'):**

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

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

Erasure of data may not be requested if the processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law or for the performance of a task carried out in the public interest;
- c) for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional, and these data are processed by or under the responsibility of a professional subject to the obligation of professional secrecy under Union or Member State law or rules established by national competent bodies or by another person also subject to an obligation of secrecy under Union or Member State law or rules established by national competent bodies.
- d) for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;
- e) for reasons of public interest in the area of public health and these data are processed by or under the responsibility of a professional subject to the obligation of professional secrecy under Union

or Member State law or rules established by national competent bodies or by another person also subject to an obligation of secrecy under Union or Member State law or rules established by national competent bodies;

- f) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes if the right to erasure would probably seriously risk or make impossible such data processing.<sup>1</sup>
- g) for the establishment, exercise or defense of legal claims.

### **Right to restriction of processing:**

Upon data subject's request, SZIGET restricts the processing of data subject's personal data where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, in this case the restriction is for a period that enables the data subject to verify the accuracy of the personal data;
- b) the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) SZIGET 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 defense of legal claims;
- d) the data subject has objected to SZIGET's processing pursuant to public interest or compelling legitimate grounds, in this case the duration of the restriction is for the time period needed for the verifying whether the legitimate grounds of the SZIGET override those of the data subject.

Where processing has been restricted for the aforementioned reasons, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense 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 who has obtained restriction of processing pursuant to the aforementioned reasons shall be informed by SZIGET before the restriction of processing is lifted.

### **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 SZIGET, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from SZIGET to which the personal data have been provided, where:

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<sup>1</sup> Processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, shall be subject to appropriate safeguards for the rights and freedoms of the data subject. Those safeguards shall ensure that technical and organizational measures are in place in particular in order to ensure respect for the principle of data minimization. Those measures may include pseudonymisation provided that those purposes can be fulfilled in that manner. Where those purposes can be fulfilled by further processing which does not permit or no longer permits the identification of data subjects, those purposes shall be fulfilled in that manner.

- a) the processing is based on consent pursuant to contract
- b) the processing is carried out by automated means.

In exercising his or her right to data portability pursuant to the aforementioned, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The exercise of the right to data portability shall be without prejudice to the right to erasure ('to be forgotten'). That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in SZIGET.

The right to data portability shall not adversely affect the rights and freedoms of others.

### **Right to object**

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

In this case, SZIGET shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense 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 for such purposes.

Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

### **Right to withdraw consent**

The data subject shall have the right to withdraw his or her consent at any time if SZIGET's data processing is based on consent. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

**Modalities in case of request by the data subjects on the exercise of the aforementioned rights**

SZIGET shall provide information on action taken on a request to the data subject without undue delay and in any event within one month (30 days) 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.

SZIGET 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 SZIGET does not take action on the request of the data subject, SZIGET 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.

SZIGET shall provide the requested information and notification free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, SZIGET 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.

SZIGET shall inform every such recipient of personal data, with whom personal data was shared, of all modification, erasure, or data processing restriction, unless this proves to be impossible, or requires an unreasonably large effort. Upon request of the data subject, SZIGET shall inform him/her of these recipients.

**10. Comments, questions or complaints:**

Any questions or requests regarding your personal data stored or processed in our system should be sent to [hello@sziget.hu](mailto:hello@sziget.hu) e-mail address, or in writing to 1399 Budapest Pf.: 694/245 postal address. Please keep in mind that to serve your best interest, we are only able to provide information or take action regarding your personal data processing if you provide us with credible identification.

We hereby inform you that concerned parties may contact SZIGET's data protection officer regarding all questions on personal data protection and exercise of rights under GDPR. The data protection officer may be contacted at:

- i. Data protection officer: Daniel Csaky
- ii. Address: H-1033 Budapest, Hajógyári-sziget Hrsz:23796/58,
- iii. Telephone: +3613720664,
- iv. E-mail: [dpo@sziget.hu](mailto:dpo@sziget.hu).

## 11. Data processing:

SZIGET shall use for its activity the processor specified in this Notice. The processor makes no decisions independently; the processor is only authorized to carry out its activity in accordance with its contract and instructions from SZIGET. The work of the processor is supervised by SZIGET. The processor shall only engage another processor with prior written authorization of SZIGET.

## 12. Data and contact information of processors:

Name of processor	What kind of personal data does it access? What way can it use the given personal data (what activity they do for SZIGET)?	How long can it store the data?
KBOSS.hu Ltd. (CRNo.: 13-09-101824, address: 2000 Szentendre, Táltos u. 22/b, e-mail: <a href="mailto:info@szamlazz.hu">info@szamlazz.hu</a> )	Operation of szamlazz.hu program Billing preparation and mailing It has access to the following data in relation to this task: name, address, email address	Service contract of indefinite duration-until the termination of the contract
Myriad Payments Limited (Elmslie House, 51-53 Irish Town Gibraltar, <a href="mailto:info@intelligentpayments.co.uk">info@intelligentpayments.co.uk</a> )	Transaction security, identification of payment fraud  It has access to the following data in relation to this task: name, address, email address	Service contract of indefinite duration-until the termination of the contract
Midichloriens Sarl. (1 rue de Montgolfier 34000 Montpellier, France)	Ticket distribution, press accreditation, promotional activity  It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.	Contract with definite duration, until the termination of the contract, by October 31, 2020.
Tickething-Change Limited Liability Company (CRNo.: 10-09-035772, address: 3360 Heves, Hunyadi street. 25., email: <a href="mailto:hello@tickething.com">hello@tickething.com</a> )	Ticket sales on secondary market (sale of already purchased but unused tickets)  It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address	Service contract of indefinite duration-until the termination of the contract



<p>TicketSwap BV</p> <p>1012 KL, Amsterdam at Rokin 75, The Netherlands</p>	<p>Ticket sales on secondary market (sale of already purchased but unused tickets)</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address</p>	<p>Contract with definite duration, until the termination of the contract, by February 12, 2019.</p>
<p>Festival Travel International Ltd</p> <p>(Cg.: 01-09-991628, 1095 Budapest, Soroksári Rd. 48., e-mail: info@meex.hu)</p>	<p>Ticket distribution</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address</p>	<p>Contract with definite duration, until the termination of the contract, by March 31, 2018.</p>
<p>Festival Travel International LTd.</p> <p>(CRNo.: 01-09-991628, 1095 Budapest, Soroksári Rd. 48., e-mail: info@meex.hu)</p>	<p>Student ticket program distribution</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address, name of institute of middle or higher education, student ID number</p>	<p>Contract with definite duration, until the termination of the contract, by August 31, 2020.</p>
<p>BIG FISH Internet-Technológiai Ltd. (Cg.: 01-09-872150, 1066 Budapest, Nyugati square 1-2., <a href="mailto:paymentgateway@bigfish.hu">paymentgateway@bigfish.hu</a> )</p>	<p>Providing payment gateway service (electronic payment options)</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Service contract of indefinite duration-until the termination of the contract</p>
<p>FESTIPAY Private Limited Company (CRNo.: 01-10-048644, 1135 Budapest, Reitter Ferenc street. 46-48., e-mail: sales@festipay.com)</p>	<p>At the location and time of festival, providing integration of Festipay developed for wrist band (balance, history, wristband cancelling, bank card refill, Festi PIN code change)</p> <p>It has access to the following data in relation to this task: name, address, identification or passport number, phone number, transaction date, transaction status, amount, email,</p>	<p>Contract with definite duration, until the termination of the contract, by December 31, 2018.</p>

	Cellum transaction result, Festipay card number, wristband number, Festipay ticket number, date of birth, Client OS, Cellum transaction status, Festipay external transaction status, recipient number, cancellation number, receipt voided	
Stoke Travel/Kerimet S.L. (Via Laietana 71, Principal 1, 08003 Barcelona, Spain, e-mail: info@stoketravel.com)	Ticket distribution  It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.	Contract with definite duration, until the termination of the contract, by October 31, 2018.
Ticketportal HU Kft. (CRNo.: 01-09-920572, 1065 Budapest, Bajcsy-Zsilinszky street 49., e-mail: ticketportal@ticketportal.hu	Ticket distribution  It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.	Service contract of indefinite duration-until the termination of the contract
Netpositive Számítástechnikai Szolgáltató és Kereskedelmi Kft. (company register no.: 13-09-104997, 2021 Tahitótfalu, Pataksor street 48., 13-09-104997, info@netpositive.hu)	Operation of ERP system, physical and operating system level operation of online sales systems servers.  It access to all personal data controlled by SZIGET under this Notice. It is responsible for operating SZIGET's enterprise resource planning (ERP) system.	Service contract of indefinite duration-until the termination of the contract

<p>TRL Hungary Kft.(CRNo.: 11-09-007772, 2510 Dorog, Mátyás király street 11/A, branch: 1034 Budapest, Tímár street 5.)</p>	<p>Provides Maconomy management ERP system</p> <p>It accesses all personal data controlled by SZIGET under this Notice. Its task is financial and accounting process support (ERP) system operation.</p>	<p>Service contract of indefinite duration-until the termination of the contract</p>
<p>FACTORY 92 mpx GmbH (Van-der-Smissen 4, 3 OG, 22767 Hamburg Germany)</p>	<p>Press accreditation, promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by October 31, 2020.</p>
<p>Ostfest KNSM-Laan 87 1019LB Amsterdam The Netherlands</p>	<p>Ticket distribution, press accreditation, promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by October 31, 2020.</p>
<p>L'Alternativa srl Via Guido Dorso, 30 70125 - Bari - Italy</p>	<p>Press accreditation, promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by October 31, 2020.</p>

<p>PR Stage s.r.o  Sídlo společnosti: Kamínky  283/7 - 63400 Brno - Česká  republik</p>	<p>Press accreditation, promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by October 31, 2018.</p>
<p>US Commercial HQ  Congress Commerce Center  601 North Congress Ave. Suite  430  Delray Beach, FL 33445</p>	<p>Ticket distribution</p>	
<p>Reservix GmbH  Kaiserstraße 69  60329 Frankfurt am Main</p>	<p>Ticket distribution</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by October 31, 2020.</p>
<p>Ticketmaster UK Ltd  2nd Floor, Regent Arcade  House,  19-25 Argyll Street, London  W1F 7TS</p>	<p>Ticket distribution</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by September 15, 2018.</p>
<p>Festicket Ltd.  Units 14 &amp; 28 Utopia Village,  7  Chalcot Road, London,  England,  NW1 8LH</p>	<p>Ticket distribution</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by October 31, 2018.</p>
<p>Ticketmaster GmbH  Niederlassung Wien  Alser Straße 21/Top 9  1080 Wien</p>	<p>Ticket distribution</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by October 31, 2018</p>

<p>Ticketportal SK, s.r.o.  Karadžičova 14  821 08 Bratislava, Slovakia  Address for correspondence:  Ticketportal SK, s.r.o.  P.O.Box 5  810 08 Bratislava, Slovakia</p>	<p>Ticket distribution</p>	
<p>Destination Clubbing / Travel  Event SAS  32 BD DE Strasbourg, CS  30108, 75468 Paris Cedex 10,  France</p>	<p>Ticket distribution   It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by October 31, 2018</p>
<p>Contiki Tours  Travel House, Rue de Manoir,  Guernsey, Channel Islands</p>	<p>Ticket distribution   It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by October 31, 2018</p>
<p>DICE FM LTD  62 Shoreditch High Street,  London E1 6JJ</p>	<p>Ticket distribution   It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by February 23, 2019</p>
<p>PODPADS LTD  (event management company)  Eden House 15 Daffords  Buildings, Larkhall, Bath, BA1  7DA</p>	<p>Ticket distribution   It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by February 23, 2019</p>
<p>FULL FAT PRODUCTIONS  LIMITED  Westgate House, Brook Street,  Warwick, Warwickshire,  CV34  4BL</p>	<p>Ticket distribution</p>	

<p>Listen Up Music Promotions  London  Unit 7, Ground Floor  21 Bonny Street  London  NW1 9PE  United Kingdom  Los Angeles  6725 Sunset Blvd #270  Los Angeles  CA 90028  United States of America</p>	<p>Ticket distribution</p>	
<p>HARVEST DIGITAL  LIMITED  71 Newman Street  London  <b>WIT 3EQ</b></p>	<p>Promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by March 12, 2019</p>
<p>Bad Taste production s.r.o.  Bardejovská 21, Pozsony,  Szlovákia</p>	<p>Press accreditation, promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by October 31, 2018</p>
<p>SM Digital CB  C. Jacinto Benavente 1, Portal  4, 3B CP28660 Boadilla del  Monte, Madrid, Spain</p>	<p>Press accreditation, promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by October 31, 2018</p>
<p>KEN  Moshav Beit Arif , Mesek 3.  ISRAEL</p>	<p>Ticket distribution, press accreditation, promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by October 31, 2018</p>

Authentic Tours Turizm Ltd. STi Arnavutköy MH Tekkeci Sokak no: 3-5 Ic, Kapi No: Besiktas Istanbul, Turkey	Ticket distribution, press accreditation, promotional activity  It has access to the following data in relation to this task: name, country and street level address, billing address, date of birth, email address.	Contract with definite duration, until the termination of the contract, by October 31, 2018
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The processor makes no decisions independently; the processor is only authorized to carry out its activity in accordance with its contract and instructions from SZIGET. The work of the processor is supervised by SZIGET. The processor shall only engage another processor with prior written authorization of SZIGET.

### 13. Personal data related to children and third persons

Persons under 16 shall not submit their personal data, except when they requested permission from the person exercising parental rights. By providing your personal data to SZIGET you hereby state and guarantee that you will act according to the aforementioned, and your legal capacity is not restricted with regards to the providing of data.

If you do not have the right to independently provide personal data, you must acquire the permission of the appropriate third party (i.e. legal representative, guardian, other person – for instance consumer - you are representing), or provide another form of a legal basis to do so. In relation to this, you must be able to consider whether the personal data to be provided requires the consent of a third party.

To this point, you are responsible for meeting all the necessary requirements, as SZIGET may not come into contact with the data subject and SZIGET shall not be liable or bear any responsibility in this regard. Nevertheless, SZIGET has the right to check and verify whether the proper legal basis has been provided with relation to the handling of data at all times. For example, if you are representing a third party – for instance a consumer – we reserve the right to request the proper authorization and/or consent of the party being represented with relation to the matter at hand.

SZIGET will do everything in its power to remove all personal information provided without authorization. SZIGET shall ensure that if SZIGET becomes aware of this, such personal information is not forwarded to any third party, or used for SZIGET's own purposes. We request that you inform us immediately via contact information provided under article 10 if you become aware that a child has provided any personal data about himself or herself, or any other third party has provided any personal data of you unauthorized to SZIGET.

### 14. Legal remedies

- a) SZIGET may be contacted with any questions or comments regarding data processing via contact information provided under article 10.

- b) You may initiate an investigation at The Hungarian National Authority for Data Protection and Freedom of Information (1530 Budapest, Pf.: 5., phone: +36 (1) 391-1400, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [www.naih.hu](http://www.naih.hu)) alleging infringement of rights concerning the processing of your personal information or if an immediate threat of such infringement is impending, in addition
  
- c) In case of infringement of your rights, you may seek judicial remedies against SZIGET as data controller. The court considers the case out of turn. SZIGET has the burden to prove that processing of the data was in accordance with the law. Decision of the case is within the jurisdiction of the court. Legal proceedings may also be brought before the court where the data subject has domicile or residence.

Additional text for handling of complaints (printed version):

I HEREBY DECLARE THAT I HAVE READ AND UNDERSTOOD THE NOTICE ON PERSONAL DATA COLLECTED DURING THE HANDLING OF THE COMPLAINT, AND I CONSENT TO THE PROCESSING OF MY PERSONAL DATA AS SET OUT THEREIN.

Budapest, \_\_\_\_\_

\_\_\_\_\_  
Name: