

## **PRIVACY POLICY**

### **concerning the Sziget Changemakers Program application and participation**

Within the frameworks of a cooperation with the organiser of SZIGET Festival, Civil Impact Nonprofit Public Benefit Ltd. organises a Changemaker Program (hereinafter: “Program”) that aims to provide young people with a platform to implement their own social and environmental projects and involve the audience of SZIGET Festival in joint thinking and action in accordance with the terms of the participation rules. During and in connection with the Program, we process various personal data in accordance with the relevant effective legislation, especially 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 the “**GDPR**”).

We hereby inform you on the details of the processing of your personal data and your corresponding rights.

The purpose of this Privacy Policy is to inform you about the processing of your personal data provided to the below specified data controller (hereinafter: “Data Controller”) in order to apply to the above Program preliminarily to the processing of your data in accordance with Articles 12, 13, and 14 of the GDPR. In this Privacy Policy, you will receive a detailed and clear information about who, on what purpose, on what basis your personal data is collected, managed, who has access to your data and what rights are you entitled to in relation to the data processing.

#### **Who processes your data?**

##### **The entity of the data controller:**

##### **Civil Impact Nonprofit Public Benefit Ltd.**

registered office: 1094 Budapest, Márton utca 35/C 6/8

tax number: 25319659-2-43

Company Registration Number: 01-09-208203

email: [info@civilimpact.hu](mailto:info@civilimpact.hu))

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

#### **What is the purpose of processing your data?**

Your contact data and team member’s data are necessary for your application, whereas the data related to the problem chosen by the team are needed to evaluate and, thus, select from among the applicants and, in case, your team is selected for presentation at the 2025 SZIGET Festival, Sziget Zrt. will need to provide you with your award, which is offering a two-day presentation opportunity and access to the SZIGET Festival.

In case the Data Controller intends to use any of the data for different purposes than those specified herein, it shall inform you preliminarily – providing all necessary information related to such intended data processing.

### What is the basis of processing your personal data?

All your data is processed based on your consent given pursuant to Point a) of Article 6 of the GDPR. In case it is not only your data (either contact data of the team members, or data in or related to audiovisual materials), you are fully liable for the lawfulness of providing such data to the Data Controller possessing the explicit, informed consent of the de facto data subject.

### How long are your data processed?

Your data are stored for 1 year reckoned from the closing date of the Program, i.e. the end of 2025 SZIGET Festival as is published on the site of the Festival.

### Who may access your personal data?

Your contact data may be accessed only by the administrators appointed by the Data Controller, whereas the team's application information and audiovisual material are to be viewed and scored by the jury selected by the Data Controller, who are authorized to access the Program application data only to the extent and for the time necessary to fulfil their duties related to the Program.

However, we would like to inform you that the Data Controller is obliged to fulfil the written data requests of the authorities based on legal authorization. Courts, prosecutors, investigative authorities, infringement authorities, public administrative authorities, national authority for data protection, or other bodies may contact the Data Controller in order to provide information, communicate and transfer data, or make documents available, based on the authorization by law. The Data Controller shall provide the requesting body with the personal data that is absolutely necessary for the fulfilment of the purpose of the request, provided that the exact purpose and the scope of the data has been specified. The Data Controller shall keep records of data transmissions in accordance with the requirements of the GDPR (to which authority, what personal data, on what legal basis, when the Data Controller transmitted), the content of which the Data Controller shall provide information upon request, unless the provision of information is prohibited by law.

**The data processing processes are presented in the below chart for easier overview:**

#### 1. DATA PROCESSING RELATED TO THE APPLICATION

When you apply for the Program, you give your team's information (your team name, the country represented, the chosen problem); the contact person's e-mail address and telephone number, all team members' name, age and country, city information; an introductory video of the team; the details of the on-site presentation: a summary and a brief description, planned showroom presentation and festival-goers' activities, necessary resources and previous experience. After submitting the application, you will receive a confirmation that your application has been submitted.

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| Description: | We are looking for teams that are willing to identify a social and/or environmental sustainability problem in their own community or place of residence, develop it with the help of sustainability experts during a mentorship process, and present it during the Program in the form described in the call for application. |
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| Legal basis:       | The legal basis of the data processing is your consent granted in accordance with Point a) of Article 6 (1) of the GDPR which you gave upon your application and acceptance of the terms of the Program.  |
| Purpose:           | You participate the Program with the purpose to gain a two-day presentation opportunity at the 2025 SZIGET Festival.  |
| Data processed:    | <p>When you fill in the application form, you will need to give:</p> <ul style="list-style-type: none"> <li>- team name</li> <li>- country represented</li> <li>- contact person's name. e-mail address, phone number</li> <li>- team members' name, age, country and city</li> <li>- introductory video of the team.</li> </ul> <p>Please, be informed that you are fully liable to observe the rights of other data subjects during the Program; thus, in case you provide us with any audiovisual material, please, make sure that you have requested the explicit, informed consent of all data subjects.</p> |
| Parties involved:  | <p>application forms: Google Forms (see: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>)</p> <p>limited access to the application forms: Sziget Zrt. as the promoter of the Program</p>  |
| Retention of data: | The personal data related to the Program shall be deleted 1 year after the closing of the 2025 SZIGET Festival. Statistical data (the applicant teams' country and chosen problem) will be retained after the deletion of the personal data. Your consent may be withdrawn anytime by sending an e-mail indicated in the participation rules, which deletion may however affect your application as well.   |

## 2. EVALUATING THE SUBMITTED APPLICATION IN THE PROGRAM

The submitted applications are to be evaluated by jury members selected by the Data Controller and Sziget Zrt. The evaluation criteria are laid down in the rules available on the dedicated site on the SZIGET Festival website. The jury members have to be impartial and need to evaluate the applications as objectively as possible. As jury members are also individuals, their personal data are also to be kept confidential.

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| Description: | The applications submitted (the introductory video of the team; the details of the on-site presentation: a summary and a brief |
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|                    | description, planned showroom presentation and festival-goers' activities, necessary resources and previous experience) are evaluated in order to select the awarded teams.   |
| Legal basis:       | The legal basis of the data processing is your consent granted in accordance with Point a) of Article 6 (1) of the GDPR which you gave upon your application and acceptance of the terms of the Program.                                  |
| Purpose:           | The on-site presenters are to be determined based on their submitted written and audiovisual materials that are evaluated by the jury.  |
| Data processed:    | In addition to data as per Point 1, the votes given by the jury members (the personal data of the jury members is confidential).  |
| Parties involved:  | application forms: Google Forms (see: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a> )<br>limited access to the application forms: the jury members and Sziget Zrt. as the promoter of the Program |
| Retention of data: | in accordance with Point 1  |

### 3. COMMUNICATING THE RESULTS IN THE SELECTION

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| Description: | <p>Based on the results (as per Point 2 above), the on-site presenters are to be selected and awarded. All applicants will be informed whether they are selected or not.</p> <p>The selected teams are to be invited for the 2025 SZIGET Festival (for which the event-specific privacy policies shall be applicable therefrom as it will be Sziget Zrt. to process data related to the on-site presentation and participation at the SZIGET Festival in accordance with the rules applicable to visitors (Privacy Policy concerning participation at SZIGET Festival, available under: <a href="https://szigetfestival.com/en/policy-gctc#!/c141/privacy-policies">https://szigetfestival.com/en/policy-gctc#!/c141/privacy-policies</a>).</p> <p>Each selected team will receive location, equipment, visual materials, as well as participation and accommodation in accordance with the Participation rules.</p> |
| Legal basis: | The legal basis of the data processing is your consent granted in accordance with Point a) of Article 6 (1) of the GDPR which you gave upon your application and acceptance of the terms of the Program,   |

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|                    | whereas for the live events, respective privacy and other policies of SZIGET Festival will be applicable.  |
| Purpose:           | The selected teams are to be awarded.  |
| Data processed:    | in accordance with Point 2   |
| Parties involved:  | application forms: Google Forms (see: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a> )<br>Sziget Zrt. as recipient of contractors' and visitors' data in relation to 2025 SZIGET Festival |
| Retention of data: | in accordance with Point 1 except that the winning team's members data will be processed in order to provide them with their prize   |

The winning team and project will be determined based on the votes of the festival-goers on site, which will not involve the processing of any personal data. The members of the winning team will receive their prize as written in the participation rules, the data processing related thereto will be governed by the privacy notice concerning the 2026 Sziget Festival.

#### 4. FINANCIAL DOCUMENTS RELATED TO THE PROGRAM

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| Purpose of data processing     | As the prizes related to the Program require certain documents to be stored for taxational reasons, the supporting documents are likely to contain personal data as well.  |
|                                | contact data of the team's contact person<br>team member's name<br>data related to the tickets won by the team members   |
| Legal basis of data processing | Financial supporting documents are stored pursuant to Point c) of Article 6 (1) of the GDPR, performing legal obligation (Act C of 2000 on accounting and Points e) and da) of Act CXXVII of 2007 on value added tax). |
| Duration of data processing    | Deletion of financial documents shall take place upon the elapse of 8 years following the issuance of the related invoices and supporting documents pursuant to Section 169 (2) of Act C of 2000 on accounting.        |
| Addressees                     | in connection with generating tickets: Sziget Zrt. and Netpositive Kft.<br>in connection with providing accommodation: the selected service provider (only the barcode shall be transferred)                           |

#### 5. INQUIRIES RELATED TO THE PROGRAM

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| Purpose of data processing     | Anybody can pose questions via the e-mail, telephone or indicated social media platform availabilities of Program indicated in the rules of participation, during which you necessarily provide personal data.   |
| Processed data                 | <ul style="list-style-type: none"> <li>• name (for addressing, identification if necessary),</li> <li>• telephone number (in case of inquiry via telephone or giving the telephone number via e-mail), or e-mail address (in case of inquiry via e-mail or giving the e-mail address on the phone), or social media platform user data (in case of contacting us on via the dedicated social media availability),</li> <li>• your problem, feedback, question and the personal data contained therein,</li> <li>• our reply and the personal data contained therein</li> </ul> |
| Legal basis of data processing | We handle your inquiry basically based on your consent pursuant to Point a) of article 6 (1) of the GDPR.  |
| Duration of data processing    | in accordance with Point 1   |

### **What measures do we make to protect your data?**

The Data Controller pays particular attention to data security, therefore, each has taken appropriate security measures, as well as appropriate technical and organizational measures to protect your personal data from unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage, as well as against becoming inaccessible due to changes in the technology used, and to protect your personal data from data loss, data destruction, data manipulation and unauthorized access.

It is the duty of all colleagues (including the invited jury members) of the Data Controller to observe data confidentiality, i.e. to treat personal data confidentially, and the Data Controller continuously revises its security measures in accordance with technological development.

### **What rights do you have in connection with the data processing?**

The Data Controller facilitates the exercise of your rights set out in the GDPR written below. The Data Controller cannot refuse to fulfil your request to exercise data subject rights, unless it proves that it could not identify you. The Data Controller shall inform you of the measures taken in response to your request without undue delay but, in any case, within one month reckoned from the receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this deadline can be extended by another two

months. The Data Controller shall inform you about the extension of the deadline, indicating the reasons for the delay, within one month reckoned from the receipt the request. If you have submitted the request electronically, the Data Controller shall also provide the information electronically, unless you request it otherwise.

If the Data Controller does not take measures following your request, it shall inform you without delay, but at the latest within one month reckoned from the receipt of the request, of the reasons for the failure to take measures, as well as the fact that you can file a complaint with a supervisory authority and exercise your right to judicial remedy.

The Data Controller shall provide the information and take the measures free of charge, however, if your request is clearly ungrounded or - especially due to its repetitive nature - excessive - taking into account the administrative costs associated with providing the requested information or taking the requested measures – the Data Controller may charge a reasonable fee or refuse to take measures based on request.

If the Data Controller has reasonable doubts about the identity of the natural person who submitted the request related to the rights of the data subject below, it may request the provision of additional information necessary to confirm the identity of the data subject.

We describe below what rights you have during the data processing:

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| <p>right of information and access to personal data:</p> | <p><i>“I would like to know what data is stored about me and what are they used for.”</i><br/>                 Within the data processing period, you may request information from the Data Controller about the processing of your personal data. As soon as possible reckoned from the date of submission of the request but no later than within 1 month, the Data Controller shall inform you in writing, in a comprehensible form about the processed data, the purpose, the legal basis and the duration of the data processing, and – in case the data has also been transferred - about who receives it and for what purpose it receives or has received the data.</p> <p><i>“I would like to access my data to see what data is stored about me.”</i><br/>                 You are entitled to receive feedback on the processing of your personal data with a content set forth in Points a) to h) of Article 15 (1) of the GDPR.</p> |
| <p>right of rectification of data:</p>                   | <p><i>“I would like to have my wrongly recorded data corrected.”</i><br/>                 Within the data processing period, you may request that the Data Controller corrects, complete your personal data. The Data Controller shall satisfy your request as soon as possible reckoned from the date of submission of the request but no later than within 1 month.</p>   |
| <p>right of erasure of data:</p>                         | <p><i>“I would like to have my data deleted.”</i><br/>                 You also have the possibility to request that the Data Controller deletes your personal data without undue delay, if</p>   |

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|   | <p>a) the personal data are no longer needed for the purpose for which they were collected or otherwise processed;</p> <p>b) you withdraw your consent to the data processing, and there is no other legal basis for the data processing;</p> <p>c) you object against the data processing and there is no overriding legal reason for the data processing;</p> <p>d) your personal data has been processed unlawfully;</p> <p>e) the personal data shall be deleted in order to fulfil the legal obligation prescribed by EU or member state law applicable to the Data Controller.</p> <p>The right to deletion shall not apply to cases where the Data Controller is required to continue storing the data by law, or in the event that the Data Controller is entitled to further process personal data in line with Point c) of Article 6 (1) of the GDPR or Section 6 (5) of Act on the right to informational self-determination and on the freedom of information (for example, in connection with invoicing).</p> <p>The Data Controller does not make your personal data public (only publicly available information submitted by you or the recording at the live event are to be made available for the evaluation at the Program), so if you wish to use your right to be forgotten, it will be enforced in relation to data processors performing data processing activities.</p> |
| <p>right to restriction of data processing:</p> | <p><i>“I would like that my data is not used until I have checked the lawfulness of it.”</i></p> <p>You are also entitled to have the Data Controller restrict data processing at your request if</p> <p>a) you dispute the accuracy of your personal data, in which case the limitation applies to the period that allows the Data Controller to check the accuracy of the personal data;</p> <p>b) the data processing is unlawful and you oppose the deletion of the data and, instead, request the restriction of their use;</p> <p>c) the Data Controller no longer needs the personal data for the purpose of the data processing but you require them in order to submit, enforce or defend legal claims; or</p> <p>d) you have objected against the data processing, in this case the restriction applies to the period until it is established whether the legitimate reasons of the Data Controller take priority.</p> <p>If data processing is subject to restrictions based on any of the above reasons, such personal data, with the exception of storage, will only be processed with your consent, or to motion, enforce or defend legal claims, or to protect the rights of another natural or legal person, or the important public interest of the Union or a member state.</p>   |
| <p>right to data portability:</p>               | <p><i>“I would like to access my data and would like to take them over to another data controller.”</i></p> <p>As neither Data Controller carries out automated data processing, the data subject's right to receive personal data in a segmented,</p>  |



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|                         | <p>widely used, machine-readable format based on his/her consent or in connection with the contract concluded with him/her or to have it transmitted to another data controller is not applicable.</p>  |
| <p>right to object:</p> | <p><i>“I object in connection with the further processing of my personal data.”</i></p> <p>You may object against the processing of your personal data,</p> <p>(i) if the processing or transmission of personal data is necessary for the execution of a task of public interest or for the enforcement of the legitimate interests of the Data Controller, data receiver or third party, except in the case of mandatory data processing and the case set forth in Article 21 (1) of the GDPR or Section 6 (5) of Act on the right to informational self-determination and on the freedom of information (in the case of the existence of a substantiated compelling legitimate reason), or</p> <p>(ii) if your personal data is used or transferred - without your consent - for the purpose of direct business acquisition, public opinion polls or scientific research. The Data Controller shall examine the objection, make a decision on its groundedness, and inform you about its decision in writing as soon as possible, but no later than 1 month reckoned from the submission of the request.</p> |

The Data Controller also informs you that the EU and Member State or the national privacy legislation applicable to itself or to the data processor used by it may limit the above rights for, inter alia, the prevention, investigation, detection or prosecution of crimes, as well as the implementation of criminal sanctions, including protection against threats to public safety and the prevention of these dangers; the protection of the data subject or the protection of the rights and freedoms of others; and enforcement of civil law claims (Article 23 of the GDPR), of which circumstances it shall inform you according to the conditions written above.

In case you consider that the Data Controller has violated a legal provision regarding data processing, or has not fulfilled any of your requests, you may initiate the investigation procedure of the national data protection authority. We would furthermore like to inform you that in the event of a violation of the legal provisions on data processing, or if we have not fulfilled any of your requests, you may apply to court against the Data Controller.