

PRIVACY POLICY

concerning marketing activities related to festivals organised by Sziget Zrt.

When a marketing activity in connection with a festival, event organised by Sziget Zrt. (hereinafter: **“Festival”** or **“Event”**) involves you, we process various personal data in connection with it that we process 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 entity of the data controller: Sziget Cultural Management Private Company Limited by Shares (seat: 1033 Budapest, Hajógyári sziget 23796/58., company registration number: 01-10-049598; hereinafter: **“Sziget Zrt.”**)

Availability of the data protection officer:

Postal address: H-1033 Budapest, Hajógyári-sziget topographical lot No.: 23796/58.

E-mail: dpo@sziget.hu

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

1.

DATA PROCESSING RELATED TO NEWSLETTERS

Sziget Zrt. provides information on several channels to those interested in its Events; thus, it sends newsletters to subscribers thereto. The newsletters are not the same as the servicing mails sent to the person buying a ticket for the Event.

In connection with newsletters, we process data in accordance with Act CXII of 2011 on Informational Self-determination and Freedom of Information (hereinafter **“Infotv.”**), the Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and the 2016/679 general data protection regulation of European Parliament and Council (EU) 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.”**).

1.1. subscription to newsletters

The subscription is related to a specific Festival ; therefore, the newsletters are in connection with the Event itself, or the general operation of Sziget Zrt. In certain cases, the newsletters contain the advertisements of third parties, too.

***PLEASE SIGN UP FOR THE NEWSLETTER ONLY IF YOU ARE ABOVE 16 YEARS OLD!**

Purpose of data processing	We request the data in order to subsequently send you commercial advertisement via e-mail with direct sales and marketing content (e.g. newsletters and eDMs) regarding our or third parties' products and services.
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Processed data	Personal information necessarily provided during subscription to newsletter: - full name, - e-mail address, - the fact being over 16*, - the fact to which Event (for instance on which site) or due to which activity did she/he subscribe for, the time of subscribing, and the Festival in which relation he/she subscribed Further (optional) data provided during the subscription to the newsletter or thereafter (the lack of providing them does not affect the subscription to the newsletter): - country, - preferred travel method, - preferred accommodation, - date of birth, - nickname / username In case of subscribers who also possess purchase related to product/service, Sziget Zrt. will take the purchased product/service into account upon sending the newsletters out.
Legal basis of data processing	voluntary: the data subject's consent pursuant to Point a) of Article 6 (1) of the GDPR, Section 13/A of the Eker tv., and Section 6 (1) of the Grt.
Duration of data processing	Until the consent is withdrawn. The consent may be withdrawn anytime in an e-mail sent to the dpo@sziget.hu address, by mail (1399 Budapest, Pf. 694/245.) or by clicking the subscription link in the newsletter, withdrawing the consent does not, however, affect the lawfulness of the data processing based on consent prior to the withdrawal of the consent.
Addressees	newsletter subscription database: Netpositive mass mailing (depending on to which Festival the subscription relates): Salesforce, Braze, Looker, MailChimp, Brevo communication development: Superstruct Travel & Stay

1.2. dispatching newsletters

During the registration for the newsletters – after becoming familiar with the preliminary notification by Sziget Zrt. –, you consent and accept that Sziget Zrt. tracks the activity (e.g. opening, clicking) in the newsletters sent to the registered e-mail address, as well as your purchases with the same e-mail address, and to use the data in order to display personalised advertisement that may contain third party ads as well on its own or a partner's side.

During the registration for newsletters, you also consent to that Sziget Zrt. sends or displays personalised advertisement that may contain third party ads as well based on the scope of the products and services concerning or connected to the current Event purchased with the identical e-mail address.

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate, analyse or predict certain personal aspects relating to a natural person (e.g. personal preferences, interests, health status, behaviour, location or movements). Sziget Zrt. performs proofing in case of giving data non-mandatory for dispatching newsletters upon or

after the subscription to the newsletter based on consent in order to provide offers adequate to the needs, wishes, interests and purchased products and services. Such offers are also sent via newsletter, in e-mail.

Purpose of data processing	Dispatching the newsletters, during which – based on the consent specified above – the personalisation described above, increasing the relevance and efficiency of the communication, decreasing the disturbance of the subscriber with uninteresting offers.
Processed data	besides those set forth in Point 1.1., the data of sending, reading the newsletter, technical data of clicking links therein (e.g. fact and time of the activity)
Legal basis of data processing	in accordance with Point 1.1.
Duration of data processing	in accordance with Point 1.1.
Addressees	in accordance with Point 1.1.

2.

DATA PROCESSING OF THE GAMES RELATED TO THE EVENT

Sziget Zrt. offers various games (“Games”) on several channels in connection with its Events to those interested in them. In case the Game is organised as a prize game, data may be processed during the selection of the winner and the handover, provision of the prize for the winner, as well as the related correspondence. In case the Game is organised as a competition game, the winner is selected by some kind of jury typically based on subjective aspects, then receives an award. In case the Game is organised as a challenge, all participants who satisfy the requirements shall be eligible to the reward written in the challenge call. In case Sziget Zrt. announces some kind of a promotion, the privacy notice related to purchases shall be adequately applied. In case subscription to newsletters is also possible during a Game or a promotion, the related data processing shall be governed by the privacy policy related to newsletters. In case any game is not organised by Sziget Zrt. but a third party on its behalf or by a partner, the game call, the participation conditions and mode of data processing shall be determined, published by this third party, thus, the data processing is performed by such third party.

We present the general rules applicable to data processing occurring during Games. At certain Games, however, the scope of data, the data processing processes, storage periods and/or the addressees may be different, of which we shall inform the possible participants preliminarily in the Game call.

2.1. selecting the winners during the Game

From time to time, Sziget Zrt. calls for prize games or competition games, whereby it publishes in each case the exact participation conditions of the respective Game, the mode of selecting the winners of the prize (typically via machine draw) or the aspects of selecting the winners at the competition, the relevant deadlines. The exact scope of the data processed during the respective Game shall in each case cover the data in the Game call.

Purpose of data processing	The purpose of processing the data is to organise the Game, choosing the winner of the prize/award as per the Game call out of the participants.
Processed data	The identification data of persons ("Players") as per the Rules of Participation compliant with the Game call (e.g. username on the social media site, e-mail address used during purchase) and the data related to participating the Game (e.g. time of participation, method/location of participation), fulfilling the conditions of participation (e.g. comment on the social media site, posted or published photograph or video, purchase, answer to the questionnaire, creative materials submitted). In some Games, Sziget Zrt. offers a choice to the Players, in which case the choice of the Player shall be part of the data processing if he/she takes the opportunity. The scope of the data processed during a specific Game shall be clearly indicated in the Game call.
Legal basis of data processing	The legal basis of the data processing is your consent in accordance with Point a) of Article 6 (1) of the GDPR. The consent may be withdrawn anytime in an e-mail sent to the dpo@sziget.hu address, withdrawing the consent does not, however, affect the lawfulness of the data processing based on consent prior to the withdrawal of the consent. In lack of consent to the data processing, Sziget Zrt. cannot enable the participation in the Game.
Duration of data processing	Until 1 month reckoned from closing the Game.
Addressees	in case of a Game organised on social media site: the operator of the social media platform in case of a Game related to a questionnaire: Typeform in case of a Game linked to ticket purchase: Netpositive (database management) and Salesforce, Braze, Looker, MailChimp, Brevo (mass mailing, depending on to which Festival the Game relates) communication development: Superstruct Travel & Stay

2.2. handing over, using prizes/awards during the Game

Purpose of data processing	After notifying the winning Player(s) who have sent reply for the sake of handing the prize/award over, providing the prize/award to the winner(s), as well as proving, documenting doing so as necessary.
Processed data	The name and e-mail / delivery address of the winning Player(s).
Legal basis of data processing	The legal basis of the data processing is your consent in accordance with Point a) of Article 6 (1) of the GDPR. The consent may be withdrawn anytime in an e-mail sent to the dpo@sziget.hu address, withdrawing the consent does not, however, affect the lawfulness of the data processing based on consent prior to the withdrawal of the consent. In lack of consent to the data processing, Sziget Zrt. cannot enable the participation in the Game.
Duration of data processing	Sziget Zrt. stores the dispatches or mailing proofs containing the contact data (name and address) of the winning Player(s), the

	occurrent documents necessary for taxation purposes for 8 years after handing the prize/award over for accounting reasons. On the social media site, deletion may be done as the social media platform makes it possible. In case during the handover, using the prize/award photographs, audiovisual, creative materials are made, they may also be used by Sziget Zrt. for marketing purposes. Sziget Zrt. processes the photographic and audio recordings (hereinafter “Recordings”) and the data therein for the purpose of creating from them (i.e. from the Recordings) audiovisual material aiming to present, publicize, and promote the use thereof the individual Events and the Events in total, as well as the Events, other services of, and Sziget Zrt. itself, furthermore, aiming at information and documentary purposes (together “Films”). The personal data contained in the Recordings are only processed in the context of making and publishing the Films as specified in the relevant data privacy policy. The Recordings, and, therefore, also the personal data included therein is processed by Sziget Zrt. for an indefinite period, however, acts as described above during the exploitation thereof. The Recordings, the Films, and the creations, creatives as a result of their exploitation are at the same time copyrighted works, with regards to their protection, Sziget Zrt. may not exercise deletion without the consent of the author but, upon the request of the data subject, in connection with the exploitation, the right of protest of the data subject can be exercise within the frameworks of technics and reasonable realisation (for which, please, contact us on the dpo@sziget.hu address).
Addressees	in case of a Game organised on a social media site: the operator of the social media platform (see Chapter 3) in case of a game granting tickets, discounts: Netpositive (database management) and Salesforce, Braze, Looker, MailChimp, Brevo (mass mailing (depending on to which Festival the subscription relates) communication development: Superstruct Travel & Stay in case of delivering the prize/award: the selected postal service provider as independent data controller in case of the participation, cooperation of a partner in the Game, attendance possibility on an accompanying Event: the cooperating partner as necessary

2.3. data processing related to fulfilling challenges

Purpose of data processing	Keeping contact for the sake of organising the challenge, sending information related to the challenge, discussion for the sake of fulfilling the challenge (e.g. providing accommodation, bike storage) as necessary, for setting appointments.
Processed data	Contact data in case of all challenges: - surname, first name - e-mail address - telephone number Further data, questions may be related to the challenge:

	- the name of the country where you live - your arrival date - whether you wish to give a mini interview to Sziget Zrt. (as for the Recordings in connection with the interview, please, see Point 2.2. above) - photograph or video recording uploaded to the site specified in the challenge call, as well as all data, personal data therein, identifiable in connection therewith - etc.
Legal basis of data processing	The legal basis of the data processing is your consent in accordance with Point a) of Article 6 (1) of the GDPR. The consent may be withdrawn anytime in an e-mail sent to the dpo@sziget.hu address, withdrawing the consent does not, however, affect the lawfulness of the data processing based on consent prior to the withdrawal of the consent. In lack of consent to the data processing, Sziget Zrt. cannot enable the participation in the challenge.
Duration of data processing	In accordance with Point 2.2. except that Sziget Zrt. processes certain data on the participation (e.g. the country specified) for statistical purposes, anonymised.
Addressees	in case of a challenge related to questionnaires: Typeform in other cases: the operator of the page indicated in the challenge call

3.

THE MANAGEMENT OF SOCIAL MEDIA SITES

Sziget Zrt. also keeps contact with those interested in the Festivals, ticket holders for the Festival or the visitors through a variety of social networking sites.

The operators of the social media platforms are individual data controllers.

As the operator of the page registered on the social media platform, Sziget Zrt. sees all the data of followers and commentators that such persons disclose, have disclosed (such as the username on the social media platform, photographs, information made public, comments).

The deletion and rectification of the data is possible based on the policies published by the operators of each platform, social networking, Sziget Zrt. is unable to do it.

The operators of each platform, social networking site are, based on the policies published by them, entitled to moderate the content that does not comply with the policy.

The data of addressees:

specification of activity	type of activity	name	availability
Operation of the customer relationship management (ERP) system of Sziget Zrt., physical and operating system operation of the servers of online sale	data processor	Netpositive Számítástechnikai Szolgáltató és Kereskedelmi Kft.	2021 Tahitótfalu, Pataksor utca 48. info@netpositive.hu

systems, provision of a running environment			
Operation of a database, letter editor, dispatch system and dispatch statistics management system for sending mass e-mails	data processor in connection with Sziget Festival until 31 st December 2025	SFDC Ireland Limited	3rd and 4th Floor, 1 Central Park Block G, Central Park, Leopardstown 18 Dublin, Ireland
		representative in Hungary: Attention CRM Consulting Kft.	1075 Budapest, Madách Imre út 13-14. T. ép. 4. em.
	data processors in connection with Sziget Festival, certified organisation under USA-EU Data Privacy Framework: https://www.braze.com/company/legal/privacy#part_one https://cloud.google.com/terms/cloud-privacy-notice	Braze, Inc.	Privacy Policy Issues Attention: General Counsel 63 Madison Building 28 East 28th Street 12th Floor Mailroom New York, NY 10016 USA privacy@braze.com
		Looker: Google Cloud service Google Cloud EMEA Ltd.	70 Sir John Rogerson's Quay, Dublin 2, D02 R296, Ireland availability: via contact form
	data processor in connection with Gourmet Festival, certified organisation under USA-EU Data Privacy Framework: https://quickbooks.intuit.com/eu/gdpr/	MailChimp: Intuit Inc.	2700 Coast Avenue Mountain View, CA 94043, USA availabilities on https://security.intuit.com/contact-us/site
		Brevo: SENDINBLUE SAS	17 rue de la Salneuve, 75017 Paris, France availability: contact@brevo.com
		maintenance (no dispatching tasks): Vu Thu Huyen e.v.	1027 Budapest, Margit körút 60.

Communication management in the database, letter editor, dispatch system and dispatch statistics management system for sending mass e-mails	data processor	Superstruct Travel & Stay Services B.V.	Isolatorweg 36, 1014 AS, Amsterdam, Hollandia
operation of a program ensuring the issuance of accounting documents, issuing and sending invoices and e-receipts	data processor	KBOSS.hu Kft.	1031 Budapest, Záhony utca 7.
providing questionnaire platform	individual data processor, privacy notice available at the following link: https://admin.typeform.com/to/dwk6gt/	TYPEFORM SL	Carrer Bac de Roda, 163, local, 08018 - Barcelona (Spain) e-mail: support@typeform.com

Data security

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

Sziget Zrt. shall ensure the prevention of unauthorized access to personal data, as well as the publication, transfer modification or erasure thereof.

Sziget Zrt. shall impose the aforementioned obligation onto its employees taking part in the data processing, as well as the data processors acting under the authority of Sziget Zrt.

The rights and legal remedies, complaints of data subjects

Pursuant to the GDPR, during the data processing, you may request access to the personal data and may request information about data processing (which shall be provided by Sziget Zrt. within no more than 1 month), may request rectification of personal data, erasure under certain conditions, or the restriction of data processing, and - when the legal basis for data processing is performance of a contract - you have the right to data portability. When the legal basis for data processing is legal interest, you have the right to object.

You can read further information about the rights in the **General privacy regulation** under the **Festival policy and general terms** menu of the websites.

If you feel that Sziget Zrt. has violated any of the legal provisions applicable to the data processing, please, contact us first, using any of the above contact information, or at the following email address: dpo@sziget.hu. If this proves to be unsuccessful, you may initiate a proceeding of the **Hungarian National Authority for Data Protection and Freedom of Information** (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH, seat: Hungary, H-1055 Budapest, Falk Miksa utca 9-11.; mailing address: 1374 Budapest, Pf. 603.; email: ugyfelszolgalat@naih.hu) or seek **judicial** remedy.

Personal data related to children and third persons

Persons under 16 may not submit their personal data, except if they have requested permission from the person exercising parental rights. By providing your personal data to Sziget Zrt., you

hereby represent and warrant that you 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 shall 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 shall be able to consider whether the personal data to be provided requires the consent of a third party. It may happen that Sziget Zrt. does not get into contact with the data subject, therefore, you are responsible for meeting all the necessary requirements and Sziget Zrt. shall not be liable or bear any responsibility in this regard. Nevertheless, Sziget Zrt. has the right to check and verify whether the proper legal basis is provided for 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 Zrt. shall do its utmost to remove all personal information provided without authorization. Sziget Zrt. shall ensure that if Sziget Zrt. becomes aware of this, such personal information is not forwarded to any third party or used for Sziget Zrt.'s own purposes. We request that you inform us immediately via our aforementioned contacts 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 Zrt.

Miscellaneous

This Privacy Policy was written in Hungarian, although its English version is also accessible. In the event of contradiction between the Hungarian and the English version, the Hungarian language version shall prevail.