

# PRIVACY POLICY

## concerning purchases for festivals organised by Sziget Zrt.

When you purchase ticket, service in connection with a festival, event organised by Sziget Zrt. (hereinafter: “**Festival**” or “**Event**”), we process various personal data in connection with the purchase 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](mailto:dpo@sziget.hu)

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

### 1.

#### DATA PROCESSING ACTIVITIES RELATED TO PURCAHSING TICKETS

##### 1.1. purchasing tickets in person (offline) as per Point II.2.2 of the GTC

It is possible to purchase tickets, passes for the events of Sziget Zrt. in person both at ticket selling places of third parties, promotional places prior to the even, and on the site of the given event.

Purpose of data processing	Tickets can be purchased on site paying in cash or with a bank card, SZÉP card (card or voucher offering a special discount), of which purchase an invoice may be issued that can also be sent by e-mail if requested. <b>Applicable only for purchases to BALATON SOUND:</b> within the frameworks of the ticket sale to inhabitants in Zamárdi, the sale is carried out as indicated by the municipality, during which the employee of the municipality checks the eligibility, and then records the ticket request in the system of Sziget Zrt., from which Sziget Zrt. sends out the secure payment link for payment. After the payment has been made, Sziget Zrt. shall send the ticket (voucher) purchased during the inhabitants' ticket sale to this e-mail address for security reasons, so that the paper-based ticket is also available in digital format for the customer.
Processed data	<ul style="list-style-type: none"><li>- unique identifier of the purchased product</li><li>- ticket type purchased, extras, upgrades or other products</li><li>- accounting document in each case, as well as acknowledgement of receipt is prepared in case of cash payment and bank card terminal receipt of bank card payment</li></ul>

	<ul style="list-style-type: none"> <li>- in case of requesting invoice: type of invoice addressee. its name, tax number, EU tax number</li> <li>- e-mail address (in case of inhabitants' ticket sale, as well as if requesting the invoice to be sent electronically)</li> </ul>
Legal basis of data processing	<p>In case of ticket sale: performance of contract pursuant to Point b) of Article 6 (1) of the GDPR.</p> <p>In relation to documenting the payment, as well as issuing invoice: pursuant to Point c) of Article 6 (1) of the GDPR (compliance with legal obligation: pursuant to Act C of 2000 on accounting and Point e) and da) of Section 169 of Act CXXVII of 2007 on value added tax).</p>
Duration of data processing	<p>Receipts, certificates issued during ticket purchase are stored for 1 year after the end of the event.</p> <p>In case of issuing invoices: pursuant to Section 169 (2) of Act C of 2000 on accounting (hereinafter: Accounting Act), they are deleted after the elapse of 8 years after they have been issued.</p>
Addressees	<p>in connection with generating, purchasing tickets: Netpositive</p> <p>in connection with issuing receipts, invoices: KBOSS</p> <p>in connection with inhabitants' ticket sale: OTP Simple</p> <p>in order to send servicing mails: Salesforce</p>

## 1.2. purchasing tickets online as per Point II.2.1 and II.2.3 of the GCT

In case of ticket purchases in the Festival's online shop and at ticket distributors, the main purpose of data processing is to identify the user as a ticket purchaser, furthermore to filter transactions suspected of abuse during online payment, and to be aware of with which person Sziget Zrt. has entered into a business relationship. The sale of certain products, the provision of discounts or services are linked to specific persons visiting the event, which eligibility to a discount shall be verified on site.

The user who purchases the ticket is solely responsible for the personal data provided during payment to be real and accurate, as well as for that their use is lawful. It is also the responsibility of the user who purchases the ticket, which he/she shall represent, too, that he/she is over 16 years of age and thus legally purchases in the online shop, registers a user account.

In case the purchase takes place based on eligibility to a discount (U21 Pass, SZIE Pass, Easy Access camping pass), checking the eligibility for the discount shall take place upon entering the event in line with Preamble (47) of the GDPR so that Sziget Zrt. may check that only one person on one occasion is entitled to avail the discount, and that no disqualified, multiple ticket purchases take place in connection with it, as well as that such person enter the Event who is entitled to purchase the discounted pass. In accordance with the above, the name of the ticket user is checked by showing an identification documents suitable to identify the person, and the document entitling for the discount (e.g. student card / school attendance certificate or professors' card) shall be shown upon entering the Event, Sziget Zrt. check the existence and validity thereof. (Sziget Zrt. does not make copies of documents suitable to identify persons!)

Purpose of data processing	<p>Purchasing tickets by the user for his/her own or for other person(s), sending the purchased tickets out.</p> <p>Purchasing tickets, passes, extras or upgrades for someone's own can be purchased without registration, but overwriting, managing, occurrent exchange of the tickets, sending ticket(s) to third persons** is possible only with a festival account.</p>
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	<p>It is also possible to add tickets purchased without registration later to a festival account. In case the purchased ticket is added to a festival account the e-mail address of which is different from the e-mail address given upon purchasing the ticket, a notification (warning) will be sent to the e-mail address of the person purchasing the ticket for safety reasons.</p>
	<p><u>mandatory data:</u>  purchased tickets, services, applied discounts, coupon codes, validated vouchers  in case of existing festival account: data of the festival account  full name (necessary for identifying and naming the purchaser, for a proper addressing)  in case of name registered ticket(s): the full name of the person entitled to use the ticket  e-mail address (necessary for sending the purchased ticket to the purchaser and for keeping contact) <i>We draw attention to the fact that we send essential information via e-mail regarding the purchased item, service, however these e-mails are not considered to be such data processing which differs from the original purpose and legal basis, neither considered to be direct marketing.</i>  country (determining which international Sziget Zrt. reseller is entitled to commission after the purchaser in case of purchasing from abroad)  address and telephone number (in order to reduce bank card abuses, prevent abuse/fraud, it is necessary for identifying suspicious transactions and for checking the legality of the transaction)  in case of requesting an invoice: type of invoice addressee, its name, invoicing address, tax number, EU tax number  choice of payment mode: bank card or SZÉP card – by issuing party*  in case of purchasing <u>U21 Pass (can be purchased only for SZIGET), SZIE Pass (can be purchased only for BALATON SOUND)</u>: the fact of being eligible for the discount  in case of purchasing <u>SZIGET CityPass by Budapest Card (can be purchased only for SZIGET)</u>: time of arrival and indication whether the purchaser requests Airport Shuttle service or not  in case of purchasing <u>Easy Access camping pass (can be purchased only for SZIGET)</u>: tent size (for 1-2 persons 2x2 metres, for 3-4 persons 4x2 metres can be the used area at least), number of accompanying persons (maximum 2 persons), whether the accompanying person(s) are lodged in the same tent or a separate tent, if in a separate, the number and size of the separate tents  <u>not mandatory, optionally given data:</u>  date of birth (day, month, year) for service-development, taking into consideration the age groups of the ticket purchasers for the determination of the programs and services available at the events  in case of purchasing <u>tent registration ticket</u> (for free camping): tent size, date of arrival and departure (for the sake of capacity planning and, therefore, for service development, as well as providing discount coupon codes, which coupon codes can be provided via festival accounts)  in the event of <u>validating coupons, discount codes, vouchers</u> Sziget Zrt. will check their validity, value or percent, validation of unique codes</p>

	<p>* during <u>bank card and SZÉP card payments</u> the bank card data shall not be processed by Sziget Zrt. Sziget Zrt. will receive only information of the payment having taken place.</p> <p>** in the <u>festival account</u> (more on this are written in Point 1.7.), in case of <u>forwarding ticket(s)</u> to third person(s): the e-mail address of the third person to whom the user intends to send the ticket given in the festival account, the selected name of such person (in order to differentiate which ticket has been sent to which person) <u>transactional information</u> (e.g. IP address of the user, time of purchasing the ticket, time of downloading the ticket, time of forwarding the ticket, time of registering the festival account, time of data corrections, information related to festival account transactions)</p>
<p>Legal basis of data processing</p>	<p>Name and e-mail address:</p> <ul style="list-style-type: none"> <li>- In case of self-used tickets: performance of a contract pursuant to Point b) of Article 6 (1) of the GDPR.</li> <li>- In case of tickets purchased for third person: the legitimate interest of Sziget Zrt. pursuant to Point f) of Article 6 (1) of the GDPR. The user who sends the ticket is fully responsible for the lawfulness of sending the ticket to the specified e-mail address in each case. It is the legitimate interest of Sziget Zrt. to be able to fulfil the ticket transfer initiated by the ticket purchaser with whom it is in contractual relationship. However, the ticket purchaser undertakes warranty that he/she provides the personal data of this third person lawfully.</li> </ul> <p>Country: Pursuant to Point f) of Article 6 (1) of the GDPR, it is the legitimate interest of Sziget Zrt. to pay its resellers' commission, but to do so, Sziget Zrt. needs to know how many ticket purchases happened in the different countries.</p> <p>Address and telephone number: Pursuant to Point c) of Article 6 (1) of the GDPR, it is the legal obligation of Sziget Zrt. under reviewed Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market (PSD2) and Act CXLV of 2017 to have the sale transaction completed, in the absence of these data the payment transaction would be rejected by the financial institution.</p> <p>In case of purchasing SZIGET CityPass by Budapest Card, with providing the purchased service, performance of a contract pursuant to Point b) of Article 6 (1) of the GDPR.</p> <p>In case of issuing an invoice: 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 200z on value added tax).</p> <p>In case of giving non-mandatory data: The consent of the data subject pursuant to Point a) of Article 6 (1) of the GDPR, with the fact that the data provided by the ticket purchaser shall be pseudonymized and used in this form, and then 1 year after the Event, the data shall be anonymized and will be used for statistical purposes only.</p>
<p>Duration of data processing</p>	<p>From among data necessary for purchasing tickets:</p> <ul style="list-style-type: none"> <li>- name, e-mail address will be deleted 1 year after the Event (as per Point II.6.4 of the GTC pursuant to Section 6:22 paragraph (3) of the Hungarian Civil Code, claims arising from the legal</li> </ul>

	<p>relationship may only be enforced within a six-months limitation period);</p> <ul style="list-style-type: none"> <li>- name, e-mail address will be pseudonymised 1 year after the Event;</li> <li>- country, town, postal code will be stored as statistical data after anonymisation;</li> <li>- address, telephone number will be deleted 1 year after the Event (as per Point II.6.4 of the GTC pursuant to Section 6:22 paragraph (3) of the Hungarian Civil Code, claims arising from the legal relationship may only be enforced within a six-months limitation period);</li> <li>- CityPass additional data will be deleted 1 year after the Event.</li> </ul> <p>In case of issuing invoices: deletion shall take place upon the elapse of 8 years following the issuance of the invoice pursuant to Section 169 (2) of Act C of 2000 on accounting.</p>
Addressees	<p>in connection with generating, purchasing tickets: Netpositive  in connection with issuing receipts, invoices: KBOSS  in case of purchasing tickets from third parties, from abroad: resellers, Festival Travel, TicketSwap  in case of purchasing SZIGET CityPass by Budapest Card: the transportation company (queries the validity time of the wristband via direct connection), the spas (query the serial number of the wristbands and their validity)  in case of supplementary services purchased (e.g. accommodation, travelling), the selected service provider (only the barcode shall be transferred)  in relation to payment: OTP Simple, Revolut, iDEAL, BigFish, cafeteria card providers  in order to send servicing mails: Salesforce  for service development: Ostfest</p>

**1.3. taking insurance out based on group insurance terms (can be purchased only for SZIGET)**

Purpose of data processing	<p>It is possible to take out insurance for the reimbursement of the price of the tickets and related services purchased for SZIGET as per Point 1.2. for the event that the person planning to visit the event with the ticket is unable to attend the event due to one of the reasons specified in the insurance conditions.</p> <p>The possibility of the insurance is offered by Sziget Zrt. as exempted additional intermediary via Alfa Vienna Group Ltd.  As a result of paying the insurance fee of the insurance, only a deferred risk-bearing obligation arises on the part of the insurance company.</p> <p>After paying the insurance fee, the purchaser will receive the availability of the interface on which the data of the persons for whom the ticket purchaser bought the ticket shall be provided to the insurance company - both the ticket purchaser and the future visitors can enter the data. The risk bearing of the insurance company comes</p>
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	<p>into force only upon the provision of these data. The deadlines open to provide the data of the insurants:</p> <ul style="list-style-type: none"> <li>- for the main insurant (who may be either the ticket purchaser, or any person named by the latter as such): within 14 days reckoned from taking out the insurance;</li> <li>- for the co-insurant(s): until the day preceding the event.</li> </ul> <p>The insurance is taken out by name, therefore, it cannot be transferred after the insurance has been designated / after the insurant's name has been specified.</p> <p>In the event of failure to provide the details of the main insurant, or cancellation within 14 days from the conclusion of the contract (sent to <a href="mailto:cancel@platformpartners.vig">cancel@platformpartners.vig</a>), the insurance shall not enter into effect, and the entire insurance fee having been paid shall be refunded by Sziget Zrt. If the co-insurant's data is not provided, the part of the fee affected by the data deficiency shall be refunded after the deadline for providing the data has expired.</p>
Processed data	In excess to the data related to ticket purchasing as per Point 1.2., the fact and the time of becoming familiar with the insurance conditions, the fact of cancellation, the fact of partial ineffectiveness if applicable, as well as the transaction data of the related refunding are also recorded, the fact and time of validation.
Legal basis of data processing	The legal basis of the data processing is the performance of the contract concluded with You pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	<p>In accordance with Point 1.2., except in relation to the insurance:</p> <ul style="list-style-type: none"> <li>- name of the ticket purchaser taking the insurance out,</li> <li>- e-mail address of the ticket purchaser taking the insurance out,</li> <li>- date of birth of the ticket purchaser taking the insurance out,</li> <li>- system data related to the payment, refunding transaction, becoming familiar with the conditions,</li> <li>- data of the tickets (type, serial number) to which the insurance relates, as well as the first validation thereof</li> </ul> <p>shall be stored for 5 years reckoned from the end of the event.</p>
Addressees	<p>generating, purchasing tickets and insurances: Netpositive  issuing receipts, invoices: KBOSS  in case of purchasing tickets from third parties, from abroad: resellers, Festival Travel, TicketSwap  in relation to payments: OTP Simple, Revolut, iDEAL, BigFish, cafeteria card providers  operation of the interface for entering insurance related data, providing IT background and communication in connection with the insurance: VIG  providing the insurance: Alfa Biztosító  sending servicing mails out in connection with the Event: Salesforce  for service development at Sziget Zrt.: Ostfest</p>

#### 1.4. payment in instalments under Point II.4 of the GTC

Purpose of data processing	For the performance of fees of the tickets and related services intended to be purchased as per Point 1.2., Sziget Zrt. offers the possibility to pay in instalments via the payment services of OTP Simple, as well as the ticket distribution services of Festival Travel Ostfest. The ticket shall be sent by Sziget Zrt. after the payment of the entire price.
Processed data	In connection with the payment data as per Point 1.2., the due date and the performance of the instalment payments is also recorded.
Legal basis of data processing	The legal basis of the data processing is the performance of the contract concluded with You pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	In accordance with Point 1.2.
Addressees	In accordance with Point 1.2.

### 1.5. ticket exchange

Purpose of data processing	Users having a festival account are entitled to exchange their daily tickets purchased pursuant to Point 1.2. for another day via the payment service of OTP Simple. Sziget Zrt. shall send the new ticket to the ticket purchaser after the payment of the exchange fee (simultaneously with the invalidation of the exchanged ticket).
Processed data	In accordance with Point 1.2.
Legal basis of data processing	The legal basis for data processing is the fulfilment of the contract with you in accordance with Point b) of Article 6 (1) of the GDPR.
Duration of data processing	In accordance with Point 1.2.
Addressees	In accordance with Point 1.2.

### 1.6. selling tickets via third parties

Third parties independent from Sziget Zrt. (ticket distributors, resellers who advertise and sell tickets, hereinafter: "resellers") can also sell tickets to the Events of Sziget Zrt.

Purpose of data processing	The resellers shall forward the personal data recorded by them in the course of the purchase to Sziget Zrt. based on their own data privacy policies, the tickets shall be generated in the CRM system of Sziget Zrt. In case the data subjects participates the Student Ticket Program ( <a href="https://diakjegy.hu">https://diakjegy.hu</a> ) organised by Festival Travel International Korlátolt Felelősségű Társaság (1095 Budapest, Soroksári út 48., company registration number: 01-09-991628), purchases ticket with its frameworks, giving the student card ID number is necessary to make sure that one person takes part in the Student Ticket Program only once and that one person purchases a pass sold within the frameworks of Student Ticket Program only once, furthermore, that the person entering the Event is entitled to the use of the pass sold within the frameworks of the Student Ticket Program. However, the student
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	card ID number shall not be transferred towards Sziget Zrt. but <i>it is mandatory to <u>present</u> the student card (or equivalent certificate, e.g. certificate of school attendance) entitling for the discount at the site of the Event, Sziget Zrt. will check if it exists, the validity based on the etiquette and the data given (the student cases are not photocopied by Sziget Zrt.).</i> It is also possible to purchase student ticket as part of the SZIGET or BALATON SOUND Ambassador program, in which case the team name will also be forwarded to Sziget Zrt., but this data will not be used by Sziget Zrt., except for statistical purposes.
Processed data	ticket purchasing data (as per Point 1.2.), in case of team student ticket: team name
Legal basis of data processing	In relation to data equivalent with ticket purchase: pursuant to Point f) of Article 6 (1) of the GDPR, the legitimate interest of Sziget Zrt. to be able to perform the sale executed by its ticket distribution partners, then to pay the commission to its ticket distribution resellers, as well as in case of products sold within the frameworks to Student Ticket Program, to make sure that the student having the ticket purchased will indeed attend the Event, that the student pass will not get into commercial distribution.
Duration of data processing	In connection with tickets purchased via third person, in accordance with Point 1.2. (i.e. in connection with the data related to payment for the tickets, the data processing of such third person shall be governing).
Addressees	In connection with tickets purchased via third person, in accordance with Point 1.2. (i.e. in connection with the data related to payment for the tickets, the data processing of such third person shall be governing).

### 1.7. registering a festival account on the website and/or in the application

Purpose of data processing	<p>Anyone over the age of 16 is entitled to create a festival account related to the event. The creation of a festival account does not require that You have a ticket entitling you to enter the event. If the user completes the registration with one device (computer, mobile phone), You can access all digital solutions operated by Sziget Zrt. with a single login. In case of certain festivals or certain ticket types, Sziget Zrt. may require that You create or have a festival account as the condition of ticket purchasing.</p> <p>When registering a festival account on the website of the given Festival and - if it is downloaded - on its official mobile application, You necessarily provide personal data. Providing your data is voluntary.</p> <p>In course of online purchase through the user account, You may opt for the use of the data provided in the user account. If You have not provided the account data prior to the purchase, You may opt for storing the data provided for the ticket purchase in the user account during the purchase process.</p> <p>Possible ways to create a user account:</p> <ul style="list-style-type: none"> <li>▪ Facebook registration,</li> <li>▪ Google registration,</li> <li>▪ account registration.</li> </ul>
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	<p>Sziget Zrt. sends a confirmation e-mail about the account registration, as well as a password reset e-mail based on the user's request.</p> <p>With the help of the festival account You can manage your tickets, plan your program of the Event, as well as follow your information in connection with the use of the cashless payment service.</p> <p>Sziget Zrt. may use the information given in the festival account for improving its services.</p>
Processed data	<ul style="list-style-type: none"> <li>- in case of account registration: e-mail address, password</li> <li>- registration via Facebook: Facebook identifiers (i.e. Facebook user ID, being a numeric identifier, by which You cannot be directly identified)</li> <li>- registration via Google: Google ID (name and e-mail address)</li> <li>- language</li> <li>- declaration on being over 16 years of age</li> <li>- photo (if uploaded by the user)</li> <li>- favourites, markings (if the function is available)</li> <li>- account connected to ticket purchasing: purchase data (in accordance with Point 1.2.)</li> <li>- data of tent registration ticket</li> <li>- information related to using the cashless payment service</li> <li>- automatically recorded in the logfiles are the IP address of the registration, the time of the registration, transactions</li> </ul>
Legal basis of data processing	<p>In case of a festival account created optionally: the consent of the data subject pursuant to Point a) of Article 6 (1) of the GDPR.</p> <p>With regard to a ticket bound to festival account: Point b) of Article 6 (1) of the GDPR for sake of providing the contract.</p>
Duration of data processing	<p>In case of a festival account created optionally: The data processing takes place until the withdrawal of the consent. The consent may be withdrawn by deleting the festival account or via letter sent to <a href="mailto:dpo@sziget.hu">dpo@sziget.hu</a> address.</p> <p>In case of a ticket bound to festival account, the data related to the ticket purchasing are deleted from the festival account in accordance with Point 1.2, 1 year after the Event.</p>
Addressees	<p>registration, management and using the festival account: Netpositive</p> <p>application development: Appmiral</p> <p>downloading, using the application: Auth0</p>

### 1.8. servicing mails

Purpose of data processing	<p>Sending news of public interest (e.g. failure of the event, heat alert, information about event visit) in connection with the Festival affected by the ticket purchase all or concerned ticket purchasers in order to provide important event-related information via as many sources as possible. <u>These servicing mails are not marketing or content letters.</u> Such news will also be published by Sziget Zrt. on other available channels.</p>
Processed data	<ul style="list-style-type: none"> <li>- e-mail address</li> <li>- purchased product, ticket</li> </ul>
Legal basis of data processing	<p>Pursuant to Point f) of Article 6 (1) of the GDPR, it is legitimate interest of Sziget Zrt. that the event is to be held in the highest safety and with</p>

	the highest possible/best visitor experience and, for this purpose, to publish the necessary information in the widest possible range.
Duration of data processing	The source of the data for the servicing mails of Sziget Zrt. is the persons affected with the ticket purchased (e-mail addresses from the purchase information shall be deleted in accordance with point 1.2.).
Addressees	ticketing database: Netpositive mass mailing: Salesforce communication development: Ostfest

## 2.

### INQUIRIES ON THE PHONE OR IN E-MAIL

Would you have any questions, issues in connection with the purchase, you can request support from Sziget Zrt. in several ways. You can contact us in e-mail, on the telephone, but there is an on-site Helpdesk during the Festival where we can help you. In case such communications are not oral, there is necessarily data processing in relation to written inquiries.

#### 2.1. General inquiries

Purpose of data processing	Anybody can formulate his/her <b>opinion</b> , indicate his/her <b>problem</b> , send <b>feedback</b> , pose <b>questions</b> via the telephone or e-mail availabilities of Sziget Zrt., 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) (for keeping contact),</li> <li>• comment, problem, feedback, question and the personal data contained therein (aiding Sziget Zrt. to develop its services, so that it may remedy the problem – for customers’ complaints see point 2.2, in the event of data protection request see point 2.4 for more details), as well as may satisfy its obligations related to complaint management, if needed, may provide answers to your questions),</li> <li>• reply of Sziget Zrt. and the personal data contained therein</li> <li>• address (in case of reply to be sent by mail)</li> </ul>
Legal basis of data processing	<p>We handle your inquiry basically based on your consent pursuant to Point a) of article 6 (1) of the GDPR.</p> <p>In case your inquiry qualifies – after having it read – as complaint eligible for natural persons (see points 2.2, or 2.4), the legal basis will further be the satisfaction of the legal obligation burdening Sziget Zrt. pursuant to Point c) of Article 6 (1) of the GDPR.</p> <p>In case the complaint arrives from a non-natural person entity, Sziget Zrt. processes the occurrently affected personal data with regards to enforcing occurrent civil law claims as per Section 6:22 of Acti V of 2013 on the Civil Code, as well as defence against occurrent civil law</p>

	claims of the affected parties, i.e. with regards to the legitimate interest of Sziget Zrt. (Point f) of Article 6 (1) of the GDPR).
Duration of data processing	In case the inquiry does not qualify as a complaint, Sziget Zrt. stores the data until the withdrawal of your consent, in lack of which Sziget Zrt. deletes the personal data until 28 <sup>th</sup> February following the elapse of one calendar year reckoned from the last communication in connection with the inquiry (from closing the inquiry). The consent may be withdrawn anytime by sending an e-mail to the <a href="mailto:dpo@sziget.hu">dpo@sziget.hu</a> address. Sziget Zrt. stores the reports of the complaints and the copy of the reply for 5 years and presents them to supervisory authorities upon request.
Addressees	providing customer service: FestLife PR providing customer service management system: Freshworks third persons affected by the resolution of the case, of whom precise information can be provided on a case by case basis, upon specific request

## 2.2. consumers' complaints

Purpose of data processing	<p><b>Examination of the complainant's complaint in accordance with the legal requirements, complaint handling:</b> You may submit the consumer objections (complaints) in relation to purchased ticket, product or related activity of Sziget Zrt. in accordance with the relevant procedural rules.</p> <p><i>Please, be informed that in case you have any complaint in connection with insurance bond, the insurance provider shall be entitled to manage, investigate it, therefore, we shall forward your complaint related to the insurance to the insurance company in order to reply it, or you can directly write to the <a href="mailto:panasz@alfa.hu">panasz@alfa.hu</a> address.</i></p> <p>Complaints that are made in person or on telephone are examined immediately and we inform the complainant of our position, and remedy the complaint if possible. If the buyer does not agree with the answer to the oral complaint, the complaint shall be sent in writing. In this case, we follow the provisions on written complaints as described below.</p> <p>Written complaints are examined and answered within 30 days. If the complaint is rejected, we justify our answer. If the complaint is rejected, we inform you in writing that, by its very nature, which authority's or conciliation body's proceeding may be initiated.</p>
Processed data	<ul style="list-style-type: none"> <li>- name, address of consumer,</li> <li>- place, time, method of filing complaint,</li> <li>- detailed description of consumer complaint, log of documents, records and other proofs submitted by consumer,</li> <li>- Sziget Zrt.'s statement regarding its position on the consumer complaint, if an immediate investigation of the consumer complaint is possible,</li> <li>- signature of consumer and the person registering the complaint (except if complaint is submitted via email or phone)</li> <li>- place and time of registering consumer complaint</li> </ul>

Legal basis of data processing	Pursuant to Point c) of Article 6 (1) of the GDPR, satisfying legal obligations prescribed for Sziget Zrt. in the Civil Code and legal regulations related to consumer complaints (especially Act CLV of 1997 on consumer protection).
Duration of data processing	Sziget Zrt. stores the reports of the complaints and the copy of the reply for 5 years and presents them to supervisory authorities upon request pursuant to Section 17/A (7) of Act on Consumer Protection.
Addressees	<p>providing customer service: FestLife PR  providing customer service management system: Freshworks</p> <p>Inquiries, complaints in connection with insurance bonds already taken out shall be forwarded to the insurance company entitled to manage the inquiries, complaints in order to reply them, Sziget Zrt. shall act exclusively in connection with the payment, occurrent refunding of the insurance fee (in the course of the latter, it shall cooperate with the service provider executing the payment transaction).</p> <p>In case of submitted for review, the authorities and organizations indicated on <a href="http://fogyasztovedelem.kormany.hu/node/7699">http://fogyasztovedelem.kormany.hu/node/7699</a> site. third persons affected by the resolution of the case, of whom precise information can be provided on a case-by-case basis, upon specific request</p>

### 2.3. issuing cancellation declaration for administration related to insurance

Purpose of data processing	<p>Pursuant to the insurance bond taken out for the ticket(s) purchased for SZIGET in accordance with Point 1.3., in case the insured person cannot or could not attend the Event due to any of the reasons specified in the insurance terms, the declaration of Sziget Zrt. is also necessary in which it is certified that no entry to the Event has taken place with the ticket affected with the insurance, which shall be requested by Alfa Insurance Company from Sziget Zrt.</p> <p>The insurance possibility is offered by Sziget Zrt. as an intermediary on behalf of Alfa Insurance Plc., the payments are decided by Alfa Insurance, as well as Alfa Insurance performs its payment obligations in accordance with the decision.</p>
Processed data	In accordance with Point 1.3.
Legal basis of data processing	Pursuant to Point b) of Article 6 (1) of the GDPR, satisfying contractual obligations of Sziget Zrt., Sziget Zrt. issues the declaration for the insured person(s) as per the earlier concluded insurance contract in accordance with the terms of the collective insurance terms.
Duration of data processing	In accordance with Point 1.3.
Addressees	<p>In excess those specified in Point 1.2. and after the elapse of the 1-year period prevailing for purchase data:</p> <p>ticketing database: Netpositive  providing IT background and communication for managing, providing the interface for entering the insurance data: VIG  providing the insurance: Alfa Biztosító</p>

### 2.4. requests towards the data protection officer

Purpose of data processing	<p><b>Exercising data subjects' rights pursuant to Article 15-22 of the GDPR:</b> You may submit a request in relation to data processing related to the purchased ticket, product or related activities of Sziget Zrt., as well as your rights described in the GDPR.</p> <p>Sziget Zrt. answers your inquiry within 1 month the latest, unless there is any justification to extend the deadline.</p>
Processed data	<ul style="list-style-type: none"> <li>- name of data subject,</li> <li>- place, date, method of submitting the request,</li> <li>- e-mail address of data subject,</li> <li>- request of data subject, all information that may be considered as personal data,</li> <li>- other personal identification data, information that are necessary to satisfy such request,</li> <li>- the replay of Sziget Zrt. and all its attachments</li> </ul>
Legal basis of data processing	<p>Pursuant to Point f) of Article 6 (1) of the GDPR, it is the legitimate interest of Sziget Zrt. as data controller to satisfy its obligations as data controller specified in the GDPR with regard to the following:</p> <p>Pursuant to Article 12-14 of the GDPR, all data subjects, thus, you are also entitled to exercise the rights of the data subject in connection with the processing of his/her personal data, as well as to request Sziget Zrt. to restore the lawful situation if, in a specific case, he/she would raise well-grounded objection in relation to the data processing. As detailed in this Privacy Policy, too, all data subjects may request</p> <ul style="list-style-type: none"> <li>- access to his/her personal data,</li> <li>- correction of his/her personal data,</li> <li>- deletion of his/her personal data,</li> <li>- limitation of the data processing,</li> <li>- portability of his/her personal data,</li> <li>- may protest against the processing of his/her personal data.</li> </ul> <p>No matter which right of data subjects is concerned with the request, Sziget Zrt. shall inform you without unjustified delay, but in any case, within one month reckoned from the receipt of the request of the measures made based on the request in accordance with Preamble (59) of the GDPR. If necessary, taking into account the complexity of the request and the number of requests, this deadline can be extended by two more months. However, Sziget Zrt. shall inform you about the extended time limit within one month reckoned from the receipt of the request, indicating the causes of the delay. If, however, Sziget Zrt. cannot make measures based on your request, it shall inform you without unjustified delay, but in any case, within one month reckoned from the receipt of the request of the reasons of the omission, as well as of the fact that you may submit a complaint at the National Authority of Data Protection and Freedom of Information and exercise your right for judicial remedy, before the tribunal competent as per your permanent address or residence (you can find out the contact details of the courts at the following link: <a href="http://birosag.hu/torvenyzek">http://birosag.hu/torvenyzek</a>).</p> <p>If, however, Sziget Zrt. has well-grounded doubt about your identity in your submission of your request to exercise your data subjects' rights, it may ask you to provide further information to confirm your identity. If Sziget Zrt. proves that it is unable to identify you, it can refuse to fulfil the request aimed at exercising data subjects' rights.</p>

	As a main rule, information and measures related to data subjects' requests are free of charge. If, however, Sziget Zrt. proves that the request is obviously ungrounded or is – especially due to its repetitive nature – excessive considering administrative costs associated with providing the requested information or making the requested measures, reasonable fee may be specified to do so or may refuse making measures based on the request.
Duration of data processing	Sziget Zrt. stores the inquiries and the copy of the reply for 5 years and presents them to supervisory authorities upon request.
Addressees	data protection officer: Csáki és Társa Ügyvédi Társulás In case the data subject seeks remedy in relation to the complaint or the reply of Sziget Zrt., data are transferred to NAIH or courts as noted above.

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 systems, provision of a running environment	data processor	Netpositive Számítástechnikai Szolgáltató és Kereskedelmi Kft.	2021 Tahitótfalu, Pataksor utca 48. <a href="mailto:info@netpositive.hu">info@netpositive.hu</a>
Operation of a database, letter editor, dispatch system and dispatch statistics management system (Salesforce) for sending mass e-mails	data processor	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.
Communication management in the database,	data processor	Ostfest B.V.	Isolatorweg 36, 1014 AS, Amsterdam, Hollandia

letter editor, dispatch system and dispatch statistics management system (Salesforce) for sending mass e-mails			
Financial service provider of bank card payments: financial processing of the transaction, transaction security, fraud detection and transaction monitoring	individual data controller	OTP Mobil Szolgáltató Kft. (via card accepting network of OTP Bank Nyrt.)	1093 Budapest, Közraktár u 30-32. <a href="mailto:ugyfelszolgalat@simple.hu">ugyfelszolgalat@simple.hu</a>
		Revolut Bank UAB	Konstitucijos pr. 21 B, LT-08130 Vilnius
iDEAL payment services via internet (payment gateway): financial handling of the transaction, transaction security and transaction monitoring	individual data controller	Adyen N.V.	Simon Carmiggeltstraat 6-50, 1011 DJ, Amsterdam, the Netherlands  complaints@adyen.com
ensuring the availability of electronic payment services: financial handling of the transaction, transaction security and	data processor	B-Payment Szolgáltató Zrt.	1132 Budapest, Váci út 4.

transaction monitoring			
provision of technical integration services supporting card payment services providing special discounts: Payment Gateway service (electronic payment options) provision	data processor	BIG FISH Payment Services Kft.	1066 Budapest, Nyugati tér 1-2.  paymentgateway@bigfish.hu
ensuring payment with a special discount device, cafeteria card (OTP SZÉP Card, MKB SZÉP Card, K&H SZÉP Card, Edenred voucher)	individual data controller	OTP Pénztárszolgáltató Zrt. MKB Nyugdíjpénztárt és Egészségpénztárt Kiszolgáltató Kft K&H Csoportszolgáltató Kft. Erzsébet Utalványforgalmazó Zrt.  Edenred Magyarország Kft.	1133 Budapest, Váci út 76.  1134 Budapest, Dévai u. 23.)  1095 Budapest, Lechner Ödön fasor 9.  1146 Budapest, Hermina út 63. I/1.  1134 Budapest, Váci út 45. G. ép. 3. em.)
Ticket sale on the secondary market (sale of tickets already purchased, but unintended to use)	individual data controller	TicketSwap BV	1012 KL, Amsterdam at Rokin 75, Hollandia
Ticket distribution within the frameworks	individual data controller	Festival Travel International Kft.	1095 Budapest, Soroksári út 48.  info@meex.hu

of Student Ticket Program, offline ticket selling, selling tickets for programs accompanying the Festival			
taking out insurance in the framework of group insurance and operating the interface for entering insurance data, providing IT background and communication in relation to insurance	individual data controller	Alfa Vienna Insurance Group Biztosító Zrt.	1091 Budapest, Üllői út 1. panasz@alfa.hu
	data processor engaged by Alfa Vienna Insurance Group Biztosító Zrt.	VIG platform partners GmbH	Ausztria, 1010 Bécs, Schottering 30.
development and operation of the festival account application	data processor	BV Appmiral	Scheldenstraat 11, 2000 Antwerpen, Belgium
ensuring festival account registration and login thereto	data processor	Auth0, Inc.	
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 ERP system	data processor	TRL Hungary Kft.	2510 Dorog, Mátyás király u. 11/A branch office: 1034 Budapest, Tímár utca 5.

CityPass	individual data controller	Budapest Brand Nonprofit Zrt.	
in case of supplementary services purchased (e.g. accommodation, travelling), the selected service provider	individual data controllers	we can provide individual information in case of a request therefor	
resellers	individual data controllers	we can provide individual information in case of a request therefor	
operation of customer service management system	data processor, certified organisation under USA-EU Data Privacy Framework: <a href="https://www.freshworks.com/privacy/">https://www.freshworks.com/privacy/</a>	Freshworks, Inc.	16192 Coastal Highway, Lewes, Delaware 19958, USA  <a href="mailto:dpo@freshworks.com">dpo@freshworks.com</a>
customer service administration	data processor	FestLife PR Kft.	1068 Budapest, Király utca 80. fsz. 11. ajtó  <a href="mailto:hello@festinform.hu">hello@festinform.hu</a>

### 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](mailto: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](mailto: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.