

PRIVACY POLICY

concerning Sziget Festival International Ambassador Program

When you attend the international ambassador program (hereinafter: “Program”) in connection with Sziget Festival organised by Sziget Zrt. (hereinafter: “**Festival**” or “**Event**”), we process various personal data in connection with your membership, activity 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:

1.1. online application form to the Program

The application of the candidates takes place via an online form where candidates provide certain data that can help Sziget Zrt. to select the future ambassadors.

Sziget Zrt. informs the candidates about the selection and, with candidates who become ambassadors, enters into an agreement based on the terms communicated previously to filling out the application form.

Purpose of data processing	Selection of future Sziget ambassadors and, thereafter, entering into agreement with the selected candidates (i.e. ambassadors).
	<u>mandatory data</u> : first and last name, date of birth (day, month, year), country and city of residence, social handler(s) with account details, e-mail address, phone number, number of times having visited the Festival, experience in and motivation and action plan for being an influencing person <u>optional data</u> : field of study/work, sporting activity <u>transactional information</u> (e.g. time of submitting the form, time and fact of acceptance of this policy and declaration of having legal capacity to enter into the ambassadorship agreement)
Legal basis of data processing	The above data are processed to select future partners (i.e. ambassadors) and to prepare the agreement with the selected candidates pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	In relation to candidates not selected as ambassadors: application data are deleted within 1 week after closing the selection for the current festival season but are retained until at most 31 st December of the year of the application (e.g. non-selected mandates’

	<p>application data given in 2024 are deleted on 31st December 2024 the latest); whereas</p> <p>in relation to candidates selected as ambassadors:</p> <p>application data are deleted within 1 week after closing the selection for the subsequent festival season but until at most 31st December of the year following the year of the application (e.g. ambassadors' application data given in 2024 are deleted on 31st December 2025 the latest).</p>
Addressees	<p>in connection with filling in and submitting the application form: Typeform</p> <p>in connection with the selection of future ambassadors: if applicable, respective country managers based on the country of residence of the mandate</p> <p>in order to send mails: Salesforce</p> <p>for communication development: Superstruct Travel and Stay</p>

1.2. providing ambassadors with communication means and other support

Purpose of data processing	It is the task of the ambassadors to share news and updates in connection with the Festival, for which purpose Sziget Zrt. send them visuals and copies, as well as to distribute posters and flyers in their cities of residence. There are several channels for providing support, sharing ideas and experience, brainstorming with and among ambassadors.
Processed data	In excess to the data related to the application, the correspondence, chats with of the ambassadors in order to provide the above support.
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 1.1.
Addressees	<p>in connection with the cooperation and coordination of ambassadors: if applicable, respective country managers based on the country of residence of the ambassador</p> <p>in order to send mails: Salesforce</p> <p>for communication development and support: Superstruct Travel and Stay</p> <p>for operative commincations with the ambassadors as indicated via the respective country manager: WhatsApp, Telegram, Instagram</p>

1.3. monitoring and assessment of ambassadors' activity

Purpose of data processing	Ambassadors who fulfil their assignment or even exceed the general requirements receive reward(s) linked to the Festival: therefore, it is necessary to assess the ambassadors' eligibility to such reward(s).
Processed data	In excess to the data related to the application, the activities of the ambassador in line with the program requirements.
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 1.1.
Addressees	In accordance with Point 1.2.

2.

INQUIRIES IN E-MAIL

Would you have any questions, issues in connection with the program, you can request support from Sziget Zrt.

2.1. General inquiries

Purpose of data processing	Anybody can formulate his/her opinion , indicate his/her problem , send feedback , pose questions 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"> • name (for addressing, identification if necessary), • 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), • 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), • reply of Sziget Zrt. and the personal data contained therein • address (in case of reply to be sent by mail)
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 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).</p>
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 th 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 dpo@sziget.hu 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. requests towards the data protection officer

Purpose of data processing	Exercising data subjects' rights pursuant to Article 15-22 of the GDPR: 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. Sziget Zrt. answers your inquiry within 1 month the latest, unless there is any justification to extend the deadline.
Processed data	<ul style="list-style-type: none"> - name of data subject, - place, date, method of submitting the request, - e-mail address of data subject, - request of data subject, all information that may be considered as personal data, - other personal identification data, information that are necessary to satisfy such request, - the replay of Sziget Zrt. and all its attachments
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.</p> <p>As detailed in this Privacy Policy, too, all data subjects may request</p> <ul style="list-style-type: none"> - access to his/her personal data, - correction of his/her personal data, - deletion of his/her personal data, - limitation of the data processing, - portability of his/her personal data, - may protest against the processing of his/her personal data. <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</p>

	<p>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: http://birosag.hu/torvenyzek).</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> <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.</p>
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	<p>data protection officer: Csáki és Társa Ügyvédi Társulás</p> <p>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.</p>

Data of addressees:

specification of activity	type of activity	name	availability
Providing online application form	data processor	TYPEFORM SL	<p>C/ Can Rabia 3-5, 4th floor, 08017 – Barcelona (Spain)</p> <p>support@videoask.com</p>
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, letter editor, dispatch system and dispatch statistics management system (Salesforce) for	data processor	Superstruct Travel and Stay B.V.	<p>Isolatorweg 36, 1014 AS, Amsterdam, Hollandia</p> <p>clientservice@travel.superstruct.com</p>

sending mass e-mails			
providing communication channel	data processor (the actual service provider will depend on your country of residence, of which prior information will be provided by the responsible country manager)	WhatsApp	see more on https://www.whatsapp.com/legal/privacy-policy site
		Telegram	see more on https://telegram.org/privacy/eu site
		Instagram	see more on https://about.instagram.com/safety/privacy site
country managers	data processors	UK/IRE: FullFat	Gold Top Media Ltd. 119 Marylebone Road NW1 5PU, London, United Kingdom sziget@wearefullfat.com
		IT: Alternativa Events	L'Alternativa srl Via Della Resistenza 146 70125 Bari (BA), Italy info@alternativaevents.it
		DE/AT: Factory 92	Factory 92 mpx GmbH Winterhuder weg 88, 22085 Hamburg, Germany info@factory92.eu
		FR: Studio Volume	Studio Volume 1bis Rue Omer Talon, 75011 Paris, France bonjour@studiovolume.fr
operation of customer service management system	data processor, certified organisation under USA-EU Data Privacy Framework: https://www.freshworks.com/privacy/	Freshworks, Inc.	16192 Coastal Highway, Lewes, Delaware 19958, USA dpo@freshworks.com
customer service administration	data processor	FestLife PR Kft.	1068 Budapest, Király utca 80. fsz. 11. ajtó hello@festinform.hu

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.