

PRIVACY POLICY

concerning the pre-registration for the first sales phase of 2027 Sziget festival

When you pre-register on the dedicated page in connection with special ticket sales event (hereinafter: **“Sales Event”**) concerning a festival, event organised by Sziget Zrt. (hereinafter: **“Festival”**), we process various personal data in connection with you that we process in accordance with the relevant effective legislation, especially Act CXII of 2011 on Informational Self-determination and Freedom of Information, 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, as well as Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities. 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. pre-registration to Sales Events and subscription to newsletters

You can pre-register for the Sales Event after getting know and accepting the applicable terms and conditions.

By pre-registering for the Sales Event, you also subscribe to the newsletters related to the Festival involved in the Sales Event in order to have the information available to you regarding the Sales Event on the basis of which you can make a decision about participating in the Sales Event. The subscription applies to a given Festival, so the newsletters are either related to the Event itself or to the general operation of Sziget Zrt. In some cases, the newsletters also contain third-party advertising.

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 **“Gr. tv.”**).

Purpose of data processing	We request the data in order to subsequently send you information, notifications via e-mail regarding the Sales Event, as well as the Festival affected with the pre-registration.
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	The pre-registration is related to a specific Festival and a specific Sales Event; therefore, the subsequently dispatched information and notifications are in connection with the Sales Event itself, or information concerning the Festival. In certain cases, the notifications may include information related to third parties, too. *PLEASE PRE-REGISTER ONLY IF YOU ARE ABOVE 16 YEARS OLD!
Processed data	Personal information necessarily provided during pre-registration: - name, - e-mail address, - the fact of being over 16*, - the pre-registered Sales Event, - the fact due to what activity and in relation to which Festival you have signed up, and technical data of the pre-registration (e.g. time, IP address).
Legal basis of data processing	voluntary: the data subject's consent pursuant to Point a) of Article 6 (1) of the GDPR
Duration of data processing	Until your 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.). Withdrawing the consent does not, however, affect the lawfulness of the data processing based on consent prior to the withdrawal of the consent.
Addressees	<u>ticketing database</u> Netpositive Számítástechnikai Szolgáltató és Kereskedelmi Kft. specification of activity: data processor - 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 availability: 2021 Tahitótfalu, Pataksor utca 48., info@netpositive.hu <u>registration site</u> DONE Digital Kft. specification of activity: data processor – website CMS and frontend operations availability: 1095 Budapest, Gát utca 21. fszt. 1., hello@thisisdone.com <u>mass mailing</u> Braze, Inc. specification of activity: data processor - operation of database, letter editor, dispatch system and dispatch statistics management system for sending mass e-mails certified organisation under USA-EU Data Privacy Framework: https://www.braze.com/company/legal/privacy#part_one availability: Privacy Policy Issues, Attention: General Counsel 63 Madison Building, 28 East 28th Street, 12th Floor Mailroom New York, NY 10016, USA; privacy@braze.com

2. dispatching Sales Event information and newsletters

During the registration for the newsletters simultaneously with the pre-registration – 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 information, notifications in connection with the Sales Event, increasing the relevance and efficiency of the communication, enabling the pre-registered persons' participation in the Sales Event, as well as checking the eligibility for, and being in accordance with the terms of the Sales Event and, thus, enabling the purchase in accordance with the terms of the Sales Event. 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	In relation to the pre-registration: besides those set forth in Point 1, the technical data of clicking links in the dispatched information e-mails. In relation to dispatching newsletters: the data of sending, reading the newsletter, technical data of clicking links therein (e.g. fact and time of the activity). 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	in accordance with Point 1
Duration of data processing	in accordance with Point 1
Addressees	in accordance with Point 1

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

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.