

## NOTICE ON DATA PROCESSING FOR NEWSLETTERS

Upon subscription to a newsletter on sites [www.szigetfestival.com](http://www.szigetfestival.com), [www.volt.hu](http://www.volt.hu), [www.balatonsound.com](http://www.balatonsound.com), [www.gourmetfesztival.hu](http://www.gourmetfesztival.hu), and [www.gyereksziget.hu](http://www.gyereksziget.hu), or by other means, you provide personal information that we process 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.”).

According to the provisions of the aforementioned laws and regulations, we hereby inform you on the details of the processing of your personal data and your corresponding rights. SZIGET determines the range, purpose and duration of data collected during subscription to the newsletter, as well as other important conditions of data processing.

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

**1. The controller of the data:** Sziget Cultural Management Private Limited Company (H-1033 Budapest, Hajógyári sziget, lot number 23796/58., company register no. 01-10-049598, phone: +36 (1) 372 0681, e-mail: [hello@sziget.hu](mailto:hello@sziget.hu), web address: [www.szigetfestival.com](http://www.szigetfestival.com); hereinafter: “SZIGET”)

### 2. Data protection officer

Data protection officer: Dániel Csáky

Mailing address: H-1033 Budapest, Hajógyári-sziget hrsz:23796/58.

E-mail: [dpo@sziget.hu](mailto:dpo@sziget.hu)

### 3. The range of processed data, the purposes and duration of data processing:

The processed data	Purpose of data processing	Duration of data processing	The legal basis of the data processing
<b><i>Personal information provided during subscription to newsletter</i></b> Full name, e-mail address***, the fact that the subscriber is older than 16***, * to which event did	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 products and	Until user withdraws consent. Users may unsubscribe at any time by emailing <a href="mailto:hello@sziget.hu">hello@sziget.hu</a> , or by clicking on the link in the newsletter.	Consent based upon Article 6 (1) a) of GDPR, paragraph 13/A of Eker. tv, as well as Grt section (1) of paragraph 6.

<p>she/he subscribe for (for instance on which site), due to which promotional activity, the time of subscribing, and the festival in relation he or she subscribed.**</p> <p>By registering for SZIGET's newsletter you consent that any activities (such as opening it or clicking on links) with the newsletters sent to the email address of you can be monitored and used by SZIGET in order to display advertisements – even third parties' advertisement - on its own or on partner's webpage.</p> <p>The newsletters also contain third party's commercial.</p>	<p>services.</p>		
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**\*\* If you are **subscribed** to the newsletter **in the digital oasis** operated by SENSO-MEDIA Zrt. (1116 Budapest, Kondorfa utca 10 ; Cg .: 01 10 046968) at the Balaton Sound Festival 2019, Telekom VOLT Festival 2019 or Sziget Festival 2019 events, you have to enter your email address, you will need to accept the Data Management Bulletin and declare that you are 16 years old.**

**\*\*\*If you subscribe at Festival WiFi, you submit your e-mail address.**

**Providing your data is voluntary.** You are not required to submit your personal data, however, without it we are unable to inform you regarding our products and services.

#### 4. Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Subsequent to subscribing to a newsletter, SZIGET creates a user profile with consent in order to provide offers based on the user's needs, preferences and interests. The offers will be sent by e-mail, via newsletters.

#### 5. Persons with access to personal data

The data may be accessed by SZIGET marketing staff, SZIGET promoters (ticket promoters), SZIGET remarketing agencies, as well as data processors specified in this Notice, in order to carry out their tasks. Accordingly, for instance, personal data may be accessed for the purposes of administration and data processing by the system administrator of SZIGET and the Data Processors specified in this Notice.

SZIGET shall use for its activity the processor specified in this Notice. The processor makes no decisions independently; the processor is only authorized to carry out its activity in accordance with its contract with and instructions from SZIGET. The work of the processor is supervised by SZIGET. The processor shall only engage another processor with prior written authorization of SZIGET.

#### Data and contact information of processors

Name of processor	Data processing activities of the processor	The duration of the data processing and storing
Netpositive Számítástechnikai Szolgáltató és Kereskedelmi Kft. (company register no.: 13-09-104997, 2021 Tahitótfalu, Pataksor street 48., 13-09-104997, info@netpositive.hu)	Operation of ERP system, physical and operating system level operation of online sales systems servers.  Has access to all personal data controlled by SZIGET under this Notice. It is responsible for operating SZIGET's enterprise resource planning (ERP) system.	Open-ended service contract – until the termination of the contract or withdrawal of data subject's consent or in case of satisfaction of objection

<p>Hidden Design Korlátolt Felelősségű Társaság (1095 Budapest, Gát utca 21. fszt. 1., Company register No.: 01-09-278702, tax number: 23089655-2-43) and its sub-processors: the Contabo GmbH (Aschauer Straße 32a, 81549 Munich, Germany, Company registration number: HRB 180722, registry court: AG München, tax number: DE267602842, telephone number: +49 89 3564717 70, Fax: +49 89 216 658 62, e-mail: <a href="mailto:info@contabo.com">info@contabo.com</a>), and the DigitalOcean LLC (101 Avenue of the Americas, 10th Floor, New York, NY 10013, United States).</p> <p>The servers of the data processor and the sub-processors are located in the European Union, therefore the data are not transferred to third countries.</p>	<p>Provides a runtime environment for the websites of SZIGET</p> <p>Has access to all personal data controlled by SZIGET under this Notice.</p>	<p>Open-ended service contract – until the termination of the contract or withdrawal of data subject’s consent or in case of satisfaction of objection</p>
<p>Wanadis Kereskedelmi és Szolgáltató Kft. (company register no.: 01-09-885144, 1118 Budapest, Rétköz street. 7)</p>	<p>Tasks associated with sending e-mails to users.</p> <p>In connection with this task, it has access to the following data: name; e-mail address; the fact that the subscriber is older than 16; method of subscription</p>	<p>Open-ended service contract – until the termination of the contract or withdrawal of data subject’s consent or in case of satisfaction of objection</p>
<p>Harvest Digital Ltd. (Mailing address: 40 CLIFTON STREET, LONDON, EC2A 4DX; Company reg. No. 03595066, Tax Nr.: 782802612)</p>	<p>Technical transaction of Sziget promotions, targeting</p>	<p>Open-ended service contract – until the termination of the contract or withdrawal of data subject’s consent or in case of satisfaction of objection</p>

**If you have subscribed for the newsletter on site [www.rauch.cc](http://www.rauch.cc), then Netpositive Számítástechnikai Szolgáltató és Kereskedelmi Kft. and Hidden Design Korlátolt Felelősségű Társaság do not see and process your personal data, in this regard they are not data processors.**

## **6. Data security**

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

SZIGET shall prevent unauthorized access to or disclosure of personal data, as well as their alteration or erasure.

SZIGET will take all reasonable measures in order to prevent damage or destruction of data. SZIGET shall impose the aforementioned obligation to its employees partaking in data processing, as well as processors acting under the authority of SZIGET.

SZIGET's information technology systems and other data storage place is server provider Claranet GmbH operated by Maileon, its servers are located at Hanauer Landstrasse 196, 60314 Frankfurt am Main, Germany. If, in addition to subscribing to a newsletter, you purchase a ticket as well, in this case we inform you that SZIGET uses the operating services of Netpositive Kft. for the storage of your personal data on servers located in the Budapest server rooms of GTS Datanet in district XIII of Budapest, Victor Hugo street 18-22. In order to prevent unauthorized persons to access your data, SZIGET and its partners ensure the protection of personal information and prevents unauthorized access as follows: Access to personal information stored on the servers are recorded in a journal by SZIGET and the data processor on SZIGET's behalf, so it can always be monitored who and when accessed what kind of personal information. Access to the computers and the server is password protected.

## **7. The rights and legal remedies of data subjects**

Pursuant to the GDPR, you may request access to the personal data and may request information about data processing (which will be provided by the Controller within no more than 1 month), may request rectification of personal data or their erasure. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. You may request the restriction of data processing and you have the right to data portability

If you feel that the Controller has violated any of the legal provisions applicable to data processing, please contact the Controller 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 with the **Hungarian National Authority for Data Protection and Freedom of Information** (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH, mailing address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c., email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) or seek **judicial remedy**.

## **8. Record keeping:**

We hereby inform you that we keep records of personal data of persons who provide a statement of consent under section 6. § (1) of Grt., and in case of a request for erasure or in case of the rescission of consent without restriction or reason at any time, we shall not send further e-mails containing advertisements with direct marketing intent, notwithstanding general customer relations information.

## **9. Personal data related to children and third persons**

Persons under 16 shall not submit their personal data, except when they requested permission from the person exercising parental rights. By providing your personal data to SZIGET you hereby state and guarantee that you will act according to the aforementioned, and your capacity is not restricted with regards to the providing of data.

If you do not have the right to independently provide personal data, you must acquire the permission of the appropriate third party (i.e. legal representative, guardian, other persons you are representing), or provide another form of a legal basis to do so. In relation to this, you must be able to consider whether the personal data to be provided requires the consent of a third party.

To this point, you are responsible for meeting all the necessary requirements, as SZIGET may not otherwise come into contact with the data subject and SZIGET shall not be liable or bear any responsibility in this regard. Nevertheless, SZIGET has the right to check and verify whether the proper legal basis has been provided with relation to the handling of data at all times. For example, if you are representing a third party, we reserve the right to request the proper authorisation and/or consent of the party being represented with relation to the matter at hand.

SZIGET will do everything in its power to remove all personal information provided without authorization. SZIGET shall ensure that if SZIGET becomes aware of this, such personal information is not forwarded to any third party, or used for SZIGET's own purposes. We request that you inform us immediately via contact information provided under article 1 should you become aware that a child has provided any personal data about himself, or any other third party has provided any personal data of yours to SZIGET that you have not properly authorised them to do so.

## **10. Extras**

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