

NOTICE ON DATA PROCESSING FOR SZIGET WEBSHOP PURCHASING

Upon subscription to a newsletter on sites www.szigetfestival.com/hu, www.volt.hu, www.balatonsound.com/hu and www.gourmetfesztival.hu you provide personal data 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 „**GDPR**”).

We hereby inform you on the details of the processing of your personal data and your corresponding rights. The controller of data determines the range, purpose and duration of data collected while making a purchase at the webshop, as well as other important conditions of data processing.

1. The controller of the data: Sziget Cultural Management Private Company Limited by Shares (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, web address: www.szigetfestival.com/hu; hereinafter: “**SZIGET**”)

2. Data protection officer:

Data protection officer: Balázs Takács
Mailing address: H-1033 Budapest, Hajógyári-sziget hrsz:23796/58.
E-mail: dpo@sziget.hu

3. Providing your data is voluntary. You are not required to submit your personal data; however, without it you are unable to purchase the products and services available at the webshop.

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

The processed data	Purpose of data processing	Duration of data processing	Legal basis of data processing
Personal data provided when purchasing at the webshop (providing is compulsory)			
name	is necessary for identifying and naming the purchaser, for a proper addressing, furthermore for specifying “5DAYS STUDENT PASS” and “Twin 5 VIP student pass”	This data will be deleted 6 months after the Event (according to GTC 5.4. 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).	Article 6 (1) (b) of the GDPR (performance of a contract) Article 6 (1) (f) of the GDPR (legitimate interest) <i>SZIGET’s legitimate interest is to make sure that the student, purchased the 5DAYS STUDENT PASS and “Twin 5days + opening day VIP pass”, is attending at the Event in order to avoid the resale of student passes</i>
e-mail address	the e-mail address is 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</i>		performance of a contract pursuant to Article 6 (1) (b) of the GDPR

	<i>purpose and legal basis, neither considered to be direct marketing.</i>		
country	determining which international SZIGET reseller is entitled to commission after the purchaser in case of purchasing from abroad	until 31 January of the year following the clearing of the commission	Article 6 (1) (f) of the GDPR (legitimate interest) <i>SZIGET's legitimate interest is to pay its resellers' commission. For this SZIGET needs to know how many ticket purchasing has happened in the different countries.</i>
address	to reduce bank card abuses, in order to prevent abuse/fraud it is necessary for identifying suspicious transactions and for checking the legality of the transaction	This data will be deleted 6 months after the Event (according to GTC 5.4. 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).	Article 6 (1) (f) of the GDPR (legitimate interest, SZIGET's legitimate interest) <i>SZIGET's legitimate interest is to have the sale transaction completed, in the absence of these data the payment transaction would be rejected by the financial institution. *</i>
phone number			
delivery address	to deliver an item that can not be sent online	This data will be deleted after the delivery.	performance of a contract pursuant to Article 6 (1) (b) of the GDPR
When the purchaser requests invoice:			
name	necessary for issuing an invoice pursuant to Act CXXVII of 2007 on value added tax	pursuant to Act C of 2000 on Accounting (hereinafter: „ Számv. tv. ”) 169. § Paragraph	Article 6 (1) (c) of the GDPR (compliance with a legal obligation)
tax number			

address/ billing address	(hereinafter: “Áfa tv.”) Article 169. § e) and da)	(2) these data will be deleted 8 years after the invoicing	
If the data subject participates in the Student Ticket program (https://diakjegy.hu) organized by SZIGET and Festival Travel International Korlátolt Felelősségű Társaság (1095 Budapest, Soroksári Road, 48., company register number: 01-09-991628), or purchases “5DAYS STUDENT PASS + OPENING DAY” or “Twin 5days VIP student pass”:			
the data subject’s student identification number	the student identification number is necessary to make sure that one person only takes part in the Student Ticket program once and that one person purchases “5DAYS STUDENT PASS” or “Twin 5days + opening day VIP student pass” only once	This data will be deleted 6 months after the Event (according to GTC 5.4. 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).	Pursuant to Article 6 (1) (f) of the GDPR, <i>SZIGET’s legitimate interest – in accordance with Preamble (47) of the GDPR – is to make sure that one person is only entitled to get the reduction once and to prevent unlawful multiple ticket purchasing relating to it. As stated above the <u>presentation</u> of the student card - that entitles for reduction – at the venue of the Event is compulsory. SZIGET checks the existence of the student card and its validity by checking the sticker on it and the provided data. (SZIGET does not copy the student card!)</i>

5. Persons with access to personal data:

The data may be accessed by SZIGET promoters (ticket promoters), SZIGET remarketing agencies, as well as data processors specified in this Notice, in order to carry out their tasks.

We also transfer data to the following recipients (for the purpose mentioned below, on the legal basis of legitimate interest*):

- a) In relation to the processing purpose of online ticket sales, data related to purchases made on the internet are transferred to OTP Mobil Kft. (Simple) (address: 1143 Budapest, Hungária körút 17-19., CRNo.: 01-09-174466, tax ID: 24386106-2-42), through the bank card accepting network of OTP Mobil Kft. (Simple), as well as OTP Bank Nyrt. (1051 Budapest, Nádor u. 16.), to ensure the processing, security, tracking of purchase transactions and the detection of fraud. Transferred data are: last name, first name, address, phone number, e-mail address, transaction data.
- b) In relation to the processing purpose of online ticket sales, data related to purchases made on the internet are transferred to B-Payment Szolgáltató Zrt. (registered office: Váci út 4., Budapest, 1132, company register no. 01-10-047882), who makes electronic payment services available, to ensure the execution, security and tracking of purchase transactions. The transferred data are: last name, first name, address, phone number, e-mail address.
- c) If the user purchases with a card or voucher offering a special discount (OTP SZÉP Card, MKB SZÉP Card, K&H SZÉP Card, Edenred voucher), SZIGET transfers the last name, first name, address, phone number and e-mail address to the company supplying the discount, MKB Nyugdíjpénztárt és Egészségpénztárt Kiszolgáló Kft. (Dévai u. 23., Budapest, 1134), K&H Csoportszolgáltató Kft. (Lechner Ödön fasor 9., Budapest, 1095), Erzsébet Utalványforgalmazó Zrt. (Hermina road 63. I/1., Budapest, 1146), Edenred Magyarország Kft. (Váci út 45. G. building 3. floor, Budapest, 1134). The user may request information on the applying data management rules directly from the respective service provider company. SZIGET automatically processes identifiers and other data of such cards/vouchers only to the extent the service provider company requires it to execute the purchase and to supply the discounts.

Data and contact information of the data processors:

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

Name of processor	What kind of personal data does it access? What way can it use the given personal data (what activity they do for SZIGET)?	How long can it store the data?
KBOSS.hu Kft. (Company registration number: 01-09-303201, seat:1031 Budapest, Záhony utca 7., Hungary)	Operation of szamlazz.hu program Billing preparation and mailing It has access to the following data in relation to this task: name, address, email address, tax number	Service contract of indefinite duration-until the termination of the contract
Myriad Payments Limited (Elmslie House, 51-53 Irish Town Gibraltar, info@intelligentpayments.co.uk)	Transaction security, identification of payment fraud It has access to the following data in relation to this task: name, address, email address, phone number, transaction data, address	Service contract of indefinite duration-until the termination of the contract
TicketSwap BV 1012 KL, Amsterdam at Rokin 75, The Netherlands	Ticket sales on secondary market (sale of already purchased but unused tickets) It has access to the following data in relation to this task: name, country and street level address, billing address, email address	Service contract of indefinite duration-until the termination of the contract
Festival Travel International Ltd (Cg.: 01-09-991628, 1095 Budapest, Soroksári Rd. 48., e-mail: info@meex.hu)	Ticket distribution It has access to the following data in relation to this task: billing data	Contract with definite duration, until the termination of the contract, by August 31, 2022.

<p>Festival Travel International Kft. (CRNo.: 01-09-991628, 1095 Budapest, Soroksári Rd. 48., e-mail: info@meex.hu)</p>	<p>Student ticket program distribution It has access to the following data in relation to this task: name, country and street level address, billing address, email address, student ID number</p>	<p>Contract with definite duration, until the termination of the contract, by August 31, 2022.</p>
<p>BIG FISH Internet-technológiai Korlátolt Felelősségű Társaság (Company registration number: 01-09-872150, 1066 Budapest, Nyugati square 1-2., paymentgateway@bigfish.hu)</p>	<p>Providing payment gateway service (electronic payment options) It has access to the following data in relation to this task: name, address, billing address, email address.</p>	<p>Service contract of indefinite duration-until the termination of the contract</p>
<p>FESTIPAY Zrt. (CRNo.: 01-10-048644, 1135 Budapest, Reitter Ferenc street. 46-48., e-mail: sales@festipay.com)</p>	<p>At the location and time of festival, providing integration of Festipay developed for wrist band (see: https://szigetfestival.com/en/policy-gctc , Festipay Privacy Policy)</p>	<p>Contract with definite duration, until the termination of the contract, by December 31, 2022.</p>
<p>TRL Hungary Kft.(CRNo.: 11-09-007772, 2510 Dorog, Mátyás király street 11/A, branch: 1034 Budapest, Tímár street 5.)</p>	<p>Provides Maconomy management ERP system It accesses all personal data controlled by SZIGET under this Notice. Its task is financial and accounting process support (ERP) system operation.</p>	<p>Service contract of indefinite duration-until the termination of the contract</p>

<p>FACTORY 92 mpx GmbH (Van-der-Smissen 4, 3 OG, 22767 Hamburg Germany)</p>	<p>Press accreditation, promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by August 31, 2023.</p>
<p>L'Alternativa srl Via Guido Dorso, 30 70125 - Bari - Italy</p>	<p>Press accreditation, promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by August 31, 2023.</p>
<p>PR Stage s.r.o Sídlo společnosti: Kamínky 283/7 - 63400 Brno - Česká republik</p>	<p>Press accreditation, promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by August 31, 2023.</p>
<p>Reservix GmbH Kaiserstraße 69 60329 Frankfurt am Main</p>	<p>Ticket distribution</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, email address. The ticket distributor operates its own webshop and sends data from it to SZIGET.</p>	<p>Contract with definite duration, until the termination of the contract, by August 31, 2022.</p>
<p>Festicket Ltd. Units 14 & 28 Utopia Village, 7 Chalcot Road, London, England, NW1 8LH</p>	<p>Ticket distribution</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, email address. The ticket distributor operates its own webshop and sends data from it to SZIGET.</p>	<p>Contract with definite duration, until the termination of the contract, by August 31, 2022.</p>

<p>PODPADS LTD (event management company) Eden House 15 Daffords Buildings, Larkhall, Bath, BA1 7DA</p>	<p>Ticket distribution</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by August 31, 2022</p>
<p>Bad Taste production s.r.o. Bardejovská 21, Pozsony, Szlovákia</p>	<p>Press accreditation, promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by August 31, 2022</p>
<p>SM Digital CB C. Jacinto Benavente 1, Portal 4, 3B CP28660 Boadilla del Monte, Madrid, Spain</p>	<p>Press accreditation, promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by August 31, 2022</p>
<p>KEN Moshav Beit Arif , Mesek 3. ISRAEL</p>	<p>Ticket distribution, press accreditation, promotional activity</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, email address.</p>	<p>Contract with definite duration, until the termination of the contract, by October 31, 2022</p>
<p>Wanadis Kereskedelmi és Szolgáltató Kft. (company registration number: 01-09-885144, 1118 Budapest, Rétköz u. 7.)</p>	<p>It has access to the following data in relation to this task: name, address, email address, transaction data</p>	<p>Service contract of indefinite duration-until the termination of the contract</p>
<p>Ticketportal HU Kft.</p>	<p>Ticket distribution</p> <p>It has access to the following data in relation to this task: name, country and street level address, billing address, email address. The</p>	<p>Contract with definite duration, until the termination of the contract, by December 31, 2022</p>

Company registration number: 01-09-920573, Tax number: 14802678-2-42, Seat: 1065 Budapest, Bajcsy-Zsilinszky út 49. földszint.	ticket distributor operates its own webshop and sends data from it to SZIGET.	
TIXA Hungary Kft. Company registration number: 04-09-012827, Tax number: 24813064-2-04, Seat: 5600 Békéscsaba, Dobozi út 58.	Ticket distribution It has access to the following data in relation to this task: name, country and street level address, billing address, email address. The ticket distributor operates its own webshop and sends data from it to SZIGET.	Contract with definite duration, until the termination of the contract, by December 31, 2022

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. Its task is the operation of ERP system, physical and operating system level operation of online sales systems servers. It accesses all personal data controlled by SZIGET under this Notice. It is responsible for operating SZIGET's enterprise resource planning (ERP) system.

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. The duration of data processing: service contract of indefinite duration-until the termination of the contract

Moreover SZIGET also uses the services of the **Hidden Design Korlátolt Felelősségű Társaság** (1095 Budapest, Gát utca 21. fszt. 1., Company register No.: 01-09-278702, tax number: 23089655-2-43) to provide a runtime environment for the Websites of SZIGET. The Hidden Design Kft. resorts to the following sub-processors (the data are exclusively stored at servers located in the European Union): 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: info@contabo.com), and the DigitalOcean LLC (101 Avenue of the Americas, 10th Floor, New York, NY 10013, United States).

During data processing activity, personal data are not transferred to any third countries or international organizations.

6. Data security

SZIGET shall ensure security of the personal data and shall implement appropriate technical and organizational 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 personal data, as well as their publication, transfer modification or erasure.

SZIGET shall impose the aforementioned obligation to its employees partaking in data processing, as well as processors acting under the authority of SZIGET.

7. The rights and legal remedies 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 will be provided by the Controller 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.

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. 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, seat: Hungary, H-1055 Budapest, Falk Miksa utca 9-11.; mailing address: 1374 Budapest, Pf. 603.; email: ugyfelszolgalat@naih.hu) or seek **judicial remedy**.

8. 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 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 must 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 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 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 – 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 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 7 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.

9. 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.