

## **PRIVACY NOTICE FOR REGISTRATION AT SZIGET LTD'S WEBSITES AND MOBILE APPLICATIONS AND MANAGEMENT OF THE USER ACCOUNT**

When you register at the [www.szigetfestival.com](http://www.szigetfestival.com), [www.volt.hu](http://www.volt.hu), [www.balatonsound.com](http://www.balatonsound.com) or [www.gourmetfesztival.hu](http://www.gourmetfesztival.hu) websites or the official mobile applications of Sziget Festival, Telekom Volt Festival, Balaton Sound Festival and OTP Bank Gourmet Festival (hereinafter referred to as: "**Platforms**"), you will be required to provide personal data, which we will process in accordance with Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter: "**Privacy Act**"), Regulation (EU) 2016/679 of the European Parliament and of the Council 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**") and Act V of 2013 on the Civil Code (hereinafter: "**Civil Code**"). According to the provisions of the referenced laws and regulations, we would like to inform you about the details of the processing of your personal data and your relevant rights.

### **1. The Controller**

**Sziget Kulturális Menedzser Iroda Zártkörűen Működő Részvénytársaság** (Sziget Cultural Management Private Company Limited by Shares, H-1033 Budapest, Hajógyári sziget topographical number 23796/58, representative: Tamás Kádár, Company Executive Officer, company registration number: 01-10-049598, tax number: 26189905-2-44; email: [dpo@sziget.hu](mailto:dpo@sziget.hu) hereinafter referred to as "**Controller**").

The Controller determines the scope of data requested to be provided in the course of registration on the Platforms, as well as the purpose, duration and legal basis of the processing.

### **2. The data protection officer's contact details**

The data protection officer: Balázs Takács

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

Email: [dpo@sziget.hu](mailto:dpo@sziget.hu).

**3. Provision of your data is voluntary.** You are not obliged to provide your personal data, but without the provision of your email address and password, you will not be able to register, and therefore, to create a user account on the Platforms. If you do not check the checkbox relating to your consent to processing, the Controller will not store, and therefore, will not process your email address and password, in an event of which, the user account cannot be created on the Platforms.

**4. You may delete your user account created at registration at any time.**

**5. The purpose of the processing** is to provide a service of convenience and to make possible, in accordance with the Controller's General Terms and Conditions and Refund Policy, the refund of the fee of the Ticket and/or Service related to any of the Controller's festival of 2020 (Telekom VOLT Festival, Balaton Sound, Sziget Festival), within which the table below sets out the purpose associated with the specific type of data.

**The categories of data processed, the purpose, duration and legal basis of processing:**

<b>Personal data processed</b>	<b>Purpose of processing</b>	<b>Duration of processing</b>	<b>Legal basis of processing</b>
Email address	<p>Identification of the user (hereinafter: "User") when logging in to a given Platform, and sending emails – also containing commercial advertisements and messages with a direct marketing purpose – relating to the products and/or services of the Controller, provided that the User subscribes to the Controller's newsletter in the course of the registration process.</p> <p>Matching with the email address provided when purchasing a ticket in the Controller's webshop or in the network of the online ticket vendors belonging to the Controller's own administrative system so that the option allowing the User to assign his or her tickets to his or her user account is displayed in the User's profile.</p> <p>Communication between the Controller and the</p>	<p>Processing lasts until withdrawal of the consent.</p> <p>Consents may be withdrawn by email sent to dpo@sziget.hu.</p>	Consent of the data subject based on Article 6(1)(a) of the GDPR.

	<p>User, sending of validation email, sending of emails related to the Controller's services.</p> <p>Sending of password reset email.</p>		
Language	<p>Setting the language of communication with the User.</p>	<p>The Controller will store the data until the data subject withdraws his or her consent.</p> <p>Consents may be withdrawn at any time by email sent to <a href="mailto:dpo@sziget.hu">dpo@sziget.hu</a>.</p>	<p>Consent of the data subject based on Article 6(1)(a) of the GDPR.</p>
In the case of registration via Facebook, the Facebook identifier (i.e. the Facebook user ID, consisting of a series of numbers, based on which it is not possible to identify you directly).	<p>Provision of the option of logging in via Facebook.</p>	<p>The Controller will store the data until the data subject withdraws his or her consent.</p> <p>Consents may be withdrawn at any time by email sent to <a href="mailto:dpo@sziget.hu">dpo@sziget.hu</a>.</p>	<p>Consent of the data subject based on Article 6(1)(a) of the GDPR.</p>
The email address of the third party specified by the User in the user account, to whom the User wishes to send the ticket.	<p>Transmission of the ticket(s) specified to the third party.</p>	<p>The Controller will delete this data within 2 days after sending the email.</p>	<p>Compliance with contractual obligation based on Article 6(1)(b) of the GDPR.</p>
Arbitrarily chosen name of the third party specified by the User.	<p>Assisting the User in differentiating between the tickets i.e. which has been transferred to whom.</p>	<p>The Controller will store the data until the data subject withdraws his or her consent.</p> <p>Consents may be withdrawn at any</p>	<p>Compliance with contractual obligation based on Article 6(1)(b) of the GDPR.</p>

		time by email sent to dpo@sziget.hu.	
Name and address linked to the bank account of the User or a third person designated by the User.	<p>Data is required for starting bank transaction for the refund of the fee of the Ticket and/or Service acquired by other means than purchase in the Controller's webshop, or if bank data necessary for the refund are not available and/or for the payment of the amount of the unused Balance.</p> <p>In the course of the eventual legal disputes and proceedings related to the Refund under the Controller's Refund Policy and misuses thereof, the exercise of the Controller's or third person's rights, the fulfillment of the Controller's obligations and the Controller's defense against the claim of third persons.</p>	<p>Pursuant to Act C of 2000 on Accounting (hereinafter „<b>Accounting Act</b>”), the data will be deleted at the expiry of an 8 (eight) years term after the bank transaction.</p> <p>The processing shall last for 5 (five) years after the fulfilment of the Cash Refund or payment of the amount of the unused Balance under the Refund Policy of the Controller.</p>	<p>Performance of a contract based on Article 6(1)(b) of the GDPR.</p> <p>Compliance with a legal obligation on Article 6(1)(c) of the GDPR.</p> <p>Lawful interest based on Article 6(1) (f) of the GDPR after the fulfilment of the Cash Refund or payment of the amount of the unused Balance</p>
Bank account number/IBAN of the User or a third person designated by the User.	Data is required for starting bank transaction for the refund of the fee of the Ticket and/or Service acquired by other means than purchase in the Controller's webshop, or if bank data	Pursuant to the Accounting Act, the data will be deleted at the expiry of an 8 (eight) years term after the bank transaction.	<p>Performance of a contract based on Article 6(1)(b) of the GDPR.</p> <p>Compliance with a legal obligation on Article 6(1)(c) of the GDPR.</p>

	<p>necessary for the refund are not available and/or for the payment of the amount of the unused Balance.</p> <p>In the course of the eventual legal disputes and proceedings related to the Refund under the Controller's Refund Policy and misuses thereof, the exercise of the Controller's or third person's rights, the fulfillment of the Controller's obligations and the Controller's defense against the claim of third persons.</p>	<p>The processing shall last for 5 (five) years after the fulfilment of the Cash Refund or payment of the amount of the unused Balance under the Refund Policy of the Controller.</p>	<p>Legitimate interest based on Article 6(1) (f) of the GDPR after the fulfilment of the Cash Refund or payment of the amount of the unused Balance.</p>
Name(s) of the performer(s) marked by the User as favourite for the festival concerned.	<p>Assessing the music preferences of the guests of the festival concerned so that the Controller can provide higher quality service when compiling the music programme of its events. Notification of the User regarding the imminent show of a performer marked by the User as favourite.</p>	<p>The Controller will store the data until the data subject withdraws his or her consent.</p> <p>Consents may be withdrawn at any time by email sent to dpo@sziget.hu.</p>	<p>Consent of the data subject based on Article 6(1)(a) of the GDPR.</p>
Name(s) of the food(s) marked by the User as favourite with regard to the OTP Bank Gourmet Festival	<p>Ensuring that the User can see the foods fitting his or her taste in a single place.</p>	<p>The Controller will store the data until the data subject withdraws his or her consent.</p> <p>Consents may be withdrawn at any time by email sent to dpo@sziget.hu.</p>	<p>Consent of the data subject based on Article 6(1)(a) of the GDPR.</p>

When reviewing the Platforms, the User's IP address, time of registration, login and logout, furthermore, any and all user disposal connected with the Refund of the fee of the Ticket and/or Service and the payment of the unused Balance will be stored in a log file.

## **6. The following legal persons will be able to access the processed data:**

**Netpositive Számítástechnikai Szolgáltató és Kereskedelmi Kft.** (H-2021 Tahitótfalu, Pataksor u. 48., company registration number: 13-09-104997, tax number: 12643565-2-13), as processor, providing the runtime environment of the Platforms, which has access to the following data in relation to this task: email address; language; time of registration; the email address of the third party, to whom the User wishes to send the ticket; arbitrarily chosen name of the third party specified by the User; name linked to the bank account of the User or a third person designated by the User; bank account number/IBAN of the User or a third person designated by the User; user disposals.

**FRONTSIDE Számítástechnikai Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság** (seat: 2735 Dánszentmiklós, Irsai út 85.; Company Registration No.: 13 09 104428) developer and operator of the application and the background system, which has access to the following data in relation to this task: email address; language; Facebook identifier; name(s) of the performer(s) marked by the User as favourite for the festival concerned; name(s) of the food(s) marked by the User as favourite with regard to the OTP Bank Gourmet Festival.

**Auth0, Inc.** (10800 NE 8th Street, Suite 600, Bellevue, WA 98004, U.S.A., hereinafter referred to as: Auth0), as individual controller, providing for registration and login, which has access to the following data in relation to this task: email address; language; Facebook identifier, the User's IP address, time of registration, login and logout

The Controller declares that the data will only be stored on servers located within the European Union.

The Controller informs you that if, on a given website, you have given your consent to your profile picture being displayed on other sites and platforms, then such picture may be automatically displayed in the user account you create with the registration. The Controller will not store or process such photo, and it will only be processed by Auth0 as an individual controller; the Controller will not be liable for the lawfulness of the processing of such photos in any event.

The Controller will not transfer personal data to Auth0.

## **7. Information regarding consent**

Provision of the data is voluntary. It is not mandatory for you to provide your personal data, but without doing so, you will not be able to register and create a user account. You are not obliged to provide the email address and arbitrarily chosen name of a third party, but without doing so, you will not be able to transmit the selected ticket. By registering, you expressly give your informed consent to the Controller's processing of the personal data specified in this Privacy Notice and provided by you related to the performance of the tasks related to registration/creation of the user account, and the transmission of the same to parties involved in the provision of facilities for registration/creation of the user account and operation of the Platforms. If you consent to the processing of the personal data by the Controller, the

Controller will store your personal data in its database. The personal data may be accessed by the persons involved in the provision of the registration, the user account and the Platforms, as well as the persons performing the related technical and staff-related tasks.

The Controller will not transfer personal data to third countries.

## **8. Data security**

The Controller will process the personal data recorded by it in accordance with the provisions of the effective legislation. The Controller warrants that the processing will be in compliance with the effective legal provisions at all times.

The Controller will ensure the security of the personal data, implement appropriate technical and organisational measures to ensure the protection of the collected, stored and processed data, and prevent the destruction, unauthorised use, and unauthorised alteration of the data.

The Controller will prevent unauthorised access to, as well as the unauthorised disclosure, alteration or erasure of personal data.

The Controller will take all reasonable measures in order to prevent damage to or destruction of the data. The Controller will cause its employees involved in its processing activity, as well as Processors acting on its behalf to comply with the aforementioned obligation.

## **9. Rights, remedies, complaints**

Pursuant to the GDPR, the data subject has the right to request access to his or her personal data, to request information regarding the processing (which the Controller must give within 1 (one) month at the latest), to request rectification or if the legal basis of data processing is consent the deletion of the personal data (deletion does not affect the lawfulness of the processing conducted based on consent prior to the withdrawal of the consent), or to request restriction of the processing. When the legal basis for data processing is legitimate interest, you may object to the processing of your personal data. The right to request deletion may not be exercised in relation to data, the processing of which is based on fulfilment of contractual or legal obligation or lawful interest. Such data shall be deleted off course, once the term specified for the processing expires.

If you consider that the Controller violated any of the legal provisions relating to data processing, please contact primarily the Controller at the above contact addresses or the [dpo@sziget.hu](mailto:dpo@sziget.hu) email address. If this proves to be unsuccessful, you may initiate the 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 turn to **court**.

The Controller will not apply automated decision-making or profiling in the scope of this processing, given that this processing is based on your explicit consent.

## **10. Liability**

Please note that Gmail, Facebook and Auth0 are individual controllers, and the Controller will not be liable for the processing activities conducted by them.

The Controller will not be liable for any temporary inaccessibility of the website containing this Privacy Notice due to technical reasons. The Controller will also not be liable for malfunctions arising from circumstances outside its control (such as technical malfunctions or interruptions of the internet network) and their consequences.

The registration and the user account will not be managed by Gmail or Facebook.

Gmail, Facebook and Auth0 will be individually liable for their own processing activities.

Facebook's privacy policy is available at the following website:  
<https://www.facebook.com/privacy/explanation>

Gmail's privacy policy is available at the following website:  
<https://policies.google.com/privacy?hl=en-GB>

Auth0's privacy policy is available at the following website:  
<https://auth0.com/docs/compliance/gdpr/data-processing>