

NOTICE ON DATA PROCESSING FOR SZIGET WEBSHOP PURCHASING

When purchasing 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. Contact information of the data protection officer:

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	This data will be deleted 6 months after the Event (according to GTC 5.4. pursuant to Section 6:22	Article 6 (1) (b) of the GDPR (performance of a contract)
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 purpose and legal basis, neither considered to be direct marketing.</i>	paragraph (3) of the Hungarian Civil Code, claims arising from the legal relationship may only be enforced within a six-months limitation period).	performance of a contract pursuant to Article 6 (1) (b) of the GDPR
country	determining which international SZIGET reseller is entitled to commission after the purchaser in case of	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</i>

	purchasing from abroad		<i>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 cannot be sent online	This data will be deleted after the delivery.	performance of a contract pursuant to Article 6 (1) (b) of the GDPR
Personal data provided when purchasing at the webshop (providing is NOT compulsory)			
birth date (day, month, year)	service-development, taking into consideration the age groups of the ticket purchasers for the determination of the programs and services available at the events	<p>Processing lasts until withdrawal of the consent but maximum for 6 months after the Event.</p> <p>The consent may be withdrawn by email sent to dpo@sziget.hu.</p> <p>The data will be pseudonymized and used in this from by SZIGET in order to</p>	Consent of the data subject based on Article 6(1)(a) of the GDPR.

		<p>take into consideration to the highest possible extent the age groups of the ticket purchasers for the determination of the programs and services available at the events</p> <p>The data will be anonymized when 6 (six) months have passed after the Event and used for statistical purposes henceforth.</p>	
When the purchaser requests invoice:			
name	<p>necessary for issuing an invoice pursuant to Act CXXVII of 2007 on value added tax (hereinafter: “Áfa tv.”) Article 169. § e) and da)</p>	<p>pursuant to Act C of 2000 on Accounting (hereinafter: „Számv. tv.”) 169. § Paragraph (2) these data will be deleted 8 years after the invoicing</p>	<p>Article 6 (1) (c) of the GDPR (compliance with a legal obligation)</p>
tax number			
address/ billing address			
In case of purchasing 21&Under festival pass			
<p>the age of the ticket user will be checked by showing an identity card certifying the age</p>	<p>it is necessary for making sure that such person enters to the Event who is entitled to the use of the 21&Under pass</p>	<p>the data will not be stored</p>	<p>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</i></p>

			<p><i>that only such person enters the Event with the 21&Under pass who is entitled to the use of the 21&Under pass, Accordingly, at the time of the entry to the Event the age of the ticket user will be checked. <u>The presentation</u> of the identity card certifying the age of the ticket user is compulsory. (SZIGET does not copy the identity card!)</i></p>
<p>If the data subject participates in the Student Ticket Program (https://festivaltravel.hu) organized by SZIGET and Festival Travel International Korlátolt Felelősségű Társaság (1095 Budapest, Soroksári Road, 48., company register number: 01-09-991628), or purchases a product sold within the frames of such program:</p>			

<p>the name of the ticket user and the fact if such person holds a student card or school certificate</p>	<p>it is necessary to make sure that one person takes part in the Student Ticket Program only once and that one person purchases a pass sold within the frames of Student Ticket Program only once, furthermore, that the person entering the Event is entitled to the use of the pass sold within the frames of the Student Ticket Program</p>	<p>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)</p>	<p>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, furthermore, to check that the person entering the Event is entitled to the purchase of the ticket sold within the Student Ticket Program. In accordance with those stated above the name of the ticket user will be checked by presenting an identity card and if the ticket user is entitled to participate in the Student Ticket Program on the basis of holding a student card or a school certificate, the <u>presentation</u> of the student card or school certification, giving entitlement for the reduction, is compulsory at the venue of the Event; SZIGET checks the existence and validity of them by checking the sticker on it.</i></p>
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			<i>(SZIGET does not copy the identity card, the student card and the school certificate!)</i>
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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:

- 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 Revolut Bank UAB (address: Konstitucijos pr. 21 B, LT-08130 Vilnius, Lithuania, registration number: 304580906), through the bank card accepting network of Revolut Bank UAB, 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.
- c) 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.
- d) 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 – 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 – 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 – until the termination of the contract
Festival Travel International Ltd (Company registration number: 01-09-991628, 1095	Ticket distribution It has access to the following data in relation to this task: billing data	Ticket distribution contract – until the termination of the contract

Budapest, Soroksári Rd. 48., e-mail: info@meex.hu)		
Festival Travel International Kft. (Company registration number: 01-09-991628, 1095 Budapest, Soroksári Rd. 48., e-mail: info@meex.hu)	Student Ticket Program, ticket distribution It has access to the following data in relation to this task: name, country and street level address, billing address, email address, name of the ticket user and the fact if the ticket user holds a student card or school certificate	Ticket distribution contract – until the termination of the contract
BIG FISH Internet-technológiai Korlátolt Felelősségű Társaság (Company registration number: 01-09-872150, 1066 Budapest, Nyugati square 1-2., paymentgateway@bigfish.hu)	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.	Service contract – until the termination of the contract
FESTIPAY Zrt. (CRNo.: 01-10-048644, 1135 Budapest, Reitter Ferenc street. 46-48., e-mail: sales@festipay.com)	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)	Service contract – until the termination of the contract

<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</p> <p>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 – until the termination of the contract</p>
<p>Ostfest B.V. (Company registration number: 65370880, Isolatorweg 36, 1014 AS, Amsterdam, the Netherlands)</p>	<p>Providing support for the marketing and sales activities of SZIGET</p> <p>It accesses all personal data controlled by SZIGET under this Notice. Its task is providing support for the marketing and sales activities of SZIGET.</p>	<p>Agency contract – until the termination of the contract</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>Attention CRM Consulting Kft. (seat: 1075 Budapest, Madách Imre út 13-14. T. ép. 4. em., cégjegyzékszám: Cg. 01 09 961453)</p>	<p>Providing tasks related to sending e-mails to the purchasers</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>SFDC Ireland Limited</p> <p>Company registration number: 394272</p> <p>3rd and 4th Floor, 1 Central Park Block G, Central Park, Leopardstown 18 Dublin, Ireland</p>	<p>Providing tasks related to sending e-mails to the purchasers</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>

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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

SZIGET may appoint further data processors for the purpose of press accreditation, promotion, and domestic and foreign ticket distribution, based on the respective contract. The range of such data processors is changing from time to time. Such data processors have access to the following data in relation to these tasks: name, country and street level address, billing address, email address. If the ticket distributor operates its own webshop, it may send data from it to SZIGET. Upon request, SZIGET gives information to the data subjects on the data processors carrying out the tasks of press accreditation, promotion, and domestic and foreign ticket distribution.

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.