

PRIVACY NOTICE

REGARDING THE USE OF ELECTRONIC SURVEILLANCE SYSTEM

Sziget Kulturális Menedzser Iroda Zrt. (H-1033 Budapest, Hajógyári sziget 23796/58., company registration number: 01-10-049598; hereinafter referred to as: „SZIGET”) operates electronic surveillance (camera) systems at the sites of certain festivals organised by it.

General information regarding the electronic surveillance system:

SZIGET installs camera systems for security reasons that provide a fixed surveillance at the following festivals: Sziget Festival, Volt Festival, Heineken Balaton Sound. The camera system provides direct (live) and fixed surveillance. The camera system is installed for the purpose of monitoring larger hubs, entry points and cash desks.

The camera surveillance systems are operated in accordance with the provisions of the effective legislation, therefore they are operated in accordance with Act CXXXIII of 2005 on the rules of personal and property protection activities and private investigation and only record footage of events taking place in private areas or areas temporarily taken into private use (without recording sound), and they operate 0-24.

The purpose of this Notice is to provide information to the data subjects regarding the processing of personal data in relation to the camera surveillance systems.

By entering the venue of the festival, the data subject acknowledges that pictures are taken of him or her and videos are recorded about her or him. Pictogram, and also the Privacy Notice at the venue draws attention to the placement of the cameras. We indicate the place of the cameras on a map which is available at the venue. The detailed rules of the camera system is governed by the non-public policy titled “*Policy regarding the camera system performing area surveillance and property protection tasks for Sziget 2023*”

a) **The Controller and its contact details:**

Sziget Kulturális Menedzser Iroda Zártkörűen Működő Részvénytársaság

(registered office: H-1033 Budapest, Hajógyári sziget 23796/58, company registration number: 01-10-049598, phone: +36 (1) 372 0681, email: hello@sziget.hu, represented by Tamás Kádár, CEO)

b) **Contact details of the data protection officer:**

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

Email: dpo@sziget.hu.

c) **The purpose of the processing:** preventing and detecting infringements, catching the perpetrator in the act, proving infringements, identifying persons entering the area of the festival without authorisation, recording the fact of the entry and documenting the activity of persons staying in the area without authorisation, preventing accidents, taking immediate action in case of an accident happens, investigating the circumstances of the accident, making easier the complaint handling for example in case of frauds, all in order to protect human life, bodily integrity and property.

d) **Legal basis of the processing:** legitimate interest pursuant to 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 (General Data Protection Regulation) (hereinafter: “GDPR”) (hereinafter referred to as: “GDPR”) Article 6 Paragraph 1 f), and in case of the employees of SZIGET authorisation pursuant to 11/A § (1) of the Act I of 2012 on the Labor Code (hereinafter: “Labor Code”).

- e) **The legitimate interest of the Controller (SZIGET)** is the protection of the people's life, bodily integrity and property who enter the festival and stay there, and the protection of property, and to provide the maximum safety of the festivals. SZIGET has done the related benefit test.
- f) **Personal data to be processed:** the facial image of persons entering the area of the festival visible on the footage, as well as their other actions recorded by the surveillance system.
- g) **Duration of the processing (of the storing of the footage):** 72 hours after the official closing of the festival concerned SZIGET deletes the footages. (You can read more about the blocking of the footages at the chapter of the rights.)
- h) **Transfer, recipients:** in case of a misdemeanour or criminal proceeding, the data may be transmitted to the authorities and courts conducting such proceedings especially pursuant to Act XC of 2017 on Criminal Proceedings Paragraph 261 and Act II of 2012 on infringements, infringement proceedings and the infringement records system Article 75. Paragraph (1) a) and Article 78. Paragraph (3). No personal data will be transferred to third countries or to international organisations.
- i) **People entitled to watch the footages:** The scope of persons entitled to view the live feed of the cameras without audio (direct, live surveillance) and the scope of persons entitled to view the fixed footage is governed by the non-public policy titled "*Policy regarding the camera system performing area surveillance and property protection tasks for Sziget 2023*". The live feed and stored footage recorded by the camera surveillance system operated by SZIGET may only be accessed by the persons authorised thereto in order to prevent and prove infringements harming human life, bodily integrity or property and to identify the perpetrators of such infringements. SZIGET will record in a protocol any access to the footage recorded, the name of the person accessing them and the reason and time of the access to the data, and will keep separate records of each data transfer. The persons acting on behalf of the Controller are compiled by the Operative Control Centre (hereinafter referred to as: "OCC") established by SZIGET, the exact composition of which is set out in the policy relating thereto.
- j) **Location of the footage storing and the security measures concerning it:**

Direct surveillance takes place in all cases via the operative control centre established at the event concerned and that is continuously guarded around the clock, which may be entered by authorised persons only. During the festivals, SZIGET stores the footage at the location of the festivals in local servers that are independent of all other systems and are located in a closed, continuously (0-24) guarded area. After the closing of a given festival, SZIGET stores the footage at its registered office, in a closed and guarded server room, in accordance with the foregoing, until the data is deleted.

The cameras are connected to the optical network installed by the IT Department of SZIGET, in which network they are connected to a separate dedicated VLAN. This VLAN has no internet or other traffic, its only purpose is to enable communication between the cameras and the servers. The VLAN contains devices with static IP addresses. Locations may be made available through the VLAN only if this is authorised by the IT Manager of SZIGET. This can be done by using the network management software, to which only the persons responsible for operating the network have access. In the Operative Control Centre, the recording, surveillance and management takes place via the Axxon Universe software. At the display locations specified above, we display the images to the competent persons using the CMS3 software. The footage and the Axxon Universe software runs on the camera servers located in the OCC. In order to protect the data, the footage is recorded on HDDs in a RAID set. The system is installed on a separate disk. The Servers are protected with passwords only known to the operators of the camera system.

The area surveillance camera system is not capable of recognising faces and license plates and has no image analytics algorithm.

k) **Your rights concerning the data processing:**

The data subject **may request information** about data processing, **may request access** to the personal data (may obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and if so, what kind of data processing is in progress). SZIGET shall provide the requested information and notification free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, SZIGET may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested, or refuse to act on the request.

SZIGET shall provide information on action taken on a request to the data subject without undue delay and in any event within one month (30 days) of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. SZIGET shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

The **right to rectification** cannot be exercised concerning the nature of the video recording. Concerning the nature of the data the data subject does not have the right to request from SZIGET the **erasure (right to be forgotten)** of personal data within the period of the data processing, although he or she may object to the data processing.

The data subject whose right or legitimate interest is affected by the recording or another recorded personal data of his or her may request from SZIGET (after 72 hours of the closing of the festival) - by certifying his or her right or legitimate interest - not to block/ destroy or delete the footage until the request of the court or authority. SZIGET hands over the footage and the connecting personal data without delay to the court or another authority at their request. If, within 30 days after the request of the ignoring of the destroying and deleting, the court or another authority does not request the handing of the footage and the connecting personal data, then SZIGET destroys, deletes them.

- l) Legal remedies If you feel that SZIGET has violated any of the legal provisions applicable to data processing, please contact us first by sending an email to the data protection officer's email address: dpo@sziget.hu, or by sending a letter to SZIGET's seat.

If this proves to be unsuccessful, you may initiate a proceeding with the **National Data Protection and Freedom on Information Authority** (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**. Decision of the case is within the jurisdiction of the superior court. Legal proceedings – at the choice of the data subject - may also be brought before the superior court where the data subject has domicile or residence.

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.