

NOTICE ON DATA PROCESSING FOR NEWSLETTERS

Upon subscription to a newsletter on sites www.sziget.hu, www.szigetfestival.com/hu, www.volt.hu, www.balatonsound.com/hu, www.gourmetfesztival.hu, and www.gyereksziget.hu, 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.

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, web address: www.szigetfestival.com/hu; , hereinafter: “SZIGET”)

For the purposes described under clauses 3-4., SZIGET determines the range, purpose and duration of data collected during subscription to the newsletter, as well as other important conditions of data processing.

2. 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.

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
<i>Personal information provided during subscription of newsletter</i> Full name, e-mail address, the fact that the subscriber is older than 16, (year of birth), to which event did she/he subscribe for (for instance on which site), due to which promotional activity, the time of subscribing, and to which brand.	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 services.	14 days in case of subscriptions to newsletters without user confirmation, otherwise until user withdraws consent. Users may unsubscribe at any time by emailing hello@sziget.hu , or by clicking on the link in the newsletter.	Consent based upon section (1) a) of Info. tv. 5.§, as well as Article 6 part (1) section a) of GDPR, paragraph 13/A of Bejelentkezés Eker. tv, as well as Grt section (1) of paragraph 6.

4. Profiling

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.

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.

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 uses web analytics services provided by **Google LLC**, (1600 Amphitheatre Parkway Mountain View CA 94043), which is part of the EU-U.S. privacy shield (address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) Google Analytics, the **Hotjar Ltd.** (Level 2 St. Julians Business Centre, 3, Elia Zammit Street, St. Julians STJ 1000, Malta) the **Facebook Ireland Ltd.** (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland), **the Optimonster** (optimonster.com) and the **Monday.com** (address: 33 West 17th Street New York, New York 10011) –the latter which is part of the EU-U.S. privacy shield. The web analytics services use cookies, which are used to assist in analyzing the use of the online platforms.

Via the online platforms, the user provides specific and expressed consent to Google Analytics to transfer data created by cookies in relation to online platform usage to Google servers located in the United States; Optimonster is to transfer and store information related to online platform usage to its servers located in Florida, United States.

The cookies processed by Hotjar and Facebook are stored on their servers located in the European Union.

For the purposes and in the manner described above, the user consents to the collection and analyses of his/her data via specific consent provided on the web site. Google, Hotjar and Facebook uses this information for the evaluation and analysis of the data subject's use of the online platforms, to create reports on the data subject's activities on the online platforms, as well as to provide other services related to online use and activity on the online platforms.

Given that Optimonster is not part of the EU-US Privacy Shield, SZIGET takes measures necessary to provide the appropriate level of privacy protection via entering into a model contract under 2010/87/EU Decision in the addendum of Optimonster's data processing contract.

In order to present personalized offers as well as to track users, www.sziget.hu, www.szigetfestival.com/hu, www.volt.hu, www.balatonsound.com/hu, www.gourmetfesztival.hu, and www.gyereksziget.hu sites include embedded code from the following providers. Tracking and analytics applications implemented via Google Tag Manager: Google Analytics, Facebook pixel, Appnexus, Double Click floodlight, Conversion linker, Adwords Conversion Tracking, OneTag pixel, Sizmek pixel, Snapchat pixel, Optimonster, Hotjar, Google Optimize. The code provides targeting opportunities for different advertising modes using cookies stored with the user. Please be aware that through direct connection to their servers, and direct communication with the user's browser, these providers can collect user data (such as IP address, browser, operating system information, cursor movement, address and time of visited site)

For additional information please review SZIGET's information on use of cookies.

6. Transfer of data

Your data will not be transferred to third persons, other than transfers described in article 5. Disclosure of data to third persons or recipients may only occur in cases when you give prior consent after we inform you of the possible recipient in advance, or if the disclosure is otherwise required by law. During such data processing activity, we do not transfer personal data to third countries or international organizations.

7. 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 Ltd. 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.

8. Communication of a personal data breach to the data subject

Personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, SZIGET shall communicate the personal data breach to the data subject without undue delay in a clear and easy to understand manner.

The communication to the data shall not be required if any of the following conditions are met:

- a) the controller has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorized to access it, such as encryption;

- b) SZIGET has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialize
- c) the communication would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

9. The rights and legal remedies of data subjects

In addition to data subjects' rights regarding the use of recordings above, data subjects may exercise the following rights related to data processing under this notice:

Right to information and to access the data

You have the right to receive feedback from SZIGET on whether your personal information is being processed, and if such processing of your data is under way, you have the right to access the personal data and the following information:

- a) the purposes of the data processing
- b) the categories of the personal data in question,
- c) the categories of recipients to whom we disclosed or will disclose the personal data, especially with regards to third country recipients or international organizations
- d) the planned duration of the storage of the personal information in any case, or if it is not possible, the criteria for determining this duration.
- e) the right of the data subject to request from the controller the correction, deletion or restriction of processing their personal data, and may object to the processing of such personal data.
- f) the right to file a complaint with a supervisory authority
- g) if the data was not collected from the person concerned, all available information regarding the data source.
- h) the fact of automated decision making, including profiling, as well as easy to understand information, at least in these cases, regarding the applied logic and the significance of such data processing, and the envisaged consequences for the data subject.

Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant relating to the transfer.

SZIGET shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, SZIGET may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided by SZIGET in a commonly used electronic form.

The right to obtain a copy referred to in the paragraph above shall not adversely affect the rights and freedoms of others.

The aforementioned rights may be exercised via the contact information specified in article 10.

Right to rectification

The data subject shall have the right to obtain from SZIGET without undue delay the rectification of inaccurate personal data concerning him or her.

Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure ('to be forgotten')

- a) The data subject shall have the right to obtain from SZIGET the erasure of personal data concerning him or her without undue delay where one of the following grounds applies: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing, or the data processing relates to direct sales ;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f) the personal data have been collected in relation to the offer of information society services.

Erasure of data may not be requested if the processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law or for the performance of a task carried out in the public interest;
- c) for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional, and these data are processed by or under the responsibility of a professional subject to the obligation of professional secrecy under Union or Member State law or rules established by national competent bodies or by another person also subject to an obligation of secrecy under Union or Member State law or rules established by national competent bodies.
- d) for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;
- e) for reasons of public interest in the area of public health and these data are processed by or under the responsibility of a professional subject to the obligation of professional secrecy under Union or Member State law or rules established by national competent bodies or by another person also subject to an obligation of secrecy under Union or Member State law or rules established by national competent bodies;
- f) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes if the right to erasure would probably seriously risk or make impossible such data processing.¹
- g) for the establishment, exercise or defense of legal claims.

Right to restriction of processing

Upon data subject's request, SZIGET restricts the processing of data subject's personal data where one of the following applies:

¹ Processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, shall be subject to appropriate safeguards for the rights and freedoms of the data subject. Those safeguards shall ensure that technical and organizational measures are in place in particular in order to ensure respect for the principle of data minimization. Those measures may include pseudonymisation provided that those purposes can be fulfilled in that manner. Where those purposes can be fulfilled by further processing which does not permit or no longer permits the identification of data subjects, those purposes shall be fulfilled in that manner.

- a) the accuracy of the personal data is contested by the data subject, in this case the restriction is for a period that enables the data subject to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) SZIGET no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;
- d) the data subject has objected to SZIGET's processing pursuant to public interest or compelling legitimate grounds, in this case the duration of the restriction is for the time period needed for the verifying whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted for the aforementioned reasons, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A data subject who has obtained restriction of processing pursuant to the aforementioned reasons shall be informed by SZIGET before the restriction of processing is lifted.

Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to SZIGET, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from SZIGET to which the personal data have been provided, where:

- a) the processing is based on consent pursuant to contract
- b) the processing is carried out by automated means.

In exercising his or her right to data portability pursuant to the aforementioned, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The exercise of the right to data portability shall be without prejudice to the right to erasure ('to be forgotten'). That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

The right to data portability shall not adversely affect the rights and freedoms of others.

Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to SZIGET's processing of personal data concerning him or her where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in SZIGET, processing is necessary for the purposes of the legitimate interests pursued by SZIGET or by a third party, including profiling based on those provisions. In this case, SZIGET shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Right to withdraw consent

The data subject shall have the right to withdraw his or her consent at any time if SZIGET's data processing is based on consent. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Modalities in case of request by the data subjects on the exercise of the aforementioned rights

The controller 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.

If SZIGET does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

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 inform all those recipients of any such rectification, erasure or restriction of processing to whom personal data were disclosed, unless this proves impossible or involves a disproportionate effort. SZIGET shall inform the data subject of such recipients upon request.

10. Comments, questions or complains:

Any questions or requests regarding your personal data stored or processed in our system should be sent to hello@sziget.hu e-mail address, or in writing to 1399 Budapest Pf.: 694/245 postal address. Please keep in mind that to serve your best interest, we are only able to provide information or take action regarding your personal data processing if you provide us with credible identification.

We hereby inform you that concerned parties may contact SZIGET's data protection officer regarding all questions on personal data protection and exercise of rights under GDPR. The data protection officer may be contacted at: dpo@sziget.hu

11. 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 under article 8.3 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.

12. Data processing

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.

13. 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

Wanadis Kereskedelmi és Szolgáltató Kft. (company register no.: 01-09-885144, 1118 Budapest, Rétköz street. 7)	Tasks associated with sending e-mails to users. In connection with this task, it has access to the following data: name, e-mail address.	Open-ended service contract – until the termination of the contract or withdrawal of data subject’s consent or in case of satisfaction of objection
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14. 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 10 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.

15. Legal remedies

- a) Controller may be contacted with any questions or comments regarding data processing via contact information provided under article 10;
- b) you may initiate an investigation at the National Data Protection and Freedom on Information Authority (1530 Budapest, Pf.: 5., phone: +36 (1) 391-1400, e-mail: ugyfelszolgalat@naih.hu, website: www.naih.hu) alleging infringement of rights concerning the processing your personal information or if an immediate threat of such infringement is impending, in addition
- c) in case of infringement of your rights, you may seek judicial remedies against SZIGET as data controller. The court considers the case out of turn. SZIGET has the burden to prove that processing of the data was in accordance with the law. Decision of the case is within the jurisdiction of the court. Legal proceedings may also be brought before the court where the data subject has domicile or residence.