

## PRIVACY POLICY

### ABOUT PERSONAL DATA PROCESSED THROUGH THE COURSE OF PAYMENTS WITH THE FESTIPAY CASHLESS PAYMENT INSTRUMENT AT MBH BANK GOURMET FESTIVAL 2023

The Visitor necessarily provides Personal Data to the Organizer (hereinafter referred to as "**Data Controller**") for the use of cashless payment systems at the MBH Bank Gourmet Festival 2023. The Visitor acknowledges that his/her personal data will be processed by the Data Controller and Data Processors in connection with the use of the Payment Chip.

For more information on this, please refer to the privacy policy below.

In the course of data processing, the Data Controller shall take into account and follow all related, valid legal provisions, in particular:

- General Data Protection Regulation (EU) No 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 (EC) No 95/46 ("the Regulation") or "GDPR")
- and Act CXII of 2011 of Hungary on Information Self-Determination and Freedom of Information; (hereinafter referred to as "Infotv").

#### The Data Controller

Sziget Kulturális Menedzser Iroda Zártkörűen Működő Részvénytársaság (seat address: 1033 Budapest, Hajógyári sziget hrsz. 23796/58, company reg.no.: 01- 10-049598, e-mail: [hello@sziget.hu](mailto:hello@sziget.hu), web: <https://szigetfestival.com/en/>, <https://gourmetfesztival.hu/en/>)

#### Availabilities of the Data Protection Officer

Postal address: H-1033 Budapest, Hajógyári sziget hsz .: 23796/58.

E-mail: [dpo@sziget.hu](mailto:dpo@sziget.hu)

**The purpose of data processing** is to protect the money (placed on the Payment Chip by the Visitor) from unauthorized use (security services) during the provision of convenience services and in the event of loss, damage or failure of the Payment Chip. Processing all of the data below is closely related to the performance of the service hence we specifically state for each data why we need them for the performance of the contract.

**The legal basis for data processing** is the **performance of a contract** under Article 6 (1) (b) of the Regulation.

Type of Data processed	Purpose of processing
e-mail address	sending service-related notifications, user instructions (not newsletter), receipts to be sent to this email address, identification for security reasons (section 6.2 of the User's Guide)
Serial number of wristband or ticket	Balance Handling, Balance Related Operations (Section 6.2 of the User Guide)

PIN code (the last four characters of the serial number of the voucher or, if the Visitor purchases the ticket at the festival site, the four characters handed over at the time of purchase)	security feature as described in the User's Guide (Payment Chip Registration and Replacement)
Top-up amount, top-up date, top-up method (cash or bank card), purchase amount, purchase date, payment method (Festipay Payment chip or bank card) purchase location (merchant ID), credit transaction date, amount, method	accurate balance records and providing receipts and security measures, because several failed transactions can be used to identify errors and misuse; fulfillment of accounting obligations; the procedures under point 6.2. of the User Guide for safety reasons
credit card transaction status feedback	to ensure the proper functioning of the service, and to investigate the cause of the error in case of complaint handling
Type of the operation system (iOs, Android)	if some kind of error occurs during the transaction, it helps to solve it (e.g. if the payment fails several times in a given time period and there is no other reason, it is possible that it was not the Festipay system's but the operating system's error)
receipt identification number	fulfillment of accounting obligations
name, address, telephone number, purchased products in the event of top-up in the Festival Account via bank card after the registration of the Payment chip in the Festival Account	the data will be transferred to OTP Mobil Kft. as data processor for the top-up of the Payment Chip

If you do not allow the Data Controller to process your aforementioned data, the Data Controller will not be able to provide you with the convenience and security services associated with Festipay's cashless payment.

#### **Erasure of data, duration of processing**

The Data Controller will delete or anonymize the above-mentioned data 6 months after the Festival (in such a way that the data subject is no longer identifiable by them). Accounting documents are kept for 8 years under current legislation.

#### **Data processors, data transfer**

The following data processors can access the processed data:

**Festipay Zrt.** (seat address: 1135 Budapest, Reitter Ferenc u 46-48., company reg. no: Cg. 01-10-048644, Registered by the Fővárosi Törvényszék Cégbírósága, tax number: 25405983-2-41, e-mail address: [sales@festipay.com](mailto:sales@festipay.com)) the entity that operates the Festipay Payment Chip System, which is placed on the access pass wristbands, as a Data Processor and

**CARDNET Kártyarendszerek és - szolgáltatások Zártkörűen Működő Részvénytársaság** (seat address: 1135 Budapest, Reitter Ferenc utca 46-48.; Registered by the Fővárosi Törvényszék Cégbírósága, company reg. no: Cg. 01 10 042150, tax number:10821886-2-41; website:

<http://www.cardnet.hu>), the sub-data processor of Festipay Zrt., which provides the technical background of the Festipay system, handles cashless payment transactions, and

**Netpositive Számítástechnikai Szolgáltató és Kereskedelmi Kft.** (seat address: 2021 Tahitótfalu, Pataksor u. 48., company reg. no: Cg. 13-09-104997, tax number: 13548274-2-13), which performs physical and operating system-level operation of servers that store data created or necessary for the operation of the Festipay system, as a Data Processor, furthermore

**OTP Mobil Szolgáltató Korlátolt Felelősségű Társaság** (Simple) (seat: 1143 Budapest, Hungária körút 17-19., company reg. no.: Cg.: 01-09-174466, tax number: 24386106-2-42) which is proceeding as payment service provider and data processor.

Automated data processing and profiling are not performed by the Data Controller.

### **Rights, Complaints, Remedies**

The Visitor is entitled to request information about the processing of his/her personal data, which the Data Controller shall respond to in writing within 30 (thirty) days. The Visitor may request access to personal data, rectification of the data (if possible by the nature of the data), as well as feedback from the Data Controller on whether the processing of his/her personal data is in progress, and if so, what data processing is in progress. The right to erase data - upon request - cannot be exercised in respect of the data handled on a legal basis; after the limitation period, the data is naturally deleted or anonymized by the Data Controller (in such a way that the data subject is no longer identifiable by them).

If, in the Visitor's opinion, the Data Controller has violated any statutory provisions on data processing, please contact the Data Controller's Data Protection Officer directly in the above contact details. In case of ineffectiveness, you may initiate the procedure of the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) (mailing address: H-1055 Budapest, Falk Miksa utca 9-11.; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)), or you can turn to court.

Budapest, May 15, 2023