

GENERAL DATA PROTECTION REGULATION

I. GENERAL INFORMATION

Why do I get this information?

During the operation, provisions of services, **Sziget Cultural Management Ltd** (address: 1033 Budapest, Hajógyári-sziget 23796/58., company register no.: 01-10-049598, hereinafter „**Sziget Ltd.**” or “**Controller**”) necessarily processes personal data. Sziget Ltd. undertakes in all stages of data processing that all data processing in connection with its activity complies with the data processing policies and the effective legal regulations.

Unless provided otherwise, the data processing policies do not extend to services and data processing related to promotions, raffles, services, other campaigns, or content advertised or otherwise published by third parties not affiliated with Sziget Ltd. or the web site operators on web sites.

The data processing of Sziget Ltd. is mainly regulated by

- 2016/679 regulation of European Parliament and Council (EU) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (Hereinafter “GDPR”),
- Act CXII of 2011 on Informational Self-determination and Freedom of Information (Hereinafter “Infotv.”),
- Act V. of 2013 on the Civil Code (“Ptk”),
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (Hereinafter “Gr.”),
- Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Hereinafter “Eker. tv.”),
- Act CXIX of 1995 on the Use of Name and Address Information Serving the Purposes of Research and Direct Marketing (“Direktmarketing tv.”),
- Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators (“Szvtv.”),
- 23/2011. (III.8.) government regulation on improving the safety of dance and musical events
- Act C of 2000 on Accounting (“Számv. tv.”),
- Act CL of 2017 on Taxation (“Art.”), and
- other data processing prescriptions in other sectoral regulations.

In this Regulation and in the specific data processing policies, Sziget Ltd. has elaborated its notional system based on the definitions of the GDPR.

We call your attention that you can read of the PURPOSE AND LEGAL BASIS of the processing of personal data, the DURATION OF THE PROCESSING (DELETION TIME) of personal data, the ADDRESSEES, the data processors in the specific data processing policies published on the websites of each festival organised by Sziget Ltd!

The above data processing policies related to specific data processings are the attachements to this General Data Protection Regulation, the scope and content of which may be amended from time to time. Sziget Ltd. reserves the right and, at the same time, undertakes to accordingly and unilaterally modify and publish the content of the specific data processing policies in accordance with the always effective legal provisions, as well as in case of changes to the services.

I. AVAILABILITY OF THE CONTROLLER

The basic data of the Controller:

Sziget Cultural Management Private Company Limited by Shares

postal address: 1033 Budapest, Hajógyári-sziget 23796/58.

company registration number: 01-10-049598

II. GUIDELINE TO THE BASIC NOTIONS

1. What are “personal data”?

Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Natural persons may be associated with online identifiers provided by their devices, applications, tools and protocols, such as internet protocol addresses, cookie identifiers or other identifiers such as radio frequency identification tags. This may leave traces which, in particular when combined with unique identifiers and other information received by the servers, may be used to create profiles of the natural persons and identify them.

2. Who are “data subjects”?

Data subjects are any natural persons identified or identifiable by any information.

3. What does “data processing” mean?

Data processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

4. Who is the “controller”?

Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Based on hereof, Sziget Ltd. is considered as the controller.

5. Who are the “addressees”?

An addressee means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. Data processors are considered as addressees.

6. What does “processor” mean?

(Data) processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

I. DATA PROTECTION OFFICER (DPO)

1. The Data Protection Officer

Sziget Ltd. has appointed a data protection officer especially given that its data processing related to its event management activity and its marketing activity repeatedly (as in yearly during the festival season) include data processing activities that require the systematic, substantial surveillance of data subjects due to the nature, extent and/or purposes (such as deploying camera systems at festivals for personal and property protection reasons, also in relations to its marketing activity, behavior-based advertising, retargeting and profiling activities are undertaken based on consent of the data subject).

2. When can I contact the DPO?

Data subjects may contact the data protection officer with regard to all issues related to processing of their personal data and to the exercise of their rights under GDPR.

The data protection officer shall be bound by secrecy or confidentiality concerning the performance of his or her tasks, and regarding the handling of data.

3. Where can I reach the DPO?

The AVAILABILITY of the data protection officer

postal address: 1033 Budapest, Hajógyári-sziget 23796/58.

e-mail address: dpo@sziget.hu

Upon contacting the data protection officer of Sziget Ltd., you necessarily provide personal data, which are processed in accordance with the GDPR.

Purpose of data processing	<p>Exercising data subjects' rights pursuant to Article 15-22 of the GDPR: You may submit a request in relation to data processing related to the purchased ticket, product or related activities of Sziget Zrt., as well as your rights described in the GDPR.</p> <p>Sziget Zrt. answers your inquiry within 1 month the latest, unless there is any justification to extend the deadline.</p>
Processed data	<ul style="list-style-type: none"> - name of data subject, - place, date, method of submitting the request, - e-mail address of data subject, - request of data subject, all information that may be considered as personal data, - other personal identification data, information that are necessary to satisfy such request, - the replay of Sziget Zrt. and all its attachments
Legal basis of data processing	<p>Pursuant to Point f) of Article 6 (1) of the GDPR, it is the legitimate interest of Sziget Zrt. as data controller to satisfy its obligations as data controller specified in the GDPR with regard to the following:</p> <p>Pursuant to Article 12-14 of the GDPR, all data subjects, thus, you are also entitled to exercise the rights of the data subject in connection with the processing of his/her personal data, as well as to request Sziget Zrt. to restore the lawful situation if, in a specific case, he/she would raise well-grounded objection in relation to the data processing. As detailed in this Privacy Policy, too, all data subjects may request</p> <ul style="list-style-type: none"> - access to his/her personal data, - correction of his/her personal data, - deletion of his/her personal data, - limitation of the data processing, - portability of his/her personal data, - may protest against the processing of his/her personal data. <p>No matter which right of data subjects is concerned with the request, Sziget Zrt. shall inform you without unjustified delay, but in any case, within one month reckoned from the receipt of the request of the measures made based on the request in accordance with Preamble (59) of the GDPR. If necessary, taking into account the complexity of the request and the number of requests, this deadline can be extended by two more months. However, Sziget Zrt. shall inform you about the extended time limit within one month reckoned from the receipt of the request, indicating the causes of the delay. If, however, Sziget Zrt. cannot make measures based on your request, it shall inform you without unjustified delay, but in any case, within one month reckoned from the receipt of the request of the reasons of the omission, as well as of the fact that you may submit a complaint at the National Authority of Data Protection and Freedom of Information and exercise your right for judicial remedy, before the tribunal competent as per your permanent address or residence (you can find out the contact details of the courts at the following link: http://birosag.hu/torvenyzek).</p>

	<p>If, however, Sziget Zrt. has well-grounded doubt about your identity in your submission of your request to exercise your data subjects' rights, it may ask you to provide further information to confirm your identity. If Sziget Zrt. proves that it is unable to identify you, it can refuse to fulfil the request aimed at exercising data subjects' rights.</p> <p>As a main rule, information and measures related to data subjects' requests are free of charge. If, however, Sziget Zrt. proves that the request is obviously ungrounded or is – especially due to its repetitive nature – excessive considering administrative costs associated with providing the requested information or making the requested measures, reasonable fee may be specified to do so or may refuse making measures based on the request.</p>
Duration of data processing	Sziget Zrt. stores the inquiries and the copy of the reply for 5 years and presents them to supervisory authorities upon request.
Addressees	<p>data protection officer: Csáki és Társa Ügyvédi Társulás</p> <p>In case the data subject seeks remedy in relation to the complaint or the reply of Sziget Zrt., data are transferred to NAIH or courts as noted above.</p>

VI. AZ ADATKEZELÉSRE VONATKOZÓ ELVEK ISMERTETÉSE

Sziget Ltd. shall strive to process personal information lawfully, fairly and in a transparent manner in relation to the data subject. Sziget Ltd. shall process the provided personal data with specified, explicit and legitimate purposes defined by this General Data Protection Regulation, and information and rules marked as the annexes hereto („principle of purpose limitation"), which shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed („data minimization").

Based on the principle of accuracy, Sziget Ltd. strives furthermore to ensure, with relation to the processed personal data, that they are kept up to date; and Sziget Ltd. shall take every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay („principle of accuracy").

During data processing, Sziget Ltd. undertakes that storage of personal data shall not be longer than is necessary for the purposes for which the personal data are processed ("principle of storage limitation"), and that data processing is carried out in a way that appropriate technical and organizational measures are implemented in order to ensure appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage ("integrity and confidentiality").

Sziget Ltd. provides additional information in the Data security subsection hereof regarding security measures taken in compliance with these data processing principles. Sziget Ltd. and its data processors shall maintain internal data processing logs in order to demonstrate compliance with present data processing principles ("principle of accountability").

In case Sziget Ltd. intends to apply profiling in relation to one or more, interconnected platforms or applications, during its setting-up, it shall consider the instructions of the revised version of the Guidelines on Automated individual decision-making and Profiling (WP251rev.01) beside the above principles. 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 analyze or predict aspects concerning that natural person's personal preferences, interests, behavior, location or movements, the principle of fair and transparent data processing requires that data subject be notified of the fact and purpose of data processing; The specific data processing policies related to the platforms, applications affected by profiling shall contain the necessary information for the data subjects.

The principles included in this Regulation inform upon our practices related to personal data processing. Our data processing principles apply to all of Sziget Ltd.'s devices, websites, all paper-based data processing, customer service platform or other online application, which refers to them by online link or any other manner.

VI. RIGHTS

During the processing of personal data, you have the following rights for each legal basis for processing, although not all data subjects' rights may be exercised on each legal basis. You can find out more about each of these rights below.

		Rights					
		Accessed from law	Right to rectification	To delete or to "forget" the right to	To restrict data processing the right to	Right to data portability	Right to object
Legal basis /GDPR 6. Article from (1) (a)-(f)/	a) Consent	✓	✓	✓	✓	✓	<i>The contribution revocable!</i>
	b) Performance of contract	✓	✓	✓	✓	✓	∅
	c) Fulfilment of legal obligation	✓	✓	∅	✓	∅	∅
	d) Vital Interest	✓	✓	✓	✓	∅	∅
	e) Exercise of public authority	✓	✓	∅	✓	∅	✓
	f) Legitimate interest	✓	✓	✓	✓	∅	✓

Right to information and to access the processed personal data

You have the right to receive feedback from Sziget Ltd. 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 organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant relating to the transfer.

Sziget Ltd. shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, Sziget Ltd. 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 Ltd. 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 below.

Right to rectification

The data subject shall have the right to obtain from Sziget Ltd. 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 ('right to be forgotten')

The data subject shall have the right to obtain from Sziget Ltd. the erasure of personal data concerning him or her without undue delay where one of the following grounds applies:

- a) 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 processing¹; or
- g) for the establishment, exercise or defense of legal claims.

Right to restriction of processing

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

- 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 Ltd. 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 Ltd.'s processing pursuant to public interest or

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.

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 defense 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 Ltd. 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 Ltd., in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from Sziget Ltd. 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 Ltd.'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 Ltd., processing is necessary for the purposes of the legitimate interests pursued by Sziget Ltd. or by a third party, including profiling based on those provisions.

In this case, Sziget Ltd. 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 Ltd.'s data processing is based on consent. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

VII. COMPLAINT, LEGAL REMEDY

- 1) **DPO - contact the Data Protection Officer!** *Please always contact the DPO of SZIGET first and foremost with any complaints or comments!* If you have any questions or comments about the data processing, you can contact the Data Controller or its DPO using one of the contact details provided above. The Data Protection Officer replies to you as soon as possible, but no later than within one month.
- 2) **Authority path (NAIH)** - If this is not successful, you can also file a complaint with the National Authority for Data Protection and Freedom of Information:
 - i. **National Authority for Data Protection and Freedom of Information (NAIH)**
 - ii. Headquarters: 1055 Budapest, Falk Miksa utca 9-11. Postal address: 1363 Budapest, Pf.: 9.
 - iii. Website: <http://www.naih.hu>
 - iv. E-mail: ugyfelszolgalat@naih.hu
- 3) **Court path:** the data subject may take legal action against SZIGET as data controller in the event of violating his/her rights. The court will rule on the case out of turn. The burden of proof that the processing complies with the law lies with SZIGET. The decision in the litigation belongs to the jurisdiction of the tribunal. The lawsuit may also be brought before the court of the place of residence or domicile of the data subject, at the data subject's choice.

VIII. DATA SECURITY MEASURES

Sziget Ltd., as well as the operator of the server network shall ensure security of the personal data with reasonably obtainable most up-to-date hardware and software support especially from unauthorized use, unauthorized alteration, transfer, publication, erasure or destruction, as well as accidental destruction or data loss, thereby serving data security

Under the general rule, data processed by Sziget Ltd. shall be only accessed by employees and other collaborators partaking in achieving the data processing purposes of Sziget Ltd., and they

are under confidentiality obligation based on employment contract, legal relationship related to the employment, furthermore other contractual relations, statutory provisions, or based on instruction of Sziget Ltd. in relation to all data they accessed.

A. Security of paper-based personal data

For the security of personal data processed on paper, Sziget Ltd. shall take the following measures:

- Data shall only be accessed by authorized persons, no other may access them, nor shall they be revealed to them
- The documents shall be placed in a well locked, dry place equipped with fire protection and property protection equipment.
- Documents under continuous, active processing shall be accessed only by authorized persons,
- The staff performing data processing can only leave the data processing room at the end of the day, if he/she locks the documents under his/her responsibility, or locks the office.
- If the personal data processed on paper is digitalized, the security rules applicable to digitally stored documents shall be applied by Sziget Ltd. and its data processors.

B. Security of Personal Data Stored Digitally

To ensure the security of the personal data stored on a computer or network, Sziget Ltd. and its data processor operating the ticketing system proceed in compliance with the rules of the Information Security Regulations of the latter, in particular

- to have access to data stored in the ticketing system only with valid, unique and identifiable authorization, at least with a user name and password,
- to log each access to data ensuring traceability,
- to provide continuous protection against viruses on the network managing personal data,
- to prevent unauthorized access to the network by the implementation of the available information technology devices.

A possible security incident may, if not addressed in an appropriate and timely manner, result in physical, material or non-material damage to natural persons such as loss of control over their personal data or limitation of their rights, discrimination, identity theft or fraud, financial loss, unauthorised reversal of pseudonymisation, damage to reputation, loss of confidentiality of personal data protected by professional secrecy or any other significant economic or social disadvantage to the natural person concerned.

As soon as Sziget Ltd. becomes aware that a security incident has occurred, it should notify the security incident to the supervisory authority without undue delay and, where feasible, not later than 72 hours after having become aware of it, unless it is able to demonstrate, in accordance with the accountability principle, that the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. If the notification cannot be given within 72 hours, Sziget Ltd. shall describe the reason for the delay in the notification, and it shall give the specified information in parts.

In order to prevent security incidents, to maintain security and to prevent processing that infringes GDPR, Sziget Ltd. or the data processor shall evaluate the risks inherent in the processing and shall implement measures to mitigate those risks, such as encryption. These measures shall ensure an appropriate level of security, including confidentiality, taking into account the state of the art and the costs of implementation in relation to the risks and the nature of the personal data to be protected. In assessing data security risk, consideration should be given to the risks that are presented by personal data processing, such as accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transferred, stored or otherwise processed which may in particular lead to physical, material or non-material damage. Furthermore, to monitor measures relating to security incidents and to inform the subjects concerned, Sziget Ltd. keeps security incident records where all security incidents obligatory listed at least with the following details

- a) the affected personal data types
- b) types and number of subjects involved in the security incidents
- c) time, circumstances and effects of security incidents
- d) measures taken to solve the problem and
- e) other data prescribed by law on data management.

To monitor the legality of data transfer and to inform the subjects concerned, Sziget Ltd. keeps data transfer records including

- a) time of personal data transfers managed by it,
- b) legal basis of data transfers,
- c) addressees,
- d) description of transferred personal data types and
- e) other data prescribed by law on data management.

In addition, Sziget Ltd. keeps records of requests to terminate data management, of cases by subjects concerned and by authorities, and of subjects concerned accepting marketing communication to be sent. Data protection officer keeps security incident records, and records of cases by subjects concerned and by supervisory authorities, and the Marketing Department of Sziget Ltd. keeps records of subjects concerned accepting marketing communication to be sent, whereas data transfer records are kept by Sziget Ltd.'s respective departments involved in the data transfer.

This General Data Protection Regulation 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.