

PRIVACY POLICY

concerning participation at GOURMET Festival

We process various personal data in connection with the visitors participating GOURMET Festival 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 the “**GDPR**”). We hereby inform you on the details of the processing of your personal data and your corresponding rights.

The entity of the data controller: Sziget Cultural Management Private Company Limited by Shares (seat: 1033 Budapest, Hajógyári sziget 23796/58., company registration number: 01-10-049598, telephone number: +36 (1) 372 0681, e-mail: hello@sziget.hu, website: www.gourmetfesztival.hu; hereinafter: “**Sziget Zrt.**”)

Availability of the data protection officer:

Postal address: H-1033 Budapest, Hajógyári-sziget topographical lot No.: 23796/58.

E-mail: dpo@sziget.hu

The scope of processed data, the purposes, duration and legal basis of data processing:

1.

ENTERING THE SITE OF THE EVENT, PARTICIPATING THE EVENT

The Festival is a private event, entering and staying there is possible only if bearing a valid wristband. The wristbands are for specific day(s) and entitle only one person to enter. Sziget Zrt. issues the wristbands with unique identifiers after validating respective tickets.

1.1. ENTERING THE EVENT

Purpose of data processing	Exchanging the purchased tickets to wristbands (connecting tickets to wristbands). The site of the event may be entered only bearing valid wristbands, which are checked at the entrance (however, no data are registered of such checking).
Processed data	In excess to the data of the purchased ticket, the serial number of the wristband, the time of the exchange.
Legal basis of data processing	Performing the contract concluded with the ticket purchasing pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	In accordance with the purchasing data.
Addressees	ticketing system: Netpositive operation of payment chip voucher system (see 1.2.): Festipay

1.2. CONVENIENCE SERVICE RELATED TO CASHLESS PAYMENT

For availing the cashless payment provided by Sziget Zrt at the event, the Visitor necessarily provides personal data, which are processed by Sziget Zrt. and the below mentioned data processor in relation to using the payment device.

1.2.1. Providing the cashless payment device (payment chip)

Purpose of data processing	Providing cashless payment and convenience service, as well as protecting the money placed thereon by the Visitor against unauthorized usage in the event of losing, damaging, defect of the payment chip (safety services).
Processed data	wristband serial number PIN code (last four characters of the serial number of the voucher or – if the Visitor purchases the ticket on the site of the Festival, – the four characters handed over upon the purchase): safety function in accordance with those set forth in the User's Guide
Legal basis of data processing	Performing the contract for cashless payment service concluded with the lawful user of the payment chip pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	Sziget Zrt. deletes or anonymises (so that the data subjects cannot be identified) the above data upon the expiry of 6 months after the Festival. Accounting certificates are stored for 8 years in accordance with the effective legal regulations.
Addressees	wristband handling: Netpositive operation of payment chip voucher system: Festipay

1.2.2. Uploading balance onto cashless payment device

Purpose of data processing	Availing by the Visitor and providing by Sziget Zrt. of the cashless payment as convenience service. The Visitor may place amounts onto the payment chip in cash or by card for the purpose of paying to merchants providing services, selling products exclusively at the time and site of the Festival affected by the wristband. The balance may be checked at the POS terminals of the merchants.
Processed data	in excess to the data of the payment chip (point 1.2.1.): balance statement, balance operations (Point 6.2 of the User's Guide) amount of the upload, upload time, upload method (cash or bank card): precise balance statement, necessary for issuing receipt, as well safety measure as several failed transactions may indicate defects, abuses; satisfying obligation to provide accounting receipts; in the event of process pursuant to Point 6.2 of the User's Guide, for security reasons feedback on the transaction status of the bank card: evidence of the appropriate operation, aid to investigate the reason of the failure in the event of handling complaints receipt identification number: satisfying obligation to provide accounting receipts
Legal basis of data processing	Performing the contract pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	Sziget Zrt. deletes or anonymises (so that the data subjects cannot be identified) the above data upon the expiry of 6 months after the Festival. Accounting certificates are stored for 8 years in accordance with the effective legal regulations.
Addressees	wristband handling: Netpositive operation of payment chip voucher system: Festipay

	in relation to balance upload: OTP Mobil, Főnix accounting receipts: KBOSS
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1.2.3. Payment with cashless payment device

Purpose of data processing	Availing by the Visitor and providing by Sziget Zrt. of the cashless payment as convenience service. The Visitor may use the payment chip in accordance with the User's Guide.
Processed data	in excess to payment chip and balance data: amount of purchase, time of purchase, place of purchase (merchant identification), crediting transaction time, amount, method: precise balance statement, necessary for issuing receipt, as well safety measure as several failed transactions may indicate defects, abuses; satisfying obligation to provide accounting receipts; in the event of process pursuant to Point 6.2 of the User's Guide, for security reasons, as well as aid to investigate the reason of the failure in the event of handling complaints
Legal basis of data processing	Performing the contract pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	Sziget Zrt. deletes or anonymises (so that the data subjects cannot be identified) the above data upon the expiry of 6 months after the Festival. Accounting certificates are stored for 8 years in accordance with the effective legal regulations.
Addressees	wristband handling and balance statement of payment chip: Netpositive operation of payment chip voucher system: Festipay in relation to balance usage: Cardnet

1.2.4. Refunding balance remained on cashless payment device

Purpose of data processing	In case unused balance remains for the Visitor, refunding of the amount takes place following a pre-specified logic (after deducting convenience fee) onto the bank account attached to the bank card used for the upload (to be identified by OTP Mobil) or in cash (Point 8 of the User's Manual). Refunding balance uploaded at uploading points may be refunded exclusively at the uploading points.
Processed data	In excess to data listed in point 1.2.3.: method, time of refunding
Legal basis of data processing	Performing the contract pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	Sziget Zrt. deletes or anonymises (so that the data subjects cannot be identified) the above data upon the expiry of 6 months after the Festival. Accounting certificates are stored for 8 years in accordance with the effective legal regulations.
Addressees	wristband handling and balance statement of payment chip: Netpositive operation of payment chip voucher system: Festipay in relation to refunding balance to bank card: OTP Mobil

HANDLING MATTERS AND ISSUES ARISING IN RELATION TO THE EVENT

All persons at the Festival must adhere to both the Festival policy, and the policy of the site of the event. Despite this, and despite all the precautions, some problems may occurrently arise that may result in the processing of personal data.

2.1. MEDICAL PROBLEMS

On the site of the Festival, Sziget Zrt. provides medical attendance, ensures on-site presence of first aid staff within its legal obligation pursuant to 5/2006 (II.7) Health Ministry decree and 23/2011 (III.8) Government decree.

Pursuant to Act XLVII of 1997 on processing and protecting medical and related personal data, the medical service provider availed by Sziget Zrt. are individual data controllers, their data processing falls outside of the sphere of control of Sziget Zrt., therefore, the latter has no liability for them, cannot provide information of them.

In connection with medial aid availed without help, no data is registered, in case of an incident, however, the security service and the medical service, respectively, records the data of the incident in a report, that contains all relevant information. The records are kept by the service providers indicated upon the entrance to the event, which are handled by the respective service providers within the sphere of their own data processing, as individual data controllers. Sziget Zrt. receives exclusively anonym statistical data of security incidents.

2.2. LOST AND FOUND OBJECTS, LUGGAGE

Purpose of data processing	<p>At the customer service of the Festival, Sziget Zrt. takes over, collects the objects lost then handed over by the person who has found it.</p> <p>To the person who hand the lost object over, Sziget Zrt. gives over a takeover declaration including the description of the object handed over) but no data is recorded about the person who has found the object.</p> <p>Under security camera, Sziget Zrt. places etiquettes with serial numbers onto the handed over objects, makes a detailed description of the objects, records them in its registry.</p> <p>When the owner who has lost the object comes to collect the object, Sziget Zrt. makes as sure as possible in accordance with its internal policy that it hands the objects over to the lawful, identified owner. Sziget Zrt. prepares a handover-takeover declaration, which the person taking the object over shall sign.</p> <p>It is also possible that the person who has lost an object, provides Sziget Zrt. with a description of the lost item in case the lost object is handed over at the customer service of the Festival.</p> <p>In case the owner of the deeds, documents, objects, or the person who is entitled for the takeover can undoubtedly be identified, as well as the contact details are available for Sziget Zrt., Sziget Zrt. shall notify such person.</p> <p>In case, however, someone else than the owner of the object or the person entitled to take the object over would take the object over, Sziget Zrt. shall hand the processed data over to the investigating authority or the court.</p>
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Processed data	<p>upon giving the description of lost object(s):</p> <ul style="list-style-type: none"> - owner's name - telephone number, e-mail address - description and, if available, photo of the lost object(s) - signature <p>additionally, upon taking over lost and found object(s), owner's and, if applicable, proxy's</p> <ul style="list-style-type: none"> - name - address - place and date of birth - ID /passport number - etiquette number, images of the object(s) handed over to the customer service
Legal basis of data processing	The legal basis of the data processing is, pursuant to Point f) of Article 6 (1) of the GDPR, primarily the legitimate interest of a third person (owner of the lost and found item), i.e. in case another person has taken the lost and found item over, the lawful owner can enforce his/her ownership claim, as well as the legitimate interest of Sziget Zrt. to be able to comply with its legal obligation pursuant to Section 5:59 of the Civil Code.
Duration of data processing	<p>Sziget Zrt. stores personal data of persons seeking their lost items for 3 months after closing the Festival considering that Sziget Zrt. is obliged to safeguard lost items for 3 months pursuant to Section 5:59 (3) of the Civil Code.</p> <p>Data and declarations related to the takeover of lost and found items shall be stored for the general forfeiture period of 5 years to enable exercising ownership claims.</p>
Addressees	<p>customer service administration related to lost and found items: FestLife PR</p> <p>Sziget Zrt. is obliged to satisfy authority inquiries in connection with lost and found items.</p>

2.3. LOST CHILD

For minors, Sziget Zrt. provides a separate wristband on each of its events, on which the telephone number of the accompanying adult (parent, relative) can be written down for the case if the child is lost in the crowd. In such a case, the Festival's customer service will try to contact the owner of the phone number on the wristband, the customer service will try to reach the specified number 5 times, then after 10 minutes, shall notify the on-site security service, then notify the police after 1 hour. In connection with the child, the security service and the police, respectively, records the data of the incident in a report, that contains all relevant information. The records are kept by the service provider indicated upon the entrance to the event, which are handled by the respective service provider within the sphere of its own data processing, as individual data controller. Sziget Zrt. receives exclusively anonym statistical data of security incidents.

2.4. THERAPEUTIC AND OTHER ANIMALS

Therapeutic animals bearing adequate certificate can be brought to the site of the event, which is checked and registered at the entrance. Other animals may be brought to the Festival site

upon the judgment and responsibility of the owner, which animals shall also be registered at the entrance.

3.

INQUIRIES ON THE PHONE OR IN E-MAIL

Would you have any questions, issues in connection with the Festival, you can request support from Sziget Zrt. in several ways. You can contact us in e-mail, on the telephone, but there is an on-site Helpdesk during the Festival where we can help you. In case such communications are not oral, there is necessarily data processing in relation to written inquiries.

3.1. GENERAL INQUIRIES

Purpose of data processing	Anybody can formulate his/her opinion , indicate his/her problem , send feedback , pose questions via the telephone or e-mail availabilities of Sziget Zrt., during which you necessarily provide personal data.
Processed data	<ul style="list-style-type: none"> • name (for addressing, identification if necessary), • telephone number (in case of inquiry via telephone or giving the telephone number via e-mail), or e-mail address (in case of inquiry via e-mail or giving the e-mail address on the phone) (for keeping contact), • comment, problem, feedback, question and the personal data contained therein (aiding Sziget Zrt. to develop its services, so that it may remedy the problem – for customers' complaints see point 3.2, for problems related to noise see point 3.3, in the event of data protection request see point 3.4 for more details), as well as may satisfy its obligations related to complaint management, if needed, may provide answers to your questions), • reply of Sziget Zrt. and the personal data contained therein • address (in case of reply to be sent by mail)
Legal basis of data processing	<p>We handle your inquiry basically based on your consent pursuant to Point a) of article 6 (1) of the GDPR.</p> <p>In case your inquiry qualifies – after having it read – as complaint eligible for natural persons (see points 3.2, 3.3 or 3.4), the legal basis will further be the satisfaction of the legal obligation burdening Sziget Zrt. pursuant to Point c) of Article 6 (1) of the GDPR.</p> <p>In case the complaint arrives from a non-natural person entity, Sziget Zrt. processes the occurrently affected personal data with regards to enforcing occurrent civil law claims as per Section 6:22 of Acti V of 2013 on the Civil Code, as well as defence against occurrent civil law claims of the affected parties, i.e. with regards to the legitimate interest of Sziget Zrt. (Point f) of Article 6 (1) of the GDPR).</p>
Duration of data processing	In case the inquiry does not qualify as a complaint, Sziget Zrt. stores the data until the withdrawal of your consent, in lack of which Sziget Zrt. deletes the personal data until 28 th February following the elapse of one calendar year reckoned from the last communication in connection with the inquiry (from closing the inquiry). The consent may

	<p>be withdrawn anytime by sending an e-mail to the dpo@sziget.hu address.</p> <p>Sziget Zrt. stores the reports of the complaints and the copy of the reply for 5 years and presents them to supervisory authorities upon request.</p>
Addressees	<p>providing customer service: FestLife PR</p> <p>providing customer service management system: Freshworks</p>

3.2. CONSUMERS' COMPLAINTS

Purpose of data processing	<p>Examination of the complainant's complaint in accordance with the legal requirements, complaint handling: You may submit the consumer objections (complaints) in relation to purchased ticket, product or related activity of Sziget Zrt. in accordance with the relevant procedural rules.</p> <p>Complaints that are made in person or on telephone are examined immediately and we inform the complainant of our position, and remedy the complaint if possible. If the buyer does not agree with the answer to the oral complaint, the complaint shall be sent in writing. In this case, we follow the provisions on written complaints as described below.</p> <p>Written complaints are examined and answered within 30 days. If the complaint is rejected, we justify our answer. If the complaint is rejected, we inform you in writing that, by its very nature, which authority's or conciliation body's proceeding may be initiated.</p>
Processed data	<ul style="list-style-type: none"> - name, address of consumer, - place, time, method of filing complaint, - detailed description of consumer complaint, log of documents, records and other proofs submitted by consumer, - Sziget Zrt.'s statement regarding its position on the consumer complaint, if an immediate investigation of the consumer complaint is possible, - signature of consumer and the person registering the complaint (except if complaint is submitted via email or phone) - place and time of registering consumer complaint
Legal basis of data processing	<p>Pursuant to Point c) of Article 6 (1) of the GDPR, satisfying legal obligations prescribed for Sziget Zrt. in the Civil Code and legal regulations related to consumer complaints (especially Act CLV of 1997 on consumer protection).</p>
Duration of data processing	<p>Sziget Zrt. stores the reports of the complaints and the copy of the reply for 5 years and presents them to supervisory authorities upon request pursuant to Section 17/A (7) of Act on Consumer Protection.</p>
Addressees	<p>providing customer service: FestLife PR</p> <p>providing customer service management system: Freshworks</p> <p>In case of submitted for review, the authorities and organizations indicated on http://fogyasztovedelem.kormany.hu/node/7699 site.</p>

3.3. COMPLAINTS ABOUT NOISE

Purpose of data processing	Examining the complaint related to noise exposure of the complainant in accordance with the legal regulations.
Processed data	<ul style="list-style-type: none"> - name, e-mail address or telephone number of complainant, - place, time, method of filing complaint, - detailed description of the complaint, street, area specified by the complainant, - Sziget Zrt.'s statement regarding its position on the consumer complaint, - person registering the report (in internal administration) - place and time of registering the report
Legal basis of data processing	Pursuant to Point c) of Article 6 (1) of the GDPR, satisfying legal obligations prescribed for Sziget Zrt. in the Civil Code and legal regulations related to complaints on noise (especially 27/2008. (XII. 3.) KvVM–EüM decree on setting environmental noise and vibration load limits).
Duration of data processing	Sziget Zrt. stores the reports of the complaints and the copy of the reply for 5 years and presents them to supervisory authorities upon request pursuant to Section 17/A (7) of Act on Consumer Protection.
Addressees	noise level control, handling complaints related to noise: ITEvent-Team

3.4. REQUESTS TOWARDS THE DATA PROTECTION OFFICER

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.</p> <p>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,

	<ul style="list-style-type: none"> – 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	data protection officer: Csáki és Társa Ügyvédi Társulás In case the data subjects seeks remedy in relation to the complaint or the reply of Sziget Zrt., data are transferred to NAIH or courts as noted above.

Details of the addressees

specification of activity	type of activity	name	availability
operation of customer relationship management (ERP) system of Sziget Zrt., physical and operation system level management of the servers for online sales systems, providing a running environment;	data processor	Netpositive Számítástechnikai Szolgáltató és Kereskedelmi Kft.	2021 Tahitótfalu, Pataksor utca 48. info@netpositive.hu

development and operation of the IT system handling and storing personal data of natural persons entering the event			
operation of the program providing accounting documents, issuing and sending invoices and e-receipts	data processor	KBOSS.hu Kft.	1031 Budapest, Záhony utca 7. dpo@kboss.hu
operation of customer service management system	data processor, certified organisation under the US-EU Data Privacy Framework: https://www.freshworks.com/privacy/	Freshworks, Inc.	16192 Coastal Highway, Lewes, Delaware 19958, USA dpo@freshworks.com
customer service administration	data processor	FestLife PR Kft.	1068 Budapest, Király utca 80. fsz. 11. ajtó hello@festinform.hu
provision of cashless payment integration developed for wristbands at the site and time of the festival	data processor	FESTIPAY Zrt.	1135 Budapest, Reitter Ferenc u. 46-48. sales@festipay.com

Data security

Sziget Zrt. shall ensure the security of the personal data and shall implement appropriate technical and organizational measures to ensure that the collected, stored and processed data are protected, in addition to preventing destruction, unauthorized use, and unauthorized alteration of the data. Sziget Zrt. shall furthermore notify third parties - to whom the data subject's information is transferred - that they are obligated to meet the data security requirements.

Sziget Zrt. shall ensure the prevention of unauthorized access to personal data, as well as the publication, transfer modification or erasure thereof.

Sziget Zrt. shall impose the aforementioned obligation onto its employees taking part in the data processing, as well as the data processors acting under the authority of Sziget Zrt.

The rights and legal remedies, complaints 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 shall be provided by Sziget Zrt. 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.

(You can read further information about the rights in the General Data Protection Regulation, which is available here: <https://szigetfestival.com/en/policy-gctc#!/c141/privacy-policies>)

If you feel that Sziget Zrt. has violated any of the legal provisions applicable to the data processing, please, contact us 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 of 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.

Personal data related to children and third persons

Persons under 16 may not submit their personal data, except if they have requested permission from the person exercising parental rights. By providing your personal data to Sziget Zrt., you hereby represent and warrant that you 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 shall 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 shall be able to consider whether the personal data to be provided requires the consent of a third party. It may happen that Sziget Zrt. does not get into contact with the data subject, therefore, you are responsible for meeting all the necessary requirements and Sziget Zrt. shall not be liable or bear any responsibility in this regard. Nevertheless, Sziget Zrt. has the right to check and verify whether the proper legal basis is provided for 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 Zrt. shall do its utmost to remove all personal information provided without authorization. Sziget Zrt. shall ensure that if Sziget Zrt. becomes aware of this, such personal information is not forwarded to any third party or used for Sziget Zrt.'s own purposes. We request that you inform us immediately via our aforementioned contacts 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 Zrt.

Miscellaneous

This Privacy Policy was written in Hungarian, although its English version is also accessible. In the event of contradiction between the Hungarian and the English version, the Hungarian language version shall prevail.