PRIVACY NOTICE

on the processing of personal data recorded by body cameras worn by the security and property guards of IN-KAL Security Events Kft

Pursuant to the obligation laid down in Article 13 of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: **GDPR**), we hereby provide the following information on the processing of the personal data of the persons appearing in the image and audio recordings made with body cameras by the security and property guards of IN-KAL Security Events Kft:

Purpose and legal basis of the data processing

1. In the course of event security provided under Section 1(2)(d) of Act CXXXIII of 2005 on the rules governing the protection of persons and property and private investigation activities, carried out by IN-KAL Security Events Kft as data controller (hereinafter: the Data Controller), the property guards designated and trained for this purpose may make image, or image and audio, recordings using body cameras.

2. The property guard switches on the body camera only where they directly perceive an actively committed act or conduct that endangers the order or safety of the event or the life, physical integrity or property of the participants, and where they initiate a measure. The body camera focuses on the act, the conduct and the perpetrator, so the data processing does not entail the wide-ranging collection of a greater quantity of personal data than necessary. Once the measure has concluded, the property guard switches the body camera off.

3. *The purpose of the data processing* is to prove conduct by the data subject that breaches the conditions of participation in the event, or a crime or an infraction, and to demonstrate the lawfulness of the property guard's measure initiated on that account,

a) documenting – in connection with Section 26(3)(b) of Act CXXXIII of 2005 – the act of a person obstructing or disrupting the holding of the event, endangering its safety, or unlawfully present there, and enforcing the necessary legal consequences against them;

b) fulfilling the obligations laid down in Section 22(3)(a) and in subsection (3c) of Act CXX of 2012 (*investigating a complaint against a measure or against the use of a coercive instrument*).

4. *The legal basis of the data processing* is Article 6(1)(f) of the GDPR (*processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party*).

5. As a property-protection undertaking, the Data Controller has a fundamental interest in being able to prove that:

a) conduct endangering the holding of the event or the safety of the participants actually occurred;

b) the data subject continued the conduct breaching the contract despite being called upon to stop;

c) the prohibition of participation in the event, the call to leave and the escorting out were well-founded and justified, and were based on an actual breach of the conditions of participation;

d) the property guard's measure was necessary and justified;

e) a situation of lawful defence existed, whether physical force or an attack-repelling device was used;

f) the coercive physical force applied during the escorting out was proportionate to the data subject's resistance, caused no injury or degrading treatment, and did not exceed the bounds of proportionality.

6. As a third party, the event organiser has a legitimate interest in ascertaining that:

a) the data subject actually breached a rule of conduct laid down in the general terms and conditions of participation in the event or in the house rules;

b) the immediate unilateral termination of the contract concluded between the organiser and the participating data subject – through the purchase of a ticket or through appearance at the venue of a free event – is well-founded from the organiser's perspective as well;

c) the intervention of the member of the security service was necessary, justified and lawful;

d) in the event of a damage claim, whether damage actually occurred, and whether there is a causal link between the perceived act and the damage.

7. The data subject may also have a legitimate interest in the body-camera image recordings, since, under Article 15(3) of the GDPR, the data controller provides the data subject, at their

request, with a copy of the personal data undergoing processing, so that these may be used to substantiate a complaint or damage claim submitted by the data subject.

The data processed, the persons affected by the data processing, and the duration of the data processing

8. *The data subjects of the data processing* are those persons participating in the event who engage in active conduct capable of disrupting the order or safety of the event or of endangering the life, physical integrity or property of those present, and who, on that basis, are directly affected by a property guard's measure.

9. The Data Controller processes the following personal data of the data subject:

a) the facial image of the data subject, together with what they say and the acts they carry out.

10. Having regard to the time limits set out in Section 22(3d) and (5) of Act CXX of 2012, the Data Controller processes the personal data for 90 days from the time of recording. If an employer's or professional-chamber investigation, or an official or court procedure, is initiated on account of a given measure, the duration of the data processing lasts until the final conclusion of the investigation or procedure.

Transfer of data

11. The Data Controller carries out transfers of the data subject's personal data only as prescribed by law, to authorities (e.g. the police, the National Tax and Customs Administration [NAV]).

12. The Data Controller does not transfer data to, or provide information to, any other third party. No transfer of data takes place to a third country outside the European Union or to an international organisation.

Rights of the data subject

13. The data subject is entitled to obtain, upon request, information from the Data Controller about the processing of their personal data. If the Data Controller processes their personal data, the data subject may access the personal data concerning them and may learn:

a) the purposes of the data processing;

b) the categories of personal data concerned, and the recipients to whom their personal data have been or will be disclosed;

c) the envisaged duration of the storage of their personal data;

d) where the data were not collected from the data subject, all available information as to their source.

14. The data subject may request the Data Controller to rectify the personal data concerning them and to restrict its processing, and may object to the processing of such personal data.

15. The data subject is entitled to receive from the Data Controller a copy of the personal data undergoing processing (right of access). The data subject is also entitled to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used, machine-readable electronic format, and is entitled to transmit those data to another data controller without hindrance from the Data Controller.

16. The data subject is entitled to have the Data Controller erase, without undue delay, the personal data concerning them, where:

a) the data are no longer necessary for the purpose for which they were processed;

b) they withdraw the consent on which the processing is based, and there is no other legal basis for the processing;

c) they object to the processing – where the processing is necessary for the legitimate interests of the data controller or a third party – and there is no overriding legitimate ground for the processing, or the personal data are processed for the purposes of direct marketing.

17. The data subject:

a) may **initiate an investigation** by lodging a report with the National Authority for Data Protection and Freedom of Information (hereinafter: the Authority) in order to examine the lawfulness of the Data Controller's measure, if the data controller restricts the exercise of their rights or rejects their request to exercise those rights;

b) may request the conduct of the Authority's data protection authority procedure if, in their opinion, in the course of processing their personal data the Data Controller – or the data processor acting on its behalf or on its instructions – infringes the requirements laid down for the processing of personal data in legislation or in a binding legal act of the European Union;

c) may bring an action before a court against the Data Controller or – in connection with data processing operations falling within the data processor's scope of activity – against the data processor, if, in their opinion, the data controller, or the data processor acting on its behalf or on its instructions, processes their personal data in breach of the requirements laid down for the processing of personal data in legislation or in a binding legal act of the European Union.

Contact details The data controller name: IN-KAL Security Events Kft postal address: 1146 Budapest, Thököly út 68. I. em. 3. email address: inkalevents@inkal.hu

The data controller's data protection officer name: Bernáth Mihály postal address: 1146 Budapest, Thököly út 68. I. em. 3. email address: inkalevents@inkal.hu

The supervisory authority name: National Authority for Data Protection and Freedom of Information address: 1055 Budapest, Falk Miksa utca 9-11. postal address: 1363 Budapest, P.O. Box 9. telephone: +36 1 391 1400 email address: ugyfelszolgalat@naih.hu online case administration: https://naih.hu/online-ugyinditas

Budapest, 22 April 2026.

IN-KAL Security Events Kft data controller