

● PRIVACY POLICY

1. Data Controller

Name: Kultúrpark Zrt.

Address: 1095 Budapest Fábíán Juli tér 1.

Representative of the data controller: András Pálffy

Contact details of the Data Controller regarding data protection:

adatvedelem@budapestpark.hu

This information is a unilateral commitment by the controller in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and the relevant legislation of the Member States.

This information may be unilaterally amended and / or revoked by the Data Controller at any time, with the simultaneous notification of the Data Subjects. The information will be provided by publishing on the website or by notifying the Data Subjects directly, depending on the nature of the change.

2. Purpose of the Privacy Policy

2.1 Sale of ice rink tickets

During the sale of tickets and passes, the Data Controller manages the specific data of the guest in order to digitally transmit the tickets and fulfil the contract.

Legal basis for data management: Contract performance, (Article 6 (1) b)).

Scope of the data processed: name, email, phone number, address, unique QR code, Facebook User ID, IP address

Planned deadline for data management: Until the end of the day for which the ticket is valid

Source of data collection: Data from the data subject

Purpose of reclassification data processing: N/A

New Data Management deadline: N/A

Categories of data processors:

2.2 Determining eligibility for a discounted ice rink ticket

Budapest Park provides tickets for access to the skating rink at a discounted price for those specified in the General Terms and Conditions. During the verification of the right to use the discounted ticket (conclusion of contract), the document entitling to the discount is inspected on site, and the number of certain documents is recorded.

Legal basis for data management: Contract performance, (Article 6 (1) b)).

Scope of the data processed: Legal title of discount, number of document certifying legal title

Planned deadline for data management: Until the end of the day for which the ticket is valid

Source of data collection: Data from the data subject

Purpose of reclassification data processing: N/A

New Data Management deadline: N/A

Categories of data processors:

2.3 Charging the mobile phones of those concerned

Budapest Park offers guests the opportunity to charge their mobile phones in the cloakroom.

Legal basis for data management: Consent of the data subject (Article 6(1)(a))

Scope of the data processed: Name, phone number, email address

Planned deadline for data management: Until the end of the day for which the ticket is valid

Source of data collection: Data from the data subject

Purpose of reclassification data processing: N/A

New Data Management deadline: N/A

Categories of data processors:

2.4 Online ticket sales and communication about the technical management of the event

The Data Controller manages the guest's data during the online sales process in order to transmit the tickets digitally during ticket sales. Sending a technical email to ticket buyers with information about the event and the conditions of participation,

Legal basis for data management: Performance of a contract (Article 6(1)(b)).

Scope of the data processed: Name, email, home address, unique QR code, Facebook User ID, IP address, delivery address, phone number

Planned deadline for data management: Until the end of the event.

2.5 Business contact related to the organization of events and concerts

The Data Controller's data management related to the organization of events and concerts, registration of guest lists, contact with performers, contact persons of performing guests, request for proposals, preparation of contracts, documents necessary for the organization of the event.

Legal basis for data management: Enforcement of the legitimate interest of the data controller (Article 6 (1) (f)). The legitimate interest of the Data Controller is to maintain contact with users of the service prior to the contract or to register the contact person's data.

Scope of the data processed: Name, address, email, phone, passport number

Planned deadline for data management: Until the last working day of January following the 4th year after termination of data management

Source of data collection: Data from the data subject, the data subject's employer or the data subject's partner

Purpose of reclassification data processing: N/A

New Data Management deadline: N/A

Categories of data processors: BackStage, Gsuite

2.6 Mail handling, delivery handling

Records of registered and recorded delivery postal items and items sent by other service providers relating to the activities of the controller.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). It is the legitimate interest of the data controller to register the data of the contact person.

Scope of the data processed: Name, address

Planned deadline for data management: The last working day of January of the 4th year following the termination of the partnership agreement or until the Data Subject objects.

Source of data collection: For incoming mail, the postal service provider. For outgoing mail, the controller's records.

Purpose of reclassification data processing: N/A

New Data Management deadline: N/A

Categories of data processors: Postal service provider

2.7 Contract management and filing

Contract management, filing. The registration of contracts related to the activity of the controller, the management and updating of the data of the contact persons of the contracting party at the time of the conclusion of the contract, the data of the authorised representatives of the contracting party.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). It is the legitimate interest of the data controller to register the data of the contact person.

Scope of the data processed: Name, phone, position, e-mail, signature

Planned deadline for data management: The last working day of January of the 4th year following the termination of the partnership agreement or until the Data Subject objects.

Source of data collection: Data from the data subject, the data subject's employer or the data subject's partner

Purpose of reclassification data processing: N/A

New Data Management deadline: N/A

Categories of data processors:

2.8 Bid request management

Registering and answering questions and requests for bids sent to the central email address of the Organisation or to the personal email address of a colleague. Issuance of bids.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the data controller is pre-contractual contact and registration of contact persons' data.

Scope of the data processed: Name, address, e-mail address, telephone, unique identifier

Planned deadline for data management: Until the last working day of January of the 1st year following the date of receipt of the request for a bid or until the Data Subject objects.

Source of data collection: Data from the data subject, the data subject's employer or the data subject's partner

Purpose of reclassification data processing: N/A

New Data Management deadline: N/A

Categories of data processors:

2.9 Management and registration of orders

The data controller keeps records of incoming and outgoing orders

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the data controller is pre-contractual contact and registration of contact persons' data.

Scope of the data processed: Name, address, e-mail address, telephone, unique identifier

Planned deadline for data management: 8 years

Source of data collection: Data from the data subject, the data subject's employer or the data subject's partner

Purpose of reclassification data processing: N/A

New Data Management deadline: N/A

Categories of data processors:

2.10 Identification and registration of persons entering the site

Data processing related to the entry of persons without an organizational access card to the site. Admission of guests, foreign vehicles.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the Data Controller is to monitor the site, protect its assets, prevent accidents, and take full measures in the event of an emergency

Scope of the data processed: Name, ID card number, company name,

Planned deadline for data management: 1 month

Source of data collection: Data from the data subject

Purpose of reclassification data processing: N/A

New Data Management deadline: N/A

Categories of data processors: Property guard

2.11 Registration for an event

Processing of registrations for company events, family day events organised by the data controller.

Legal basis for data management: Consent of the data subject (Article 6(1)(a))

Scope of the data processed: Name, Company name, Position, Email address, Phone number

Number of adult guests, Number of children (under 16)

Planned deadline for data management: Until the withdrawal of the data subject's consent

Source of data collection: Data from the data subject

Purpose of reclassification data processing: N/A

New Data Management deadline: N/A

Categories of data processors: Event Organizer, Photo Video Service, Hostess Service, Property Guard Service

2.12 Photo and video documentation of the event

The data controller takes photos and makes video recordings of the events organized by it, which can be published on the Data Controller's website and Facebook page, and stored in its own organizational databases.

Legal basis for data management: Consent of the data subject (Article 6(1)(a))

Scope of the data processed: Face and body image

Planned deadline for data management: Until the withdrawal of the data subject's consent

Source of data collection: Data from the data subject

Purpose of reclassification data processing: N/A

New Data Management deadline: N/A

Categories of data processors:

2.13 Keeping track of press contact details for sending press communications and invitations to events

The Data Controller keeps a record of the contact information of representatives of the press.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). It is in the legitimate interest of the data controller to record the data of press staff in the interest of effective press communication.

Scope of the data processed: Name, phone number, email address

Planned deadline for data management: Until the Data Subject's objection

Source of data collection: Data from a published website

Purpose of reclassification data processing: N/A

New Data Management deadline: Until the Data Subject's objection

Reclassification data processing purpose: Promote the service(s) to people who have previously purchased tickets for the event, and conducting customer satisfaction surveys and research to improve services

Categories of data processors: IT operator, Application provider, Ticket sales portals

2.14 Providing customer service to guests and visitors

Operating customer service, receiving and responding to inquiries via phone, Facebook Messenger and email.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the Data Controller is to deal with the problems and answer the questions of customers and guests who use the service.

Scope of the data processed: Name, email address, phone number

Planned deadline for data management: By 11 January of the year following the year in which the data are disclosed, or until the data subject objects

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: Contracted call centre, ticket sellers

2.15 Age verification when buying alcoholic beverages

When ordering an alcoholic beverage, the service provider may ask the consumer for a photo ID that proves they have reached the age of 18 and is suitable for personal identification.

Legal basis for data management: Fulfilling the legal obligation of the data controller (Article 6, (1), c)).

Scope of the data processed: Data included in a personal identification card

Planned deadline for data management: No storage just viewing

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors:

2.16 Age verification and parental consent during ticket purchase and entry

When purchasing a ticket, as well as when entering the park area, the data controller must be provided the minor's parental consent statement or the parent's authorization for supervision of a person over the age of 18.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). It is the legitimate interest of the data controller to check that minor guests do not participate in the events without authorization.

Scope of the data processed: Identification card data, signature, witness data, parent identification data, data identifying the minor.

Planned deadline for data management: By the first working day of the month following 1 full month after the event.

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: Property guard

2.17 Admission of holders of a named ticket

Issuance of vouchers in the accreditation system for honorary tickets, guests of performers and prize draw winners. The Data Controller will ask you to show your identity card for identification upon entry.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). It is the legitimate interest of the data controller to check that unauthorized people do not enter the event or a given area.

Scope of the data processed: Name of the person entitled to issue the honorary ticket, name of the guest, data contained in his/her identity card

Planned deadline for data management: Until the last working day of January of the year following the event, or until the person concerned objects

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: IT Operator, Application service provider, Property guard

2.18 Organisation of a private event

Registering the list of people invited to a private event. Sending out invitations. Communicating with the invitees. Registration of the guest list for access to the rented area for events organised by an external party (e.g. company).

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the Data Controller is to maintain contact with the participants of the event and record their data.

Scope of the data processed: Name, email address, phone number,

Planned deadline for data management: Until the last working day of January of the year following the event, or until the person concerned objects

Source of data collection: Data from the event organiser

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: IT operator, Hostess service provider, Property guard

2.19 Management of signed declaration for extraneous food brought in from outside

Storing a completed statement of responsibility for the health compliance of extraneous food brought in by guests.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). Legitimate interest - It is in the legitimate interest of the Data Controller to promote the safety of extraneous food brought into the area.

Scope of managed data: Name, address, signature

Planned deadline for data management: Until the last working day of January of the year following the event, or until the person concerned objects

Source of data collection: Data from the event organiser

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors:

2.20 Identification of the owners of lost packages or package tags and storage of related records

Loss of a tag used to identify items dropped off at a left-luggage storage office or, in the case of lost and found items, drawing up a report to trace the release of packages. The Data Controller on Facebook if the data subject can be identified.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the data controller in preventing the misuse of issued valuables in the case of a lost tag.

Scope of managed data: Data included in the identity card, signature, Authorization data

Planned deadline for data management: Until the last working day of January of the year following the event, or until the person concerned objects

Source of data collection: Data from the event organiser

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors:

2.21 Photo and video documentation of events and media communication for promotional purposes

The Data Controller produces photos and videos of his public events, promotional videos, and live Facebook broadcasts, which he can publish on the Data Controller's website and social media pages, use in advertising, and store in its own organizational databases.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the Data Controller in the effective and personalised promotion of the organisation

Scope of managed data: Face and body image

Planned deadline for data management: Until the Person concerned objects

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: IT Service Provider, Web Service Provider, G Suite, Social media sites

2.22 Issuing invoices and compulsory documentation related to the provision of the service, storing the data for compliance with the accounting act

Issuing invoices related to the activities of the Data Controller's catering and event organiser activities, as well as issuing the related mandatory documentation for the performance of the service.

Legal basis for data management: Fulfilling the legal obligation of the data controller (Article 6, (1), c)). x

Scope of managed data: Billing name and address, e-mail address, telephone, tax number, bank account number

Planned deadline for data management: 8 years

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: Authority, contracted accountant, invoicing service provider

2.23 Providing infrastructure and services for a partner company event

Provision of infrastructure and services for rental events organised and licensed by the event management partner company.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The Data Controller's legitimate interest in providing services and venue for partner company events

Scope of managed data: Name, email address, postal code,

Planned deadline for data management: Until the last working day of January of the year following the event, or until the person concerned objects

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: Partner event organizing company

2.24 Registration of VIP guests

The Data Controller keeps a list of VIP guests and their contact details on a Oops (Hoppá) list, for which it provides a card entitling the holder to a discounted ticket

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). It is the legitimate interest of the data controller to manage the contact information of VIP guests and provide services

Scope of managed data: Name, date of birth, address, email address, phone number, ID number, registration date

Planned deadline for data management: Until the Person concerned objects

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors:

1.1 Registration for the prize games, and related media communication, promotion of the prize gamers, prize draw, contact with winners

Managing the data of natural persons registered for a prize game organized by the data controller or conducted by the data controller and publishing them on the data controller's web and social media pages.

Legal basis for data management: Consent of the data subject (Article 6(1)(a))

Scope of managed data: Name, email address, postal code, photo, video recording

Planned deadline for data management: At the latest by the last working day of January of the year following the year of the prize draw, or until the withdrawal of the consent of the person concerned

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: web service provider

2.25 Advertising service(s) and measuring satisfaction related to service(s), conducting research to improve services

Recommending events and programs, making inquiries for the purpose of measuring satisfaction, advertising special promotions for VIP members.

Legal basis for data management: Consent of the data subject (Article 6(1)(a))

Scope of managed data: Name, email address

Planned deadline for data management: Until the withdrawal of the consent of the person concerned

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: Newsletter provider, marketing agencies

2.26 Promotion of service(s) to those who have previously purchased tickets for events

Recommending events and programs. The source of the data is the Data Controller's own ticket buyer database.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the Data Controller is to obtain direct business

Scope of managed data: Name, email address

Planned deadline for data management: Until the Person concerned objects

Source of data collection: Data from the Data Controller's shopping database

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: Newsletter provider, marketing agencies

2.27 Customer satisfaction measurement and research to improve services

The data controller conducts satisfaction measurements among ticket buyers and research to improve services. The source of the data is the Data Controller's own ticket buyer database.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the Data Controller is data management for the purpose of developing its services

Scope of managed data: Name, email address

Planned deadline for data management: Until the Person concerned objects

Source of data collection: Data from the Data Controller's shopping database

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: Newsletter provider, marketing agencies

2.28 Complaint book management

Complaint book management; Management of data entered in the complaint book in the commercial unit operating at the premises of the data controller

Legal basis for data management: To comply with a legal obligation to which the controller is subject (Article 6(1)(c)).

Scope of managed data: Name, address, telephone number, e-mail address, signature

Planned deadline for data management: 5 years

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: Legal representative

2.29 Live or recorded television broadcasting

Budapest Park provides the press and the media as independent data controllers with the opportunity to make on-site recordings and broadcasts.

Legal basis for data management: Independent data management rights of the press and media.

Scope of managed data: Budapest Park does not manage data.

Planned deadline for data management: Budapest Park does not manage data.

Source of data collection: -

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors:

2.30 Provision of a location for external partners to take video and photo recordings

Budapest Park offers its partners, performers, event venue sponsors and venue tenants the opportunity to take photos and video recordings or live broadcasts at the public event.

Legal basis for data management: Based on the data management information of the partner

Scope of managed data: Budapest Park does not manage data.

Planned deadline for data management: Budapest Park does not manage data.

Source of data collection: -

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors:

2.31 Website monitoring – with the help of Hotjar service

Hotjar facilitates the use of the website, e.g. measure and evaluate mouse clicks, mouse movements, keystrokes (excluding personally identifiable information), scrolling activities, and the pages you visit and activities on website.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the Data Controller is to optimize and monitor its services.

Scope of managed data: E-mail address, IP address

Planned deadline for data management: Until the last working day of January of the following year, or until the person concerned objects

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: IT service provider, Application service provider

2.32 Cookie management

The Data Controller places cookies and web beacons on the website in order to identify the person who has previously visited the website; map the visitor's interests; improve the visitor's user experience and display personalized ads to the visitor, and to improve the security of the website.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the Data Controller is to optimize and monitor its services.

Source of data collection: Unique identification number, dates, times

Planned deadline for data management: Until the end of the session

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: IT service provider, Application service provider

2.33 Google Adwords

Remarketing function, with the help of which the website displays relevant ads to users who have already visited the website

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the Data Controller is to obtain direct business

Source of data collection: Unique identification number, dates, times

Planned deadline for data management: Last working day of January of the 4th year following the end of data processing.

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: Application service provider

2.34 IT data backup

Operation of IT systems and infrastructure, including operation of workstation servers and network elements, archiving and saving of data and their recovery in the event of a disaster.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the Data Controller is to regularly save and archive the data of the IT systems in order to maintain business.

Scope of the data processed: All categories of digital data collected or processed by the Organisation

Planned deadline for data management: The organisation will keep a backup of the IT system for 10 days. Data archiving for 5 years.

Source of data collection: Data from the controller's IT system

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: System Operator

2.35 Operation of electronic video surveillance system

Protecting the security of the Data Controller's premises, protecting the property of the Data Controller, protecting the physical safety and property of the Data Controller's employees and visitors, investigating the circumstances of any accidents or criminal offences that may occur.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). It is in the legitimate interest of the data controller to operate an electronic video surveillance system in order to protect the property, the physical safety of guests and to investigate possible criminal offences.

Scope of the data processed: Image or moving image of a natural person (hereinafter collectively referred to as "image")

Planned deadline for data management: Maximum 15 days.

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: Property guard

2.36 Data management related to the GDPR Regulation

Data management related to the GDPR Regulation

Legal basis for data management: To comply with a legal obligation to which the controller is subject (Article 6(1)(c)).

Scope of the data processed: Name, Data protection identifier, data subject request, date, type, content, result of data subject request, Incident date, documentation, result

Planned deadline for data management: Not to be scrapped

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: Legal adviser, GDPR adviser

2.37 Data management for the purpose of legal and other claim enforcement

For the purpose of asserting claims, the data controller shall retain the personal data it manages during the general limitation period after the data has been provided.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). It is the legitimate interest of the data controller to keep the personal data of the data subjects related to him during the general limitation period.

Scope of the data processed: Name, address, phone number, email address, IP address

Planned deadline for data management: Last working day of January of the 4th year following the end of data processing.

Source of data collection: Data registered by the data controller for other data management purposes

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: IT service provider, Web and application service provider

2.38 Audio recording by telephone

Audio recording of calls to the fixed line of Customer Service to facilitate the investigation of reports and for quality assurance.

Legal basis for data management: Consent of the data subject (Article 6(1)(a)) The legitimate interest of the Data Controller is to carry out activities aimed at improving the quality and development of its services.

Scope of the data processed: Audio recording

Planned deadline for data management: A maximum of 60 days after the call

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: United Call Center Kft.

2.39 Management of subcontractors, partners, registration and monitoring of related tasks and activities

Application of filing system

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). It is the legitimate interest of the data controller to register the data of the contact person.

Scope of the data processed: Name, phone, e-mail

Planned deadline for data management: The last working day of January of the 8th year following the termination of the contract or until the Data Subject objects.

Source of data collection: Data from the data subject, the data subject's employer or the data subject's partner

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: SalesAutopilot

2.40 Ensuring the redemption of promotional codes for admission tickets, performing related administrative tasks

Redemption of promotional tickets

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). It is the legitimate interest of the Data Controller to provide its partners with a contract with unique identification codes, which can be used to purchase tickets or register promotion tickets for the partner's own customers and employees.

Scope of the data processed: Name, email, address, unique QR code, Facebook User ID, IP address, shipping address, phone number

Planned deadline for data management: Until the last working day of January of the year following the event, or until the person concerned objects

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: IT operator

2.41 Management of event visitor data provided by Budapest Park's partner for issuing promotional/accreditation tickets

Management of the data of Budapest Park's contracted partners, or those invited to a specific event by the performers or the performer's representative. The Data Controller uses the data provided as third party data in the partner portal system provided by Budapest Park.

Legal basis for data management: Enforcement of the legitimate interest of the Data Controller

(Article 6(1)(f)). It is the legitimate interest of the Data Controller to provide a portal system for its partners under contract and the guests of the performers, where the partner can register promotional and accreditation tickets or purchase tickets for its own customers/guests.

Scope of the data processed: unique identifier, guest name, email address, nickname, details of the concert attended

Planned deadline for data management: Until the last working day of January of the year following the event, or until the person concerned objects

Source of data collection: Data from the data subject's invitation. The Partner assumes responsibility for providing data

Reclassification data processing purpose: N/A

New Data Management deadline: N/A

Categories of data processors: IT operator

2.42 Operation of a message wall

Display, moderate and otherwise manage text messages sent by visitors during events

Legal basis for data management: Performance of the contract (Article 6(1)(b)). –

Scope of the data processed: Any nickname given by the user, the text of the message

Planned deadline for data management: 10 seconds after the message is displayed on the screen.

Source of data collection: Data from the data subject

Reclassification data processing purpose:

New Data Management deadline:

Categories of data processors: IT operator

3. Consequences of failure to provide data

Possible consequence of failure to provide data: Failure of the purpose of data management.

4. Data subjects

Representatives of natural persons or legal entities using the Company's services.

5. Range of mandatory data

- The Data Controller does not indicate the mandatory data to be filled in on each data submission form, where all data are mandatory. In interfaces where not all data are mandatory, the data controller will display an asterisk* to indicate the mandatory data fields.

6. Children

The Data Controller's services are services related to the information society, so users are entitled to make a legal declaration after reaching the age of 16 in connection with the use of the service, accordingly they can use the Data Controller's services without parental consent. In addition, our products and services are generally not intended for persons under the age of 16. We ask that persons under the age of 16 do not provide personal data to the Data Controller. If we become aware that we have collected personal data from a child under the age of 16, we will take the necessary steps to delete the data as soon as possible or, in the data management process concerning the personal data of a child under the age of 16, we will ask for consent to the data management from the child's guardian.

7. Information on the use of a data processor

In the course of processing, the data controller transfers the data to the data processor(s) contracted by it for the performance of the contract.

Categories of data processors: IT Operators, Web Hosting Service Providers, Web Content Development, Security Service Provider, Contracted Call Centre, Hostess Service Provider, Web Service Provider, Social Media Service Provider, Billing Service Provider, Partner Event Planner, Marketing Agencies, Legal Consultant, GDPR Consultant, Photo Video Service Provider, Event Organizer, Google G-Suite,

Categories of addressees: Courier services, forwarding companies, Hungarian Post Office, Authorities, internet payment service providers, ticket sales portals.

8. The circle of persons entitled to access the data

The data controller will not disclose the data to third parties, except to the processor(s) and recipients indicated in point 7.

8.1 Access to IT backup data

The Data Controller stores IT backups separately, with access control. Access to the backed up data is restricted to IT operations staff with appropriate documentation and procedures. In the case of recovery from backup, have a documented procedure for the process of reviewing data recovered from backup before live use.

8.2 Access to video surveillance data

The data manager will not transfer the recordings to third parties, except for the Property guard Service Provider specified in point 7. Only designated employees of the data controller and the data processor(s) may have access to the recordings.

The Data Protection Manager, the Security Manager, the IT Operator and the CEO have access to the recordings previously recorded by the electronic surveillance system. At the Data Subject's request, he or she may only have access to the recordings of his or her person in the presence of one of the persons mentioned above. In all cases, he/she must request access in writing to the Data Protection Officer.

In all cases, the Data Controller shall draw up a record of the fact of access, which shall be kept by the company for 1 year.

8.3 Persons entitled to restrict access to images from the electronic surveillance system

Restrictions on the recordings made by the electronic surveillance system may only be implemented in cases where the Data Controller has detected an event that is likely to jeopardise the purpose of the electronic surveillance system.

At the Data Subject's request, the processing of images of him or her may be limited to the processing of images of him or her. The Data Subject must request the blocking in writing to the Data Protection Officer, indicating the purpose of the blocking and its expected duration.

The Data Controller shall keep a record of each step of the blocking process for 1 year.

8.4 Disclosure of Data

The data controller shall not disclose the recordings of the electronic surveillance system to the public.

9. Processing of data received from third parties

If the User/Partner does not provide his/her own data to the Data Controller, but that of another natural person, the User/Partner shall be solely responsible for the fact that the provision of the data

was made with the consent, knowledge and due information of that natural person. The Data Controller is not obliged to verify their existence. The Data Controller draws the attention of the User/Partner to the fact that if the User/Partner fails to comply with this obligation and therefore the Data Subject asserts a claim against the Data Controller, the Data Controller may pass the asserted claim and the amount of the related damage to the User/Partner.

10. Data transfer to a third country or international organization

In the case of data transfer to countries outside the EEA, the Data Manager forwards the users' data to the following recipients as data processors in accordance with the following guarantees.

| Addressee in a non-EEA Member State | Data transmission guarantees |
|-------------------------------------|------------------------------|
| Google | SCC + DPA |

11. Rights of data subjects

The Data Subject may contact the Data Controller at the contact details indicated in point 1,

- may request access to a copy of his/her personal data managed by the data controller.
- may request the correction of his/her data,
- may request information about the purpose and legal basis of data management,
- may request the deletion of his/her personal data and restriction of data management.

Data subject may exercise the above rights at any time.

The Data Subject may also send to the Controller at one of the contact addresses indicated in point 1:

- may request the transfer of his/her data to another data controller, if the data management is based on a contract or consent and is handled by the Organization within the framework of an automated procedure.
- may request the withdrawal of his/her previously given consent to data management.

The Data Controller shall arrange or reject (with reasons) the notification within 1 month at the latest after the submission of the request, in exceptional cases within a longer period permitted by law. The Data Subject will be informed of the results of the investigation in writing.

11.1 Cost of information

The Organisation shall provide the measures and the necessary information **free of charge** for the first time.

If the Data Subject requests the same data for the 2nd time within one month and the data have not changed during this period, the Data Controller will charge an administrative fee.

- Administrative costs are calculated on the basis of the hourly cost of the current minimum wage as an hourly rate.
- The number of working hours used for information is calculated at the above hourly rate.
- Furthermore, in the case of a paper-based information request, the printing cost of the answer is at cost price and the cost of postage.

11.2 Refusal to provide information

If the data subject's request is clearly **unfounded**, he/she is not entitled to information, or the Organization, as a data controller, can prove that the Data Subject has the requested information, the data controller will reject the request for information.

If the data subject's request is **excessive**, in particular because of its repetitive nature, the Organisation may refuse to act on the request, if

- for the third time within one month, the Data Subject makes a request to exercise his or her rights under Articles 15 to 22 on the same subject matter.

11.3 Right to object

The data subject has the right to object at any time to the processing of his or her personal data on the basis of a legitimate interest or on the basis of a legal basis involving public authority.

In this case, the Organization may no longer process the personal data, unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

If it determines that the legal basis for the objection is well-founded, it will terminate the data management as soon as possible - including data transfer and further data collection. It notifies all those to whom it previously forwarded the Data Subject's data about the objection.

The processing of the request shall be free of charge, except for unfounded or excessive requests, for which the Data Controller may charge a reasonable fee corresponding to its administrative costs. If the Data Subject does not agree with the decision taken by the Data Controller, he or she may take the matter to court.

12. Information on data security measures

The Data Controller manages the data in a closed system based on the requirements of the Information Security Policy.

The Data Controller ensures default and built-in data protection. To this end, the Data Controller applies appropriate technical and organizational measures in order to:

- precisely regulate access to data;
- allow access only to persons who need the data to perform the task for which it is collected, and then only to the minimum necessary for the performance of that task;
- carefully select the data processors it engages and ensure data security through an appropriate data processing contract;
- ensure the integrity (data integrity), authenticity and protection of the data processed.

The Data Controller applies reasonable physical, technical and organizational security measures to protect Data Subjects, especially against their accidental, unauthorized or illegal destruction, loss, alteration, transmission, use, access or processing. The Data Controller shall immediately notify the Data Subject in the event of unauthorized access to or use of personal data that is known to pose a high risk to the data subject.

If the transmission of Data Subject's data is necessary, the Data Controller ensures the appropriate protection of the transmitted data, for example by encrypting the data file. The Data Controller is fully responsible for the processing of Data Subjects by third parties.

The Data Controller also ensures with appropriate and regular backups that the Data Subject's data are protected against destruction or loss.

13. Remedy

Any data subject if, in his or her opinion

- a) the Data Controller restricts the enforcement of his/her rights or rejects his/her request to this effect, can initiate an investigation by the National Data Protection and Freedom of Information Authority in order to investigate the legality of the Data Controller's action.;
- b) during the processing of his personal data, the Data Controller violates the legal requirements for the processing of personal data,
 - may request the National Authority for Data Protection and Freedom of Information to initiate proceedings before the data protection authority, or
 - may apply to court against the Data Controller, and may also initiate the lawsuit before the competent court according to his place of residence or place of stay.

Contact details of the National Data Protection and Freedom of Information Authority:

:

President: dr. Attila Péterfalvi Attila,
Address: 1055 Budapest, Falk Miksa utca 9-11.
Mailing address: 1363 Budapest, Pf. 9.
Tel.: +36-1-3911400
E-mail: ugyfelszolgalat@naih.hu
www.naih.hu

Budapest, 21.11.2023