

PRIVACY POLICY

1. Data Controller

Name: Kultúrpark Private Limited Liability Company

Address: 1095 Budapest, Fábián Juli square 1.

Representative of the Data Controller: András László Pálffy

Contact details of the Data Controller regarding data protection:
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This notice constitutes a unilateral undertaking by the controller pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and the applicable laws of the Member States.

This notice may be unilaterally amended and/or withdrawn by the Data Controller at any time, by informing the Data Subjects at the same time. The information is provided by publication on the website or, depending on the nature of the change, by direct notification to the Data Subjects.

2. Purpose of data processing

2.1 Online ticket sales and communication about the technical implementation of the event.

The Data Controller processes the data of the guest during the online sales process in order to digitally transmit the tickets. Sending technical emails to ticket purchasers with information about the event and the conditions of participation, arrival times, equipment that can be brought into the event area and other technical information prior to the event. A further purpose is the handling of claims and complaints and the enforcement of rights.

For certain events, the Data Controller provides a free online registration option for wheelchair-using guests. The personal data provided during registration are processed by the Data Controller for the purposes of ensuring eligibility to participate, organising accessible services, organising the event, managing entry, and technical communication related to the event.

Legal basis for data processing: Contract performance (Article 6(1)(b)); in the case of wheelchair ticket registration, also the explicit consent of the data subject (Article 9(2)(a)).

Scope of the data processed: Name, email, home address, unique QR code, Facebook User ID, IP address, billing address, phone number; in the case of wheelchair ticket registration, also the fact of the wheelchair-related health condition.

Planned deadline for data processing: The last working day of January following the expiry of the limitation period (5 years) for claims arising from the ticket sales contract.

Source of data collection: Data from the data subject

Reclassification processing purpose: Conducting customer satisfaction measurement and research for the development of services; data processing for the purpose of legal and other claim enforcement

New processing deadline: Until the objection of the data subject; until legal limitation

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

Categories of recipients:

2.2 Providing customer service for guests and interested parties

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

Legal basis for data processing: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the Data Controller is to handle the problems of customers and guests using the service and to answer their questions

Scope of the data processed: Name, email address, phone number, personal data provided in the inquiry

Planned deadline for data processing: After the request has been closed, until the expiry of the limitation period or until the data subject objects.

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors: Contracted call center, Application provider,

Categories of recipients:

2.3 Age verification when buying alcoholic beverages

When ordering alcoholic beverages, the service provider may ask the consumer to provide photo identification proving that he/she is over 18 years of age and suitable for personal identification.

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

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

Planned deadline for data processing: No storage just viewing

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors:

Categories of recipients:

2.4 Age verification and handling of parental consent during ticket purchase and entry

When purchasing a ticket, as well as when entering the Park area, the minor's parental consent statement or the parent's authorization for supervision of an adult over the age of 18 must be submitted to the data controller upon entry. Upon entry, the property guard will ask the accompanying person who has reached the age of 18 and the minor to present an identity card for the purpose of checking the data. An exception to the requirement to submit a parental declaration is admission to the ice rink.

Legal basis for data processing: 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: Data included in the identity card, signature, witness data, parent identification data, data suitable for the identification of the minor.

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

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors: Security guard

Categories of recipients:

2.5 Issuing tickets to holders of named tickets

Issuance of named vouchers in the accreditation system for complimentary tickets, guests of performers, and prize draw winners. The Data Controller requests the presentation of an identity card for identification when issuing the ticket.

Legal basis for data processing: Enforcement of the legitimate interest of the Data Controller (Article 6, (1) (f)). The data controller has a legitimate interest in checking that no unauthorised person enters the event or the area, and that the named ticket is used by the holder.

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 processing: Until the last working day of January of the year following the event, or until the data subject objects

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

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

Categories of recipients:

2.6 Organisation of a private event

Registration of the list of invitees to private events. Sending out invitations. Communication with invited guests. Guest list registration for events organized by an external party (e.g. company) for entering the rented area.

Legal basis for data processing: 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 processing: Until the last working day of January of the year following the event, or until the data subject objects

Source of data collection: Data from the event organiser

Reclassification processing purpose: N/A

New processing deadline: N/A

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

Categories of recipients:

2.7 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 processing: Enforcement of the legitimate interest of the Data Controller (Article 6(1) (f)). It is in the legitimate interest of the Data Controller to promote the safety of extraneous food brought into the area

Scope of the data processed: Name, address, signature

Planned deadline for data processing: Until the last working day of January of the year following the event, or until the data subject objects

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors:

Categories of recipients:

2.8 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. If the data

subject can be identified, the Data Controller on Facebook sends a message about the lost object via his/her Facebook profile.

Legal basis for data processing: 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 the data processed: Data included in the identity card, signature, Authorization data

Planned deadline for data processing: Until the last working day of January of the year following the event, or until the data subject objects

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors:

Categories of recipients:

2.9 Taking and storing damage reports for compensation claims

In the event of damage, the Data Controller draws up a report to record the events for the purpose of subsequent enforcement of claims, which it stores and may use in the course of enforcing its claims.

Legal basis for data processing: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the Data Controller is the enforcement of its compensation claims.

Scope of the data processed: Name, home address, identity card number (or other document suitable for personal identification), phone number, other data related to the case, signature

Planned deadline for data processing: The last working day of January following the expiry of the limitation period (5 years) for compensation claims.

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors:

Categories of recipients: Legal adviser, authority

2.10 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 processing: 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 the data processed: Face and body image

Planned deadline for data processing: Until the Person concerned objects

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

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

Categories of recipients:

2.11 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 processing: Fulfilling the legal obligation of the data controller (Article 6, (1), c)). x

Scope of the data processed: Billing name and address, e-mail address, telephone, tax number

Planned deadline for data processing: 8 years

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors: Contracted accountant, invoicing service provider

Categories of recipients: Authority

2.12 Management of bank card and SZÉP card payment receipts

Management of credit card and SZÉP Card payment receipts at the Data Controller.

Legal basis for data processing: Enforcement of the legitimate interest of the Data Controller (Article 6(1)(f)). The legitimate interest of the data controller is settlement with the bank card provider

Scope of the data processed: Signature, SZÉP card receipt details

Planned deadline for data processing: By the last working day of January of the year following the event

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors:

Categories of recipients: Payment service provider, SZÉP card provider

2.13 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 processing: 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 the data processed: Name, email address, postal code,

Planned deadline for data processing: 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 processing purpose: N/A

New processing deadline: N/A

Categories of data processors: Partner event organizing company

Categories of recipients:

2.14 Registration of VIP guests

The Data Controller keeps a record of Hoppá members and their contact details on the Hoppá list, for which it provides a card entitling the holder to discounted ticket purchase.

Legal basis for data processing: 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 the data processed: Name, date of birth, address, email address, phone number, ID number, registration date

Planned deadline for data processing: Until the Person concerned objects

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors:

Categories of recipients:

2.15 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 processing: Consent of the data subject (Article 6(1) (a))

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

Planned deadline for data processing: 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 processing purpose: N/A

New processing deadline: N/A

Categories of data processors: web service provider

Categories of recipients: Social media sites

2.16 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 processing: Consent of the data subject (Article 6(1) (a))

Scope of the data processed: Name, email address

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

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors: Newsletter provider, marketing agencies

Categories of recipients:

2.17 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 processing: 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 the data processed: Name, email address

Planned deadline for data processing: Until the Person concerned objects

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

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors: Newsletter provider, marketing agencies

Categories of recipients:

2.18 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 processing: To comply with a legal obligation to which the controller is subject (Article 6(1) (c)).

Scope of the data processed: Name, address, telephone number, e-mail address, signature, personal data indicated in the entry

Planned deadline for data processing: From the closure of the complaint entry until the expiry of the general limitation period (5 years)

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors: Legal representative

Categories of recipients: Authority

2.19 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 processing: Independent data management rights of the press and media.

Scope of the data processed: Budapest Park does not manage data.

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

Source of data collection: -

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors:

Categories of recipients:

2.20 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 processing: Based on the data management information of the partner

Scope of the data processed: Budapest Park does not manage data.

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

Source of data collection: -

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors:

Categories of recipients:

2.21 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 processing: 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 the data processed: E-mail address, IP address

Planned deadline for data processing: 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 processing purpose: N/A

New processing deadline: N/A

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

Categories of recipients:

2.22 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 processing: 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 processing: 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 processing purpose: N/A

New processing deadline: N/A

Categories of data processors: System Operator

Categories of recipients:

2.23 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 processing: 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 processing: For a maximum of 15 calendar days from the date of the recording, or until the data subject objects

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors: Property guard

Categories of recipients:

2.24 Data management related to the GDPR Regulation

Data management related to the GDPR Regulation

Legal basis for data processing: Fulfilling the legal obligation of the data controller (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 processing: Not to be scrapped

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors: GDPR adviser

Categories of recipients: Legal adviser, authority

2.25 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 processing: 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 processing: The last working day of January of the 4th year following the reclassification.

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

Reclassification processing purpose: N/A

New processing deadline: N/A

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

Categories of recipients:

2.26 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 processing: Consent of the data subject (Article 6(1) (a))

Scope of the data processed: Audio recording

Planned deadline for data processing: A maximum of 5 years after the call.

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors: Multicom Kft.

Categories of recipients:

2.27 Provision of free earmuffs for children

Filling in the parental declaration required for the issuance of noise protection earmuffs for free rental for children

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

Scope of the data processed: Name, address, signature

Planned deadline for data processing: Within 7 days of returning the earmuffs

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors:

Categories of recipients:

2.28 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 processing: Consent of the data subject (Article 6(1) (a))

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

Planned deadline for data processing: For 7 days after the phone is charged

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors:

Categories of recipients:

2.29 Keeping records of the contact list received from the customer for Skybox use in order to ensure entry

To use Skybox, the customer sends a list of names of the participants to Budapest Park, based on which entry is made on the day of the event.

Legal basis for data processing: Enforcement of the legitimate interest of the Data Controller (Article 6(1) (f)). It is the legitimate interest of the Data Controller to keep contact with the participants of the event and to keep records of their data in order to ensure entry

Scope of the data processed: Name

Planned deadline for data processing: Until the last working day of January of the year following the year of processing or until the data subject objects

Source of data collection: Data from the customer

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors:

Categories of recipients:

2.30 Ensuring the redemption of promotional codes for entry tickets, performing related administrative tasks

Redemption of promotional tickets

Legal basis for data processing: 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 contracted partners with unique identification codes with which the partner can purchase tickets or register promotional tickets for its 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 processing: Until the last working day of January of the year following the event, 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 processing purpose: N/A

New processing deadline: N/A

Categories of data processors: IT operator

Categories of recipients:

2.31 Discounted ticket purchase with MÁK and ONYF official ID card

The Data Controller provides the opportunity to purchase tickets at a discount for holders of MÁK and ONYF official ID cards. The Data Controller keeps a record of the use of the discount. Checking eligibility for the discount.

Legal basis for data processing: 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

only those with MÁK and ONYF official ID cards can make use of the discounted ticket purchase option.

Scope of the data processed: Authority ID number, identity card number, personal data content of the ID card, date and name of the event.

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

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors:

Categories of recipients:

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

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

Legal basis for data processing: 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 processing: Until the last working day of January of the year following the event, or until the data subject objects

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

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors: IT operator

Categories of recipients: Joint controller: contracted partner

2.33 Operation of a message wall

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

Legal basis for data processing: 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 processing: 10 seconds after the message is displayed on the screen.

Source of data collection: Data from the data subject

Reclassification processing purpose:

New processing deadline:

Categories of data processors: IT operator

Categories of recipients:

2.34 Processing of data relating to the request for free tickets to the data controller's events

Requesting free tickets to the events organized by Budapest Park

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

Scope of the data processed: Name, email address, application details.

Planned deadline for data processing: Until the end of the working day following the end of the event.

Source of data collection: Data from the data subject

Reclassification processing purpose:

New processing deadline:

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

Categories of recipients:

2.35 Recording, storing and publishing photos, videos and audio recordings of the winners at the events related to the prize draw.

The Data Controller shall conclude a media usage contract with the winners of prize draws.

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

Scope of the data processed: Name, face and body image, voice.

Planned deadline for data processing: For the duration of the right of use granted in the contract

Source of data collection: Data from the data subject

Reclassification processing purpose:

New processing deadline:

Categories of data processors: Photographer, video recording subcontractor, social media site manager, web site manager.

Categories of recipients:

2.36 Ensuring the use of the website

The data controller places cookies and web beacons on the website in order to connect to the user's endpoint device and to provide the service (Mandatory cookies).

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

Scope of the data processed: Personal identifiers related to internet browsing

Planned deadline for data processing: Until the end of the session or until the deadline specified in the cookie

Source of data collection: Data from the data subject

Reclassification processing purpose:

New processing deadline:

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

Categories of recipients:

2.37 Setting cookies management

By using preference cookies, the data controller collects information that changes the operation and appearance of the website according to the needs of the visitor, e.g. preferred language or region.

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

Scope of the data processed: Personal identifiers related to internet browsing

Planned deadline for data processing: By the deadline specified in the cookie

Source of data collection: Data from the data subject

Reclassification processing purpose:

New processing deadline:

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

Categories of recipients:

2.38 Management of statistical cookies

By collecting and reporting data in an anonymous form, statistical cookies help the data controller to understand how visitors interact with the website.

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

Scope of the data processed: Personal identifiers related to internet browsing

Planned deadline for data processing: By the deadline specified in the cookie

Source of data collection: Data from the data subject

Reclassification processing purpose:

New processing deadline:

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

Categories of recipients:

2.39 Management of marketing cookies

Marketing cookies are used to track visitors' activity on the Internet. Using the collected data, the data controller publishes relevant advertisements for individual users in order to increase their activity.

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

Scope of the data processed: Personal identifiers related to internet browsing

Planned deadline for data processing: Until the withdrawal of consent or the deadline specified in the cookie

Source of data collection: Data from the data subject

Reclassification processing purpose:

New processing deadline:

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

Categories of recipients:

2.40 Data provision to the National Tourism Data Service Centre

The Data Controller provides the National Tourism Data Service Centre with data on tickets purchased for events and their use. Data is transferred using anonymized data

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

Scope of the data processed: The data specified in the Regulation. https://info.ntak.hu/attrakcio#bekuldendo-adatok

Planned deadline for data processing: Until the last day of January of the year following the provision of data.

Source of data collection: Data from the data subject

Reclassification processing purpose:

New processing deadline:

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

Categories of recipients: Magyar Turisztikai Ügynökség Zrt. (Hungarian Tourism Agency)

2.41 Data processing in connection with the handling of complaints in accordance with the Consumer Protection Act

Settlement of consumer protection complaints recorded by the Data Controller's customer service in accordance with the law, protocol management, communication with the complainant.

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

Scope of the data processed: Personal identifiers, contact details, other personal data necessary for case management

Planned deadline for data processing: From the closure of the complaint registration until the expiry of the general limitation period (5 years)

Source of data collection:

Reclassification processing purpose:

New processing deadline:

Categories of data processors: Multicom Kft. IT operator, Application service provider

Categories of recipients:

2.42 Online Bank Card Payment

The Data Controller transfers the data provided by the Customer during the online purchase to the payment service provider as data processor.

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

Scope of the data processed: Name on the card, card number, expiry date, name of card issuing bank, CVC/CVV security code

Planned deadline for data processing: For the duration of the data transfer

Source of data collection: data from data subject

Reclassification processing purpose:

New processing deadline:

Categories of data processors: Payment service providers

Categories of recipients:

2.43 Processing of data related to accreditation tickets

Processing of data subject data received from third parties in order to issue accreditation tickets.

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

Scope of the data processed: unique identifier, data subject's name, email address, home address, tax identification number, concert attended

Planned deadline for data processing: By the last working day of January of the year following the event

Source of data collection: Data from a third party

Reclassification processing purpose:

New processing deadline:

Categories of data processors: IT operator

Categories of recipients:

2.44 Proving conduct by the data subject that breaches the conditions of participation at the event, or a criminal offence or infraction, and demonstrating the lawfulness of the security measures initiated as a result

The property protection service provider, acting as an independent data controller, records the events of the event using body cameras.

Legal basis for data processing: Enforcement of legitimate interest (Article 6(1)(f)), as set out in the privacy notice of the property protection service provider as independent data controller.

Scope of the data processed: As set out in the privacy notice of the property protection service provider as independent data controller.

Planned deadline for data processing: As set out in the privacy notice of the property protection service provider as independent data controller.

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors:

Categories of recipients:

2.45 Provision of a registration service for the processing of data related to the purchase and use of tickets for the Data Controller's events

Visitor account registration.

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

Scope of the data processed: Email address, password

Planned deadline for data processing: Until the closure of the contract, which takes place upon deletion of the entire visitor account.

Source of data collection: Data subject

Reclassification processing purpose:

New processing deadline:

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

Categories of recipients:

2.46 Provision of convenience services for the processing of data related to the purchase and use of tickets for the Data Controller's events

Use of the visitor account.

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

Scope of the data processed: Name, billing address, phone number, third party's email address

Planned deadline for data processing: Until the withdrawal of consent, which takes place upon deletion of the given data or of the entire visitor account.

Source of data collection: Data subject

Reclassification processing purpose:

New processing deadline:

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

Categories of recipients:

2.47 Guardian consent

Recording and managing guardian consent for the processing of a minor's data.

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

Scope of the data processed: Guardian's data, minor's data

Planned deadline for data processing: Until the withdrawal of the consent or until the entitlement ceases.

Source of data collection: Data from the data subject

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors: Application service provider

Categories of recipients: Authority

2.48 Registration and contact-keeping for activities, games or competitions connected to an event

The Data Controller may organise activities, games or competitions connected to certain events, for which data subjects may register in advance. The purpose of the processing is to handle the registrations, register and confirm the participants, keep contact with the teams, and support the on-site running of the competition.

Legal basis for data processing: Performance of a contract, or taking steps at the request of the data subject prior to entering into a contract (Article 6(1)(b)).

Scope of the data processed: First player's name, email address and phone number, team name, second player's name and email address, and a declaration of having reached the age of 18.

Planned deadline for data processing: Without delay after the closure of the event, at the latest by the end of the first working day following the event.

Source of data collection: Data from the data subject, or from a team member (another data subject).

Reclassification processing purpose: N/A

New processing deadline: N/A

Categories of data processors: IT operator, form service provider

Categories of recipients: N/A

2.49 Handling withdrawal from online voucher purchases and performing the related refund

Receiving the withdrawal statement relating to a Budapest Park voucher purchased online, identifying the data subject and the voucher purchase, confirming the withdrawal statement, invalidating the voucher, performing the refund, and handling and proving any legal claims related to the withdrawal.

Legal basis for data processing: Compliance with a legal obligation to which the controller is subject as regards receiving and confirming the withdrawal statement (Article 6(1)(c)), and performance of the contract concluded with the data subject, or its termination and the resulting settlement (Article 6(1)(b)).

Scope of the data processed: Name, email address, voucher code, identifiers of the purchase or transaction concerned by the withdrawal, content of the withdrawal statement, date and time of its submission, usage status of the voucher, confirmation and case-handling data, the amount, method, date and status of the refund, and data generated in the course of communication with the data subject.

Planned deadline for data processing: Until the end of the general limitation period for civil law claims (5 years) from the closure of the withdrawal case. Where the data or document forms part of an accounting record related to the refund, the processing period follows the retention period under accounting legislation (8 years).

Source of data collection: Data from the data subject, and data available in the Data Controller's ticket and voucher sales, payment and customer service systems.

Reclassification processing purpose: Data processing for the purpose of legal and other claim enforcement

New processing deadline: Until legal limitation

Categories of data processors: Web and form service provider, hosting provider, ticket and voucher sales system provider, email service provider, payment service provider, accounting service provider, IT operator

Categories of recipients: Legal representative, authority, court

3. Consequences of failure to provide data

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

4. Data subjects

Natural persons using the Company's services or representatives of legal persons (e.g. ticket buyers, visitors, newsletter subscribers).

5. Range of mandatory data

The Data Controller does not separately indicate the mandatory data fields on data entry interfaces where all data must be provided. On interfaces where not all data are mandatory, the data controller indicates the mandatory data fields by displaying an asterisk*.

6. Children

The Data Controller's services are information society services, so users are entitled to make a legal declaration in connection with the use of the service after the age of 16, and accordingly they can use the Data Controller's services without parental consent. That said, as a general rule, our products and services are 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 case of processing of personal data of a child under the age of 16, we will seek the consent of the child's guardian.

7. Information on the use of a data processor

The data controller transfers the data to the data processor(s) contracted by it for the performance of the contract.

Categories of data processors: See the individual data processing purposes.

Categories of recipients: See the individual data processing purposes.

8. 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 backed-up data is restricted to IT operations staff, subject to appropriate documentation and procedures. For restoration from backup, the Data Controller has a documented procedure for reviewing data restored from backup before live use.

8.2. Access to video surveillance system data

The recordings will not be transferred by the data controller to third parties, with the exception of the property protection service provider indicated in point 7. Only designated employees of the controller and the data processor(s) shall have access to the recordings.

The recordings previously recorded by the electronic surveillance system can be accessed by the Data Protection Manager, the Security Manager, the IT Operator and the CEO. At the Data Subject's request, he or she shall have access to the recordings of his or her person only in the presence of one of the persons mentioned above. In all cases, access must be requested in writing from 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, only the processing of recordings of his/her own person may be restricted. The Data Subject must request the blocking in writing from the Data Protection Officer, indicating the purpose of the blocking and its expected duration.

The Data Controller prepares a record of each step of the blocking process, which the Data Controller stores for 1 year.

8.4. Disclosure of data

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

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 on 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 Controller 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	DPF

11. Rights of data subjects

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

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

The Data Subject may exercise the above rights at any time.

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

- a request for the transfer of his/her data to another data controller, provided that the processing is based on a contract or consent and is carried out by the Organisation by automated means,
- a withdrawal of his/her previously given consent to the data processing.

The Data Controller shall settle or reject (with reasons) the request within 1 month at the latest after its submission, in exceptional cases within a longer period permitted by law. The Data Subject will be informed of the result of the examination 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 the information is calculated at the above hourly rate.
- Furthermore, in the case of a paper-based information request, the printing cost of the answer 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 the information, or the Organisation, as data controller, can prove that the Data Subject already 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 based on legitimate interest or on the exercise of official authority.

In this case, the Organisation 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 which are related to the establishment, exercise or defence of legal claims.

If it establishes that the objection is well-founded, it will terminate the data processing as soon as possible, including data transfer and further data collection, and will notify all those to whom it previously transferred the Data Subject's data of the objection.

The processing of the request is 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 processes the data in a closed system based on the requirements of its Information Security Policy.

The Data Controller ensures data protection by design and by default. To this end, the Data Controller applies appropriate technical and organisational 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 data 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 organisational security measures to protect the Data Subjects' data, especially against their accidental, unauthorised or unlawful destruction, loss, alteration, transmission, use, access or processing. The Data Controller shall immediately notify the Data Subject in the event of known unauthorised access to or use of personal data that poses a high risk to the data subject.

If the transmission of the 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 bears full responsibility for the processing of Data Subjects' data carried out 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 who, in his or her opinion,

- a) is restricted by the Data Controller in the enforcement of his/her rights, or whose request to this effect is rejected, may initiate an investigation by the National Authority for Data Protection and Freedom of Information in order to examine the legality of the Data Controller's action;
- b) considers that during the processing of his/her 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 conduct data protection authority proceedings, or
- may apply to court against the Data Controller, and may also initiate the lawsuit before the regional court (törvényszék) competent according to his/her place of residence or place of stay. Information on the competence of the courts is available at: https://birosag.hu/birosag-kereso

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

President: Dr. Attila Péterfalvi,

Address: 1055 Budapest, Falk Miksa utca 9-11.

Mailing address: 1363 Budapest, Pf. 9.

Phone: +36-1-3911400

E-mail: ugyfelszolgalat@naih.hu

www.naih.hu

The complaint procedure is available at: https://www.naih.hu/adatkezeles-erintettjekent-fordulok-a-hatosaghoz

Budapest, 18/07/2026