



PRIVACY POLICY

1. Data Controller

Name: Kultúrpark Zrt.

Address: 1095 Budapest, Fábrián Juli tér 1.

Representative of the data controller: András Pálffy

Contact details of the Data Controller regarding data protection: adatvedelem@budapestpark.hu

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 information may be unilaterally modified and/or revoked by the Data Controller at any time, with the simultaneous notification of the Data Subjects. 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 management

2.1. IT systems access management records

User identification and access control

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 monitor, protect and control access to its data assets.

Scope of the data processed: System name, access level, user ID, user activity log file, email address

Planned deadline for data processing: Until the last working day of January of the 3rd calendar year following the termination of the employment contract or until the Data Subject's objection.

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors:

2.2. Operation of an electronic video surveillance system

Camera system operation at the Data Controller's workplaces

Legal basis for data processing: Enforcement of the legitimate interest of the Data Controller (Article 6 (1) (f)). It is the data controller's legitimate interest to protect its assets and control access.

Scope of the data processed: Face and body image

Planned deadline for data processing: Maximum 15 days.

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors: Property guard

2.3. Management and filing of contracts

Management and filing of contracts. Filing contracts related to the activities of the data controller, managing the contact details of the contracting party at the conclusion of the contract and keeping them up-to-date, data of the contractor's agents and keeping them up-to-date.



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 register the data of the contact person.

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

Planned deadline for data processing: Until the last working day of January of the 4th 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 processing deadline: N/A

Categories of data processors:

2.4. Managing a request for a quote

Recording and answering questions and requests for quotations sent to the central email address of the Organization or to the personal email address of a colleague. Issuing offers

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 pre-contractual contact and registration of contact details.

Scope of the data processed: Name, address, email address, telephone, unique identifier

Planned deadline for data processing: Until the last working day of January of the 1st year following the date of receipt of the request for a quote 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 processing deadline: N/A

Categories of data processors:

2.5. Management and registration of orders

The data controller keeps records of incoming and outgoing orders

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 pre-contractual contact and registration of contact details.

Scope of the data processed: Name, address, email address, telephone, unique identifier

Planned deadline for data processing: By the last working day of January of the 5th calendar year following the date of the order

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 processing deadline: N/A

Categories of data processors:

2.6. Identification and registration of persons entering the site

Processing of data relating to access to the site by persons not in possession of an organisational access card. Admission of guests and outsider vehicles.

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 supervise the site, protect its assets, prevent accidents, and take full measures in the event of an emergency

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

Planned deadline for data processing: 6 months

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors: Property guard



2.7. Registration for an event

Management of registrations related to company events and family day events organized by the data controller.

Legal basis for data processing: 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 processing: Until the withdrawal of the data subject's consent

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors: Event organizer, Photo Video service provider, Host service provider, Asset protection service provider

2.8. Event photo and video documentation

The Data Controller takes photos and videos of the events he organizes, which can be published on the Data Controller's website and Facebook page, as well as stored in its own organizational databases.

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

Scope of the data processed: Face and body image

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

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors:

2.9. Management of liability declaration

In relation to activities requiring a licence or qualification, the data controller shall complete and keep a declaration of liability with the subcontractors carrying out the activities.

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 registration of the declarations of liability for the licensed activities carried out in its territory.

Scope of the data processed: Name, Identification card number, licence or certificate number, signature

Planned deadline for data processing: Until the last working day of January of the 5th year following the termination of the legal relationship with the subcontractor.

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors:

2.10. Photo and video documentation of events and media communication for promotional purposes.

The Data Controller shall take photos, videos, promotional videos and live Facebook broadcasts of its public events, which may be published on its website and social media pages, used in advertisements and stored in its own organisational 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 objection of the data subject

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New data processing deadline: N/A

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



2.11. Issuance of an invoice, as well as the issuance of related mandatory documentation for the performance of services, storage of data in order to comply with the Accounting Act.

Issuance of an invoice related to the Data Controller's catering and event organizer activities, as well as the issuance of related mandatory documentation for the performance of services.

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 data processing purpose: N/A

New data processing deadline: N/A

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

2.12. Live or recorded television broadcast

Budapest Park provides the press and 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 data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors:

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

Budapest Park partners, performers, venue sponsors, venue tenants will be given the opportunity to take photos and videos or to broadcast live at the public event.

Legal basis for data processing: Based on the partner's privacy policy

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 data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors:

2.14. IT data backup

Operation of IT systems and infrastructure, including running workstation servers and network elements, archiving and backing up data and restoring it 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 Data Controller has a legitimate interest in regularly backing up and archiving data on its IT systems in order to maintain its 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 data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors: System Operator



2.15. Operation of an electronic video surveillance system

Protecting the security of the Data Controller's premises, protecting the Data Controller's property, protecting the health and property of the Data Controller's employees and visitors, investigating the circumstances of accidents and crimes 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 and motion picture recording of a natural person (hereinafter together referred to as recording)

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 data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors: Property guard

2.16. Data processing related to the GDPR regulation

Data processing related to the GDPR regulation

Legal basis for data processing: Compliance with a legal obligation on the 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, Date, documentation, result of incident

Planned deadline for data processing: Not to be scrapped

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors: Legal advisor, GDPR advisor

2.17. Data processing for legal and other claim enforcement purposes

The data controller shall retain the personal data processed by it for claim enforcement purposes during the general limitation period after providing the data.

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 keeping personal data of data subjects relating to him or her during the general limitation period.

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

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

Source of data collection: Data recorded by the controller for other processing purposes

Reclassification data processing purpose: N/A

New data processing deadline: N/A

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

2.18. Recording the online meetings of the Data Controller at the workplace, documenting what has been said, performing the administrative tasks of the Company, ensuring the continuity of the performance of tasks.

Online meetings are recorded in the form of a video recording in order to document what was said in the meeting and to ensure the continuity of task performance.

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 record what is said in workplace meetings in order to ensure continuity of work, so that the results of the meeting can be made available to those who were unable to attend the meeting.



Scope of the data processed: The image, video recording and voice of the natural person.

Planned deadline for data processing: Maximum 10 days.

Source of data collection: Data from the data subject

Reclassification data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors:

2.19. Management of subcontractors and partners, registration and follow-up of related tasks and activities, application of filing system

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 register the data of the contact person.

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

Planned deadline for data processing: The last working day of January of the 5th 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 processing deadline: N/A

Categories of data processors: Sales Autopilot

2.20. Operation of a message wall

Display, moderation and other management of text messages sent by visitors during the events

Legal basis for data processing: Performance of a 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 data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors: IT operator

2.21. Handling anonymous whistleblowing reports to investigate the report and remedy or terminate the reported conduct

In case of reporting information on an unlawful or suspected unlawful act or omission or other abuse, the Data Controller processes the data of the person under investigation (whose act or omission gave rise to the report) and persons with relevant information.

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

Scope of the data processed: Data of persons under investigation and persons with relevant information provided in the report

Planned deadline for data processing: Until the report is investigated (in case of rejection) or until the reported conduct is remedied.

Source of data collection: Data from the reporting person

Reclassification data processing purpose: Processing of data for legal and other claim enforcement purposes

New data processing deadline: 5 years from the date of notification

Categories of data processors: N/A

2.22. Handling of named abuse reports, to investigate the report and to remedy or eliminate the reported conduct

When reporting information on an unlawful or suspected unlawful act or omission, or any other abuse, the Data Controller processes the data of the persons who are reporting, under investigation and possessing relevant information.

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



Scope of the data processed: Data provided in the notification by reporting persons under investigation and persons with relevant information.

Planned deadline for data processing: Until the report is investigated (in case of rejection) or until the behaviour that is the subject of the report is remedied.

Source of data collection: Data from data subject and reporting person

Reclassification data processing purpose: Processing of data for legal and other claim enforcement purposes

New data processing deadline: 5 years from the date of notification

Categories of data processors: N/A

2.23. Electronic access control system management

Operating a photo-card access control system, producing access cards, recording entry and exit data.

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 protect its assets and control access.

Scope of the data processed: Name, unique identifier, facial image

Planned deadline for data processing: Until the last day of January following the termination of the subcontract, or until the person concerned objects.

Source of data collection: Data from data subject

Reclassification data processing purpose: N/A

New data processing deadline: N/A

Categories of data processors: Property guard, System operator, Application provider

2.24. Photo management required for admission cards with a photo.

Management of the photo required for the production and use of admission cards

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

Scope of the data processed: Name, unique identifier, face image

Planned deadline for data processing: Until scrapping following withdrawal of entry rights, or withdrawal of consent

Source of data collection: Data from data subject

Reclassification data processing purpose:

New data processing deadline:

Categories of data processors: Property guard, System operator, Application provider

3. Consequence of failure to provide data

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

4. Data subjects

Natural persons using the Company's services or representatives of legal persons.

5. Mandatory data

The Data Controller does not indicate the mandatory data in each of the data submission interfaces where the provision of all data is mandatory. In interfaces where not all data are mandatory, the data controller will display an asterisk* to indicate the mandatory data fields.

6. Children

Our services are not intended for persons under the age of 18 and do not fall within the scope of the Information Society services. Please ensure that persons under the age of 18 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 18, we will take the necessary steps to delete the data as soon as possible. If minors under the age of 18 visit our events, they can enter the Company's premises under the conditions set out in the GTC.



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 Center, 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 recipients: Courier services, freight forwarders, Hungarian Post, Public authorities, Internet payment service providers, Ticketing portals,

8. The circle of persons entitled to access the data

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

8.1 Access to IT backup data

The Data Controller stores IT backups separately with access control. Only IT operations staff have access to the backed up data, with appropriate documentation and procedures. In the case of recovery from data backup, it has a documented procedure for the process of reviewing data recovered from data 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 Security Service Provider indicated 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. The Data Subject may, at his/her request, have access only to the recordings made of him/her in the presence of one of the persons mentioned above. Access must always be requested in writing to the Data Protection Officer.

In all cases, the Data Controller shall draw up a record of the fact of inspection, 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 prepares a record of each step of the blocking process, which the Data Controller stores for 1 year.



9. Disclosure of data

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

10. 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.

11. Data transfer to a third country or international organisation

In the case of data transfers to countries outside the EEA, the Data Controller transfers users' data to the following recipients as data processors, subject to the following safeguards.

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

12. Rights of data subjects

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

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

The 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 or her data to another controller, where the processing is based on a contract or consent and is carried out by the Organisation by automated means.
- may provide for the withdrawal of consent previously given for processing

The Data Controller shall process or reject (with reasons) the notification within 1 month at the latest after the request has been submitted, or in exceptional cases within a longer period permitted by law. Inform the Data Subject in writing of the results of the investigation.

12.1 Cost of information

The Organisation will provide the measures and the necessary information **free of charge** for the first time. If the Data Subject requests the same data for a 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.



12.2 Refusal to provide information

If the data subject's request is manifestly **unfounded**, the data subject does not have the right to be informed or the Organisation as controller can prove that the data subject has the information requested, the controller shall 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.

12.3 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 proves that the data processing is justified by compelling, legitimate reasons that take precedence over the interests, rights and freedoms of the data subject, or that are related to the presentation, enforcement or defence of legal claims.

If it finds that the legal basis for the objection is justified, it will stop the processing, including the transfer and further processing, as soon as possible. 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.

13. Information on data security measures

The Data Controller processes the data in a closed system in accordance with the requirements of the Information Security Policy.

The data controller ensures that data protection is provided by default and built-in. To this end, the Data Controller shall apply 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 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 shall apply reasonable physical, technical and organisational security measures to protect the Data Subjects' data, in particular against accidental, unauthorised or unlawful destruction, loss, alteration, disclosure, use, access or processing. The Data Controller shall notify the Data Subject without undue delay in the event of known unauthorised access to or use of personal data which is likely to present a high risk to the Data Subject.

The Data Controller shall, where the transfer of Data Subject data is necessary, ensure adequate protection of the data transferred, for example by encrypting the data file. The Data Controller is fully responsible for the processing of the Data Subject's data carried out by third parties.

The Data Controller shall also ensure that the Data Subject's data are protected against destruction or loss by adequate and regular backups.



14. Remedy

Any data subject if, in his or her opinion,

- a) the Data Controller restricts the exercise of his or her rights or rejects his or her request to do so, the Data Controller may initiate an investigation by the National Authority for Data Protection and Freedom of Information by means of a notification, in order to examine the lawfulness of the Data Controller's action;
- b) in the processing of his or her personal data, the Data Controller infringes the legal provisions applicable to 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
 - he or she can go to court against the Data Controller, and he or she can also initiate the lawsuit before the competent court according to his/her place of residence or place of stay.

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

President: dr. Attila Péterfalvi,
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