PRIVACY NOTICE

1. Data Controller

Name: Kultúrpark Zrt.

Address: 1095 Budapest, Fábián Juli tér 1, Hungary

Representative of the Data Controller: Péter Albert

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

This notice constitutes a unilateral undertaking by the Data 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This notice may be unilaterally amended and/or withdrawn by the Data Controller at any time, by informing the Data Subjects at the same time.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 event arrangements

The Data Controller processes guests' data during the online sales process in order to deliver tickets digitally. Before the event, the Data Controller sends ticket purchasers technical emails about the event, the conditions of participation, arrival times, items that may be brought into the venue and other practical information. A further purpose is handling claims and complaints and enforcing 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: Performance of a contract (Article 6(1)(b)); in the case of wheelchair ticket registration, also the explicit consent of the data subject (Article 9(2)(a)).

Categories of personal data: 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 that the guest uses a wheelchair (health condition).

Retention period: 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

Purpose of further processing: Conducting customer satisfaction measurement and research for the development of services

Data processing for the purpose of legal and other claim enforcement

Retention period for further processing: Until the data subject objects

Until expiry of the applicable limitation period

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

Categories of recipients: The organiser of the event concerned, if different from the Data Controller

2.2 Providing customer service for guests and interested parties

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

Legal basis for data processing: The Data Controller's legitimate interests (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.

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

Retention period: 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

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors: Contracted call centre, Application service provider

Categories of recipients:

2.3 Age verification when buying alcoholic beverages

When alcoholic beverages are ordered, the service provider may ask the consumer to present a photographic identity document proving that they have reached the age of 18.

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

Categories of personal data: Data contained in an identity document

Retention period: No storage; viewing only

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors:

Categories of recipients:

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

For ticket purchases and admission to the Park, the minor's parental consent statement, or the parent's authorisation appointing an accompanying adult aged 18 or over to supervise the minor, must be submitted to the Data Controller upon entry. At entry, the security guard asks both the accompanying adult and the minor to present an identity document to verify their details. No parental declaration needs to be submitted for admission to the ice rink.

Legal basis for data processing: The Data Controller's legitimate interests (Article 6(1)(f)). The Data Controller has a legitimate interest in ensuring that minor guests do not attend events without authorisation.

Categories of personal data: Data contained in an identity document, signature, witness data, parent identification data, data suitable for the identification of the minor.

Retention period: Until the first working day of the month following one full month after the event.

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors: Security service provider

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 document for identification when issuing the ticket.

Legal basis for data processing: The Data Controller's legitimate interests (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.

Categories of personal data: Name of the person authorised to issue the complimentary ticket, name of the guest and data contained in the guest's identity document

Retention period: 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

Purpose of further processing: N/A

Retention period for further processing: N/A

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

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 organised by an external party (e.g. corporate events) for entering the rented area.

Legal basis for data processing: The Data Controller's legitimate interests (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.

Categories of personal data: Name, email address, phone number

Retention period: 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

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors: IT operator, Hostess service provider, Security service provider

Categories of recipients:

2.7 Processing signed declarations for food brought in from outside

Storing completed declarations accepting responsibility for the safety of food brought in by guests.

Legal basis for data processing: The Data Controller's legitimate interests (Article 6(1)(f)). The Data Controller has a legitimate interest in promoting the safety of food brought into the venue.

Categories of personal data: Name, address, signature

Retention period: 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

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors:

Categories of recipients:

2.8 Identification of the owners of lost left-luggage items or tags and storage of related records

Where a tag used to identify items deposited at the left-luggage facility is lost, or an item is found, a report is drawn up so that the release of items can be traced. If the data subject can be identified, the Data Controller sends a message about the lost item via the data subject's Facebook profile.

Legal basis for data processing: The Data Controller's legitimate interests (Article 6(1)(f)).

The Data Controller has a legitimate interest in preventing misuse when releasing valuables after a tag has been lost.

Categories of personal data: Data contained in an identity document, signature, authorisation data

Retention period: 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

Purpose of further processing: N/A

Retention period for further processing: 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: The Data Controller's legitimate interests (Article 6(1)(f)). The legitimate interest of the Data Controller is the enforcement of its compensation claims.

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

Retention period: 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

Purpose of further processing: N/A

Retention period for further processing: 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 photographs and video recordings of the public events it organises, promotional videos and live Facebook broadcasts, which it may publish on its website and social media pages, use in advertising and store in its own organisational databases.

Legal basis for data processing: The Data Controller's legitimate interests (Article 6(1)(f)). The Data Controller has a legitimate interest in the effective and personalised promotion of the organisation.

Categories of personal data: Face and body image

Retention period: Until the data subject objects

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors: IT service provider, Web service provider, Google Workspace, 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 in connection with the Data Controller’s catering and event-organising activities, and preparing the mandatory documentation relating to the provision of the service.

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

Categories of personal data: Billing name and address, email address, telephone, tax number

Retention period: 8 years

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: 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 bank card and SZÉP card payment receipts at the Data Controller.

Legal basis for data processing: The Data Controller's legitimate interests (Article 6(1)(f)).

The legitimate interest of the Data Controller is settlement with the bank card provider.

Categories of personal data: Signature, SZÉP card receipt details

Retention period: Until the last working day of January of the year following the event

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: 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 rented events organised by the event-organiser partner company, which has obtained the necessary permits.

Legal basis for data processing: The Data Controller's legitimate interests (Article 6(1)(f)).

The Data Controller has a legitimate interest in providing services and the venue for a partner company's event.

Categories of personal data: Name, email address, postal code

Retention period: 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

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors: Partner event organising 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: The Data Controller's legitimate interests (Article 6(1)(f)). It is the legitimate interest of the Data Controller to manage the contact information of VIP guests and provide services.

Categories of personal data: Name, date of birth, address, email address, phone number, ID number, registration date

Retention period: Until the data subject objects

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors:

Categories of recipients:

2.15 Registration for prize draws, related media communications and promotion, conducting draws and contacting winners

Managing the data of natural persons registered for a prize draw organised 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)).

Categories of personal data: Name, email address, postal code, photo, video recording

Retention period: 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 data subject

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors: Web service provider

Categories of recipients: Social media sites

2.16 Advertising of services, measuring satisfaction with services and conducting research to improve services

Recommending events and programmes, making inquiries for the purpose of measuring satisfaction, advertising special promotions for VIP members. On the wishlist page, subscription requires a separate, voluntary declaration. Subscribers request the general Budapest Park programme newsletter, rather than individual alerts relating to their selected artists. The time of consent and the version of the consent statement are recorded in the newsletter database so that consent can be demonstrated.
Legal basis for data processing: Consent of the data subject (Article 6(1)(a)).

Categories of personal data: Name, email address

Retention period: Until the withdrawal of the consent of the data subject

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors: Newsletter provider, marketing agencies. For subscriptions made through the wishlist, the existing newsletter provider is XQueue GmbH (Germany), using the Maileon system.

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: The Data Controller's legitimate interests (Article 6(1)(f)).
The legitimate interest of the Data Controller is data processing for the purpose of developing its services.

Categories of personal data: Name, email address

Retention period: Until the data subject objects

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

Purpose of further processing: N/A

Retention period for further processing: 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 units operating at the premises of the Data Controller

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

Categories of personal data: Name, address, telephone number, email address, signature, personal data indicated in the entry

Retention period: 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

Purpose of further processing: N/A

Retention period for further processing: 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 processing rights of the press and media.

Categories of personal data: Budapest Park does not process data.

Retention period: Budapest Park does not process data.

Source of data collection: -

Purpose of further processing: N/A

Retention period for further processing: 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 photographs, make video recordings or broadcast live at public events.

Legal basis for data processing: As set out in the partner's privacy notice.

Categories of personal data: Budapest Park does not process data.

Retention period: Budapest Park does not process data.

Source of data collection: -

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors:

Categories of recipients:

2.21 Website monitoring using Hotjar

Hotjar helps measure and evaluate website use, including mouse clicks, mouse movements, keystrokes (excluding personally identifiable information), scrolling, pages visited and activities on the website.

Legal basis for data processing: The Data Controller's legitimate interests (Article 6(1)(f)). The Data Controller has a legitimate interest in optimising and monitoring its services.

Categories of personal data: Email address, IP address

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

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: 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 workstations, servers and network elements, archiving and saving of data and their recovery in the event of a disaster.

Legal basis for data processing: The Data Controller's legitimate interests (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 operations.

Categories of personal data: All categories of digital data collected or processed by the Data Controller

Retention period: The Data Controller keeps IT system backups for 10 days and archived data for 5 years.

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

Purpose of further processing: N/A

Retention period for further processing: 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: The Data Controller's legitimate interests (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.

Categories of personal data: Image or moving image of a natural person (hereinafter collectively referred to as "recording")

Retention period: 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

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors: Security service provider

Categories of recipients:

2.24 Handling data subject requests and personal data breaches

Handling data subject requests and personal data breaches

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

Categories of personal data: Name, data protection identifier, date, type, content and outcome of the data subject request, date, documentation and outcome of the incident

Retention period: No scheduled deletion.

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors: GDPR adviser

Categories of recipients: Legal adviser, authority

2.25 Data processing for the purpose of legal and other claim enforcement

For the purpose of enforcing legal and other claims, the Data Controller retains the personal data it processes for the general limitation period after the data have been provided.

Legal basis for data processing: The Data Controller's legitimate interests (Article 6(1)(f)). The Data Controller has a legitimate interest in retaining the personal data of data subjects with whom it has dealings for the general limitation period.

Categories of personal data: Name, address, phone number, email address, IP address

Retention period: 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 processing purposes

Purpose of further processing: N/A

Retention period for further processing: 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 recorded customer service line to facilitate the investigation of reports and for quality assurance.

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

Categories of personal data: Audio recording

Retention period: A maximum of 5 years after the call.

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: 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 lending noise protection earmuffs to children free of charge

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

Categories of personal data: Name, address, signature

Retention period: Within 7 days of returning the earmuffs

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors:

Categories of recipients:

2.28 Charging guests' mobile phones

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)).

Categories of personal data: Name, phone number, email address

Retention period: For 7 days after the phone is charged

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors:

Categories of recipients:

2.29 Keeping the guest list received from the customer for Skybox use to arrange admission

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: The Data Controller's legitimate interests (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.

Categories of personal data: Name

Retention period: 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

Purpose of further processing: N/A

Retention period for further processing: 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: The Data Controller's legitimate interests (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.

Categories of personal data: Name, email, address, unique QR code, Facebook User ID, IP address, shipping address, phone number

Retention period: 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

Purpose of further processing: N/A

Retention period for further processing: 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: The Data Controller's legitimate interests (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.

Categories of personal data: Number on the official card, identity card number, personal data shown on the identity document, and the date and name of the event.

Retention period: Until the end of the event.

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: 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: The Data Controller's legitimate interests (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.

Categories of personal data: Unique identifier, guest name, email address, nickname, details of the concert attended

Retention period: 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 the data.

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors: IT operator

Categories of recipients: Joint controller: contracted partner

2.33 Operation of a message wall

Displaying, moderating and otherwise processing text messages sent by visitors during events.

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

Categories of personal data: Any nickname given by the user, the text of the message

Retention period: 10 seconds after the message is displayed on the screen.

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

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 organised by Budapest Park

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

Categories of personal data: Name, email address, application details.

Retention period: Until the end of the working day following the end of the event.

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

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 concludes a media usage contract with the winners of prize draws.

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

Categories of personal data: Name, face and body image, voice.

Retention period: For the duration of the right of use granted in the contract

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors: Photographer, video recording subcontractor, social media site manager, website 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: Performance of a contract (Article 6(1)(b)).

Categories of personal data: Personal identifiers related to internet browsing

Retention period: Until the end of the session or until the expiry date specified in the cookie

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors: IT operator, Application service provider

Categories of recipients:

2.37 Management of preference cookies

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)).

Categories of personal data: Personal identifiers related to internet browsing

Retention period: Until the expiry date specified in the cookie

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

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)).

Categories of personal data: Personal identifiers related to internet browsing

Retention period: Until the expiry date specified in the cookie

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

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)).

Categories of personal data: Personal identifiers related to internet browsing

Retention period: Until the withdrawal of consent or the expiry date specified in the cookie

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

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. The data are transferred in anonymised form.

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

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

Retention period: Until the last day of January of the year following the provision of data.

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

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, keeping records of complaints, communication with the complainant.

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

Categories of personal data: Personal identifiers, contact details, other personal data necessary for case management

Retention period: From the closure of the complaint entry until the expiry of the general limitation period (5 years)

Source of data collection:

Purpose of further processing: N/A

Retention period for further processing: N/A

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: Performance of a contract (Article 6(1)(b)).

Categories of personal data: Name on the card, card number, expiry date, name of the card-issuing bank, CVC/CVV security code

Retention period: For the duration of the data transfer

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

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: Performance of a contract (Article 6(1)(b)).

Categories of personal data: Unique identifier, data subject's name, email address, home address, tax identification number, concert attended

Retention period: Until the last working day of January of the year following the event

Source of data collection: Data from a third party

Purpose of further processing: N/A

Retention period for further processing: N/A

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 petty offence, and demonstrating the lawfulness of the security measures initiated as a result

The security service provider, acting as an independent controller, makes body-camera recordings at the event.

Legal basis for data processing: Legitimate interests (Article 6(1)(f)), as set out in the privacy notice of the security service provider as an independent controller.

Categories of personal data: As set out in the privacy notice of the security service provider as an independent controller.

Retention period: As set out in the privacy notice of the security service provider as an independent controller.

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: 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: Performance of a contract (Article 6(1)(b)).

Categories of personal data: Email address, password

Retention period: Until the closure of the contract, which takes place upon deletion of the entire visitor account.

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

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)).

Categories of personal data: Name, billing address, phone number, third party's email address

Retention period: 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 from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

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 Data Controller is subject (Article 6(1)(c)).

Categories of personal data: Guardian's data, minor's data

Retention period: Until the withdrawal of the consent or until the entitlement ceases.

Source of data collection: Data from the data subject

Purpose of further processing: N/A

Retention period for further processing: N/A

Categories of data processors: Application service provider

Categories of recipients: Authority

2.48 Registration and contact arrangements 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)).

Categories of personal data: 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.

Retention period: 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).

Purpose of further processing: N/A

Retention period for further processing: 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 Data 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)).

Categories of personal data: 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.

Retention period: 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.

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

Retention period for further processing: Until expiry of the applicable limitation period

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

2.50 Wishlist artist suggestion campaign

Through budapestpark.hu/wish, the Data Controller collects guests' suggestions of up to five international artists, ranked in order of preference, to plan the 2027 programme. The age and geographical breakdown of the potential audience for each artist helps select performers and assess likely attendance; the age band and home-region category are therefore required to submit a response. We do not request a precise date of birth or street address.

Legal basis: the participant's consent under Article 6(1)(a) GDPR, given through a separate declaration before the form is submitted. Participation is voluntary and does not require a newsletter subscription. We accept submissions only from persons who have reached the age of 16; no parental consent process is provided for this campaign.

Personal data processed: the artist list and its order; email address; age band (16–17, 18–24, 25–34, 35–44 or 45+); home-region category (Budapest, Pest County, another Hungarian county or abroad); interface language; submission and email confirmation times; confirmation status and one-time code; and the time of consent and the version identifier of the consent statement. If a newsletter subscription is requested, the name, email address and information needed to demonstrate newsletter consent are recorded separately in the newsletter database.

The data are collected directly from the person completing the form. Email confirmation verifies use of the email address and helps filter out repeated submissions from the same address. It does not in itself guarantee that each natural person participates only once. The confirmation message is a technical email, not advertising.

Retention: unconfirmed submissions are retained for no more than 72 hours from submission; the email address, one-time code and data allowing the response to be linked to a person are then deleted. The email address and related personal data for a confirmed submission are processed until the campaign closes on the date announced on the campaign website, or until consent is withdrawn earlier, and are then deleted. Used or expired confirmation codes are invalidated without delay; the code and its technical evidence are removed no later than the related personal data.

After personal data have been deleted, programme-planning statistics may retain only the artist list, age band, home-region category and confirmed or unconfirmed status that can no longer be linked to any person. This dataset contains no email address, name, precise timestamp, confirmation code, IP address, cookie identifier or other identifier that would allow the data to be linked back to a person. Anonymous statistics may be retained for longer. We do not make automated decisions about individual participants or carry out personalised marketing based on favourite artists.

Newsletter: the general Budapest Park programme newsletter, requested through a separate declaration that is not pre-ticked, is a separate processing activity under section 2.16. The name, email address and newsletter consent are transferred to Maileon, and the subscription activated, only after email confirmation. Pending newsletter data are also deleted when the 72-hour confirmation period expires. The artist list, age band and home-region category are not transferred to the newsletter database. Deleting wishlist data does not cancel a separately confirmed newsletter subscription; subscribers may unsubscribe at any time using the link in the newsletter.

Access and processing: designated programme staff use a password-protected summary; they do not have access to email addresses, codes or logs that are unnecessary for their tasks. Only anonymous aggregate data may be exported. Access to the email dataset and the system is restricted to authorised IT staff and processors to the extent necessary to perform their tasks.

Processors and services: external developer Tamás Hrenko for authorised IT tasks; DigitalOcean for hosting and daily backups in Frankfurt, Germany; Mailgun/Sinch for confirmation emails in the EU region; and XQueue GmbH, Germany, using Maileon for the separate newsletter. Daily backups are kept separately on a rolling cycle of no more than 30

days and may be used only for recovery. When data are restored, previous deletions are reapplied before the restored data are used in the live system.

Even where an EEA storage region is selected, access by international providers' support teams or subprocessors outside the EEA may constitute a transfer of data. Such access is permitted only with appropriate safeguards under Chapter V GDPR: an applicable adequacy decision, including the EU–US Data Privacy Framework where applicable, or otherwise the European Commission's standard contractual clauses and any necessary supplementary measures. Information about recipients and copies of the safeguards used may be requested at adatvedelem@budapestpark.hu.

Consent may be withdrawn at any time by emailing adatvedelem@budapestpark.hu, without affecting the lawfulness of processing before withdrawal. Following withdrawal, we delete any submission that can still be linked to the participant. Data subject rights are explained in the section of this policy on exercising those rights. We cannot identify an individual participant's data within statistics that can no longer be linked to any person.

The shareable image is generated solely in the visitor's browser and contains the artist names. The Data Controller does not store or publish the image. The visitor decides whether to share it.

2.51 Technical protection of the wishlist service

Purpose and legal basis: protecting the security and availability of the website, limiting bots and misuse, and investigating errors and security incidents, based on legitimate interests under Article 6(1)(f) GDPR. A separate legitimate interests assessment also takes account of younger visitors. This processing is separate from wishlist and newsletter consent.

Data and retention: IP address, technical browser data, access time and technical result. Access logs may be retained for no more than 30 days. IP-based technical counters used to limit bots may operate within a time window of no more than 24 hours. Logs must not contain artist lists, email addresses, names, complete form content or confirmation codes.

For a specific security incident, only the necessary log extract may be isolated, with the reason and retention deadline documented, for no more than 90 days. Longer retention is permitted only for a specific legal claim or official proceeding, limited to the necessary data and subject to a reviewed deadline. The incident does not extend the general log retention period.

Technical data are accessible only to persons designated to perform IT and security tasks and must not be linked to programme-planning or marketing profiles. The restrictions on IT providers, backups and transfer safeguards in the wishlist section also apply.

Data subjects may object to processing based on legitimate interests on grounds relating to their particular situation by contacting adatvedelem@budapestpark.hu. We assess the request; processing may continue only under the conditions set out in Article 21 GDPR. Analytics or marketing measurement may begin only with separate, prior consent through the cookie settings; participation does not depend on giving that consent.

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 Data Controller's services or representatives of legal persons (e.g. ticket buyers, visitors, newsletter subscribers). This includes wishlist campaign participants who have reached the age of 16.

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. Users who have reached the age of 16 may therefore make declarations in connection with using the service and may use the Data Controller's services without parental consent.

Nevertheless, as a general rule, our products and services are not intended for persons under the age of 16. We ask persons under 16 not to provide personal data to the Data Controller. If we become aware that we have collected personal data from a child under 16, we take the necessary steps to delete the data as soon as possible or seek the child's guardian's consent for processing. The wishlist campaign has a specific rule: submissions are accepted only from persons aged 16 or over; persons under 16 cannot submit a response with parental consent.

7. Information on the use of a data processor

The Data Controller also uses contracted processors to provide hosting, IT, email and other services for the individual processing purposes. Processors act on behalf of the Data Controller and in accordance with its instructions.

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 for the individual processing purposes in section 2.

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 security service provider indicated in section 2.23. Only designated employees of the Data 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. Data Subjects may access recordings of themselves 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 the Data Controller keeps for 1 year.

8.3. Restriction of processing of surveillance recordings

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 their 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 their 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 whether these conditions are met. 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 organisation

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, subject to the following safeguards. The recipients involved in wishlist hosting and technical email services, and the safeguards for access from outside the EEA, are described in section 2.50 on the wishlist.

Recipient outside the EEA	Data transfer safeguards
Google	DPF

11. Rights of data subjects

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

- may request access to a copy of their personal data processed by the Data Controller;
- may request rectification of their data;
- may request information about the purpose and legal basis of the processing;
- may request erasure of their personal data and restriction of 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 section 1:

- a request for their data to be transferred to another controller, where processing is based on a contract or consent and is carried out by the Data Controller by automated means;
- withdrawal of consent previously given to the processing.

The Data Controller shall act on the request or reject it with reasons within one month of its submission, or, in exceptional cases, within a longer period permitted by law. The Data Subject will be informed of the outcome in writing, or electronically where the request was submitted electronically.

11.1. Cost of information

As a rule, the Data Controller provides information and takes action in connection with the exercise of data subject rights free of charge.

Where a request is manifestly unfounded or excessive, in particular because of its repetitive character, the Data Controller may charge a reasonable fee or refuse to act under Article 12(5) GDPR. The Data Controller must demonstrate that the request is manifestly unfounded or excessive.

- Any reasonable fee must be based solely on the actual administrative costs of providing the information or communication or taking the action requested. We inform the data subject of the reason for, and amount of, the fee in advance.
- The first copy of personal data provided in response to an access request is free of charge. For further copies, a reasonable fee based on administrative costs may be charged under Article 15(3) GDPR.

- No automatic fee is charged for the first copy merely because it needs to be printed or posted.

11.2. Refusal of a request

A refusal to act on a request is permitted only under the conditions laid down in the GDPR and must be justified individually. Within one month at the latest, we inform the data subject of the reasons for refusal and of the possibility of lodging a complaint with the supervisory authority and seeking a judicial remedy.

A repeated request does not, in itself, justify a fee or refusal. We assess the circumstances of each request and the conditions under Article 12(5) GDPR.

- There is no automatic fee or refusal for a second or third request within a month.

11.3. Right to object

The data subject has the right to object at any time to the processing of their personal data based on legitimate interest or on the exercise of official authority.

In this case, the Data Controller 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 manifestly 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, they 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 the data are collected, and only to the minimum data necessary for that task;
- carefully select the processors it engages and ensure data security through an appropriate data processing agreement;
- ensure the integrity, authenticity and protection of the data processed.

The Data Controller applies reasonable physical, technical and organisational security measures to protect 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 of known unauthorised access to or use of personal data that poses a high risk to the data subject.

Where the transfer of a Data Subject's data is necessary, the Data Controller ensures appropriate protection of the transferred 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 considers that

a) the Data Controller has restricted the exercise of their rights or rejected a request to exercise those rights may initiate an investigation by the National Authority for Data Protection and Freedom of Information to examine the lawfulness of the Data Controller’s action;

b) the Data Controller has infringed the legal requirements for processing personal data when processing their personal data,

- may request data protection authority proceedings before the National Authority for Data Protection and Freedom of Information; or
- may bring proceedings against the Data Controller before a court, including, at their choice, the regional court (törvényszék) with jurisdiction over their place of residence

or stay. Information on court jurisdiction 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 1 391 1400

Email: ugyfelszolgalat@naih.hu

www.naih.hu

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

Budapest, 12 November 2026