

## PRIVACY NOTICE

### ON THE PROCESSING OF PERSONAL DATA PROVIDED IN CONNECTION WITH ACCREDITATION

During the accreditation process (i.e. the issuing of a ticket for admission to a Sziget Zrt. festival), the personal data of the person requesting admission and the personal data of the ticket user are necessarily provided, which are processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter: "**GDPR**").

We hereby inform you of the details of the processing of your personal data in accordance with the referred legislative provisions.

Personal data is processed by the colleagues of Sziget Zrt. solely for the purposes described herein. No data is transferred abroad or to international organizations.

For the storage of your personal data Sziget Zrt. uses the services of **Netpositive Számítástechnikai Szolgáltató és Kereskedelmi Kft.** (registered office: 2021 Tahitótfalu, Pataksor utca 48.; company registration number: 13-09-104997; e-mail address: [info@netpositive.hu](mailto:info@netpositive.hu)) as data processor, with whom the data storage location is Budapest, XIII<sup>th</sup> district Victor Hugo u. 18-22. The data processor is responsible for the operation of the Backstage system, the Partner Portal, the physical and operating system level operation of the system servers. The data processor has access to all personal data processed by Sziget Zrt. on the basis of this Notice, therefore, only other recipients are listed separately below.

<b>THE DATA CONTROLLER</b>	The <b>Sziget Cultural Management Private Company Limited by Shares</b> (1033 Budapest, Hajógyári sziget, hrsz. 23796/58., company registration number: 01-10- 049598, tax number: 26189905-2-41, e-mail address: <a href="mailto:dpo@sziget.hu">dpo@sziget.hu</a> - hereinafter referred to as: " <b>Data Controller</b> ")
<b>THE DATA PROTECTION OFFICER (DPO) CONTACT</b>	Postal address: H-1033 Budapest, Hajógyári-sziget, 23796/58. E-mail: <a href="mailto:dpo@sziget.hu">dpo@sziget.hu</a>

### Specific data processing processes related to accreditation

Sziget Zrt. operates the Sziget Partner Portal (<https://partners.sziget.hu>) in order to request and manage accreditations for participating its events and availing any related services (e.g. camping). The Partner Portal is connected to the ticket management system of Sziget Zrt., which, however, can only be viewed by Sziget Zrt. staff.

#### 1. REGISTERING A USER ACCOUNT ON THE PARTNER PORTAL

Purpose of data processing	Press colleagues or traders who have not previously been in contact with Sziget Zrt. can register on the Partner Portal in order to apply for accreditation for any event of Sziget Zrt.. To finalize the registration, Sziget Zrt. sends an activation e-mail, which does not mean that the
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	user has obtained accreditation for any event.
The data processed	The account user's full name, phone number, email address, language used, account password (for future login, the user's e-mail address and password are required).
Legal basis for processing	Consent under Point a) of Article 6 (1) of the GDPR
Duration of processing	If you do not have accreditation data for an ongoing event in your account, you can request the deletion of the account you have created at any time. You can modify or delete the personal data of the account user or the contact person at any time by logging into your account.

## 2. PARTNER REGISTRATION ON THE PARTNER PORTAL BY SZIGET ZRT.

Purpose of data processing	If the registration of a user (partner) is initiated by Sziget Zrt. in the ticket management system as a result of prior consultation between the parties, the Partner Portal access is also set up by Sziget Zrt. for the partner.
The data processed	The account user's first and last name, telephone number, e-mail address, language used, password to be entered or to be changed upon first login or later upon password reset.
Legal basis for processing	For natural person partners: performance of a contract under Point b) of Article 6 (1) of the GDPR. In case of non-natural person partners (i.e. contractual contact persons): legitimate interest under Point f) of Article 6 (1) of the GDPR - it is in the legitimate interest of Sziget Zrt. to ensure communication with non-natural person partners through contractual contact persons, the provision of whom with the present information is in all cases the task and obligation of the person who provides the contact person's details to the other party.
Duration of processing	If you do not have accreditation data for an ongoing event in your account, you can request the deletion of the account you have created at any time. You can modify or delete the personal data of the account user or the contact person at any time by logging into your account.

### 3. PRESS ACCREDITATION BY THE USER

Purpose of data processing	Creating an organization on the Partner Portal: When the Partner Portal user applying for accreditation continues to register as a staff member of a national or international media organization (news agency, online, print, radio, TV or influencer), Sziget Zrt. asks for additional data and information in the form of a questionnaire in order to verify whether the registration, the application for accreditation is really for the purpose of informing the public.
The data processed	In relation to the accrediting body: name of the media (required), type of media (required), country of the media (required), brief description of the media (required), address of the editorial office, contact person (required), position of the contact person, contact person's email address (required) and phone number, contact details of the media (website, Facebook, Twitter, Youtube / Vimeo or Instagram page) In connection with billing data: name / company name, address / registered office, tax number
Legal basis for processing	Consent under Point a) of Article 6 (1) of the GDPR In the case of contractual contacts (i.e. where a non-natural person registers or the registrant and the contact person are not the same): legitimate interest under Point f) of Article 6 (1) of the GDPR - it is in the legitimate interest of Sziget Zrt. to ensure communication with non-natural person partners through the contractual contact persons, the provision of whom with the present information is in all cases the task and obligation of the person who provides the contact person's details to the other party.
Duration of processing	If you do not have accreditation data for an ongoing event in your account, you can request the deletion of the account you have created at any time. You can modify or delete personal data of users and contact persons at any time by logging into the account.

### 4. VENDOR ACCREDITATION BY THE USER

Purpose of data processing	Creating an organization on the Partner Portal: When the Partner Portal user applying for accreditation continues the registration not being a colleague of a vendor (craftsman, artisan, kitchen, club or service provider) who has applied via tender, Sziget Zrt. asks for additional data in order to verify that the registration or accreditation is for the purpose of providing a trade or service relevant to the event.
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The data processed	In relation to the accrediting organization: name of the trading entity (required), trading category (required), country of the trader (required), message to Sziget Zrt., address of the organization, contact person (required), position of the contact person, contact person's email address (required) and phone number, contact details of the medium (website, Facebook, Twitter, Youtube / Vimeo or Instagram page) In connection with billing data: name / company name, address / registered office, tax number
Legal basis for processing	Consent under Point a) of Article 6 (1) of the GDPR. In the case of contractual contacts (i.e. where a non-natural person registers or the registrant and the contact person are not the same): legitimate interest under Point f) of Article 6 (1) of the GDPR - it is in the legitimate interest of Sziget Zrt. to ensure communication with non-natural persons through the contractual contact persons, the provision of whom with the present information is in all cases the task and obligation of the person who provides the contact person's details to the other party.
Duration of processing	If you do not have accreditation data for an ongoing event in your account, you can request the deletion of the account you have created at any time. You can modify or delete personal data of users and contact persons at any time by logging into the account.

## 5. APPLYING FOR ACCREDITATION TICKETS

Purpose of data processing	Requesting accreditation tickets for the Partners and/or their employees, staff, agents and collaborators (in particular for the purpose of working at the Festival). After the registration or after the account has been created by Sziget Zrt., the user can submit a request for the tickets available according to his/her classification. If you face any difficulties during the process, please, contact our colleagues at <a href="mailto:press@sziget.hu">press@sziget.hu</a> for press accreditation or <a href="mailto:vendor@sziget.hu">vendor@sziget.hu</a> for vendor registration.
The data processed	In addition to the contact person's details previously provided, the type, the date, the number of tickets for the event you have chosen; in case of advance (optional) personalization: name, e-mail address, telephone number.

Legal basis for processing	Performance of a contract under Point b) of Article 6 (1) of the GDPR. In the case of contractual contact persons, employees and contractors of the Partner: to the extent necessary for the purposes of pursuing its legitimate interests pursuant to Point f) of Article 6 (1) of the GDPR in accordance with NAIH opinion No. NAIH/2018/2570/2/V.
Duration of processing	Until the 18 <sup>th</sup> month reckoned from the last day of the event.

## 6. PROVIDING ACCREDITATION MARKS

Considering that it is possible in case of non-natural person accrediting organizations (i.e. not natural person accreditors applying for accreditation exclusively for themselves) to apply for, approve and issue both individual (personalized) tickets, and group tickets and related vouchers, the actual ticketholders (e.g. sponsors, builders, traders, volunteers, press) as data subjects do not always provide the data themselves. For this reason, it is always the responsibility and obligation of the person initiating the accreditation to provide the data subject with the data processing notice under Article 14 of the GDPR and the general data processing notice of Sziget Zrt. (including the information concerning exercising the rights of the data subject).

Purpose of data processing	<p>Sziget Zrt. decides on the accreditation ticket applications submitted for approval on the Partner Portal.</p> <p>In case the application is approved, the approval appears in the partner account and the contact person receives an email notification. In case the accredited ticket is subject to payment, the partner can purchase the tickets as decided and the accreditation becomes final. The invoice is issued based on the information provided on the page available by clicking on the approved accreditation and becomes then available on the Partner Portal. Once the invoicing details have been provided, payment is made via the method as per the user's choice (credit card or bank transfer based on a proforma invoice). The vouchers are available after the payment has been made or Sziget Zrt. has verified that the transfer has been completed.</p> <p>In case a partner does not apply for accreditation through the Partner Portal, Sziget Zrt. generates the accreditations and sends the vouchers electronically to the address provided or, in the absence of such an address, to the contact address.</p> <p>The vouchers can be downloaded from the Partner Portal, collected at the event venue, or</p>
	<p>may be sent to a contact person or a personalized e-mail address at the discretion of the contact person managing the accreditation.</p> <p>In the event that an accreditation request is rejected or amended in whole or in part, the rejection is displayed in the partner account and the contact person receives an e-mail notification.</p>

The data processed	In addition to the user and contact details previously provided, the type, date, number of tickets approved/rejected; in case of (optional) personalization: name, e-mail address, telephone number; in case of issuing invoice: billing information required by law; in the case of bank transfer on the basis of proforma invoice: bank account details; in case of sending vouchers (optional): e-mail address, in case of collecting vouchers (optional) in person: name. Data source: the contact person who initiated the accreditation.
Legal basis for processing	In case of a natural person accreditor, the performance of a contract under Point b) of Article 6 (1) of the GDPR. In case of accreditors who are not natural persons, in relation to contractual contactors, their employees and collaborators (optionally) appointed by the partner: legitimate interest under Point f) of Article 6 (1) of the GDPR (see point 5, extended to the persons named as ticket holders by the partner).
Duration of processing	Until the 18 <sup>th</sup> month reckoned from the last day of the event, except for invoice and payment any processing of data related to the invoice, where this is until the 8 <sup>th</sup> year after issuing the invoice.

## 7. ACCREDITATION OF PARKING AND ACCESS PERMITS

Purpose of data processing	During the construction and during the festival, only authorized persons are granted with permit for parking and for access, some of which can be requested through the Partner Portal. The application and approval process are the same as the accreditation process except that the access permits to be filled in with personal data are sent by the approving department in e-mail, the limited access permits and stickers proving parking authorization can be taken over in person (the approving department sends the information for the takeover). Before driving in, Sziget Zrt. checks the possession of the authorization and, in case of limited access permits, also the exit of the vehicle and observing the relevant provisions of the technical terms.
The data processed	Beside the account users and contact persons data on the Partner Portal, the name of the holder or driver and, in case of access permits, mobile telephone number of the driver and the plate number of the vehicle.
Legal basis for processing	Performance of a contract under Point b) of Article 6 (1) of the GDPR.

Other recipients	The company responsible for the Information security checking the usage of the limited access permits (EventIT-Team Kft. as data processor, availability: <a href="https://eventit.hu/hu/adatkezelesinyilatkozat/">https://eventit.hu/hu/adatkezelesinyilatkozat/</a> ) and the company performing the security service checking all permits.
Duration of processing	Until the 18 <sup>th</sup> month reckoned from the last day of the event.

### COMPLAINT, REMEDY

1. DPO - contact the Data Protection Officer! *Please always contact the DPO of SZIGET first and foremost with any complaints or comments!* If you have any questions or comments about the data processing, you can contact the Data Controller or its DPO using one of the contact details provided above. The Data Protection Officer replies to you as soon as possible, but no later than within one month.
2. Authority path (NAIH) - If this is not successful, you can also file a complaint with the National Authority for Data Protection and Freedom of Information:

#### **National Authority for Data Protection and Freedom of Information (NAIH)**

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

Postal address: 1363 Budapest, Pf.: 9.

Website: <http://www.naih.hu>

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

3. Court path: the data subject may take legal action against SZIGET as data controller in the event of violating his/her rights. The court will rule on the case out of turn. The burden of proof that the processing complies with the law lies with SZIGET. The decision in the litigation belongs to the jurisdiction of the tribunal. The lawsuit may also be brought before the court of the place of residence or domicile of the data subject, at the data subject's choice.

### RIGHTS

During the processing of personal data, you have the following rights for each legal basis for processing, although not all data subjects' rights may be exercised on each legal basis. You can find out more about each of these rights below.

		Rights					
		Accessed from law	Right to rectification	To delete or to "forget" the right to	To restrict data processing the right to	Right to data portability	Right to object
<b>Legal basis /GDPR 6. Article from (1) (a)-(f)/</b>	a) Contribution	✓	✓	✓	✓	✓	<i>The contribution revocable!</i>
	b) Contract fulfilling	✓	✓	✓	✓	✓	X
	c) Legal Commitment fulfilling	✓	✓	X	✓	X	X
	c) Vital Interest	✓	✓	✓	✓	X	X
	d) Public authorities driving licence	✓	✓	X	✓	X	✓
	e) Legitimate interest	✓	✓	✓	✓	X	✓

**Right of access**

The data subject has the right to receive feedback from SZIGET on whether his or her personal data are being processed and, if such processing is ongoing, the right to access the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom or with whom the personal data have been or is to be disclosed, including in particular recipients in third countries or international organizations;
- d) where applicable, the envisaged period of storage of the personal data or, if this is not possible, the criteria for determining that period;
- e) the right of the data subject to obtain from the controller the rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data;
- f) the right to lodge a complaint with a supervisory authority;
- g) if the data were not collected from the data subject, any available information on their source;
- h) the fact that automated decision-making, including profiling, is taking place and, at least in these cases, the logic used and clear information about the significance of such processing and the likely consequences for the data subject.

Where personal data are transferred to a third country or an international organization, the data subject is entitled to be informed of the appropriate safeguards regarding the transfer.

SZIGET provides the data subject with a copy of the personal data processed. For additional copies requested by the data subject, SZIGET may charge a reasonable fee based on administrative costs. If the data subject has made the request by electronic means, SZIGET provides the information in a commonly used electronic format, unless the data subject requests otherwise.

The right to request a copy referred to in the previous paragraph shall not adversely affect the rights and freedoms of others.

The above rights can be exercised through the contact details indicated above.

### **Right to rectification**

Upon the data subject's request, SZIGET corrects personal data which are inaccurate for the data subject without undue delay. Taking into account the purpose of the processing, the data subject has the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

### **Right to erasure ("right to be forgotten")**

The data subject has the right, upon request, to obtain from SZIGET the erasure of personal data concerning him or her without undue delay on one of the following grounds:

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing or where the processing would be for direct marketing purposes;
- d) the personal data have been unlawfully processed;
- e) the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- f) personal data are collected in connection with the provision of information society services.

The erasure of data cannot be initiated if the processing is necessary:

- a) to exercise the right to freedom of expression and information;



- b) to comply with an obligation under Union or Member State law that requires the controller to process personal data or in the public interest;
- c) for preventive health or occupational health purposes, to assess a worker's ability to work, to make a medical diagnosis, to provide health or social care or treatment, or to provide health or social systems and for the management of services, under Union or Member State law or under a contract with a healthcare professional, and the processing of that data is carried out by or under the responsibility of a professional subject to the obligation of professional secrecy under Union or Member State law or under the rules established by the competent authorities of the Member States or by another person who is also subject to the obligation of professional secrecy under Union or Member State law or under the rules established by the competent authorities of the Member States;
- d) in the public interest in the field of public health, such as protection against serious cross-border threats to health or ensuring a high level of quality and safety of healthcare, medicines and medical devices, and on the basis of Union or Member State law which provides for adequate and specific measures to safeguard the rights and freedoms of the persons concerned, in particular professional secrecy;
- e) on grounds of public interest in the field of public health and the processing of such data is carried out by or under the responsibility of a professional subject to the obligation of professional secrecy under Union or Member State law or the rules established by the competent authorities of the Member States, or by another person who is also subject to the obligation of professional secrecy under Union or Member State law or the rules established by the competent authorities of the Member States;
- f) archiving in the public interest, for scientific or historical research purposes or for statistical purposes, where the right of erasure would be likely to render such processing impossible or seriously jeopardize it; or
- g) to bring, enforce or defend legal claims.

### **Right to restriction of processing**

At the request of the data subject, SZIGET restricts the processing if one of the following conditions is met:

- a) the data subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the data subject to verify the accuracy of the personal data;
- b) the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- c) SZIGET no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defense of legal claims; or
- d) the data subject has objected to processing based on the public interest or legitimate interest of SZIGET; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the controller prevail over the legitimate grounds of the data subject.

Where processing is restricted on the basis of the above, such personal data may be processed, except for storage, only with the consent of the data subject or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the Union or of a Member State.

SZIGET informs in advance the data subject at whose request it has restricted the processing on the basis of the above about the lifting of the restriction.

### **Right to data portability:**

The data subject has the right to receive the personal data concerning him or her which he or she has provided to SZIGET in a structured, commonly used, machine-readable format and has the right to transfer these data to another controller without being prevented from doing so by SZIGET, to

whom the personal data have been provided, if:

- a) the processing is based on consent or a contract; and
- b) the processing is carried out by automated means.

In exercising the right to data portability as set out above, the data subject has the right to request, where technically feasible, the direct transfer of personal data between controllers.

The exercise of the right to data portability must be without prejudice to the right to erasure ("right to be forgotten"). This right does not apply where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

The right to data portability must not adversely affect the rights and freedoms of others.

### **Right to object**

The data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data by SZIGET where the legal basis for the processing is the public interest or the need to pursue the legitimate interests of SZIGET or a third party, including profiling based on the aforementioned provisions. In such a case, SZIGET may no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

Where personal data are processed for direct marketing purposes, the data subject has the right to object at any time to the processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing. If the data subject objects to the processing of personal data for direct marketing purposes, the personal data may no longer be processed for those purposes.

Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject has the right to object, on grounds relating to his or her particular situation, to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

### **Right of withdrawal**

The data subject has the right to withdraw his or her consent at any time if the processing by SZIGET is based on the data subject's consent. The withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal.

Budapest, 27<sup>th</sup> July 2023