

PRIVACY POLICY concerning participation at STRAND Festival

During participation at **STRAND Festival** (hereinafter “**Event**”), we process various personal data in connection with the visitors that we process in accordance with the relevant effective legislation, especially Regulation 2016/679 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 (hereinafter the “**GDPR**”).

We hereby inform you on the details of the processing of your personal data and your corresponding rights.

The entity of the data controller: Weekend Event Korlátolt Felelősségű Társaság (seat: 1122 Budapest, Városmajor utca 48. B. ép. Fsz. 2. ajtó, company registration number: Cg. 01-09-695549, e-mail: adat@nagyonbalaton.hu; website: <https://strandfesztival.com/en/>, hereinafter “**Organiser**”)

The scope of processed data, the purposes, duration and legal basis of data processing:

1.

ENTERING THE EVENT AREA, PARTICIPATION AT THE EVENT

The Event is a private event, entering and staying there is possible only with a valid wristband. The wristband(s) are for specific day(s) and entitle only one person to enter. The wristband equipped with a unique identifier will be issued by Organiser after ticket validation.

1.1. exchange of ticket to wristband and onsite check-in

From 30th July 2019, Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators (“Szvtv.”) mandatorily obliges Organiser to record the below mentioned personal data of the natural person (hereinafter: “**Visitor**”) who intends to enter a mass event – thereby also the Event - with an entry ticket. Pursuant to the Visitor Policy, children under the age of 10 are not required to have a ticket, therefore, they are not affected by the data recording.

The data recording may take place

- within the frameworks of a preliminary recording (on sites communicated by Organiser in advance) (hereinafter “**preliminary recording**”) or
- during the Event at its venue (hereinafter “**onsite recording/check-in**”) (collectively: “**check-in**”).

Providing the personal data is obligatory. The process takes a little time, but in lack of it, the Visitor is not entitled to enter the Event.

Organiser does not scan the document that contains your facial image being appropriate for identifying you (with the content of the personal data required under Szvtv. 72/C.§ (2)), only reads out the data required by law from it and pastes them by means of a scanner or mobile device or enters manually data that are missing or cannot be recognized with the help of its colleagues, as well as records the facial image of the Visitor exclusively as a cut-out image made from that part of the document that contains this data! Neither the scanner, nor the mobile device (the application used thereon) allows to make print screens during the read-

out or the data entry (making a print screen is logically, software-wise prohibited on the devices)!

After completing the check-in process, the tickets purchased are exchanged to wristband (rendering tickets to wristbands): entry to the Event area is possible bearing valid wristband, which is checked so that our colleagues visually compare the facial image of the person recorded during the check-in with the face of the person waiting to enter, as well as check the validity of the wristband (only log data is generated).

Purpose of data processing	The purpose determined in Szvtv. 72/C.§ (1): Providing the personal safety of natural persons entering the mass event (i.e. the Event), the effective prevention and detection of crimes – in particular terrorist activities – in particular proving the crimes committed at the mass event, identifying and catching persons wanted.
Processed data	Beside the data of the ticket purchased, the serial number of the chip in the wristband handed over, the time of the ticket exchange, as well as the Visitor's - surname and first name - nationality - date of birth - gender - the name of the state in which the authority issued the document – that contains the Visitor's facial image and is appropriate for identifying him or her - is located - facial image pursuant to Szvtv. 72/C.§ (2).
Legal basis of data processing	In connection with the ticket exchange: performance of the contract entered into via the ticket purchase pursuant to Point b) of Article 6 (1) of the GDPR. In case of preliminary recording: compliance with a legal obligation pursuant to Point c) of Article 6 (1) of the GDPR, required by Section 72/C (5) of Szvtv. In case of onsite check-in: compliance with a legal obligation pursuant to Point c) of Article 6 (1) of the GDPR, required by Section 72/C (1) and (2) of Szvtv.
Duration of data processing	In case of preliminary recording: - the data recorded this way must be compared with the data of the Visitor's document – by presenting the document – at the Event venue before entering the Event. If the data provided during the preliminary recording do not match the data of the Visitor's document, onsite recording takes place. However, in this case when entering the Event, the Controller immediately deletes the data provided during the preliminary recording. - if the Visitor has not entered the Event from the beginning of the Event until the end of the Event in spite of the preliminary recording, the Controller deletes the personal data immediately after the end of the Event (pursuant to Szvtv. 72/C. § (6)).

	In the event of data recording of the Event venue (onsite check-in): if the Visitor enters the Event, Organiser deletes the personal data 90 days after the ending of the Event pursuant to Szvtv. 72/C. § (2). Documents and receipts issued during the ticket purchase are stored for 1 year after the end of the Event.
Addressees	the operation of the IT system for recording and storing the personal data of natural persons entering the Event, as well as the ticket management system: Netpositive

1.2. eligibility check

In case of Visitors purchasing and/or using tickets for the Event, the eligibility for discount, entry, or other circumstances is subject to check, but of which no data are stored, no data are transmitted.

checked fact	place of checking	method of checking
Eligibility for discounted tickets for Zamárdi residents of and Zamárdi holiday home owners	check-in	verification of the validity of the identity document containing the name of the ticket user, as well as verification of the existence and, where applicable, the validity of the document entitling the user to the discount, in each case by visual checking (in the case of Zamárdi residents, an official document proving their address [address card], in the case of Zamárdi holiday home owners, a copy of a utility bill or property sheet).
Student pass eligibility	check-in	visually checking the date of birth in identification document
Children's pass / Children's ticket eligibility	check-in	verification of, by visual checking, the validity of the identity document containing the date of birth of the ticket user
VIP eligibility	entry to VIP zone	visual checking of the wristband or machine-reading of the chip
random validity checking	whole Event area	visual or handheld device checking: possession,

		validity, intactness of the wristband
baggage locker usage	baggage lockers	by reading the barcode on the locker ticket, providing access to the baggage locker

2.

ELECTRONIC SURVEILLANCE SYSTEM

Organiser installs surveillance and other fixed observation camera systems (i.e. electronic observation systems, cameras) for security at the Event area. The camera system provides direct (live) and fixed surveillance. The camera system is installed for the purpose of monitoring larger hubs, entry points and cash desks.

The camera surveillance systems are operated in accordance with the provisions of the effective legislation, therefore they are operated in accordance with Act CXXXIII of 2005 on the rules of personal and property protection activities and private investigation and only record footage of events taking place in private areas or areas temporarily taken into private use (without recording sound), and they operate 0-24.

The cameras of the surveillance systems are not the same the Event cameras, you can read more of the latter below.

By entering the venue of the Event, the data subject acknowledges that pictures are taken of him or her and videos are recorded about her or him. Pictogram, and also the Privacy Notice at the venue draws attention to the placement of the cameras. We indicate the place of the cameras on a map which is available at the venue. The detailed rules of the camera system is governed by the non-public policy regarding the camera system performing area surveillance and property protection tasks for Organiser

Direct surveillance takes place in all cases via the operative control centre established at the Event concerned and that is continuously guarded around the clock, which may be entered by authorised persons only. The dedicated colleagues of the security service provider at the Event are also present at the leadpoints, may give instructions to move cameras that are suitable therefor. During the Event, Organiser stores the footage at the location of the Event in local servers that are independent of all other systems and are located in a closed, continuously (0-24) guarded area. After the closing of a given Event, Organiser stores the footage at its registered office, in a closed and guarded server room, in accordance with the foregoing, until the data is deleted.

The cameras are connected to the optical network installed by the IT Department of Organiser, in which network they are connected to a separate dedicated VLAN. This VLAN has no internet or other traffic, its only purpose is to enable communication between the cameras and the servers. The VLAN contains devices with static IP addresses. Locations may be made available through the VLAN only if this is authorised by the IT Manager of Organiser This can be done by using the network management software, to which only the persons responsible for operating the network have access. In the Operative Control Centre, the recording, surveillance and management takes place via the IvMS4002 software. At the display locations specified above, we display the images to the competent persons using the IvMS4002 software. The footage and the IvMS4002 software runs on the camera servers located in the OCC. In order to protect the data, the footage is recorded on HDDs in a RAID set. The system is installed on a separate disk. The Servers are protected with passwords only known to the operators of the camera system.

The area surveillance camera system is not capable of recognising faces and license plates and has no image analytics algorithm.

Purpose of data processing	For the purpose of protecting human life, bodily integrity, as well as property, preventing and detecting infringements, catching the perpetrator in the act, proving infringements; identifying persons entering the area of the Event without authorisation, recording the fact of the entry and documenting the activity of persons staying in the area without authorisation; crowd management, preventing accidents, taking immediate action in case of an accident happens, investigating the circumstances of the accident; supporting the complaint handling.
Processed data	The facial image of persons entering the Event area visible on the footage, as well as their other actions recorded by the surveillance system.
Legal basis of data processing	legitimate interest pursuant to Point f) of Article 6 (1) of the GDPR, it is the legitimate interest of especially Organiser to be able to provide the persons who enter the Event area with personal and property protection, the protection of life and physical integrity, and to ensure the highest degree of Event order and security, and in case of the employees of Organiser, to exercise the authorisation pursuant to 11/A § (1) of the Act I of 2012 on the Labour Code (hereinafter: "Labour Code"), as well as the legitimate interest of visitors at the Events or persons working there to enjoy the above personal and property protection. Organiser has performed its legitimate interest assessment with regard to that, pursuant to Article VI of the Fundamental Law, everyone has the right to respect their reputation, and this fundamental right also entitles Organiser. Since, if Organiser could not effectively provide the personal and property protection at the events with the known and accessible means and technology, the confidence of visitors to the event would be reduced, the number of visitors would be decreased, which would lead to not only the violation of the reputation of Organiser, but would also be a loss of revenue, the latter can also be traced back to the right to property and linked to the freedom to entrepreneurial activities as per Article XII of the Fundamental Law.
Duration of data processing	The footage of a given Event day are deleted by Organiser on the 4 th calendar day following the Event day at 12:00. The data subject may, however, request that Organiser to lock the recordings if indicating a purpose that excludes the deletion. The locked data may be processed exclusively as long as the purpose that excluded the deletion exists. <i>Important information: You can read about the possibility of locking footages in the closing part on the rights hereof and in the General Data Protection Regulations. Considering the short storage period, please, send your possible request as soon as possible to the adat@nagyonbalaton.hu address. Please, specify the time interval and location of the requested locked footage as precise</i>

	<i>as possible in your request in order to protect the rights of other data subjects.</i>
Addressees	The scope of persons entitled to view the live feed of the cameras without audio (direct, live surveillance) and the scope of persons entitled to view the fixed footage is governed by the non-public policy regarding the camera system performing area surveillance and property protection tasks for Organiser. The live feed and stored footage recorded by the camera surveillance system operated by Organiser may only be accessed by the persons authorised thereto in order to prevent and prove infringements harming human life, bodily integrity or property and to identify the perpetrators of such infringements. Organiser records in a protocol any access to the footage recorded, the name of the person accessing them and the reason and time of the access to the data and keeps separate records of each data transfer. The persons acting on behalf of the Controller are compiled by the Operative Control Centre (hereinafter referred to as: "OCC") established by Organiser, the exact composition of which is set out in the policy relating thereto. In case of a misdemeanour or criminal proceeding, the data may be transmitted to the authorities and courts conducting such proceedings by Organiser especially pursuant to Act XC of 2017 on Criminal Proceedings Paragraph 261 and Act II of 2012 on infringements, infringement proceedings and the infringement records system Article 75. Paragraph (1) a) and Article 78. Paragraph (3). No personal data are transferred to third countries or to international organisations.

3.

EVENT CAMERAS

Organiser prepares recordings on all the Events it organises and holds. During making and exploiting the voice and image recordings - including especially the video recordings - (hereinafter referred to as "Recording") pursuant to the cited provisions of the GTC, the data of the data subjects is processed as follows.

Purpose of data processing	Organiser processes the Recordings and the data therein for the purpose of creating from them (i.e. from the Recordings) audiovisual material aiming to present, publicize, and promote the use thereof the individual Events and the Events in total, as well as the events, other services of, and itself Organiser as the organiser, furthermore, aiming at information and documentary purposes (for the purpose of this document hereinafter jointly referred to as "Films"). The personal data contained in the Recordings are only processed in the context of making and publishing the Films as specified in this document. No Film may be produced and published unless it features the data subjects in situations, contexts and while engaging in conducts that are generally foreseeable for the data subjects in relation to their participation at the Event in question, on the understanding that recordings generally harmful for the data subject and obviously prejudicial to Organiser are not used. Certain parts, elements (including images and sound recordings separately) of the Films created and published earlier may be used in further films. The Recordings used in the Films may be modified for the following reasons and in the following ways, at the good faith discretion of Organiser not adversely affecting the data subjects' interests: - the sharpness and colour depth of the recorded image, for aesthetic reasons; - to blur out any brand logo or reference to an undertaking other than Organiser appearing in the Recording; - to blur out any offensive content. In accordance with the practice followed by Organiser at the time of the publication of this document, the Films may be published in the following ways: - broadcasting them in television and radio channels, as well as in cinemas; - making them available via electronic and printed press; - making them available on online surfaces, community media available for or accessible by itself; furthermore, - making them public via any other means.
Processed data	Faces and other parts of the body, as well as the sound (with separate images and audio recordings) and all visible aspects of the appearance and behaviour of persons entering the Event area can be seen in the Recordings.
Legal basis of data processing	In line with the enforceability of the undertakings pursuant to Point III. 4.3 of the GTC, it is the legitimate interest of Organiser set forth

	in Point f) of Article 6 (1) of the GDPR to, on the one hand, exercise the freedom to entrepreneurial activities as per Article XII of the Fundamental Law that can be traced back to property right, and, on the other hand, inform the great public that can be traced back to freedom of expression and the freedom of press.
Duration of data processing	The Recordings, and, therefore, also the personal data included therein is processed by Organiser for an indefinite period, however, acts as described above during the exploitation thereof. The Recordings, the Films, and the creations, creatives as a result of their exploitation are at the same time copyrighted works, with regards to their protection, Organiser may not exercise deletion without the consent of the author but, upon the request of the data subject, in connection with the exploitation, the right of protest of the data subject can be exercise within the frameworks of technics and reasonable realization (for which, please, contact us on the adat@nagyonbalaton.hu address).
Addressees	Organiser avails as data processors all mandates who make the Recordings of the data subjects (photographers, video cameramen), as well as compile the Films. Organiser can transfer both the Recordings, and the Films for promotion and information purposes within the company group. In the case of press requests, Organiser can provide the requesting press organ with Recordings, Films. Organiser can transfer Recordings, Films to the partners of the Event to prove the performance of the contract by and between them. Organiser also transfers the Films to the person who provides the channel of publication, exclusively for this purpose.

4.

CONVENIENCE SERVICE RELATED TO CASHLESS PAYMENT

The Organizer does not process personal data and therefore is not a data controller. If the Visitor registers the Festipay card, **FestiPay Cashless Payment Services Private Limited Company** (registered office: 1135 Budapest, Reitter Ferenc utca 46-48., company registration number: Cg. 01-10-048644), as data controller, and its data processors will process the Visitor's personal data as necessary in accordance with the data protection policy of Festipay Zrt. The data protection policy of Festipay Zrt. can be found in the Festipay mobile application, at the charging points on site, and here: <https://festipay.com/terms-of-data-management/>.

5.

SERVICES PROVIDED BY ORGANISER

In order to increase the visitor experience, Organiser itself provides many services for the comfortable Event visit, and many service providers participate at the Event. Most of the services provided by Organiser do not require data processing, but there are also services that require data processing.

5.1. camping service

5.1.1. filling in takeover receipt related to accommodation

Purpose of data processing	The below mentioned personal data are necessary for Organiser to issue an invoice about the restoration fee if there is a damage in the accommodation, and to get into contact with you.
Processed data	• Name, • Street, house number • Floor, door • Code/Zip Code • City • Country • Phone number • E-mail address • Signature
Legal basis of data processing	The legal basis of data processing is the performance of contract pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	In case you have checked out and there is no damage in the accommodation, Organiser deletes your personal data the day after the ending of the Event. In case you have not checked out and there is a damage in the accommodation, Organiser deletes the personal data immediately after the enforcement of the claims, but at the latest following the statutory limitation period.

5.1.2. Data entry in the VIZA (Guest Information Closed Database) system

Purpose of data processing	For the protection of rights, safety and property of the data subject and others, furthermore, for the control the compliance with the provisions on the stay of citizens of third countries and persons entitled to the freedom of movement and residence, data are recorded and transferred for the purpose of data provision prescribed by law (Act 156 of 2016 on the state tasks of development of touristic areas [hereinafter “Touristic Act”])
Processed data	Based on Paragraph 1 of Section 9/H of the Touristic Act, by use of ID scanner via the accommodation administering software, the provider of accommodation shall record the following data on the host (Guest Information Closed Database [VIZA]) maintained by the

	Hungarian Touristic Agency (seat: 1027 Kacsas u. 15-23.), as the host provider designated by the decree of the Government: • family name and given name • birth family name and given name • place and date of birth • gender • nationality • mother's birth family name and given name • identification data of ID document and passport • number of visa or residence permit of citizens from third countries, date and place of entry • the beginning date and the planned final date and the actual final date of access to the accommodation
Legal basis of data processing	Pursuant to Point c) of Article 6 (1) of the GDPR, the legal basis for the data processing is the fulfilment of legal obligation of Organiser
Duration of data processing	Until the last day of the calendar year following the date of provision of the data.
Addressees	Organiser processes the personal data as per Paragraph 1 of Section 9/H of the Touristic Act to achieve the abovementioned purpose. Based on Governmental Decree 235/2019. (X. 15.), after recording the personal data on the host, the Hungarian Touristic Agency shall proceed, as defined therein, as data processor for the personal data determined in Paragraph 1 of Section 9/H of the Touristic Act. Pursuant to Section 9/A of the Touristic Act, Organiser shall transfer statistical and event-driven data, which do not contain personal data, to National Touristic Data Provider Centre (NTAK) operating under the supervision of Hungarian Touristic Agency. No personal data will be transferred to third countries or to international organisations. For recording the data: Netpositive

5.1.3. Data entry for payment of touristic tax

Purpose of data processing	The data are recorded pursuant to Section 9 of Municipal Decree of 25/2022. (XII. 13.) of Zámárdi City Municipality, for collecting the touristic tax.
Processed data	Pursuant to Paragraph 2 of Section 11 of Municipal Decree of 25/2022. (XII. 13.) of Zámárdi City Municipality on local taxes and taxation, in line with Paragraph 3 of Section 9/I of the Touristic Act, the registry by law is electronically registered with the application of the accommodation management software as per Point 5.2.2. with the following data content: • guest name • date of birth • time of arrival • date of departure • number of guest nights spent
Legal basis of data processing	Pursuant to Point c) of Article 6 (1) of the GDPR, the legal basis for the data processing is the fulfilment of legal obligation of Organiser

Duration of data processing	Until the end of the limitation period for the determination of the tax (until 31 st December of the 5 th year following the year of the statement).
Addressees	Organiser processes the personal data specified by Section 9 and Section 11 of Municipal Decree of 25/2022. (XII. 13.) of Zámárdi City Municipality to achieve the abovementioned purpose. data registry: Netpositive

6.

MANAGING QUESTIONS AND ISSUES OCCURRING IN CONNECTION WITH THE EVENT

All persons at the Event must adhere to the Event policy. Despite this, and despite all the precautions, some problems may occurrently arise that may result in the processing of personal data.

6.1. medical problems

On the site of the Event, Organiser provides medical attendance, ensures on-site presence of first aid staff within its legal obligation pursuant to 5/2006 (II.7) Health Ministry decree and 23/2011 (III.8) Government decree.

Pursuant to Act XLVII of 1997 on processing and protecting medical and related personal data, the medical service provider availed by Organiser are individual data controllers, their data processing falls outside of the sphere of control of Organiser, therefore, the latter has no liability for them, cannot provide information of them.

In connection with medial aid availed without help, and the helper service of the medical patrolcrew, no data is registered, in case of an incident, however, the security service and the medical service, respectively, records the data of the incident in a report, that contains all relevant information. The records are kept by the security service, and the medical service providers, which are handled by the respective service providers within the sphere of their own data processing. Organiser receives exclusively anonym statistical data of security incidents.

6.2. lost, and found-submitted objects, luggage

It can unfortunately happen during the Event that a participant loses some object(s). In order to help each other return these objects to the owners, it is possible to submit at the customer service any objects found at the Event area but you do not know who they belong to. In the event that someone loses something, he or she has the opportunity to indicate at the same place that he or she is looking for an object and, if someone submits it, the customer service notifies him or her of finding it.

It is also possible to submit the found objects at some of the designated merchant desks, but in such a case, you will not receive any certificates of the submission. The found items submitted at the merchants are collected once a day and are then taken over by the customer service, records them in the list of items found, and giving them over to the owner is possible only afterwards.

Organiser handles as lost objects all those items that have been taken over by the security service upon the entry beside handing a numbered tag (without registering any personal data) from the Visitor because they are forbidden to take into the Event area under the visitor policy of the Event but the holder of the numbered tag does not collect the item until the end of the Event.

Purpose of data processing	At the customer service of the Event, Organiser takes over, collects the objects lost then handed over by the person who has found it. To the person who hand the lost object over, Organiser gives over a takeover declaration including the description of the object handed over) but no data is recorded about the person who has found the object. Organiser places etiquettes with serial numbers onto the handed over objects, makes a detailed description of the objects, records them in its registry. When the owner who has lost the object comes to collect the object, Organiser makes as sure as possible in accordance with its internal policy that it hands the objects over to the lawful, identified owner. Organiser prepares a handover-takeover declaration, which the person taking the object over shall sign. It is also possible that the person who has lost an object provides Organiser with a description of the lost item personally or via an electronic format operated by the customer service in case the lost object is handed over at the customer service of the Event. In case the owner of the deeds, documents, objects, or the person who is entitled for the takeover can undoubtedly be identified, as well as the contact details are available for Organiser, Organiser shall notify such person. In case, however, someone else than the owner of the object or the person entitled to take the object over would take the object over, Organiser shall hand the processed data over to the investigating authority or the court.
Processed data	upon giving the description of lost object(s): - owner's name - telephone number, e-mail address - description and, if available, photo of the lost object(s) - signature additionally, upon taking over lost and found object(s), owner's and, if applicable, proxy's - name - address - place and date of birth - ID /passport number - etiquette number -
Legal basis of data processing	The legal basis of the data processing is, pursuant to Point f) of Article 6 (1) of the GDPR, primarily the legitimate interest of a third person (owner of the lost and found item), i.e. in case another person has taken the lost and found item over, the lawful owner can enforce his/her ownership claim, as well as the legitimate interest of Organiser to be able to comply with its legal obligation pursuant to Section 5:59 of the Civil Code.
Duration of data processing	Organiser stores personal data of persons seeking their lost items for 3 months after closing the Event considering that Organiser is obliged

	to safeguard lost items for 3 months pursuant to Section 5:59 (3) of the Civil Code. Data and declarations related to the takeover of lost and found items shall be stored for the general forfeiture period to enable exercising ownership claims.
Addressees	on-site customer service administration related to lost and found items: FestLife PR Organiser is obliged to satisfy authority inquiries in connection with lost and found items.

6.3. individual emergencies

When an individual emergency occurs at the Event (for example, a child is lost, or a person not being conscious or aware is found), Organiser takes all reasonable measures within the framework of its capabilities to manage the individual emergency. If we are unable to manage the individual emergency, or our efforts to manage the individual emergency prove to be unsuccessful, we contact the competent authorities to take further measures.

Purpose of data processing	Aiding the person in individual emergency.
Processed data	All necessary data available within common sense (the scope of them can be specified individually, on a case-by-case basis, the relevant information cannot be given in advance pursuant to Point b) of Article 14 (5) of the GDPR).
Legal basis of data processing	The legal basis of the data processing is, pursuant to Point d) of Article 6 (1) of the GDPR, the protection of the vital interests of the persons in the individual emergency.
Duration of data processing	For a period justified by the nature and documentation requirement of the individual emergency, of which precise information can be given on a case-by-case basis, upon specific request.
Addressees	Third persons contributing in, affected by the management of the individual emergency, of whom precise information can be provided on a case-by-case basis, upon specific request.

6.4. therapeutic animals

Visitors may bring assistance dogs and guide dogs with valid certificate to the Event venue at their own risk. Apart from these, only police dogs are allowed to enter. ***Please bring animals to the Event venue in accordance with the applicable legal requirements and with due regard for the interests of the animal and other participants.*** Upon entry, our staff will check the required identification, training certificates, and vaccination records for animals brought into the venue, but will not photocopy them or record any other information.

7.

INQUIRIES ON THE PHONE OR IN WRITING

Would you have any questions, issues in connection with the Event, you can request support from Organiser in several ways. You can contact us in e-mail, on the telephone, but there is an on-site Helpdesk during the Event where we can help you. In case such communications are not oral, there is necessarily data processing in relation to written inquiries.

7.1. General inquiries

Purpose of data processing	Anybody can formulate his/her opinion , indicate his/her problem , send feedback , pose questions via the telephone or e-mail availabilities of Organiser, during which you necessarily provide personal data.
Processed data	• name (for addressing, identification if necessary), • telephone number (in case of inquiry via telephone or giving the telephone number via e-mail), or e-mail address (in case of inquiry via e-mail or giving the e-mail address on the phone) (for keeping contact), • comment, problem, feedback, question and the personal data contained therein (aiding Organiser to develop its services, so that it may remedy the problem – for customers' complaints see point 7.2, for noise problem see point 7.3, in the event of data protection request see point 7.4 for more details), as well as may satisfy its obligations related to complaint management, if needed, may provide answers to your questions), • reply of Organiser and the personal data contained therein • address (in case of reply to be sent by mail)
Legal basis of data processing	We handle your inquiry basically based on your consent pursuant to Point a) of article 6 (1) of the GDPR. In case your inquiry qualifies – after having it read – as complaint eligible for natural persons (see points 7.2, 7.3 or 7.4), the legal basis will further be the satisfaction of the legal obligation burdening Organiser pursuant to Point c) of Article 6 (1) of the GDPR. In case the complaint arrives from a non-natural person entity, Organiser processes the occurrently affected personal data with regards to enforcing occurrent civil law claims as per Section 6:22 of Acti V of 2013 on the Civil Code, as well as defence against occurrent civil law claims of the affected parties, i.e. with regards to the legitimate interest of Organiser (Point f) of Article 6 (1) of the GDPR).
Duration of data processing	In case the inquiry does not qualify as a complaint, Organiser stores the data until the withdrawal of your consent, in lack of which Organiser deletes the personal data until 28 th February following the elapse of one calendar year reckoned from the last communication in connection with the inquiry (from closing the inquiry). The consent

	may be withdrawn anytime by sending an e-mail to the adat@nagyonbalaton.hu address. Organiser stores the reports of the complaints and the copy of the reply for 5 years and presents them to supervisory authorities upon request.
Addressees	third persons affected by the resolution of the case, of whom precise information can be provided on a case by case basis, upon specific request

7.2. consumers' complaints

Purpose of data processing	Examination of the complainant's complaint in accordance with the legal requirements, complaint handling: You may submit the consumer objections (complaints) in relation to purchased ticket, product or related activity of Organiser in accordance with the relevant procedural rules. Complaints that are made in person or on telephone are examined immediately and we inform the complainant of our position, and remedy the complaint if possible. If the buyer does not agree with the answer to the oral complaint, the complaint shall be sent in writing. In this case, we follow the provisions on written complaints as described below. Written complaints are examined and answered within 30 days. If the complaint is rejected, we justify our answer. If the complaint is rejected, we inform you in writing that, by its very nature, which authority's or conciliation body's proceeding may be initiated.
Processed data	- name, address of consumer, - place, time, method of filing complaint, - detailed description of consumer complaint, log of documents, records and other proofs submitted by consumer, - Organiser's statement regarding its position on the consumer complaint, if an immediate investigation of the consumer complaint is possible, - signature of consumer and the person registering the complaint (except if complaint is submitted via email or phone) - place and time of registering consumer complaint - unique identification number of the complaint communicated on the phone or via other electronic communication services.
Legal basis of data processing	Pursuant to Point c) of Article 6 (1) of the GDPR, satisfying legal obligations prescribed for Organiser in the Civil Code and legal regulations related to consumer complaints (especially Act CLV of 1997 on consumer protection).
Duration of data processing	Organiser stores the reports of the complaints and the copy of the reply for 5 years and presents them to supervisory authorities upon request pursuant to Section 17/A (7) of Act on Consumer Protection.
Addressees	providing on-site customer service: FestLife PR

	third persons affected by the resolution of the case, of whom precise information can be provided on a case-by-case basis, upon specific request In case of submitted for review, the authorities and organizations indicated on http://fogyasztovedelem.kormany.hu/node/7699 site.
--	--

7.3. complaints about noise

Purpose of data processing	Examining the complaint related to noise exposure of the complainant in accordance with the legal regulations.
Processed data	- name, e-mail address or telephone number of complainant, - place, time, method of filing complaint, - detailed description of the complaint, street, area specified by the complainant, - Organiser's statement regarding its position on the consumer complaint, - person registering the report (in internal administration) - place and time of registering the report
Legal basis of data processing	Pursuant to Point c) of Article 6 (1) of the GDPR, satisfying legal obligations prescribed for Organiser in the Civil Code and legal regulations related to complaints on noise (especially 27/2008. (XII. 3.) KvVM–EüM decree on setting environmental noise and vibration load limits).
Duration of data processing	Organiser stores the reports of the complaints and the copy of the reply for 5 years and presents them to supervisory authorities upon request pursuant to Section 17/A (7) of Act on Consumer Protection.
Addressees	third persons affected by the resolution of the case, of whom precise information can be provided on a case-by-case basis, upon specific request

7.4. data protection requests

Purpose of data processing	Exercising data subjects' rights pursuant to Article 15-22 of the GDPR: You may submit a request in relation to data processing related to the purchased ticket, product or related activities of Organiser, as well as your rights described in the GDPR. Organiser answers your inquiry within 1 month the latest, unless there is any justification to extend the deadline.
Processed data	- name of data subject, - place, date, method of submitting the request, - e-mail address of data subject, - request of data subject, all information that may be considered as personal data, - other personal identification data, information that are necessary to satisfy such request, - the replay of Organiser and all its attachments

Legal basis of data processing	Pursuant to Point f) of Article 6 (1) of the GDPR, it is the legitimate interest of Organiser as data controller to satisfy its obligations as data controller specified in the GDPR with regard to the following: Pursuant to Article 12-14 of the GDPR, all data subjects, thus, you are also entitled to exercise the rights of the data subject in connection with the processing of his/her personal data, as well as to request Organiser to restore the lawful situation if, in a specific case, he/she would raise well-grounded objection in relation to the data processing. As detailed in this Privacy Policy, too, all data subjects may request – access to his/her personal data, – correction of his/her personal data, – deletion of his/her personal data, – limitation of the data processing, – portability of his/her personal data, – may protest against the processing of his/her personal data. No matter which right of data subjects is concerned with the request, Organiser shall inform you without unjustified delay, but in any case, within one month reckoned from the receipt of the request of the measures made based on the request in accordance with Preamble (59) of the GDPR. If necessary, taking into account the complexity of the request and the number of requests, this deadline can be extended by two more months. However, Organiser shall inform you about the extended time limit within one month reckoned from the receipt of the request, indicating the causes of the delay. If, however, Organiser cannot make measures based on your request, it shall inform you without unjustified delay, but in any case, within one month reckoned from the receipt of the request of the reasons of the omission, as well as of the fact that you may submit a complaint at the National Authority of Data Protection and Freedom of Information and exercise your right for judicial remedy, before the tribunal competent as per your permanent address or residence (you can find out the contact details of the courts at the following link: http://birosag.hu/torvenyzek). If, however, Organiser has well-grounded doubt about your identity in your submission of your request to exercise your data subjects' rights, it may ask you to provide further information to confirm your identity. If Organiser proves that it is unable to identify you, it can refuse to fulfil the request aimed at exercising data subjects' rights. As a main rule, information and measures related to data subjects' requests are free of charge. If, however, Organiser proves that the request is obviously ungrounded or is – especially due to its repetitive nature – excessive considering administrative costs associated with providing the requested information or making the requested measures, reasonable fee may be specified to do so or may refuse making measures based on the request.
Duration of data processing	Organiser stores the inquiries and the copy of the reply for 5 years and presents them to supervisory authorities upon request.

Addressees	hird persons affected by the resolution of the case, of whom precise information can be provided on a case-by-case basis, upon specific request In case the data subject seeks remedy in relation to the complaint or the reply of Organiser, data are transferred to NAIH or courts as noted above.
------------	--

DATA OF ADDRESSEES

specification of activity	type of activity	name	availability
Operation of Organiser's customer relations management (ERP) system, physical and operating system-level operation of the servers for online vending systems, providing the running environment; development and operation of IT system managing and storing personal data of natural persons entering the Event	data processor	Netpositive Számítás-technikai Szolgáltató és Kereskedelmi Kft.	2021 Tahitótfalu, Pataksor utca 48. info@netpositive.hu
Operation of the program providing accounting documents, issuing and sending out invoices and e-receipts	data processor	KBOSS.hu Kft.	1031 Budapest, Záhony utca 7. dpo@kboss.hu
providing POS service and related software, communication with the service provider enabling bank card payment	data processor	CARDNET Kártya-rendszerek és –szolgáltatások Zrt.	1135 Budapest, Reitter Ferenc utca 46-48. dpo@cardnet.hu
application development	data processor	Appmiral BVBA	2000 Antwerp, Scheldestraat 11, Belgium Stationsstraat 100, 2800 Mechelen, Belgium hello@appmiral.com
on-site customer service administration	data processor	FestLife PR Kft.	1068 Budapest, Király utca 80. fsz. 11. ajtó hello@festinform.hu

DATA SECURITY

Organiser shall ensure the security of the personal data and shall implement appropriate technical and organizational measures to ensure that the collected, stored and processed data are protected, in addition to preventing destruction, unauthorized use, and unauthorized alteration of the data. Organiser shall furthermore notify third parties - to whom the data subject's information is transferred - that they are obligated to meet the data security requirements.

Organiser shall ensure the prevention of unauthorized access to personal data, as well as the publication, transfer modification or erasure thereof.

Organiser shall impose the aforementioned obligation onto its employees taking part in the data processing, as well as the data processors acting under the authority of Organiser

THE RIGHTS AND LEGAL REMEDIES, COMPLAINTS OF DATA SUBJECTS

Pursuant to the GDPR, during the data processing, you may request access to the personal data and may request information about data processing (which shall be provided by Organiser within no more than 1 month), may request rectification of personal data, erasure under certain conditions, or the restriction of data processing, and - when the legal basis for data processing is performance of a contract - you have the right to data portability. When the legal basis for data processing is legal interest, you have the right to object.

You can read further information about the rights in the ***General privacy regulation*** under the ***Event policy and general terms*** menu of the website.

If you feel that Organiser has violated any of the legal provisions applicable to the data processing, please, contact us first, using any of the above contact information, or at the following email address: adat@nagyonbalaton.hu. If this proves to be unsuccessful, you may initiate a proceeding of the **Hungarian National Authority for Data Protection and Freedom of Information** (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH, seat: Hungary, H-1055 Budapest, Falk Miksa utca 9-11.; mailing address: 1374 Budapest, Pf. 603.; email: ugyfelszolgalat@naih.hu) or seek **judicial** remedy.

Personal data related to children and third persons

Persons under 16 may not submit their personal data, except if they have requested permission from the person exercising parental rights. By providing your personal data to Organiser, you hereby represent and warrant that you act according to the aforementioned, and your legal capacity is not restricted with regards to the providing of data.

If you do not have the right to independently provide personal data, you shall acquire the permission of the appropriate third party (i.e. legal representative, guardian, other person – for instance consumer - you are representing) or provide another form of a legal basis to do so. In relation to this, you shall be able to consider whether the personal data to be provided requires the consent of a third party. It may happen that Organiser does not get into contact with the data subject, therefore, you are responsible for meeting all the necessary requirements and Organiser shall not be liable or bear any responsibility in this regard. Nevertheless, Organiser has the right to check and verify whether the proper legal basis is provided for the handling of data at all times. For example, if you are representing a third party – for instance a consumer – we reserve the right to request the proper authorization and/or consent of the party being represented with relation to the matter at hand.

Organiser shall do its utmost to remove all personal information provided without authorization. Organiser shall ensure that if Organiser becomes aware of this, such personal information is not forwarded to any third party or used for Organiser's own purposes. We request that you inform us immediately via our aforementioned contacts if you become aware that a child has provided any personal data about himself or herself, or any other third party has provided any personal data of you unauthorized to Organiser

MISCELLANEOUS

This Privacy Policy was written in Hungarian, although its English version is also available. In the event of contradiction, the Hungarian language version shall prevail.