

# PRIVACY POLICY

## concerning participation at HEINEKEN BALATON SOUND Festival

During participation at HEINEKEN BALATON SOUND Festival (hereinafter: “Festival”), 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: Sziget Cultural Management Private Company Limited by Shares** (seat: 1033 Budapest, Hajógyári sziget 23796/58., company registration number: 01-10-049598, telephone number: +36 (1) 372 0681, e-mail: [hello@sziget.hu](mailto:hello@sziget.hu); website: [www.balatonsound.com](http://www.balatonsound.com), hereinafter: “**Sziget Zrt.**”)

### Availability of the data protection officer:

Postal address: H-1033 Budapest, Hajógyári-sziget topographical lot No.: 23796/58.

E-mail: [dpo@sziget.hu](mailto:dpo@sziget.hu)

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

## 1.

### ENTERING THE FESTIVAL AREA, PARTICIPATION AT THE FESTIVAL

The Festival 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 Sziget Zrt. after ticket validation.

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

From 30<sup>th</sup> July 2019, Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators (“Szvtv.”) mandatorily obliges Sziget Zrt. to record the below mentioned personal data of the natural person (hereinafter: “Visitor”) who intends to enter a mass event – thereby also the Festival - with an entry ticket. Pursuant to the Visitor Policy, children under the age of 11 are not required to have a ticket, therefore, they are not affected by the data recording.

The data recording takes place during the Festival at its venue (hereinafter: “onsite recording/ 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 Festival.

***Sziget Zrt. 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 Festival 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 Festival), 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 <ul style="list-style-type: none"> <li>- surname and first name</li> <li>- nationality</li> <li>- date of birth</li> <li>- gender</li> <li>- 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</li> <li>- facial image</li> </ul> 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 Pont b) of Article 6 (1) of the GDPR. In connection with 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 the event of data recording of the Festival venue (onsite check-in): if the Visitor enters the Festival, Sziget Zrt. deletes the personal data 90 days after the ending of the Festival pursuant to Szvtv. 72/C. § (2). Documents and receipts issued during the ticket purchase are stored for 6 months after the end of the Festival.
Addressees	the operation of the IT system for recording and storing the personal data of natural persons entering the Festival, as well as the ticket management system: Netpositive contribution in the data recording: Fesztivál Önkéntesek (Festival Volunteers)

## 1.2. eligibility check

In case of Visitors purchasing and/or using tickets for the Festival, 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
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Diákjegy (Student ticket)	check-in	visually checking the validity of student card or other certificate
SZIE student or lecturer	check-in	visually checking the student card, the teacher card, or other certificate of studentship or professorship
VIP eligibility	entry to VIP zone	visual checking of the wristband or machine-reading of the chip
random validity checking	whole Festival area	visual 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

Sziget Zrt. installs surveillance and other fixed observation camera systems (i.e. electronic observation systems, cameras) for security at the Festival 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 festival cameras, you can read more of the latter below.*

By entering the venue of the festival, 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 Sziget Zrt.

Direct surveillance takes place in all cases via the operative control centre established at the Festival concerned and that is continuously guarded around the clock, which may be entered by authorised persons only. During the Festival, Sziget Zrt. stores the footage at the location of the Festival 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 Festival, Sziget Zrt. 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 Sziget Zrt., 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 Sziget Zrt. 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 Axxon Universe software. At the display locations specified above, we display the images to the competent persons using the CMS3 software. The footage and the Axxon Universe 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	<p>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;</p> <p>identifying persons entering the area of the festival without authorisation, recording the fact of the entry and documenting the activity of persons staying in the area without authorisation;</p> <p>crowd management, preventing accidents, taking immediate action in case of an accident happens, investigating the circumstances of the accident;</p> <p>supporting the complaint handling.</p>
Processed data	The facial image of persons entering the Festival area visible on the footage, as well as their other actions recorded by the surveillance system.
Legal basis of data processing	<p>legitimate interest pursuant to Point f) of Article 6 (1) of the GDPR, it is the legitimate interest of especially Sziget Zrt. to be able to provide the persons who enter the Festival area with personal and property protection, the protection of life and physical integrity, and to ensure the highest degree of Festival order and security, and in case of the employees of Sziget Zrt., 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 Festivals or persons working there to enjoy the above personal and property protection.</p> <p>Sziget Zrt. 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 Sziget Zrt. Since, if Sziget Zrt. 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 Sziget Zrt., 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.</p>
Duration of data processing	<p>The footage of a given Festival day are deleted by Sziget Zrt. on the 4<sup>th</sup> calendar day following the Festival day at 12:00.</p> <p><b><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 <a href="mailto:dpo@sziget.hu">dpo@sziget.hu</a> address. Please, specify the time interval and location of the requested locked footage as precise as possible in your request in order to protect the rights of other data subjects.</i></b></p>
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 Sziget Zrt. The live feed and stored footage recorded by the camera surveillance system operated by

Sziget Zrt. 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. Sziget Zrt. 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 Sziget Zrt., 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 Sziget Zrt. 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.

#### FESTIVAL CAMERAS

Sziget Zrt. prepares recordings on all the festivals 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.

<p>Purpose of data processing</p>	<p>Sziget Zrt. 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 Festivals and the Festivals in total, as well as the events, other services of, and itself Sziget Zrt. as the organiser, furthermore, aiming at information and documentary purposes (for the purpose of this document hereinafter jointly referred to as "Films").</p> <p>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 Festival in question, on the understanding that recordings generally harmful for the data subject and obviously prejudicial to Sziget Zrt. 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 Sziget Zrt. not adversely affecting the data subjects' interests:</p> <ul style="list-style-type: none"> <li>- the sharpness and colour depth of the recorded image, for aesthetic reasons;</li> <li>- to blur out any brand logo or reference to an undertaking other than Sziget Zrt. appearing in the Recording;</li> <li>- to blur out any offensive content.</li> </ul> <p>In accordance with the practice followed by Sziget Zrt. at the time of the publication of this document, the Films may be published in the following ways:</p> <ul style="list-style-type: none"> <li>- broadcasting them in television and radio channels, as well as in cinemas;</li> <li>- making them available via electronic and printed press;</li> <li>- making them available on online surfaces, community media available for or accessible by itself; furthermore,</li> <li>- making them public via any other means.</li> </ul>
<p>Processed data</p>	<p>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 Festival area can be seen in the Recordings.</p>
<p>Legal basis of data processing</p>	<p>In line with the enforceability of the undertakings pursuant to Point III. 4.2 of the GTC, it is the legitimate interest of Sziget Zrt. set forth in Point f) of Article 6 (1) of the GDPR to, on the one hand, exercise the freedom</p>

	<p>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.</p>
Duration of data processing	<p>The Recordings, and, therefore, also the personal data included therein is processed by Sziget Zrt. 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, Sziget Zrt. 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 <a href="mailto:dpo@sziget.hu">dpo@sziget.hu</a> address).</p>
Addressees	<p>Sziget Zrt. avails as data processors all mandates who make the Recordings of the data subjects (photographers, video cameramen), as well as compile the Films.</p> <p>Data storage: Netpositive</p> <p>Sziget Zrt. can transfer both the Recordings, and the Films for promotion and information purposes within the company group.</p> <p>In the case of press requests, Sziget Zrt. can provide the requesting press organ with Recordings, Films.</p> <p>Sziget Zrt. can transfer Recordings, Films to the partners of the Festival to prove the performance of the contract by and between them.</p> <p>Sziget Zrt. also transfers the Films to the person who provides the channel of publication, exclusively for this purpose.</p>



#### 4.

### CONVENIENCE SERVICE RELATED TO CASHLESS PAYMENT

The Visitor necessarily provides Personal Data to Sziget Zrt. for the use of cashless payment systems at the Festival, which are processed by Sziget Zrt. and its below mentioned data processors in connection with the use of the payment device.

#### 4.1. providing cashless payment device (“Payment chip”)

Purpose of data processing	Providing cashless payment as convenience service, as well as protecting the money placed thereon by the Visitor against unauthorized usage in the event of losing, damaging, defect of the Payment chip (safety services).
Processed data	serial number of the Payment chip being part of the chip in the wristband PIN code (last four characters of the serial number of the voucher or – if the Visitor purchases the ticket on the site of the Festival, – the four characters handed over upon the purchase): safety function in accordance with those set forth in the User’s Guide
Legal basis of data processing	Performing the contract for cashless payment service concluded with the lawful user of the Payment chip pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	Sziget Zrt. anonymises (so that the data subjects cannot be identified) the above data upon the expiry of 6 months after the Festival. Accounting certificates are stored for 8 years in accordance with the effective legal regulations.
Addressees	handling of wristband chips: Netpositive operation of Payment chip voucher system: Festipay

#### 4.2. balance top-up onto cashless payment device

Purpose of data processing	Availing by the Visitor and providing by Sziget Zrt. of the cashless payment as convenience service. The Visitor may place amounts onto the Payment chip in cash or by card for the purpose of paying to merchants providing services, selling products exclusively at the time and site of the Festival affected by the wristband. The balance may be checked at the POS terminals of the merchants.
Processed data	In excess to the data of the Payment chip (point 4.1.): balance statement, balance operations in line with the effective Festipay User’s Guide amount of the top-up, top-up time, top-up method (cash or bank card): precise balance statement, necessary for issuing receipt, as well safety measure as several failed transactions may indicate defects, abuses; satisfying obligation to provide accounting receipts; in the event of Payment chip replacement process in line with the effective Festipay User’s Guide, for security reasons

	<p>feedback on the transaction status of the bank card: evidence of the appropriate operation, aid to investigate the reason of the failure in the event of handling complaints</p> <p>receipt identification number: satisfying obligation to provide accounting receipts</p>
Legal basis of data processing	Performing the contract pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	Sziget Zrt. anonymises (so that the data subjects cannot be identified) the above data upon the expiry of 6 months after the Festival. Accounting certificates are stored for 8 years in accordance with the effective legal regulations.
Addressees	<p>handling of wristband chips: Netpositive</p> <p>operation of Payment chip voucher system: Festipay</p> <p>in relation to balance top-up: OTP Mobil</p> <p>accounting certificates: KBOSS</p>

#### 4.3. payment with cashless payment device

Purpose of data processing	<p>Availing by the Visitor and providing by Sziget Zrt. of the cashless payment as convenience service.</p> <p>The Visitor may use the Payment chip in accordance with the User's Guide.</p>
Processed data	<p>in excess to Payment chip and balance data:</p> <p>amount of purchase, time of purchase, place of purchase (merchant identification), crediting transaction time, amount, method: precise balance statement, necessary for issuing receipt, as well safety measure as several failed transactions may indicate defects, abuses; satisfying obligation to provide accounting receipts; in the event of Payment chip replacement process in line with the effective Festipay User's Guide, for security reasons, as well as aid to investigate the reason of the failure in the event of handling complaints</p>
Legal basis of data processing	Performing the contract pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	Sziget Zrt. anonymises (so that the data subjects cannot be identified) the above data upon the expiry of 6 months after the Festival. Accounting certificates are stored for 8 years in accordance with the effective legal regulations.
Addressees	<p>handling of wristband chips and balance statement of the Payment chip: Netpositive</p> <p>operation of Payment chip voucher system: Festipay</p> <p>in connection with using the balance: Cardnet</p>

#### 4.4. redemption/repayment/refunding of balance remained on cashless payment device

Purpose of data processing	<p>In case unused balance remains for the Visitor, its</p> <ul style="list-style-type: none"> <li>- redemption in cash as per the effective Festipay User's guide,</li> <li>- repayment onto bank card as per the effective Festipay User's guide,</li> <li>- refunding (after deduction of a convenience fee) as per the effective Festipay User's guide onto the bank account</li> </ul>
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	<p>belonging to the bank card used for the top-up (identified by OTP Mobil) takes place.</p>
Processed data	In excess to data listed in point 4.3.: method, time of redemption/repayment/refunding
Legal basis of data processing	Performing the contract pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	Sziget Zrt. anonymises (so that the data subjects cannot be identified) the above data upon the expiry of 6 months after the Festival. Accounting certificates are stored for 8 years in accordance with the effective legal regulations.
Addressees	<p>handling of wristband chips and balance statement of the Payment chip: Netpositive operation of Payment chip voucher system: Festipay in connection with balance refunding onto bank cards: OTP Mobil</p>

## 5.

### SERVICES PROVIDED BY SZIGET ZRT.

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

#### 5.1. using Festival WiFi

Purpose of data processing	Sziget Zrt. – depending on its technical possibilities – provides free wireless public internet access to the Visitors (“Festival WiFi”), which is available at the designated venues of the Festival. The internet access via Festival WiFi is provided by service provider of Sziget Zrt., Magyar Telekom Nyrt., Sziget Zrt. does not record the wifi traffic.
Processed data	Randomly distributed IP address, MAC Address of the Visitor’s device connecting to the network (Media Access Control is a series of numbers given to network cards during manufacturing - other devices on the network use the MAC address to identify predefined ports on the network).
Legal basis of data processing	The legal basis of data processing is the performance of contract (availing WiFi service) pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	Your data are erased following disconnection from the Festival WiFi network.
Addressees	We are obliged to provide the data to law enforcement agencies, authorities upon their request.

#### 5.2. camping service

##### 5.2.1. filling in takeover receipt related to accommodation

Purpose of data processing	The below mentioned personal data are necessary for Sziget Zrt. 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	<ul style="list-style-type: none"><li>• Name,</li><li>• Street, house number</li><li>• Floor, door</li><li>• Code/Zip Code</li><li>• City</li><li>• Country</li><li>• Phone number</li><li>• E-mail address</li><li>• Signature</li></ul>
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, Sziget Zrt. deletes your personal data the day after the ending of the Festival.

	In case you have not checked out and there is a damage in the accommodation, Sziget Zrt. deletes the personal data immediately after the enforcement of the claims, but at the latest following the statutory limitation period.
Addressees	TRANZ-ORG

### 5.2.2. 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 Kacska u. 15-23.), as the host provider designated by the decree of the Government: <ul style="list-style-type: none"> <li>• family name and given name</li> <li>• birth family name and given name</li> <li>• place and date of birth</li> <li>• gender</li> <li>• nationality</li> <li>• mother's birth family name and given name</li> <li>• identification data of ID document and passport</li> <li>• number of visa or residence permit of citizens from third countries, date and place of entry</li> <li>• the beginning date and the planned final date and the actual final date of access to the accommodation</li> </ul>
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 Sziget Zrt.
Duration of data processing	Until the last day of the year following the date of provision of the data.
Addressees	Sziget Zrt. 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, Sziget Zrt. 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: TRANZ-ORG For transferring the data: Netpositive

### 5.2.3. Data entry for payment of touristic tax

Purpose of data processing	The data are recorded pursuant to Paragraph 2 of Section 11 of Municipal Decree of 25/2022. (XII. 13.) of Zamárdi Municipality, for collecting the touristic tax.
Processed data	Pursuant to Section 9 of Municipal Decree of 25/2022. (XII. 13.) of Zamárdi 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: <ul style="list-style-type: none"> <li>• guest name</li> <li>• place and date of birth</li> <li>• address</li> <li>• nationality</li> <li>• time of arrival</li> <li>• date of departure</li> <li>• number of guest nights spent</li> </ul>
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 Sziget Zrt.
Duration of data processing	Until the end of the limitation period for the determination of the tax (until 31 <sup>st</sup> December of the 5 <sup>th</sup> year following the year of the statement).
Addressees	Sziget Zrt. processes the personal data specified by the Municipal Decree of 25/2022. (XII. 13.) of Zamárdi Municipality on local taxes and taxation, and in the form prescribed by the tax office of Zamárdi Municipality to achieve the abovementioned purpose. data registry: Netpositive

### 5.3. Parking ticket service

Purpose of data processing	Providing the purchased services at the Festival area.
Processed data	Beside the data of the purchased ticket (service) the plate number of the vehicle and the name and telephone number of the driver.
Legal basis of data processing	Performing the contract entering into via the ticket purchase pursuant to Point b) of Article 6 (1) of the GDPR.
Duration of data processing	We store the data until the 8 <sup>th</sup> day after closing the Festival.
Addressees	operating ticketing system: Netpositive

## 6.

### MANAGING QUESTIONS AND ISSUES OCCURRING IN CONNECTION WITH THE FESTIVAL

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

#### 6.1. medical problems

On the site of the Festival, Sziget Zrt. 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 available by Sziget Zrt. are individual data controllers, their data processing falls outside of the sphere of control of Sziget Zrt., therefore, the latter has no liability for them, cannot provide information of them.

In connection with medical aid available without help, 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. Sziget Zrt. receives exclusively anonymized statistical data of security incidents.

#### 6.2. Safety First

Sziget Zrt. provides the Sound Watch feature available in the mobile application at the Festival area, which is primarily used for asking for help - via the four-digit code - anonymously.

Purpose of data processing	Helping the Visitors, keeping contact with them.
Processed data	Location of you and/ or another person who needs help, the name of you and/ or another person who needs help (not obligatory to give), your comment shared via SMS or during the phone conversation regarding your own or another person's location, condition, the telephone number of the person who uses the application.
Legal basis of data processing	the express consent of the data subject pursuant to Point a) of Article 6 (1) of the GDPR in relation to the data subject using the Sound Watch feature; the vital interests of the data subject or of another natural person who needs help pursuant to Point d) of Article 6 (1) of the GDPR (if the data subject is not in the condition to give his or her consent)

Duration of data processing	Sziget Zrt. deletes the personal data after providing the assistance or the arrival of the ambulance, police has arrived (except if the authority obliges the locking of the personal data).
Addressees	considering the function of the Sound Watch feature – the data connected to the assistance are transferred to the ambulance, police, investigation authority or any other authority in order to provide further professional assistance and care. application operation: Appmiral, Crowd Connected

### 6.3. lost, and found-submitted objects, luggage

It can unfortunately happen during the Festival 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 Festival 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.

Sziget Zrt. also helps if someone's luggage does not arrive at the airport when traveling to the Festival, but the airport customer service brings it to the Festival venue (in this case, Sziget Zrt. acts on behalf of the airport customer service, as a data processor during the handover of the luggage).

Purpose of data processing	<p>At the customer service of the Festival, Sziget Zrt. takes over, collects the objects lost then handed over by the person who has found it.</p> <p>To the person <b>who hand the lost object over</b>, Sziget Zrt. 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.</p> <p>Sziget Zrt. places etiquettes with serial numbers onto the handed over objects, makes a detailed description of the objects, records them in its registry.</p> <p>When the <b>owner who has lost the object</b> comes to collect the object, Sziget Zrt. makes as sure as possible in accordance with its internal policy that it hands the objects over to the lawful, identified owner. Sziget Zrt. prepares a handover-takeover declaration, which the person taking the object over shall sign.</p> <p>It is also possible that the person who has lost an object provides Sziget Zrt. 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 Festival.</p>
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	<p>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 Sziget Zrt., Sziget Zrt. shall notify such person.</p> <p>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, Sziget Zrt. shall hand the processed data over to the investigating authority or the court.</p>
Processed data	<p>upon giving the description of lost object(s):</p> <ul style="list-style-type: none"> <li>- owner's name</li> <li>- telephone number, e-mail address</li> <li>- description and, if available, photo of the lost object(s)</li> <li>- signature</li> </ul> <p>additionally, upon taking over lost and found object(s), owner's and, if applicable, proxy's</p> <ul style="list-style-type: none"> <li>- name</li> <li>- address</li> <li>- place and date of birth</li> <li>- ID /passport number</li> <li>- etiquette number</li> </ul>
Legal basis of data processing	<p>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 Sziget Zrt. to be able to comply with its legal obligation pursuant to Section 5:59 of the Civil Code.</p>
Duration of data processing	<p>Sziget Zrt. stores personal data of persons seeking their lost items for 3 months after closing the Festival considering that Sziget Zrt. is obliged to safeguard lost items for 3 months pursuant to Section 5:59 (3) of the Civil Code.</p> <p>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.</p>
Addressees	<p>customer service administration related to lost and found items: FestLife PR</p> <p>Sziget Zrt. is obliged to satisfy authority inquiries in connection with lost and found items.</p>

#### 6.4. individual emergencies

When an individual emergency occurs at the Festival (for example, a child is lost, or a person not being conscious or aware is found), Sziget Zrt. 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.

### 6.5. therapeutic animals, admission of pets

Therapeutic animals bearing adequate certificate, as well as other pets can be brought to the Festival area upon the responsibility of the Visitor. ***Please, bring your pet to the Festival area in accordance with the observing the obligation prescribed in effective legal regulations, taking into account the interests of the animal and other participants!***

## 7.

### INQUIRIES ON THE PHONE OR IN WRITING

Would you have any questions, issues in connection with the Festival, you can request support from Sziget Zrt. in several ways. You can contact us in e-mail, on the telephone, but there is an on-site Helpdesk during the Festival 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 <b>opinion</b> , indicate his/her <b>problem</b> , send <b>feedback</b> , pose <b>questions</b> via the telephone or e-mail availabilities of Sziget Zrt., during which you necessarily provide personal data.
Processed data	<ul style="list-style-type: none"> <li>• name (for addressing, identification if necessary),</li> <li>• 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),</li> <li>• comment, problem, feedback, question and the personal data contained therein (aiding Sziget Zrt. 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),</li> <li>• reply of Sziget Zrt. and the personal data contained therein</li> <li>• address (in case of reply to be sent by mail)</li> </ul>
Legal basis of data processing	<p>We handle your inquiry basically based on your consent pursuant to Point a) of article 6 (1) of the GDPR.</p> <p>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 Sziget Zrt. pursuant to Point c) of Article 6 (1) of the GDPR.</p> <p>In case the complaint arrives from a non-natural person entity, Sziget Zrt. 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 Sziget Zrt. (Point f) of Article 6 (1) of the GDPR).</p>
Duration of data processing	<p>In case the inquiry does not qualify as a complaint, Sziget Zrt. stores the data until the withdrawal of your consent, in lack of which Sziget Zrt. deletes the personal data until 28<sup>th</sup> 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 <a href="mailto:dpo@sziget.hu">dpo@sziget.hu</a> address.</p> <p>Sziget Zrt. stores the reports of the complaints and the copy of the reply for 5 years and presents them to supervisory authorities upon request.</p>

Addressees	<p>providing customer service: FestLife PR</p> <p>providing customer service management system: Freshworks</p> <p>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</p>
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## 7.2. consumers' complaints

Purpose of data processing	<p><b>Examination of the complainant's complaint in accordance with the legal requirements, complaint handling:</b> You may submit the consumer objections (complaints) in relation to purchased ticket, product or related activity of Sziget Zrt. in accordance with the relevant procedural rules.</p> <p>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.</p> <p>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.</p>
Processed data	<ul style="list-style-type: none"> <li>- name, address of consumer,</li> <li>- place, time, method of filing complaint,</li> <li>- detailed description of consumer complaint, log of documents, records and other proofs submitted by consumer,</li> <li>- Sziget Zrt.'s statement regarding its position on the consumer complaint, if an immediate investigation of the consumer complaint is possible,</li> <li>- signature of consumer and the person registering the complaint (except if complaint is submitted via email or phone)</li> <li>- place and time of registering consumer complaint</li> <li>- unique identification number of the complaint communicated on the phone or via other electronic communication services.</li> </ul>
Legal basis of data processing	Pursuant to Point c) of Article 6 (1) of the GDPR, satisfying legal obligations prescribed for Sziget Zrt. in the Civil Code and legal regulations related to consumer complaints (especially Act CLV of 1997 on consumer protection).
Duration of data processing	Sziget Zrt. 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	<p>providing customer service: FestLife PR</p> <p>providing customer service management system: Freshworks</p> <p>In case of submitted for review, the authorities and organizations indicated on <a href="http://fogyasztovedelem.kormany.hu/node/7699">http://fogyasztovedelem.kormany.hu/node/7699</a> site.</p>

	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
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### 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	<ul style="list-style-type: none"> <li>- name, e-mail address or telephone number of complainant,</li> <li>- place, time, method of filing complaint,</li> <li>- detailed description of the complaint, street, area specified by the complainant,</li> <li>- Sziget Zrt.'s statement regarding its position on the consumer complaint,</li> <li>- person registering the report (in internal administration)</li> <li>- place and time of registering the report</li> </ul>
Legal basis of data processing	Pursuant to Point c) of Article 6 (1) of the GDPR, satisfying legal obligations prescribed for Sziget Zrt. 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	Sziget Zrt. 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	noise level control, handling complaints related to noise: EventIT-Team

### 7.4. requests towards the data protection officer

Purpose of data processing	<b>Exercising data subjects' rights pursuant to Article 15-22 of the GDPR:</b> You may submit a request in relation to data processing related to the purchased ticket, product or related activities of Sziget Zrt., as well as your rights described in the GDPR. Sziget Zrt. answers your inquiry within 1 month the latest, unless there is any justification to extend the deadline.
Processed data	<ul style="list-style-type: none"> <li>- name of data subject,</li> <li>- place, date, method of submitting the request,</li> <li>- e-mail address of data subject,</li> <li>- request of data subject, all information that may be considered as personal data,</li> <li>- other personal identification data, information that are necessary to satisfy such request,</li> <li>- the replay of Sziget Zrt. and all its attachments</li> </ul>
Legal basis of data processing	Pursuant to Point f) of Article 6 (1) of the GDPR, it is the legitimate interest of Sziget Zrt. 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

	<p>Sziget Zrt. 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</p> <ul style="list-style-type: none"> <li>– access to his/her personal data,</li> <li>– correction of his/her personal data,</li> <li>– deletion of his/her personal data,</li> <li>– limitation of the data processing,</li> <li>– portability of his/her personal data,</li> <li>– may protest against the processing of his/her personal data.</li> </ul> <p>No matter which right of data subjects is concerned with the request, Sziget Zrt. 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, Sziget Zrt. 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, Sziget Zrt. 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: <a href="http://birosag.hu/torvenyzek">http://birosag.hu/torvenyzek</a>).</p> <p>If, however, Sziget Zrt. 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 Sziget Zrt. proves that it is unable to identify you, it can refuse to fulfil the request aimed at exercising data subjects' rights.</p> <p>As a main rule, information and measures related to data subjects' requests are free of charge. If, however, Sziget Zrt. 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.</p>
Duration of data processing	Sziget Zrt. stores the inquiries and the copy of the reply for 5 years and presents them to supervisory authorities upon request.
Addressees	data protection officer: Csáki és Társa Ügyvédi Társulás In case the data subject seeks remedy in relation to the complaint or the reply of Sziget Zrt., data are transferred to NAIH or courts as noted above.

#### DATA OF ADDRESSEES

specification of activity	type of activity	name	availability
Operation of Sziget Zrt.'s customer relations management (ERP) system, physical and operating system-level operation of the	data processor	Netpositive Számítás-technikai	2021 Tahitótfalu, Pataksor utca 48.

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 Festival		Szolgáltató és Kereskedelmi Kft.	<a href="mailto:info@netpositive.hu">info@netpositive.hu</a>
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.  <a href="mailto:dpo@kboss.hu">dpo@kboss.hu</a>
operation of customer service case management system	data processor, certified organisation under USA-EU Privacy Framework: <a href="https://www.freshworks.com/privacy/">https://www.freshworks.com/privacy/</a>	Freshworks, Inc.	16192 Coastal Highway, Lewes, Delaware 19958, USA  <a href="mailto:dpo@freshworks.com">dpo@freshworks.com</a>
customer service administration	data processor	FestLife PR Kft.	1068 Budapest, Király utca 80. fsz. 11. ajtó  <a href="mailto:hello@festinform.hu">hello@festinform.hu</a>
providing the integration for cashless payment development for wristbands on the site and date of the Festival	data processor	FESTIPAY Zrt.	1135 Budapest, Reitter Ferenc u. 46-48.  <a href="mailto:sales@festipay.com">sales@festipay.com</a>
providing volunteers on the Festival	data processor	Fesztivál Önkéntes Nonprofit Kft.	1084 Budapest, Bacsó Béla u. 6. 2/20.  <a href="mailto:info@fesztivalonkentes.hu">info@fesztivalonkentes.hu</a>
payment service provider enabling preliminary top-up of balance in the festival account, as well as top-up of balance onto the Payment chip	individual data controller	OTP Mobil	1138 Budapest, Váci utca 135-139. B ép. 5. em.  <a href="mailto:ugyfelszolgalat@simple.hu">ugyfelszolgalat@simple.hu</a>
providing POS service and related software, communication with the service provider enabling bank card payment	data processor	CARDNET Kártyarendszerek és – szolgáltatások Zrt.	1135 Budapest, Reitter Ferenc utca 46-48.  <a href="mailto:dpo@cardnet.hu">dpo@cardnet.hu</a>
camping administration service	data processor	TRANZ-ORG Rendezvény-technika Kft.	2360 Gyál, Bánki Donát köz 6.  <a href="mailto:info@tranzorg.hu">info@tranzorg.hu</a>
application development	data processor	Appmiral BVBA	2000 Antwerp, Scheldestraat 11, Belgium

			Stationsstraat 100, 2800 Mechelen, Belgium  hello@appmiral.com
application development	data processor	Crowd Connected Ltd.	Surrey Technology Centre, Guildford, GU2 7YG, UK
management of noise complaints, noise level measurements	data processor	EventIT- Team Kft.	2200 Monor, Móricz Zsigmond utca 29.  office@eventit.hu



## DATA SECURITY

Sziget Zrt. 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. Sziget Zrt. shall furthermore notify third parties - to whom the data subject's information is transferred - that they are obligated to meet the data security requirements.

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

Sziget Zrt. 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 Sziget Zrt.

## 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 Sziget Zrt. 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 **Festival policy and general terms** menu of the websites.

If you feel that Sziget Zrt. 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: [dpo@sziget.hu](mailto:dpo@sziget.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](mailto: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 Sziget Zrt., 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 Sziget Zrt. does not get into contact with the data subject, therefore, you are responsible for meeting all the necessary requirements and Sziget Zrt. shall not be liable or bear any responsibility in this regard. Nevertheless, Sziget Zrt. 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.

Sziget Zrt. shall do its utmost to remove all personal information provided without authorization. Sziget Zrt. shall ensure that if Sziget Zrt. becomes aware of this, such personal information is not forwarded to any third party or used for Sziget Zrt.'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 Sziget Zrt.

## **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.