

PRIVACY POLICY STATEMENT

BUDAPEST BRAND NONPROFIT ZRT.

Last updated: Oct. 22. 2021.

1. INTRODUCTION

Budapest Brand Nonprofit Zártkörűen Működő Részvénytársaság (1052 Budapest, Városház utca 9-11., company number: 01-10-140962, VAT number: 28748511-2-41) (hereinafter: Controller) hereby informs the data subjects that in the course of data processing it proceeds in accordance with the EU Directive 2016/679 (hereafter: GDPR), the substantive and procedural rules of the Hungarian law in force, the Data Protection and Data Security Policy in force at any time and other internal regulations.

Our company reserves the right to change this Privacy Policy Statement (hereinafter: Statement) at any time, which will be notified to the parties concerned by publishing the new notice on its website.

2. DEFINITION AND CONTACT DETAILS OF THE CONTROLLER

The Controller is: ***Budapest Brand Nonprofit Zártkörűen Működő Részvénytársaság***

Our business site(s):

1052 Budapest, Sütő utca

1185 Budapest, Liszt Ferenc Nemzetközi Repülőtér T2A terminál 1103. and 1104.

1185 Budapest, Liszt Ferenc Nemzetközi Repülőtér T2B terminál 2027 and 2027/1

1146 Budapest, Olof Palme sétány 5.

VAT number: 28748511-2-41

Company number: 01-10-140962

General contact e-mail address: info@budapestbrand.hu

E-mail address of the Data Protection Officer: [dpo@ budapestbrand.hu](mailto:dpo@budapestbrand.hu)

Website [www. budapestkaracsony.hu](http://www.budapestkaracsony.hu)

The Controller acknowledges that the content of this Statement is binding on it and undertakes that it has developed all the content elements of this Statement and its Policy in accordance with the requirements of the legislation in force in Hungary and the EU and it fully complies with those requirements.

3. THE CONCEPT OF PERSONAL DATA, DATA SUBJECTS AND DATA PROCESSING

Personal data are any data or information on the basis of which, individually or together with other data or information, a specific person can be directly or indirectly identified as a data subject involved in data processing.

Data processing is any operation performed on personal data, such as collecting, storing, using, organizing, transmitting, modifying, linking to other data, deleting or destroying data. The data processing activities performed by the Controller are based on the voluntary consent of the involved data subject in addition to mandatory data processing due to compliance with legal and regulatory obligations, in accordance with the legal regulations.

Data subjects are therefore primarily the data subjects, customers, natural persons using the services of the Controller, own Employees, natural person Partners of the Controller, representatives of non-natural person Partners, contact persons and possibly other employees. The data subjects were precisely defined during each data processing.

4. PRINCIPLES OF PERSONAL DATA PROCESSING

The Controller processes personal data in accordance with the following basic principles:

- It shall process the data lawfully and fairly, and in a manner that is transparent to the data subject.
- The principle of data minimisation prevails in the course of data processing, accordingly, it must be appropriate and relevant to the purpose of data processing and must be limited to necessity.
- Data processing must be accurate and, where necessary, must be kept up to date. In this context, the Controller and the data processors shall take all reasonable measures to ensure that inaccurate data are deleted or corrected without delay.
- Personal data are stored for a limited period necessary to achieve their purpose.
- During the processing of personal data, the Controller provides protection against unauthorized or illegal processing of data and accidental loss, destruction or damage.
- The Controller processes personal data only for the purpose and in the manner specified in this Notice and in the Policy, in order to exercise the rights and fulfill the obligation specified in the Policy. The Controller meets this goal at every stage of Data processing.
- The Controller only processes personal data that are essential for realizing the purpose of data processing, suitable for achieving the purpose, only to the extent and for the time necessary for realizing the purpose.

- The Controller shall process personal data in particular if this is necessary for protecting the vital interests of the data subject, for fulfilling the contract concluded between the data subject and the Controller and for enforcing the legitimate interests of the Controller or a third party.

5. WHAT KIND OF DATA PROCESSING ACTIVITIES DOES THE CONTROLLER PERFORM AND FOR WHAT PURPOSE, FOR HOW LONG DOES IT PROCESS YOUR PERSONAL DATA?

We process your personal information in the course of the following activities.

5.1. Data processing related to services and customer management

5.1.1. One-time information request, constant or regular contact

The Controller allows the data subjects to request information from the Controller, for example about the Controller's service, by providing their details as described below.

Legal ground for data processing: the request for information is based on the voluntary consent of the data subject.

Data subjects: any natural person who contacts the Controller either by telephone, e-mail or at the Controller's website and requests information from the Controller in addition to providing his/her personal data.

Scope of the processed data and purpose of use:

Scope of the processed data	purpose of using the data
Name	identification
Phone number	contact
e-mai	contact
content of the question	response

The purpose of data processing: to provide the data subject with appropriate information and to keep contact with the data subject.

Activity and process involved in data processing:

- The data subject may consult the Controller about the Controller's services and/or other related issues through the means or in the manner provided by the Controller.
- The Controller answers the data subject's question and sends it to him/her in the same way as the information request was received, unless the data subject provides otherwise.
- In accordance with the purpose of data processing, the data subject voluntarily consents that the Controller should contact him/her – if his/her contact was provided upon the request for information – in order to clarify or answer the question.

Duration of data processing: until the goal is achieved. In the event where the request for information and/or the provision of information has legal effect or affects the data subject or the Controller to a similarly significant extent, the Controller shall process the data in the respective limitation period.

5.1.2. Data processing related to concluding an agreement

The Controller makes the provision of each of its services subject to the prior conclusion of an agreement. The conclusion of the agreement is based on voluntary consent.

Legal ground for data processing: agreement, conclusion of an order, in case of purchase the legal ground for data processing is Article 6 1. b. of the GDPR (data processing is necessary for performing a contract in which the data subject is one of the parties or in order to take steps at the request of the data subject prior to concluding the contract).

The purpose of data processing: identification of the data subject, provision of a suitable service to the data subject in accordance with the provisions of the agreement, keeping contact.

Data subjects: All natural persons, as well as natural persons acting on behalf of, and representing an organization, who, in addition to providing their personal data, enter into an agreement with the Controller to use the services of the Controller.

Duration of data processing: it lasts until the validity of the rights and obligations arising from the legal relationship in connection with which the Controller processes personal data expires in respect of data that are documented and the document supports the accounting, the data processing period is at least 8 years based on Section 169 (2) of Act C of 2000.

Scope and purpose of the processed data:

Scope of the processed data	purpose of using the data
Name	identification
Phone number	contact
e-mai	contact
subject and content of the service	content element of the contract/order/purchase

Activity and process involved in data processing:

- The data subject notifies the Controller about accepting the Controller's offer through the way or in the manner provided by the Controller and available to the data subject.
- The Controller shall jointly work out the details of the service agreement with the data subject, taking into account the content of the accepted offer.
- The data subject provides his/her data to the Controller in order to create the agreement and enters into the agreement with the Controller voluntarily and without influence.
- The Controller records the agreement in the electronic and/or paper-based registration system set up for this purpose.
- The Controller may notify the data subject of each step of the execution process.
- In accordance with the purpose of data processing, the data subject voluntarily consents to the Controller contacting him/her via the given contact details in order to agree on the details of the performance and/or on related issues.
- In this agreement, the data subject and the Controller may agree to use the image or image and sound material created during the service, from which the data subject is identifiable, in the Controller's social networking site, website or other platform for their own advertising or marketing purposes. In this case, the data subject may withdraw his/her consent and the data must be deleted by the Controller on the basis of the withdrawal, but other provisions of the relevant agreement, which may be restrictive, must also be observed.

5.1.3. Declaration of consent

The Controller requests a paper-based or electronic declaration of consent from the data subjects in order to access, process and, if necessary, transmit their data. The declaration of consent is based on voluntary consent.

The purpose of data processing: to process the declarations of consent in order to prove the legal ground of data processing and the fulfillment of the consent (principle of accountability) as well as to keep contact.

Data subjects: Any natural person who makes a declaration to the Controller on consenting to processing his/her data for any purpose.

Duration of data processing: it lasts until the validity of the rights and obligations arising from the legal relationship in connection with which the Controller processes the personal data, or if such a legal relationship has not been established, until cancellation if requested by the data subject.

Scope and purpose of the processed data:

Scope of the processed data	purpose of using the data
Name	identification
place and date of birth	con identification tact
data indicated in the declaration of consent	necessary for giving consent

Activity and process involved in data processing:

- The data subject consents to data processing through a means or in a manner provided to him/her by the Controller.
- For example, the data subject gives his/her prior consent to data processing electronically on the website or on paper.
- The Controller stores and manages the declarations of consent on paper or electronically for the purpose of subsequent retrieval and proof. Declarations of consent are handled by the Controller privately.

5.2. Data processing activities for marketing and market research

5.2.1. Questionnaire completion, feedback, satisfaction survey, market research

The Controller allows the data subjects to complete a satisfaction, market research, or other questionnaire related to the prize game in order to provide feedback by giving their below-mentioned details.

Legal ground for data processing: the completion of the questionnaires is based on voluntary consent.

Data subjects: all natural persons over the age of 16 who wish to participate in the completion of the questionnaire sent by the Controller or published on the Controller's website by providing their data.

Scope and purposes of the processed data:

Scope of the processed data	purpose of using the data
Name	identification
e-mai	contact

The purpose of data processing is to identify the data subjects during the draw organized for the respondents and to keep contact.

Activity and process involved in data processing:

- The data subject completes the questionnaire by entering his/her e-mail address, so s/he applies for the prize game linked to the questionnaire by entering his/her email address.
- The Controller records the data electronically and/or on paper.
- In accordance with the purpose of data processing, the data subject voluntarily consents to the Controller contacting him/her through the provided contact details.

Duration of data processing: in respect of identification and contact data, it lasts until the validity of the rights and obligations arising from the legal relationship in connection with which the Controller processes personal data expires, in respect of data that are documented and the document supports the accounting, the period of data processing is at least 8 years, in other cases 2 years pursuant to Section 169 (2) of Act C of 2000.

Data Processing Partner During this data processing, Jotform Inc. (111 Pine St. Suite 1815, San Francisco, CA 94111) is stored in the Jotform Form Management electronic information system used by data controller during data processing.

Method of data processing: with an IT system, electronically.

Data source: directly from the data subject.

5.2.2. Presence and marketing on social networking sites

The Controller is available on the following social networking sites:

Facebook:

<https://www.facebook.com/visitbudapest/>

<https://www.facebook.com/Enbudapestem><https://www.facebook.com/budapestchristmasfair/>

<https://www.facebook.com/budapestspringfair/>

<https://www.facebook.com/budapestioszifesztival>

<https://www.facebook.com/budapestbrandnonprofitrt>

Instagram:

https://www.instagram.com/budapest_official/

<https://www.instagram.com/enbudapestem/>

Twitter:

<https://twitter.com/visitbudapest?lang=en>

LinkedIn:

<https://www.linkedin.com/company/budapest-festival-and-tourism-centre-ltd/>

The use of social networking sites, in particular the above contacts, establishing and maintaining contact with the Controller through them and other operations permitted by the social networking site are based on voluntary consent.

Purpose of data processing: the purpose of presence on social portals and related data processing is to share, publish and marketing the contents and the news of the Controller's website on the social networking site. With the help of the social networking site, the data subject can also gather information about the latest promotions.

Data subjects: Natural persons who voluntarily follow, share or like the social networking sites of the Controller or the content appearing on them.

Duration of data processing: until canceled at the request of the data subject.

Scope and purpose of the processed data:

Scope of the processed data	purpose of using the data
the public name of the data subject	identification
public photo	identification
public email address	contact
message of the data subject sent through the social networking site	response, communication
assessment by the data subject or the result of another operation	quality improvement or other operation

Activity and process involved in data processing:

- The Controller communicates with the data subjects via the social networking site and thus the purpose of the scope of the processed data becomes relevant if the data subject contacts the Controller via the social networking site.
- Based on the terms of the social networking site, the data subject voluntarily consents to follow and like the contents of the Controller. By way of example, the data subject can subscribe to a newsfeed posted on the message board on a Facebook page by clicking on the “like” link on the page, thereby consenting to posting the Data Controller’s news and offers on their own message board and they can unsubscribe by clicking the "dislike" link, as well as they can delete unwanted newsfeeds appearing on the message wall with the help of the message wall settings.
- The data subject can assess the Controller with text and with numbers if it is allowed by the social networking site.
- The Controller publishes pictures/videos of various events, the services of the Controller, etc. at its social networking site. The Controller may link its social networking sites to other social networking sites in accordance with the rules of the respective social networking sites, so publication on a given social networking site shall also mean publication on such affiliated social networking sites.
- If it is not a mass recording or a recording of a public performance (Section 2:48 of the Civil Code), the Controller always asks for the written consent of the data subject before publishing the images.

The data subject can get information about data processing at the given social networking site on the given social networking site, accordingly, s/he can get information about the data processing on the Facebook page at the www.facebook.com address.

6. IT RELATED DATA PROCESSING

6.1. Web server logging

In order to ensure the secure and continuous operation of its website, the Controller records user data and their analysis may render the given user identifiable. Browsing the website without user registration does not record data that are directly suitable for identifying the data subject.

Legal ground for data processing: Legitimate interest of the Controller [Article 6 (1) f) of the GDPR] and Article 13/A. (3) of Act CVIII of 2001.

Data subjects: Data subjects who browse the Controller's website: budapestioszifesztival.hu

Scope and purposes of the processed data:

Scope of the processed data	purpose of using the data
IP address, operating system and internet browser data, time of website visit, time spent on the website	ensuring IT operation, providing services

The purpose of data processing: The continuous operation of the Controller's website, and IT Security

Duration of data processing: one year

Method of data processing: with an IT system, electronically, automatically.

Automated decision making, profiling: none

Data source: directly from the data subject.

Use of data processor:

6.2. Processing cookies

The processing of cookies is governed by the Controller's cookie policy.

7. WHO PROCESSES YOUR DATA?

The data may be processed by the Controller's Employees, only to the extent strictly necessary for performing their tasks.

8. TO WHOM DO WE TRANSMIT / DISCLOSE THESE DATA, I.E. DOES THE CONTROLLER TRANSFER OR TRANSMIT DATA TO OTHER ENTITIES?

Personal data are basically processed by the Controller or, if the task is outsourced, in that case it is performed by the data processor(s) defined below. In this case, the Controller transfers data to the data processors and it is responsible for the activities of the data processors.

The Controller may transfer the data specified by the data subject to its Partners if the legal ground of data processing is clear (e.g. the data subject has given prior and voluntary consent) AND the data are necessary for data processing.

The data processing partners of the Controller are indicated when describing each data processing activity.

9. DATA PROTECTION

The Controller ensures the security of the data. To this end, it takes the technical and organizational measures and establishes the procedural rules necessary to enforce the applicable legislation, data protection and confidentiality rules.

The Controller takes appropriate measures to protect the data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, against accidental destruction and damage, as well as against becoming inaccessible due to changes in the technology used.

The Controller (also) ensures the enforcement of the data security rules by means of internal regulations, instructions and procedures separated from the Data Protection and Data Security Policy and this Notice.

When defining and applying the data security measures, the Controller takes into account the current technical standards and chooses from several possible data processing solutions the one that ensures a higher level of personal data protection, unless this would represent a disproportionate burden.

Within the scope of its tasks related to IT protection, the Controller shall in particular ensure:

10. PRIVACY RIGHTS

Pursuant to the Info Act and Regulation (EU) 2016/679 of the European Parliament and of the Council, the data subject's rights are as follows: **the right to information, the right to**

rectification, the right to erasure, the right to be forgotten, the right to block data / the right of restriction, the right to object, the right to turn to court, the right to turn to the authority.

You are entitled at any time to:

- request information on the processing of your personal data,
- request the correction of your personal data,
- request a restriction on the processing of your personal data (withdraw your consent to certain data processing or change the required form of contact),
- request the erasure of your personal data (withdraw your consent to data processing in its entirety),

To exercise your rights, please contact our Company's contact person for privacy matters.

You may request information about the processing of your personal information. Our company will respond to your request in writing within 30 days.

You may withdraw – in writing, in whole or in part– your already provided consent to data processing at any time, without limitation and without giving any reason. Our company provides for terminating data processing within 15 working days after your notification about withdrawing your consent, and we permanently delete from our registry the personal data affected by the withdrawal. An exception is given by the personal data that are processed by us in order to fulfill our legal obligation as set out above.

11. COMPLAINT MANAGEMENT

You can always submit a complaint about data processing to our Company's data protection manager. The contact details of our data protection manager are available in section **1. Definition and contact details of the controller** of this Policy. The data protection manager investigates the incoming complaints within 30 days from receipt, takes action as necessary and informs you about the outcome of the investigation and the action taken.

Although our Company does its best to properly process your data, if you do not agree with the results of our Company's investigation, action, or otherwise believe that your rights are violated in connection with personal data processing, you can contact the National Data Protection and Freedom of Information Authority (postal address: 1363 Budapest, Pf.: 9 address: 1055 Budapest, Falk Miksa utca 9-11, telephone number: +36 (1) 391-1400, fax: +36 (1) 391-1410, e-mail: ugyfelszolgalat@naih.hu, web: <http://naih.hu>) or apply to the competent court (including the court with jurisdiction at your place of residence).

We propose you to send your complaint or inquiry directly to our Company, at one of our contact details, so that we can remedy any problem as soon as possible.

With regard to contents violating the rights of minors and inciting hatred, exclusionary content, reparation, violating the rights of deceased persons and causing damage to reputation, you can turn to the National Media and Infocommunication Authority (1015 Budapest, Ostrom u. 23-25. Mail address: 1525. Pf. 75. Tel: (06 1) 457 7100 Fax: (06 1) 356 5520, E-mail: info@nmhh.hu).

The data subject can turn to court if his/her rights are violated. The court acts in the case out of turn. The Controller is obliged to prove that the data processing complies with the provisions of law.

The data subject may demand a grievance award from the Controller if the Controller violates the data subject's right to privacy by illegally processing the data subject's data or by violating the data security requirements.

12. Legal rules regarding the data processing

Our data processing principles are in accordance with the applicable Hungarian and European Union laws and regulations on data processing and data protection, including, but not limited to, the following legislation:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, GDPR);
- Act CXII of 2011 - on informational self-determination and the freedom of information (Info Act)
- Act CLV of 1997 - on consumer protection (Fgytv.)

13. OTHER PROVISIONS

In this notice the Controller has introduced the data processing procedures that are customary upon establishing contacts and using the services when visiting the website. In addition, the Controller also processes personal data for the purpose of establishing employment, partnerships and other customer relationships.

Based on their legal authorization, other bodies may contact the Controller in order to provide information, to disclose and supply data or to deliver documents. In such a case, the Controller discloses personal data only in the quantity and to the extent that is strictly necessary for



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NONPROFIT PRIVATE LIMITED COMPANY
1052 Budapest, Városház utca 9-11.
Email: vasar@budapestbrand.hu

meeting the purpose of the request, provided that the data requester has indicated the exact purpose and scope of the data.