



Privacy and Data Management Regulations

Based on Act CXII of 2011 on the right to information self-determination and freedom of information and on Regulation No 2016/679 of the European Parliament and of the Council (EU) on the protection of natural persons with regards to the processing of personal data and on the free movement of such data and on repealing Regulation (EC) No 95/46 (General Data Protection Regulation)

In force as of 25 May 2018

I. Purpose of the Regulations

These regulations set out the privacy and data management principles and procedures applied by the Data Controller, Concerto Akadémia Non-profit Limited Liability Company (seat: 1094 Budapest, Páva u. 10-12., Company Registration Number.: 01-09-177086, Tax ID: 18312777-2-43, Registry Court: Company Court of the Budapest-Capital Regional Court, phone: +36 1 215 5770, email: jegy@concertobudapest.hu, info@concertobudapest.hu, fax: +36 1 215 5462, mailing address: 1450 Budapest, Pf. 75.) (hereinafter: Concerto)

The purpose of these Regulations is to ensure that Concerto provides the Customer (Data Subject) with fair, predictable and lawful management of their personal data in accordance with the principles set out in the Data Protection Act and the General Data Protection Regulation and in these Regulations.

Contact details of the privacy officer:

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II. Definitions

'personal data' means any information relating to an identified or identifiable natural person ('Data Subject'); a natural person who can be identified, directly or indirectly, in particular through an identifier such as name, number, location data, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person;

'data processing' means any operation or set of operations carried out on personal data or files, whether automated or non-automated, such as collection, recording, organisation, layout, storage, transformation or alteration, consultation, requesting, use, disclosure by transmission, dissemination or other available means of communication, alignment or interconnection, restriction, deletion or elimination;

'Data Controller' means any natural or legal person, public authority, agency or any other body which defines the purposes and means of processing personal data individually or in conjunction with others; where the purposes and means of processing are determined by the European Union or national law. The specific criteria relating to the Data Controller or their designation may also be determined by the European Union or national law;

'data processor' means any natural or legal person, public authority, agency or any other body which manages personal data on behalf of the Data Controller;

'recipient means any natural or legal person, public authority, agency or any other body to whom or with which the personal data are communicated, whether or not it is a third party. Public authorities having access to personal data in the context of a specific investigation in accordance with European Union or national law shall not be treated as recipients; the processing of such data by those public authorities shall comply with the applicable privacy regulations in accordance with the purposes of the processing;

'consent of the Data Subject' means a voluntary, concrete and appropriately informed and clear statement of the will of the Data Subject, by which the declaration concerned or an unequivocal statement of confirmation indicates that the Data Subject agrees to the processing of personal data concerning them;

'privacy incident' means an injury to security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access of personal data transmitted, stored or otherwise processed.

III. Privacy principles

Personal information:

- a) it shall be handled lawfully and fairly and in a manner transparent for the Data Subject ('legality, fair procedure and transparency');
- b) it shall be collected only for specific, clear and legitimate purposes and shall not be treated in a manner incompatible with those objectives; in accordance with Part (1) of Section 89, public interest-related, archiving, scientific and historical research purposes or statistical purposes, additional data management ("purpose limitation") do not qualify as incompatible with the original purpose;
- c) they should be appropriate and relevant for the purposes of data management and should be limited to what is necessary ("data economy");
- d) accurate and, if necessary, up-to-date; all reasonable measures shall be taken to ensure that personal data which are inaccurate for the purposes of data processing are deleted or rectified without delay ("accuracy");
- e) it must be stored in a form that permits identification of Data Subjects only for the time necessary to achieve the purposes for which personal data are processed; personal data may be stored for a longer period only if the personal data are processed in accordance with Section (1) of Article 89 for the purposes of archiving in the public interest, for scientific and historical research purposes or for statistical purposes, considering the technical and organisational measures decreed to protect the rights and freedoms of Data Subjects("restricted storage");
- f) it should be handled such that by applying the appropriate technical or organisational measures, adequate security of personal data can be ensured, including protection against unauthorised or unlawful processing, accidental loss,

destruction or damage to data ("integrity and confidentiality").

Concerto is responsible for the above compliance and must be able to demonstrate such compliance ("accountability").

IV. Data management

1. Ticket/subscription purchase on the website

The purpose and nature of data management related to the purchase of tickets/subscriptions on the Company's website www.concertobudapest.hu is checking the relationship between the purchase of tickets/subscriptions for the events to be held and the eligibility to participate in the events, checking the validity of tickets, admission, the transmission of information to Customers regarding changed and cancelled performances, handling of complaints and customer service requests concerning events, identifying the Customers to the extent necessary, and distinguishing Customers from each other.

Scope of the managed data:

Surname and given name
Email address
Phone number (if specified by Customer)
Number, date and time of the ticket purchase transaction
Number and value of tickets/subscriptions purchased; event, date, location (sector, seat, etc.) of the events concerned.)

Additional Data Controllers:

Based on the service agreement, ticket and subscription sales for Concerto events are performed in the IT system operated by InterTicket Ltd. Additional data manager for the sale of tickets and subscription with regards to Concerto:

Additional data controller's name: InterTicket Ltd (seat: 1139 Budapest, Váci út 99.,
Company Registration Number: 01-09-736766,
tax number: 10384709-2-41, phone: +36 1 266 0000).

Scope of Data Subjects: all buyers of tickets and subscriptions

Legal basis for data processing:

- Performance of the contract in accordance with Part (1) b) of Article 6 of the EU Regulation.

- Consent of the Data Subject, Part (1) a) of Article 6 of the EU Regulation and Part (1) a) of Section 5 of the Information Act.
- and Part (3) of Section 13/a of Act CVIII of 2001 on certain aspects of electronic commerce services and information society: "Concerto may process personal data which are technically essential for the provision of the given service for the purpose of providing the service. If all other conditions are identical, Concerto must choose and operate the means used in the provision of the information society services in such a way that personal data are processed only if this is strictly necessary for the provision of the service and for the fulfilment of other purposes set out in the above-mentioned legal act, but only to the extent and for the time necessary."

The duration of the data management in the course of the ticket and subscription transaction is 15 calendar days following the date of the last performance included in ticket or season ticket. Should the Data Subject initiate a legal dispute in connection with the ticket/subscription transaction, the duration of the data management is extended to the duration of the dispute. The legal basis for the processing of data is the legitimate interest of the Data Controller based on Part (1) f) of Section 6 of the EU Regulation.

Possible consequences of not providing data: failure of the purchase transaction.

Data processors entitled to access the data and recipients of personal data: personal data may be handled by the public relations and marketing staff of the Data Controller and by the staff responsible for the execution of orders while observing the principles and objectives of data management.

2. Ticket/subscription purchase at Concerto's Audience Relations Office

The purpose and nature of ticket/subscription purchase transactions (after a previous arrangement of an appointment between 9 am and 4 pm) at the Audience Relations Office of Concerto (1094 Budapest, Páva u. 10-12.) is checking the relationship between the purchase of tickets/subscriptions and the eligibility to participate in the events, verification of the validity of tickets, admission, transmission of information regarding changes and cancellations of performances to the Customers, handling complaints and customer service needs related to performances, identifying Customers to the extent necessary and distinguishing Customers from each other.

Scope of the managed data:

Surname and given name
Email address
Phone number (if specified by Customer)
Number, date and time of the ticket purchase transaction
Number and value of tickets/subscriptions purchased; programme, date, location (sector, seat, etc.) of the events concerned.)

Additional Data Controller:

Based on the service agreement, ticket/subscription sales for Concerto are performed in the IT system operated by InterTicket Ltd. Additional data manager for the sale of tickets/subscription with regards to Concerto:

Additional Data Controller's name: InterTicket Ltd (seat: 1139 Budapest, Váci út 99., Company Registration Number: 01-09-736766, Tax ID: 10384709-2-41, phone: +36 1 266 0000).

Scope of Data Subjects: all buyers of tickets and subscriptions

Legal basis for data processing:

- Performance of the contract in accordance with Part (1) b) of Article 6 of the EU Regulation.
- Consent of the Data Subject, Part (1) a) of Article 6 of the EU Regulation and Part (1) a) of Section 5 of the Information Act.
- and Part (3) of Section 13/a of Act CVIII of 2001 on certain aspects of electronic commerce services and information society: "Concerto may process personal data which are technically essential for the provision of the given service for the purpose of providing the service. If all other conditions are identical, Concerto must choose and operate the means used in the provision of the information society services in such a way that personal data are processed only if this is strictly necessary for the provision of the service and for the fulfilment of other purposes set out in the above-mentioned legal act, but only to the extent and for the time necessary."

The duration of the data management in the course of the ticket/subscription transaction is 15 calendar days following the date of the last performance included in ticket or season ticket. Should the Data Subject initiate a legal dispute in connection with the ticket/subscription transaction, the duration of the data management is extended to the duration of the dispute. The legal basis for the processing of data is the legitimate interest of the Data Controller based on Part (1) f) of Section 6 of the EU Regulation.

Possible consequences of not providing data: failure of the purchase transaction.

Data processors entitled to access the data and recipients of personal data: personal data may be handled by the public relations and marketing staff of the Data Controller and by the staff responsible for the execution of orders while observing the principles and objectives of data management.

3. Billing

The purpose of data management is to issue invoices for purchase transactions and to preserve them within the statutory time limits.

Scope of the managed data:

Surname and given name
Billing address provided for issuing invoices
Number, date and time of the ticket purchase transaction
Invoice contents
Tax ID in case of VAT invoices (if provided by the Data Subject)

Additional Data Controller:

Based on the service agreement, ticket/subscription sales for Concerto are performed in the IT system operated by InterTicket Ltd. Additional data manager for the sale of tickets and subscription with regards to Concerto:

Additional Data Controller's name: InterTicket Ltd (seat: 1139 Budapest, Váci út 99., Company Registry Number: 01-09-736766, Tax ID: 10384709-2-41, phone: +36 1 266 0000).

Scope of Data Subjects: all buyers of tickets/subscriptions

The legal basis for the processing of data is the fulfilment of legal obligations based on Part (1) c) of Section 6 of the EU Regulation.

Based on Part (2) of Section 169 of Act C of 2000 on Accounting, the deadline of deletion of data, the period of data processing is 8 years or the period laid down in the tax and accounting legislation in force at all times.

Possible consequences of not providing data: failure of the purchase transaction.

Data processors entitled to access the data and recipients of personal data: personal data may be handled by the financial personnel of the Data Controller and by the company providing accounting services as well as their personnel while observing the principles and objectives of data management.

4. Newsletter service

The purpose of the data management is sending electronic messages (emails, text messages, push messages) containing newsletters and advertisements to the Data Subject and providing information on current events. Should Data Subjects subscribe to the newsletter, Concerto may send them a newsletter at the frequency of their choice.

Scope of the managed data:

Name
Email address
Date of subscription
IP address upon subscription

Scope of Data Subjects: users at the time of purchase of tickets, and all users who have subscribed to a newsletter on this website www.concertobudapest.hu.

Legal basis for data processing: consent of the Data Subject based on Part (1) of Section 6 of the EU Regulation and Part (1) of Section 5 of the Information Act and Part (5) of Section 6 of Act XLVIII of 2008: "The advertiser or the publisher of the advertisement shall keep a record of the personal data of the persons who have given their consent - within the scope specified in the consent. The data recorded in this register - concerning the addressee of the advertisement - may be treated only as specified in the consent declaration and until its revocation and may be transmitted to third parties only with the prior consent of the Data Subject."

The duration of the data processing and the deadline for the deletion of the data: the data processing lasts until the cancellation of the consent declaration, i.e. until unsubscription. The Data Subject may **unsubscribe** from the newsletter **free of charge** at any time.

Possible consequences of data provision: the Data Subject is not notified of the information included in the newsletter.

Data processors entitled to access the data and recipients of personal data: personal data may be handled by the public relations and marketing staff of the Data Controller while observing the principles and objectives of data management.

5. Complaint handling, client correspondence

Purpose of data processing: processing comments and requests of Data Subjects.

Scope of the managed data:

Name
Email address
Phone number

Scope of Data Subjects: all users who have made a complaint addressed to Concerto.

Legal basis for data processing: consent of the Data Subject based on Part (1) a) of Section 6 of the EU Regulation and Part (1) a) of Section 5 of the Information Act. Other legal bases: Part (1) c) of Section 6 of the EU Regulation and Part (1) of Section 5 of the Information Act and Part (7) of Section 17/A of Act CLV of 1997.

Duration of data processing, deadline for the deletion of data: duplicates of the minutes, transcripts of the objection and of the reply to the complaint are to be safeguarded for 5 years in accordance with Part (7) of Section 17/A of Act CLV of 1997.

Possible consequences of not providing data: Concerto cannot handle the complaint or request of the Data Subject.

Data processors entitled to access the data and recipients of personal data: personal data may be handled by the public relations and marketing staff of the Data Controller and by the staff responsible for the execution of orders while observing the principles and objectives of data management.

6. Operation of the camera system

In the premises of Concerto open to Customers (1094 Budapest Páva u. 10-12.), surveillance and recording systems are in place, which include cameras with infrared technology, which are able to make images also in the dark to convey colour images in order to ensure the safety of the high-value musical instruments stored in the main office building.

Purpose of data management: operation of electronic monitoring and recording systems, the fulfilment of contractual obligations under law.

Scope of the managed data: faces and other personal data of the individuals entering the seat of Concerto (1094 Budapest Páva u. 10-12.)

Scope of Data Subjects: all persons entering the seat of Concerto (1094 Budapest Páva u. 10-12.).

The legal basis for data management: by entering the premises, the Data Subject gives their consent to data management in accordance with Part (2) of Section 30 of Act CXXXIII of 2005 on security services and the activities of private investigators.

Duration of data processing, deadline for data deletion: 30 days in the absence of use.

Failure to provide data: no personal administration.

Information on the storage of data: Concerto stores the recordings on the servers at its headquarters with enhanced data security measures, which are suitable to prevent unauthorised persons from accessing the recordings.

Access to recordings: only the Data Controller and the processor's designated employees are entitled to view and upload on data storage devices the recorded images of the cameras in order to achieve the data management purposes specified in this document.

Logging: viewings and uploads on data storage devices are recorded by the Data Controller with the name of the person who viewed or uploaded them and with the indication of the time and the purpose for which the data were disclosed.

7. Social media sites

The purpose of data management is to promote the Concerto Budapest symphony orchestra.

Scope of the managed data: the name and public profile picture of the users who registered on the social media platforms Facebook/Google+ /Twitter/Pinterest/Youtube/Instagram etc.

Scope of Data Subjects: all those who have registered to the social media sites Instagram, Facebook/Google+/Twitter/Pinterest/Youtube/Instagram, etc. and have "liked " Concerto's sites.

Legal basis for data processing: voluntary consent of the Data Subject to the processing of personal data on the given social media platform.

The duration of data processing, the deadline for data deletion, the identity of potential data processors entitled to access the data and information of the rights of Data Subjects: Data Subjects can find information about the source of the data, how data are handled and transferred as well as on the legal basis on the relevant social media site. Data management is carried out on the social media sites, so the duration, method of data management and the possibility of deleting and modifying data are governed by the rules of the given social media site.

8. Other data management

8.1 USING GOOGLE ADWORDS CONVERSION TRACKING

Concerto uses an online advertising program called "Google AdWords", and within its framework, Concerto uses the service of Google conversion tracking. Google conversion tracking is the analytical tool of Google Inc (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").

When the user accesses a website through a Google ad, a conversion tracking cookie is placed on their computer. The validity of these cookies is limited, and they do not contain any personal information, so the user cannot be identified by them.

When a user is browsing certain pages of the website and the cookie has not expired, Google and the data processor can see that the user has clicked on the advertisement.

Each Google AdWords customer receives a different cookie, so they cannot be tracked through the AdWords customers' websites.

The information that was obtained using conversion tracking cookies serves to produce conversion statistics for AdWords customers who choose conversion tracking. This is how customers learn about the number of users who click on their advertisements and were forwarded to a page with a conversion tracking tag. However, no information is available to them to identify any of users.

If Data Subjects do not want to participate in conversion tracking, they can refuse to do so by disabling the installation of Cookies option in their browser. They will then not be included in the statistics on conversion tracking.

For more information and Google's Privacy Statement, see the following page:

www.google.de/policies/privacy/

8.2 USING GOOGLE ANALYTICS

The website www.concertobudapest.hu uses the application of Google Analytics, which is Google Inc's ("Google") web analysis service. Google Analytics uses so-called "cookies", text files that are saved on users' computers to help analyse users' use of the website. Information generated by user-related cookies is usually placed and stored on a Google server in the USA. By activating IP anonymisation on websites, Google has previously shortened the user'S IP address within the member states of the European Union or other states that have ratified the agreement on the European Economic Area.

The transfer of the entire IP address to Google's server in the USA and its shortening will only take place in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate how users have been using the website, to provide the

website's operator with reports on the website activity and to provide additional services related to website and internet use.

Within the framework of Google Analytics, the IP address transmitted by the user's browser is not linked to other Google data. Users can prevent the storage of cookies by the relevant setting of their browser. However, please, note that in this case, not all features of this website may be fully usable. Users can also prevent Google from collecting and processing the data connected to user's website use provided through the cookies (including IP address) by downloading and installing the browser plugin that is available on the following link. <https://tools.google.com/dlpage/gaoptout?hl=hu>

V. Data processors

The Data Subject agrees to Concerto transmitting their data to the following partners. Legal basis for data transmission: fulfilment of the contract, Part (1) b) of Section 6 of EU Regulation, consent given by the Data Subject in accordance with Part (1) a) of Section 5 of the Information Act, Part (1) a) of Section 6 of the EU Regulation and Part (3) of Section 13/A of Act CVIII of 2001 on e-commerce and certain issues regarding Information society services.

- Invoicing is technically facilitated for Concerto, as data processor by Számlazz.hu, operated by KBOSS.hu Ltd (Tax ID: 13421739-2-13, Company Registration Number: 13-09-101824, seat: 2000 Szentendre, Táltos u. 22 / b) or K key-Soft Computing Plc. (seat: 1022 Budapest, Törökvesz út 30 / A., Tax ID: 13812203-2-41, Community Tax Number: HU13812203, Company Registration Number: 01-10-045531).

- Data related to the newsletter sent to the Data Subjects and to the operation of the website www.concertobudapest.hu and to the provision of storage space are managed by E-Solution Ltd as data processor (seat: 1119 Budapest, Fehérvári út 131. Fsz. 3., Tax ID: 12596535-2-43, Company Registration Number 01-09-694209).

- Accounting responsibilities for Concerto as data processor are carried out by: Csengedi and Co. Ltd (seat: 1035 Budapest, Szél u 17. 9. em. 50., Tax ID: 12000090-2-41, Company Registration Number: 01-09-366534).

- System administration responsibilities for Concerto as data processor are carried out by: Poli Computer PC Ltd (seat: 2071 Páty, Fazekas M. u.17., Tax ID: 11820534-2-13, Company Registration Number: 13-09-081942).

Concerto, as Data Controller, is obliged to transmit any personal data to the competent authorities that are at their disposal and duly stored by them if required by law or a legally binding instruction emanating from a public authority. The Data Controller shall not be held responsible for any such data transfer and the consequences thereof.

Concerto shall only make the data transfer not indicated without the prior and informed consent of the Data Subject.

VI. Rights of Data Subject

1. Right to information

Concerto takes appropriate measures to provide Data Subjects with all information related to personal data referred to in Sections 13 and 14 of the EU Regulation and all the information in accordance with Sections 15-22 and 34 in a concise, transparent, understandable and easily accessible form and in a clear and comprehensible manner.

The right to information may be exercised in writing through the contact details specified in Chapter I of these Regulations. Upon Data Subject's request - following the verification of their identity, information may be provided orally.

2. Right of access

Data Subjects have the right to receive feedback from the Data Controller whether their personal data are being processed, and if so, they have the right to gain access to the personal data and the following information listed in the EU Regulation: purposes of data management; categories of the personal data concerned; categories of recipients to whom personal data have been communicated, including in particular third-country recipients or international organisations; the intended duration of the storage of personal data; the right to rectify, delete or block data processing and to object; the right to lodge a complaint to the supervisory authority; information on data sources; the fact of automated decision-making, including profiling, and understandable information on the logic used and the importance of such processing and the likely consequences for the Data Subject. In the event of the transfer of personal data to a third country or international organisation, the Data Subject shall have the right to be informed of the appropriate guarantees regarding the transfer.

On one occasion, Concerto will provide Data Subject with a copy of the personal data, which are subject to data management at Data Subject's request, free of charge. For additional copies you require, the Data Controller may charge a reasonable fee based on the administrative costs of issuing the copy.

The information will be provided by Concerto in the form you requested, within a maximum of 30 days from the date of submission of the application.

3. Right to rectification

Data Subjects have the right to have inaccurate personal data relating to them rectified by the Data Controller without undue delay and within a maximum of 15 days upon the Data Subject's request. Taking into account the purpose of data processing, by means of an additional declaration (among other things), Data Subjects are entitled to request the completion of incomplete personal data,

4. Right to deletion

Data Subjects have the right to have inaccurate personal data relating to them deleted by the Data Controller without undue delay and within a maximum of 15 days upon the Data Subject's request.

The Data Controller is obliged to delete personal data relating to Data Subjects without undue delay if any of the conditions listed here are met:

- personal data are no longer necessary for the purposes from which they were collected or otherwise handled;
- the Data Subject withdraws the consent on which data management is based and there is no other legal basis for data management;
- the Data Subject objects to data processing and there are no priority legitimate grounds for processing the data;
- personal data was unlawfully processed;
- personal data should be deleted in order to fulfil the legal obligation imposed by the European Union or national law applicable to the Data Controller;
- in connection to offering services related to information society for the collection of personal data.

The above deletion-related provisions shall not apply if processing is necessary for one of the reasons listed below:

- for the purpose of exercising the right to freedom of expression and of being informed;
- for the purpose of fulfilling an obligation applicable to the Data Controller under European Union or member state law, or for the purpose of carrying out a task in the public interest or in the exercise of a power of public authority conferred on the Data Controller;
- on the basis of public interest in the field of Public Health;
- either for the purpose of archiving in the public interest, for scientific and historical research purposes or for statistical purposes;
- or for the submission, enforcement or protection of legal claims.

5. Right to be forgotten

If the Data Controller has disclosed the personal data to the public and is required to delete it, they shall take reasonable steps - including technical measures - to inform the data processors that the Data Subject has requested the deletion of links pointing to the personal data in question or of copies or duplicates of such personal data, taking into account the available technology and the costs of implementation.

6. Right to limiting data management

Data Subjects have the right to limit data management at their request if one of the following conditions is met:

- Data Subjects dispute the accuracy of their personal data, in which case the limitation applies for the period of time allowed to the Data Controller to verify the accuracy of Data Subjects' personal data;
- the data management is illegal, and instead of requiring the deletion of data, Data Subjects request restrictions on their use;
- the Data Controller no longer needs the personal data for the purposes of data processing, but Data Subjects require them for the submission, enforcement or protection of legal claims;
- Data Subjects have objected to data handling; in this case, the limitation applies for a period of time until it is established whether the legitimate reasons of the Data Controller prevail over Data Subjects' legitimate reasons.

If data management is restricted based on this section, such personal data, except for storage, shall be subject to Data Subjects' consent or to the submission of legal claims, enforcement or protection of their legal claims or for the protection of rights of other natural or legal persons or in the public interest of the European Union or of a member state.

7. Right to be data portability

Data Subjects are entitled to receive their personal data in a widely used machine-readable format, which they have submitted to the Data Controller, and Data Subjects are also entitled to forward that information to another controller, without being prevented from doing so by the Data Controller to which they previously provided the personal information.

8. Right to objection

Data Subjects are entitled to object at any time, for reasons relating to their own situation, to the processing of their personal data necessary for the performance of a task carried out in the context of public authority or data management necessary for enforcing the legitimate interests of the Data Controller or a third party, including profiling, based on those provisions.

In the event of an objection, the Data Controller shall not further process personal data unless justified by compelling legitimate reasons which take precedence over the interests, rights and freedoms of the Data Subject or which relate to the submission, enforcement or protection of legal claims.

9. Protest on direct business acquisition

If personal data is processed for the purpose of direct business acquisition, Data Subjects are entitled to object at any time to the processing of personal data relating to them for this purpose, including profiling, if it relates to direct business acquisition. If Data Subjects object to the processing of personal data for the purpose of direct business acquisition, personal data shall no longer be processed for this purpose.

10. Automated decision-making in individual cases, including profiling

Data Subjects are entitled not to be subject to a decision based solely on automated data management, including profiling, which would have legal effects or a similarly significant impact on them.

The preceding paragraph shall not apply where the decision

- is necessary for the conclusion or performance of a contract between the Data Subject and the Data Controller;
- if making the decision is facilitated by EU or member state law applicable to the Data Controller, which also lays down appropriate measures to protect the Data Subject's rights, freedoms and legitimate interests; or
- it is based on Data Subjects' express consent.

11. Right of withdrawal

Data Subjects are entitled to withdraw their consent to the processing of their personal data at any time. Withdrawal of consent does not affect the lawfulness of data processing based on consent prior to revocation.

VII. Time limit for action

The Data Controller shall inform the Data Subject without undue delay, but in any event, within 1 month of receipt of the request, of the measures taken in response to the above requests.

In cases where these rules provide for a shorter time limit for action to be undertaken by the Data Controller, this shorter time limit shall apply.

If necessary, this period may be extended by two months. The Data Controller shall inform Data Subjects of the extension of the deadline, indicating the reasons for the delay, within 1 month of receipt of the request.

If the Data Controller does not take action on Data Subjects' request without delay, but at the latest within one month of receipt of the request, they shall inform Data Subjects of the reasons for the non-action and of the fact that Data Subjects may lodge a complaint with a supervisory authority and exercise their right to legal remedies.

VIII. Security of the data processing

The Data Controller and the data processor take the appropriate technical and organisational measures while taking into account the current state of science and technology, the nature, scope, circumstances and purposes of data management as well as the varying probability and risks regarding the rights and freedoms of natural persons to ensure that an adequate level of data security corresponding to the level of risk is guaranteed, including, inter alia, as appropriate:

- a) pseudonyms and encryption of personal data;
- b) ensuring the continued confidentiality, integrity, availability and resilience of systems and services used for the processing of personal data;
- c) in the event of a physical or technical incident, the ability to restore access to personal data and the availability of data in due time;
- d) a procedure for the systematic testing, assessment and evaluation of the effectiveness of the technical and organisational measures taken to ensure the security of data processing.

IX. Notification of the Data Subject about a privacy incident

If the privacy incident is likely to pose a high risk to the rights and freedoms of natural persons, the Data Controller shall inform the Data Subject thereof without undue delay.

The information provided to the Data Subject shall state clearly and comprehensibly the nature of the privacy incident and the name and contact details of the privacy officer or other contact persons who are in charge of providing further information; the information must cover the likely consequences of the privacy incident, the measures taken or planned by the Data Controller to remedy the privacy incident, including, where appropriate, measures to mitigate any adverse consequences arising from the incident.

The Data Subject need not be informed if any of the following conditions are met:

- the Data Controller has implemented appropriate technical and organisational protection measures, and these measures have been applied to the data concerned in the privacy incident, in particular those measures - for example, the use of encryption - which render the data unintelligible to persons not authorised to access personal data;
- the Data Controller has taken further measures following the privacy incident that ensure that the high risk with regards to the rights and freedoms of the Data Subject is no longer likely to be realised;
- the notification would require a disproportionate effort. In such cases, Data Subjects should be informed by means of publicly disclosed information, or a similar measure should be taken to ensure that Data Subjects are informed equally effectively.

If the Data Controller has not yet informed the Data Subject of the privacy incident, the supervisory authority may - after considering the risk level of the privacy incident - order the notification of the Data Subject.

X. Reporting privacy incidents to the authority

The privacy incident shall be reported by the Data Controller to the supervisory authority in charge without undue delay and, if possible, no later than 72 hours after the privacy incident becomes known, in accordance with Section 55 of the EU Regulation; except if the privacy incident is unlikely to pose a risk to the rights and freedoms of natural persons. If the notification is not made within 72 hours, the reasons justifying the delay must be enclosed.

XI. Right to appeal to a supervisory authority

1. Right of appeal to Data Controller or the privacy officer

As the primary goal of the Data Controller is to remedy possible infringements, Data Subjects are asked to make this request primarily to the Data Controller (Chapter II) or the privacy officer (Chapter III).

The Data Controller shall make every effort to remedy the infringement in an appropriate manner.

2. Compensation and grievance fee

Any person who has suffered material or non-material damage as a result of a breach of the

EU Regulation shall be entitled to compensation for damage caused by the Data Controller or data processor.

The data processor shall be liable for the damage caused by data processing only if they have not complied with the obligations laid down by law which are specifically imposed on processors, or if they have disregarded or acted contrary to the lawful instructions of the Data Controller.

The Data Controller or the data processor shall be exempt from liability if they prove that they are not responsible for the incident which caused the damage in any way.

3. Right to appealing to the court

In the event of a breach of Data Subjects' rights, they may bring the Data Controller to court. The court will take action as a matter of urgency.

4. Right to appeal to a privacy authority

Against the potential violation of the Data Controller, Data Subjects can lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information.

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