

Supplementary data processing notice

The detailed data processing notice (hereinafter: Data Processing Notice) is available electronically on <http://www.varkapitanysag.hu> and in a printed form on site. The following is a summary of the Notice.

Data Controller: Várkapitányság Integrált Területfejlesztési Központ Nonprofit Zártkörűen Működő Részvénytársaság (seat: 1013 Budapest, Ybl Miklós tér 6; company registration number: 01-10-140096; tax number: 26592352-2-41, represented by: CEO Bence Madaras, Data Protection Officer: Dr. Péter Onder, e-mail address: onder.peter@onder.hu, phone: +36 1 3610600, hereinafter: „Data Controller”).

Data Subjects: visitors to the website www.szentistvanterem.hu who voluntarily subscribe to the newsletter.

Chapter IV of the Data Processing Notice published on <http://www.varkapitanysag.hu> is applicable together with the following provisions.

1. **Legal basis of data processing:** The Data Controller processes personal data based on the data subjects’ voluntary consent (Article 6 (1) (a) of the GDPR).

2. **Purpose of data processing:** As defined in Chapter IV of the Data Processing Notice. The data referred to in this supplementary notice is processed for the purpose of sending newsletters to the persons who subscribe to them on www.szentistvanterem.hu, and providing discounts to ticket buyers.

The discounts can only be provided if the data referred to in this supplementary notice is entered when subscribing to the Data Controller’s newsletter.

3. **Data processed; duration of data processing; persons authorised to access the data:**

Data processed with the data subject’s voluntary consent	Type of data	Retention period
	E-mail address	Until unsubscribing or withdrawal of consent

Without consent to data processing, the Data Subject will not receive any newsletter or related discount. However, the Data Subject may still conclude a contract with (buy tickets from) the Data Controller without a discount, and may freely visit the website.

4. The Data Controller may acquire the Data Subjects’ data directly or indirectly from the Data Subjects, in compliance with this Data Processing Notice.

5. The Company shall always ensure safe data storage pursuant to the relevant rules and legal provisions, taking appropriate technical and organisational measures. The Company shall inform Data Subjects of the sources of their data.

6. The Data Controller shall not involve any Data Processor in the processing of personal data.

7. The data shall be stored both electronically and on paper.

I. Usage of the website www.szentistvanterem.hu

Without contacting the Data Subjects on the internet, the Data Controller uses anonymous user identifiers (cookies) to collect and process data about the usage of the website by visitors. Such data collection and processing must be accepted by the Data Subjects. Cookies are described as follows.

The Data Controller uses alphanumeric information packages of varied contents (cookies), sent by the web server and saved on a user's computer for a predefined validity period. Cookies are necessary to operate a website and provide related services.

Cookies are series of signals used for unique identification and the storage of profile information. It is saved by web service providers on a Data Subject's computer. It is important to know that these signal series cannot be used to identify the Data Subject at all, but only to recognise his/her computer. On the internet, personal information and customised services can only be provided if a service provider can identify each client's habits and needs. Anonymous identification is used in order to allow service providers to learn about their customers' information usage habits, so that the providers can improve the quality of their services and offer personalisation options.

For example, cookies are used to store Data Subjects' preferences and settings, help user log in, allow for displaying personalised advertisements and enable website analytics. To these ends, cookies are used by the Data Controller to collect and track information on the Data Subject's activities, such as relevance, recommendations, searches, sites opened, and frequently used functions.

Flash cookies tell a website operator whether a Data Subject has already visited the site, and help identify the functions / services that could be the most interesting to the Data Subject. Search and Flash cookies improve the online experience by storing a Data Subject's preferences concerning the site. Neither search nor Flash cookies are suitable for identifying a Data Subject, and the Data Subject can prevent the storage of cookies via the browser settings. However, not all services of a website can be used without the storage of cookies.

Anonymous user IDs:

Cookie	Purpose	Data Subject's personal data	Legal basis for data processing	Storage/Retention period
Cookies placed by Google Analytics	Collection of website usage information	IP address of the Data Subject's computer; start and end time of visit; the type of the browser and operating system (depending on the settings of the Data Subject's computer), and information on the Data Subject's activity on the website	The Data Subject's consent	2 years

If they wish, Data Subjects can prevent the storage of such unique identifiers on their computers by setting up their browsers accordingly. They may also withdraw their acceptance

of cookies at any time, and may delete the cookies. However, in this case they may not have access to the services of the website in the same manner as if they had allowed the placement of cookies.

Online services are utilised by many users in varied software and hardware environments, for various purposes, and in various areas. Service development can be best adjusted to users' needs and opportunities if a website's operator has a comprehensive oversight of users' habits and needs. Users can be personally contacted to seek feedback; but due to their high number, an effective secondary method for a website operator involves the automated collection and analysis of information on user habits and runtime environments.

Purpose of data processing: guaranteeing the proper operation and quality of the website; monitoring and improving the Data Controller's service quality; identifying malicious website attackers; and measuring website traffic.

Persons authorised to access the data: staff supervising and maintaining the Data Controller's IT systems; and Data Processors, if any.

The Data Controller shall not involve any Data Processor in the processing of personal data.

Data storage method: electronic; however, personal data may also be recorded on paper in case of a data breach, pursuant to the Data Controller's Data Breach Response Policy.

8. The Company shall always ensure safe data storage pursuant to the relevant rules and legal provisions, taking appropriate technical and organisational measures. The Company shall inform Data Subjects of the sources of their data. The Data Controller shall involve the above-mentioned Data Processors for the purpose of the specified activities.

Rights related to data processing: a Data Subject may request the Data Controller to grant access to his/her personal data, to rectify or erase such data, or limit the processing thereof. The Data Subject may also object to the processing of such data, and he/she may have a right to data portability. Concerning personal data based on consent, the Data Subject is entitled to withdraw his/her consent at any time. The withdrawal of the consent shall not affect the lawfulness of consent-based data processing before the time of withdrawal. Contact information of the Data Processor's data protection officer: Dr. Péter Onder, e-mail address: onder.peter@onder.hu, phone: +36 1 3610600. A Data Subject whose rights related to the processing of his/her data have been breached may seek information from the Data Controller on the processing of his/her personal data and may request the rectification or erasure of his/her data, apart from any data required by law. A Data Subject who disagrees with the Data Controller's actions or information may file a complaint with the National Authority for Data Protection and Freedom of Information as the competent supervisory authority (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c, e-mail: ugyfelszolgalat@naih.hu), or seek legal remedy before a court of law. Data protection proceedings are adjudicated by courts. Such a lawsuit can be initiated at the court that is competent over the Data Subject's permanent address or current residence, as chosen by the Data Subject.