

## **PRIVACY NOTICE FOR THE TAKING OF PICTURES AND MAKING OF VIDEO RECORDINGS**

During the making and use of the sound and image recordings – including video recordings in particular – (hereinafter: **‘Recording’**) prepared by SZIGET in accordance with Clause III. 4.3. of the General Terms and Conditions laying down the rights and obligations concerning ticket purchases and the purchase of other products and services regarding all festivals organised and hosted by SZIGET Kulturális Menedzser Iroda Zártkörűen Működő Részvénytársaság (Sziget Cultural Management Private Company Limited by Shares) (hereinafter individually as the **‘Event’** and jointly as the **‘Events’**), regulating the legal relationship between Sziget and ticket purchasers, as well as laying down the general terms and conditions of the visitors’ participation at the Events (hereinafter: **‘GTC’**), the personal data of the data subjects will be processed as follows (in the cases where the data subject is recognisable in the image and sound recordings), in which cases data will be processed under Act CXII of 2011 on Informational Self-Determination and Freedom of Information, Regulation (EU) 2016/679 of the European Parliament and of the Council 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: **‘GDPR’**) and Act V of 2013 on the Civil Code of Hungary (hereinafter: **‘Civil Code’**). In compliance with the provisions of the laws referred to above, SZIGET hereby informs the data subjects of the details of the processing of their personal data, along with the rights they have in this regard.

**The data controller: Sziget Kulturális Menedzser Iroda Zártkörűen Működő Részvénytársaság** (registered office: H-1033 Budapest, Hajógyári sziget hrsz. 23796/58, company registration number: 01-10-049598, phone: +36 (1) 372 0681, email: hello@sziget.hu, web: www.szigetfestival.com; represented by: Tamás Kádár CEO, for the purposes of this document: **“SZIGET”**).

The data protection officer’s contact details:

The person acting as data protection officer: Balázs Takács

Mailing address: H-1033 Budapest, Hajógyári-sziget Hrsz: 23796/58.,

Email: [dpo@sziget.hu](mailto:dpo@sziget.hu).

SZIGET shall determine the categories of the data processed during the making and use of the Recordings, as well as the purpose, duration, legal basis and other substantial conditions of processing. SZIGET hereby informs the data subjects that it may also permit third parties to make Recordings at the Events; however, in such cases SZIGET processes no personal data, and such third party shall qualify as the controller, who will process the personal data of the data subjects pursuant to its own privacy policy.

The Recordings may be prepared and used with regard to the undertaking in Clause III. 4.3. of the GTC.

<b>The data processed</b>	<b>Purpose of processing</b>	<b>Duration of processing</b>	<b>Legal basis for processing</b>
the facial image of the persons entering the Event area as shown in the Recording, their other body parts featured in the	SZIGET processes the data for the purpose of creating from them (i.e. from the Recordings) short films to present and advertise the individual Events and the Events in total, as well as SZIGET as the organiser	The Recordings, and therefore also the personal data included in them, will be processed by SZIGET for an indefinite period, i.e. as long as they can	Necessity for the performance of the provisions in Clause III. 4.2. of the GTC, in compliance with point (b) of Article

Recording, as well as the voice of these persons (on the understanding that separate image and voice recordings may also be made)	and its other services, and to promote the use of these services. Such films may be created during the Event and the 1-year period after the given Event regarding the Event in question, or regarding several consecutive Events (typically before or within 1 year after Events organised for a certain round number of times or other anniversary Events) in a retrospect style regarding several previous Events (for the purpose of this document hereinafter jointly referred to as ‘Films’). The Films will be published in accordance with Clause 7.	reasonably be used for the data processing purpose specified in this document.	6(1) of the GDPR.
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#### **Data processing, persons with access to the personal data, data transmission:**

Data may be accessed by the employees of SZIGET working in the marketing area and/or the Processors named below to carry out their tasks. Thus, for example, the system administrator of SZIGET and the Processors named in this Notice may access the personal data for the purposes of administration and data processing.

To perform its activities, SZIGET uses as Processors all the providers that make the Recordings of the data subjects.

For the storage of the personal data, SZIGET uses the operational services offered by **Netpositive Kft.**, which stores the data at the GTS Datanet server room located at Budapest, XIII. ker. Victor Hugo u. 18-22, Hungary.

Moreover, SZIGET also uses the services of the **Hidden Design Korlátolt Felelősségű Társaság** (1095 Budapest, Gát utca 21. fszt. 1., Company register No.: 01-09-278702, tax number: 23089655-2-43) to provide a runtime environment for the Websites of SZIGET. The Hidden Design Kft. resorts to the following sub-processors (the data are exclusively stored at servers located in the European Union): the **Contabo GmbH** (Aschauer Straße 32a, 81549 Munich, Germany, Company registration number: HRB 180722, registry court: AG München, tax number: DE267602842, telephone number: +49 89 3564717 70, Fax: +49 89 216 658 62, e-mail: [info@contabo.com](mailto:info@contabo.com)), and the **DigitalOcean LLC** (101 Avenue of the Americas, 10th Floor, New York, NY 10013, United States).

SZIGET is entitled to transfer the recordings to its sponsors. The list of sponsors are available at the webpages of the Events.

#### **1. Use of the Recordings, publication of the Films**

The personal data contained in the Recordings will only be processed in the context of making and publishing the Films as specified in this document. No Film may be produced and published unless it features the data subjects in situations, contexts and while engaging in conducts that are generally foreseeable for the data subjects in relation to their participation at the Event in question, on the

understanding that recordings generally harmful for the data subject and obviously prejudicial to SZIGET will not be 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 not adversely affecting the data subjects' interests:

- the sharpness and colour depth of the recorded image, for aesthetic reasons;
- to blur out any brand logo or reference to an undertaking other than SZIGET appearing in the Recording;
- to blur out any offensive content.

In accordance with the practice followed by SZIGET at the time of the publication of this document, the Films may be published in the following ways:

- the Events, or the advertisements used by SZIGET from time to time, which are broadcasted in television channels or in cinemas;
- in the online space available to SZIGET.

### **Data security**

More information about the data security measures taken by SZIGET can be found in the 11. Chapter (Data security procedures) of SZIGET's General Data Protection Regulation, which is accessible via the following link:  
[https://cdn2.szigetfestival.com/c5u7c9/f851/en/media/2018/12/en\\_00\\_general\\_181031.pdf](https://cdn2.szigetfestival.com/c5u7c9/f851/en/media/2018/12/en_00_general_181031.pdf)

### **Your rights concerning the data processing**

The data subject may request information about data processing, may request access to the personal data (may obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and if so, what kind of data processing is in progress). SZIGET shall provide the requested information and notification free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, SZIGET may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested, or refuse to act on the request.

SZIGET shall provide information on action taken on a request to the data subject without undue delay and in any event within one month (30 days) of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. SZIGET shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject

The right to rectification cannot be exercised or can be exercised limited, concerning the nature of the processed data. The data subject – pursuant to Article 17. and 18. of the GDPR – has the right to request from SZIGET the erasure of personal data or restriction of processing of personal data.

### **Legal remedies**

If you feel that the Controller has violated any of the legal provisions applicable to data processing, please contact us first by sending an email to the data protection officer's email address: [dpo@sziget.hu](mailto:dpo@sziget.hu), or by sending a letter to SZIGET's seat.

If this proves to be unsuccessful, you may initiate a proceeding with the National Data Protection and Freedom on Information Authority (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH, mailing address: H-1055 Budapest, Falk Miksa utca 9-11., email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) or seek judicial remedy. Decision of the case is within the jurisdiction of the superior court. Legal proceedings – at the choice of the data subject - may also be brought before the superior court where the data subject has domicile or residence.

### **Extras**

This Notice was written in Hungarian, although its English version is also accessible. In the event of contradiction between Hungarian and English version, the Hungarian language version shall prevail.