

## Data Processing Notice

Veszprém-Balaton 2023 Zártkörűen Működő Részvénytársaság ("VEB2023") organizes various events and activities in order to implement the "Veszprém European Capital of Culture 2023" project ("Project"), and aims to increase the popularity of the ECOOC Project by sending newsletters and organizing prize draws, which entails the processing of certain personal data. The present Data Processing Notice contains detailed information on the following:

- 1) Professional event registration
- 2) Public event registration
- 3) Newsletter
- 4) Image and sound recording of an event ("**Image and Sound Recording**")

The home page of the registration interface ("**Registration Interface**") contains information about (i) the name and (ii) the type of event for which you are registering on the interface, (iii) whether the event is being organised by VEB2023 or in cooperation with another organisation, and (iv) whether the event will be video or audio recorded.

### 1. NAME AND CONTACT DATA OF THE DATA CONTROLLER

Company Name: Veszprém-Balaton 2023 Zártkörűen Működő Részvénytársaság (Veszprém-Balaton 2023 Joint-stock Company)  
Registered office: 26 Óváros tér, Veszprém H-8200  
Company Registration No.: 19-10-500277  
Tax No.: 23701142-2-19  
Represented by: Represented by: Alíz Markovits CEO  
Website: [www.veszprembalaton2023.hu](http://www.veszprembalaton2023.hu)  
Data Protection Officer: Judit Bazsala  
E-mail: [adatvedelem.kulso@veszprembalaton2023.hu](mailto:adatvedelem.kulso@veszprembalaton2023.hu)

VEB2023 hereinafter referred to as data controller ( "VEB2023" or "Data Controller"). If the event is co-organised by VEB2023 with another organisation, you will be informed of the identity of the other Data Controller on the opening page of the Registration Interface. In this case, VEB2023 and this other entity are collectively referred to as the Data Controller.

### 2. THE SCOPE OF DATA SUBJECT DATA, THE PURPOSE, LEGAL BASIS, AND DURATION OF PROCESSING

#### I. Registrat to a Professional Event

If you have registered for this type of event, you will be attending a professional event , which aims to promote professional and academic cooperation between organisations and to serve wider professional cooperation at a regional, national and international level. Accordingly, the organisers are counting on the participation of representatives of professional organisations related to the topic. We ask you to provide the following personal data during registration for the intended purposes:

SCOPE OF PROCESSED DATA	PURPOSE OF DATA PROCESSING	LEGAL BASIS OF PROCESSING	DURATION OF DATA STORAGE
Your name	<ul style="list-style-type: none"><li>• Identification of event registrants</li></ul>	Your consent, pursuant to Article 6(1)(a) of the GDPR.	<ul style="list-style-type: none"><li>• Until 30 days after the end of the Event or until your consent is withdrawn. It will be erased in 30 days after the Event.</li></ul>
NameThe Institution you represent	<ul style="list-style-type: none"><li>• To register for the Event, to ensure a high professional standard of the Event and to facilitate networking.</li></ul>	Your consent, pursuant to Article 6(1)(a) of the GDPR.	<ul style="list-style-type: none"><li>• Until 30 days after the end of the Event or until your consent is withdrawn. It will be anonymised in 30 days after</li></ul>

			the Event. VEB2023 processes this data anonymously for statistical purposes.
The Institution you represent	<ul style="list-style-type: none"> <li>To measure the success of the Project in terms of the organisations from the municipalities and regions that have been reached within the framework of the Project.</li> </ul>	Your consent, pursuant to Article 6(1)(a) of the GDPR.	<ul style="list-style-type: none"> <li>Until 30 days after the end of the Event or until your consent is withdrawn. It will be anonymised in 30 days after the Event. VEB2023 processes this data anonymously for statistical purposes.</li> </ul>
Your e-mail address	<ul style="list-style-type: none"> <li>Pre-event contact, notification of changes</li> </ul>	Your consent, pursuant to Article 6(1)(a) of the GDPR.	<ul style="list-style-type: none"> <li>Until 30 days after the end of the Event or until your consent is withdrawn. It will be erased in 30 days after the Event. Except if you have subscribed to the newsletter. In this case, the provisions of point III shall apply.</li> </ul>
Applying group's name	<ul style="list-style-type: none"> <li>To register for the Event, to ensure a high professional standard of the Event</li> </ul>	Your consent, pursuant to Article 6(1)(a) of the GDPR.	Until 30 days after the end of the Event or until your consent is withdrawn. It will be erased immediately after the 30th day after the Event.
Applying group's type (choir, music band, other)	<ul style="list-style-type: none"> <li>To register for the Event, to ensure a high professional standard of the Event</li> </ul>	Your consent, pursuant to Article 6(1)(a) of the GDPR.	Until 30 days after the end of the Event or until your consent is withdrawn. It will be erased immediately after the 30th day after the Event.
Applying group's number	<ul style="list-style-type: none"> <li>To register for the Event, to ensure a high professional standard of the Event</li> </ul>	Your consent, pursuant to Article 6(1)(a) of the GDPR.	Until 30 days after the end of the Event or until your consent is withdrawn. It will be erased immediately after the 30th day after the Event.
Age of the members of the applying group	<ul style="list-style-type: none"> <li>To register for the Event, to ensure a high professional standard of the Event</li> </ul>	Your consent, pursuant to Article 6(1)(a) of the GDPR.	Until 30 days after the end of the Event or until your consent is withdrawn. It will be erased immediately after the 30th day after the Event.
Applying group's accomodation request	<ul style="list-style-type: none"> <li>To register for the Event, to ensure a high professional standard of the Event</li> </ul>	Your consent, pursuant to Article 6(1)(a) of the GDPR.	Until 30 days after the end of the Event or until your consent is withdrawn. It will be erased immediately after the 30th day after the Event.

You can unsubscribe from the Event by sending an e-mail to the following address: [adatvedelem.kulso@veszprembalaton2023.hu](mailto:adatvedelem.kulso@veszprembalaton2023.hu)

## II. Registering to Public Event

If you register for one of these events, you will be attending an event that is open to the general public and can be visited by anyone.

SCOPE OF PROCESSED DATA	PURPOSE OF DATA PROCESSING	LEGAL BASIS OF PROCESSING	DURATION OF DATA STORAGE
The municipality you are coming from	<ul style="list-style-type: none"> <li>To measure the success of the Project in terms of people from which municipalities and regions have been reached within the framework of the Project.</li> </ul>	Your consent, pursuant to Article 6(1)(a) of the GDPR.	<ul style="list-style-type: none"> <li>Until 30 days after the end of the Event or until your consent is withdrawn. It will be anonymised in 30 days after the Event. VEB2023 processes this data anonymously for statistical purposes.</li> </ul>
Your e-mail address	<ul style="list-style-type: none"> <li>Pre-event contact, notification of changes</li> </ul>	Your consent, pursuant to Article 6(1)(a) of the GDPR.	<ul style="list-style-type: none"> <li>Until 30 days after the end of the Event or until your consent is withdrawn. It will be erased in 30 days after the Event. Except if you have subscribed to the newsletter. In this case, the provisions of point III shall apply.</li> </ul>

You can unsubscribe from the Event by sending an e-mail to the following address: [adatvedelem.kulso@veszprembalaton2023.hu](mailto:adatvedelem.kulso@veszprembalaton2023.hu)

### III. Newsletter

During the registration, you can subscribe to the newsletter service receive up-to-date information about the Project. In addition, during registration and at

Events, promotional prize competition may take place. If the promotional prize competition is available on site, you can also subscribe to the newsletter by participating in the game and filling in a survey. For promotional prize competitions, your answers to the questionnaire will be treated anonymously.

SCOPE OF PROCESSED DATA	PURPOSE OF DATA PROCESSING	LEGAL BASIS OF PROCESSING	DURATION OF DATA STORAGE
Your e-mail address	Sending a newsletter in order to promote the Project,	According to Art. 6 GDPR, par. 1: The data subject shall have the right to withdraw his or her consent at any time.	Until 31 December 2024 or until your consent is withdrawn.

You can unsubscribe from the Event by sending an e-mail to the following address: [adatvedelem.kulso@veszprembalaton2023.hu](mailto:adatvedelem.kulso@veszprembalaton2023.hu)

### IV. Image and Sound Recording

Images and audio recordings (“**Recording**”) will be made at the Event, and the processing of personal data generated in this way is also covered by this Notice.

SCOPE OF PROCESSED DATA	PURPOSE OF DATA PROCESSING	IMPLEMENTATION OF DATA PROCESSING	LEGAL BASIS OF PROCESSING	DURATION OF DATA STORAGE
Recording images and sounds of you ("Recording")	To Promote the project and inform the public.	For VEB2023 to promote the "Veszprém European Capital of Culture 2023" project (the "Project"), in particular, but not exclusively, through summaries using the Recordings, videos promoting or presenting the Project, and by publishing these on VEB2023's YouTube channel, Facebook page, LinkedIn page and its website for the public, as well as through competitions, tenders and campaigns and other forums suitable for the promotion of the Project	Pursuant to Article 6(1)(f) of the GDPR, the data controller's legitimate interest in promoting and informing the public about the Project implemented in the public interest	Until 31 December 2024
	Documenting the implementation of the Event to justify the financial settlement.	The Records will be stored in the internal database and on the VEB2023 server and will be submitted to the public auditing bodies to certify the implementation of the Activity/Event.	Pursuant to Article 6(1)(f) of the GDPR, the Data Controller has a legitimate interest in being able to document the implementation of the Event when verifying the contractual use of the financial support provided to VEB2023 Zrt.	Until 31 December 2033

### 3. DATA SECURITY

The Data Controller shall protect the personal data provided in accordance with the provisions on the security of personal data, including appropriate measures to protect against unauthorised access, alteration, disclosure, publication, erasure or destruction, including access to databases containing personal data only by its employees who are involved in the purpose of the processing or who need to do so for their troubleshooting duties.

### 4. RECIPIENTS OF PERSONAL DATA, DATA PROCESSOR

Your personal data will be accessed by the VEB2023 organiser's staff and volunteers employed by the organiser or its subcontractor. Personal data will not be transferred to third countries.

Registration is done using the Typeform service, for which the following processor is used by VEB2023:

#### TYPEFORM SL

registered office: Carrer Bac de Roda, 163, local, 08018 - Barcelona (Spain),

tax No.: C.I.F. B65831836.

e-mail: [support@typeform.com](mailto:support@typeform.com)

Participants' personal data may be accessed by VEB2023 Event organiser staff and volunteers and the following organizers:

Company Name: **Veszprém-Balaton Régió Kultúrájáért Közalapítvány** (Foundation for the Culture of the Veszprém-Balaton Region)

Registered office: 9 Óváros tér, Veszprém H-8200

Registration Number: 19-01-0000227

Tax No.: 19264581-1-19

Represented by: Eszter Sigmund Chairman of the board of trustees

If any recording is made at the event VEB2023 may also use a third party as a processor for achieving the usage purpose of the Recordings. The activities of these third parties are limited to works on visual materials necessary to achieve the purpose of the processing, they do not process or record the personal data themselves, but use them for operations as instructed by VEB2023 (e.g. video creation, cutting, editing). It will also publish promotional materials created from the Recordings on VEB2023's YouTube channel, Facebook page, LinkedIn page, its website and on forums used to promote the Project.

The VEB2023 newsletter is expected to be sent from the end of 2022. For the sending of newsletters, VEB2023 may use a processor, whose identity will be communicated to the data subjects in an appropriate manner after such processor has been selected and the appropriate data processing agreement has been concluded.

## **5. DATA SUBJECTS' RIGHTS IN RELATION TO THIS PROCESSING**

### **5.1. Right of access**

Pursuant to Article 15 of the GDPR, you have the right to request information from the Data Controllers at any time on whether and how your personal data are processed, including the purposes of the data processing, the recipients to whom the data have been disclosed or the source from which the data were obtained by the Data Controllers, the retention period, any of your rights in relation to the processing and, in the case of transfers to third countries or international organisations, information on the safeguards relating thereto.

In exercising your right of access, you also have the right to request a copy of the data as follows:

- The right to request a copy must not adversely affect the rights and freedoms of others,
- If other data subjects are identifiable in the Recording, the Data Controller will take technical measures (such as image editing, including obscuring or blurring) to protect the rights of third parties.
- If your request is excessive or manifestly unfounded, the Data Controller may charge you a reasonable fee under Article 12(5)(a) of the GDPR or refuse to act on your request (Article 12(5)(b) of the GDPR).

### **5.2. Right to rectification**

Pursuant to Article 16 of the GDPR, the Data Controller will rectify or complete personal data concerning you at your request.

### **5.3. Right to erasure ('right to be forgotten')**

Under Article 17 of the GDPR, if you request the erasure of your personal data, the Data Controllers will erase them without undue delay:

- If they are no longer necessary for the purpose for which they were originally stored or if the processing is unlawful,
- If you withdraw your consent and there is no other legal basis for the processing.
- In terms of the Recordings, if you exercise your right to object and there are no overriding compelling legitimate grounds for the processing.

The data cannot be erased if the processing is required for any of the following:

- a) for exercising the right of freedom of expression and information;

- b) for compliance with a legal obligation which requires processing of the personal data by Union or Member State law to which the controller is subject;
- c) for the establishment, exercise or defence of legal claims.

#### **5.4. Right to restriction of processing**

You may request restriction of the processing of your personal data on the basis of Article 18 of the GDPR in the following cases:

- The processing is unlawful, but you oppose the erasure of the personal data and request the restriction of their use instead;
- The Data Controller no longer needs the personal data for the purposes of the processing, but they are required by the Player for the establishment, exercise or defence of legal claims;

#### **5.5. Right to data portability**

You have the right under Article 20 of the GDPR to receive the personal data concerning you that you have provided to the Data Controllers and also to have those data transmitted directly by the Data Controllers to another data controller, provided that the legal basis for the processing is your consent.

#### **5.6. Right to object**

**Pursuant to Article 21 of the GDPR, if the legal basis for the processing of your data is the legitimate interest of the Data Controllers or a third party (Article 6(1)(f) of the GDPR), you have the right to object to the processing.** The Data Controllers are not obliged to uphold the objection if they prove that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or that the processing is connected to the establishment, exercise or defence of the legal claims of the Data Controllers.

#### **5.7. Right to lodge a complaint, right to appeal**

If you consider that the processing of your personal data by the Data Controllers infringes the provisions of the currently effective data protection legislation, in particular the GDPR, you have the right to lodge a complaint with the competent data protection supervisory authority. In Hungary you shall lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH). Contact details of NAIH:

**Website:** <http://naih.hu/>  
**Postal address:** 1363 Budapest, P.O. Box No. 9.  
**Address:** 9-11 Falk Miksa St., Budapest, H-1055  
**Phone:** +36 (1) 391-1400  
**Fax:** +36 (1) 391-1410  
**E-mail:** [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

You can also take legal action under the GDPR and the Information Act. Your detailed rights and the available legal remedies are specified under Chapters III and VIII of the GDPR and Article 23 of the Information Act.

#### **5.8. Responding to the data subject's request**

**If you wish to exercise any of your rights, or if you have any questions or comments, please contact VEB2023 using the contact details provided in Section 1 of this Notice.**

VEB2023 will ensure that if you exercise any of your rights in relation to this processing and contact VEB2023, VEB2023 will respond to such requests without undue delay and in any event within 30 days at the latest.