



## PRIVACY POLICY Effective as of 10/07/2023

**In its capacity as a non-budgetary organisation** under Section 3/A (2) of Act CXCV of 2011 on Public Finances (hereinafter referred to as "**PFA**"), Veszprém-Balaton 2023 Joint Stock Company (hereinafter referred to as "**VEB2023**") **participates** in the creation of a series of programmes in the framework of the "**Veszprém-Balaton 2023 European Capital of Culture**" programme (hereinafter the "**ECOC Programme**"), whose aim is to increase the scale, diversity and European dimension of cultural offerings by way of, among others, cooperation between countries, expanding access to and participation in culture.

In order to implement the aims defined above, VEB2023 used a state budget support to create and operate a "**Tourism Management System**" (hereinafter: "**TMS**") to promote and support the ECOC Programme events. TMS is a uniform complex framework, through which proper information about the Region's cultural events and ticketing are provided. TMS includes a web platform ("**ECOC Website**") and a mobile phone application ("**ECOC Application**").

Below, we wish to inform you about the processing operations connected to using the ECOC Website, the ECOC Application and the TMS, the purposes the legal basis and the duration of processing your data, and your rights of remedy related to the processing.

Information about the processing by VEB2023 is available in the footer of the ECOC Website landing page and within the ECOC Application.

VEB2023 shall be entitled to amend the Privacy Policy unilaterally. In the event of any modification to the Privacy Policy, you will be informed by a notice on the ECOC Website and in the ECOC Application. By using the services after the amendment's effective date, you accept the amended Privacy Policy.

Incapacitated persons and minors of limited legal capacity under 14 years of age may not use services through the VEB2023 system.

It is up to you whether and what personal data you provide – it is not mandatory. However, the provision of personal data is essential to the success of the services we provide and is a condition of entering into and performing a contract when using the ticketing service, as detailed below.



## I. Definitions

Controller means the legal person which, alone or jointly with others, determines the purposes and means of the processing of personal data;

Name and contact details of the Controller:

**Veszprém-Balaton 2023 JSC (Registered office: 8200 Veszprém, Óváros tér 26., Company registration number: Cg. 19-10-500277, Tax number: 23701142-2-19, Represented by Aliz Markovits, CEO)**

**Website:** [www.veszprembalaton2023.hu](http://www.veszprembalaton2023.hu)

**Data Protection Officer:** Dr. Réka Benedek

**E-mail address:** [adatvedelem@veszprembalaton2023.hu](mailto:adatvedelem@veszprembalaton2023.hu)

Personal Data means any information relating to an identified or identifiable natural person ("**data subject**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Processing means any operation or set of operations performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

Processor means a legal person which processes personal data on behalf of the controller.



## II. Particular Processing Operations

### 1. Registration on the ECOC Application and creation of a user account on the ECOC Website

After downloading the ECOC Application, registration is required to use the ECOC Application. A User account can be created on the ECOC Website. To register, the following data is required:

SCOPE OF THE DATA PROCESSED	PURPOSE OF THE PROCESSING	BASIS OF THE PROCESSING	STORAGE PERIOD
Your name, e-mail address, the password entered for registration	To create a personalised User account with which the services provided by VEB2023 can be used (e.g., one-time entry of billing address, storage of tickets, recommendations, modification of newsletter subscription, etc.)	Your consent pursuant to Article 6(1)(a) of the GDPR.	The data provided will be processed by VEB2023 until you delete your User account. VEB2023 will send you e-mail notifications periodically in order to verify actual use of the User accounts; inactive and unconfirmed User accounts will be deleted.

Persons entitled to know the data: The Controller's marketing, ticketing and billing staff.

Processor: IMG Solution Zrt. (registered seat: 1023 Budapest, Lajos utca 26.; company registration number: 01-10-141012; tax number: 28771315-2-44) involved in the development and operation of the TMS and Measureland Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság (registered seat: 1125 Budapest, Béla király út No. 13, Building A., Staircase B, GF No. 2, company registration number: 01-09-349947, tax number: 27110281-2-43) employed by the former as sub-processor.



**2. Other data that may be entered in the User Account of the ECOC Application and that are provided by using the ECOC Application for sending personalized recommendations**

<b>SCOPE OF THE DATA PROCESSED</b>	<b>PURPOSE OF THE PROCESSING</b>	<b>BASIS OF THE PROCESSING</b>	<b>STORAGE PERIOD</b>
Date of birth, sex, neighbourhood of Veszprém, interest in cultural and recreational programmes, educational attainment	To present offers that best match your interests and preferences when using the ECOC Website and Application. By providing this information, you will be offered opportunities to participate in a game encouraging you to use the ECOC Application (gamification)	Your consent pursuant to Article 6(1)(a) of the GDPR.	The data provided will be processed by VEB2023 until you delete the data from your User account. You may always delete any of the data thus provided at will.

Providing this information is entirely voluntary. However, should you wish to participate in the points collection game organised by VEB2023 for users of the ECOC Application, you may provide this information in the ECOC Application. You may receive points for your use of the ECOC Application, attending and evaluating events and other actions during the series of events. Points can be redeemed for coupons in your profile. You may change or delete your data at any time by modifying or deleting the data you have entered in your user account in the ECOC Application.

Persons entitled to know the data: The Controller's marketing and ticketing staff.

Processor: IMG Solution Zrt. (registered seat: 1023 Budapest, Lajos utca 26.; company registration number: 01-10-141012; tax number: 28771315-2-44) involved in the development and operation of the TMS and Measureland Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság (registered seat: 1125 Budapest, Béla király út No. 13, Building A., Staircase B, GF No. 2, company registration number: 01-09-349947, tax number: 27110281-2-43) employed by the former as sub-processor.



### 3. Data provided when using the ECOC Application

By using the ECOC Application, you may register for events organised by VEB2023 and purchase tickets sold by partner institutions of VEB2023. In doing so, you will be able to view and download your tickets, invoices, and give an evaluation of the events you have attended. In your User Account, you can modify your follow-up services and newsletter subscriptions and, if you participate in the points collection game, view your points balance. The processing of the diverse personal data stored in your User account necessarily involves profiling. By using the ECOC Application, the following processing operations take place, excluding the processing of data described in Point 6 below:

<b>SCOPE OF THE DATA PROCESSED</b>	<b>PURPOSE OF THE PROCESSING</b>	<b>BASIS OF THE PROCESSING</b>	<b>STORAGE PERIOD</b>
Events you have registered for and tickets you have purchased	Clarity of the events you have registered for, easier access to events.  You will be presented with the offers that best match your interests and preferences when using the ECOC Website and Application.	Your consent pursuant to Article 6(1)(a) of the GDPR.	The data provided will be processed by VEB2023 until you delete your User account. VEB2023 will send you e-mail notifications periodically in order to verify actual use of the User accounts; inactive and unconfirmed User accounts will be deleted.
Registering the fact of your entry to events – There is access control at the events where the system "validates" your QR code by scanning the admission tickets, and this fact is saved on the back-end server.	Verification of the use of tickets, serving as the basis for the settlement of finances between VEB2023 and its partners.	In accordance with Article 6(1)(f) of the GDPR, VEB2023 has a legitimate interest in ensuring settling accounts with its Partners and in making any claim enforcement related to such settlement possible.	Five (5) years after VEB2023 settles accounts with the given Partner.
Your rating of an event – if you have validated your QR code, you will receive a push notification requesting your evaluation of the event.	Requesting feedback on the quality of the events allowing VEB2023 to improve them in the future and to provide you with offers that best match your interests and preferences when using the ECOC Website and Application.	Your consent pursuant to Article 6(1)(a) of the GDPR.	The data provided will be processed by VEB2023 until you delete your User account. VEB2023 will send you e-mail notifications periodically in order to verify actual use of the User accounts; inactive and unconfirmed User accounts will be deleted.



Balance of points you have collected	Participation in a game to encourage the use of the ECOC Application, which will qualify you for points and coupons for discounts.	Your consent pursuant to Article 6(1)(a) of the GDPR.	The data provided will be processed by VEB2023 until you delete your User account. VEB2023 will send you e-mail notifications periodically in order to verify actual use of the User accounts; inactive and unconfirmed User accounts will be deleted.
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Persons entitled to know the data: The Controller's marketing and ticketing staff.

Processor: IMG Solution Zrt. (registered seat: 1023 Budapest, Lajos utca 26.; company registration number: 01-10-141012; tax number: 28771315-2-44) involved in the development and operation of the TMS and Measureland Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság (registered seat: 1125 Budapest, Béla király út No. 13, Building A., Staircase B, GF No. 2, company registration number: 01-09-349947, tax number: 27110281-2-43) employed by the former as sub-processor.



#### 4. Newsletter

Through the ECOC Application and the ECOC Website, you may subscribe to the VEB2023 newsletter. Here, you can choose the topics of the newsletters you wish to receive: (i) General Public Newsletter: events, artistic and cultural projects, interesting information (ii) Institutional Newsletter: Tenders, capacity building, professional information. If you subscribe, VEB2023 may send you the newsletter at a frequency of its choice.

VEB2023 will endeavour, where possible, to offer relevant events of interest to the newsletter's readers based on their place of residence, previous purchases and other data collected in the profiling process.

SCOPE OF THE DATA PROCESSED	PURPOSE OF THE PROCESSING	BASIS OF THE PROCESSING	STORAGE PERIOD
Your e-mail address and name	Sending e-mail newsletters to interested parties.	The basis of processing is Article 6(1)(a) of the GDPR, i.e., the consent of the data subject	Until your consent to receiving the newsletter is withdrawn. You may unsubscribe from the newsletter in the ECOC Application or by clicking on the unsubscribe link in the newsletter.

Persons entitled to know the data: The Controller's marketing and ticketing staff.

Processor: IMG Solution Zrt. (registered seat: 1023 Budapest, Lajos utca 26.; company registration number: 01-10-141012; tax number: 28771315-2-44) involved in the development and operation of the TMS and Measureland Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság (registered seat: 1125 Budapest, Béla király út No. 13, Building A., Staircase B, GF No. 2, company registration number: 01-09-349947, tax number: 27110281-2-43) employed by the former as sub-processor.



## 5. Ticketing service

Tickets for events organised by the VEB2023 partner institutions may be sold through the ECOOC Application and the ECOOC Website. Ticket sales are realised as individual ticket sales ("**Individual Ticket Sales**"), whereby tickets for a specific partner institution are sold. The sales are performed by VEB2023.

SCOPE OF THE DATA PROCESSED	PURPOSE OF THE PROCESSING	BASIS OF THE PROCESSING	STORAGE PERIOD
Your name, e-mail address, password, username, transaction number, customer code, transaction date	Providing ticketing service, fulfilling orders, management of the purchase and the related payment using a payment service provider, documenting the payment and sending notifications related to the service ordered (e.g., change of performance, change of date, etc.)	The basis of processing is the performance of the contract under Article 6(1)(b) of the GDPR and the legitimate interest of VEB2023 in enforcing its claim arising from the contract under Article 6(1)(f) of the GDPR.	Five (5) years from the date of purchase.
Your first and last name, the billing address provided to issue the invoice, the number, date and time of the transaction, the content of the voucher, and, in the case of VAT invoices, the tax number, (if you have provided)	Drawing up and keeping the accounting documents relating to purchase transactions within the legal deadlines.	Compliance with the legal obligation of VEB2023, Article 6(1)(c) of the GDPR. (Accounting Act)	8 years or the period specified in the tax and accounting legislation in force at the time

Persons entitled to know the data: The Controller's marketing, ticketing and billing staff.

Processor: IMG Solution Zrt. (registered seat: 1023 Budapest, Lajos utca 26.; company registration number: 01-10-141012; tax number: 28771315-2-44) involved in the development and operation of the TMS and Measureland Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság (registered seat: 1125 Budapest, Béla király út No. 13, Building A., Staircase B, GF No. 2, company registration number: 01-09-349947, tax number: 27110281-2-43) employed by the former as sub-processor.



The technical facilities for invoicing are provided by the following company /szamlazz.hu/

KBOSS.hu Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság (1031 Budapest, Záhony utca 7.  
Company reg. no.: Cg. 01-09-30320, Tax number: 13421739-2-41)

Sub-processors:

- 1.) OTP Mobil Szolgáltató Korlátolt Felelősségű Társaság (1143 Budapest, Hungária körút 17-19.;  
company registration number: 01-09-174466, tax number: 24386106-2-42)
- 2.) PayPal (Europe) S.à r.l. et Cie, S.C.A. (22-24 Boulevard Royal L-2449 Luxembourg)

## **6. Personalised offers, profiling**

As described above concerning the processing of certain data, when you register on the ECOC Application and use the ECOC Application, we will collect (i) the basic preferences you have provided when registering; (ii) your interest in specific events; (iii) your participation in events (the fact of registration/ticket purchase); and (iv) your evaluation of events. The purpose of collecting these data is to use the profile thus created for presenting personalised offers relevant to you on the ECOC Website and in the ECOC Application. The legal basis for such processing is the freely given consent of the data subject, according to Article 6(1)(a) of the GDPR. No automated decision-making is done in relation to profiling.

ALS algorithm: By the weighted evaluation of user interactions and the above categories, thousands of events of hundreds of programmes can be recommended. Interactions are recorded at event-level, they are stored for all users, and based on the processed data, the presumably most suitable programmes to the buyer will be offered.

The profile created using the above data will be managed by VEB2023 until you opt out of using your data for this purpose. If a User does not show any activity, i.e., does not use any of the services provided by VEB2023, VEB2023 will delete the registration after three years from the subscription to the profiling.

Possible consequences of not providing the data: the ECOC Website and the ECOC Application will not display offers relevant to you, and you will not be able to use the convenience services linked to your registration.

### **III. Other data collection and processing on the ECOC Website and ECOC Application**

#### **1. Management of cookies**

A cookie is a variable alphanumeric packet of information sent by the web server, which is stored on your device for a predefined period of validity. The use of cookies allows the retrieval of certain



information about the visitor and track their internet usage. The cookie helps track your interests, internet usage habits and website visit history to optimise your shopping experience. Since cookies act as a kind of tag that allows the website to recognise a returning visitor, they can also be used to store the username and password valid for that page. If the browser returns a previously saved cookie, VEB2023 managing the cookie can link the user's current visit to previous visits, but for its own content only.

Cookies used by the ECOC Website and the ECOC Application:

- (i) Non-persistent cookies – Session-id cookies are essential for the use of the site. They are used only to navigate the website and for making the website function. Without accepting them, the website or parts of the website will not be displayed, browsing will be hindered, and the addition of tickets to the shopping cart or bank payment will not be possible properly.
- (ii) Persistent cookies, depending on your web browser settings, may remain on your device for a more extended period or until you delete them. These can be internal or external cookies. If the cookie is installed by the VEB2023 web server and the data is transferred to its own database, it is an internal cookie. If the cookie is installed by the VEB2023 web server, but the data is transferred to an external VEB2023 partner, it is an external cookie. Such external cookies are third-party cookies placed on the User's browser by a third party (Google Analytics, Facebook Pixel). They are placed on the browser when the website visited uses the services provided by the third party. The purpose of these persistent cookies is to ensure the highest possible quality of the site's functioning to enhance the user experience.

You can give your consent for persistent cookies to be stored on your device and accessed by VEB2023 by using the button on the cookie warning on the login page.

You can set and block cookie-related activities through your browser software. The management choices of cookies are generally available in the Tools/Preferences menu of browsers under Privacy/Preferences/Custom Settings, under the menu item Cookies or Tracking. However, we need to emphasize that without the use of cookies in the latter case, the User may not be able to use all the website services, particularly the payment services.

The purpose of the processing is to process payment transactions, identify and distinguish users, determine the current session of users, store the data provided during the session, prevent data loss, identify, and track users and measure web analytics.

The legal basis for processing is the freely given consent of the data subject, Article 6(1)(a) of the GDPR.

Duration of processing: session-id cookies are stored until all browsers of the given type are closed by the user. Persistent cookies are stored on the user's computer for one year or until they are deleted by the User.



Possible consequences of not providing the data include incomplete use of the website services, failure of payment transactions, inaccuracy of analytical measurements.

The source of personal data is the data generated automatically by the IT system. Recipients of personal data, categories of recipients: none

## **2. Statistics, Web analytics**

The data may be used by the controller for statistical purposes. The use of data in the aggregate statistical form shall not include the name or any other identifiable data of the user concerned in any form.

Google Analytics, as an external VEB2023 partner, helps to independently measure website traffic and other web analytics data. Detailed information on the processing of the measurement data can be found at the following link: <http://www.google.com/analytics>. Google Analytics data is used by VEB2023 for statistical purposes only to optimise the functioning of the site.

The source of personal data is the data generated automatically by the IT system.

## **IV. Other Information**

We will inform you of processing operations not covered by this Policy at the time of recording your data.

Please be informed that the courts, the prosecutors' offices, the investigating authorities, the infringement authorities, the administrative authorities, the National Authority for Data Protection and Freedom of Information, and other bodies authorised by law may contact VEB2023 to request information, communication or transmission of data or documents. VEB2023 shall disclose to the public authorities, provided that the public authority has indicated the precise purpose and scope of the data, only such personal data as is strictly necessary for accomplishing the goal of the request and to the extent that the VEB2023 may be required to do so by law.

VEB2023 shall not verify the accuracy of the data you provide. You are responsible for their appropriateness. Please make sure that your user account login details are treated with appropriate security and that they are used exclusively by you. In view of this responsibility, any liability for access with a given e-mail address rests solely with the user who registered that e-mail address. If the user provides personal data other than their own, they are obliged to obtain the consent of the data subject concerned.

The persons entitled to know the personal data are the employees or contractors of VEB2023 and the Processors named in each processing operation.

## **V. DATA SUBJECTS' RIGHTS CONCERNING THE PRESENT PROCESSING**



### **1.1. Right of access**

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

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

- The right to request a copy must not adversely affect the rights and freedoms of others;
- Should a Recording be made, the Controller will take technical measures (such as image editing, including masking or blurring) to protect the rights of third parties to enforce the above principle if other data subjects are identifiable in the Recording;
- Should your request be excessive or manifestly unfounded, the Controller may charge a reasonable fee in accordance with Article 12(5)(a) of the GDPR or refuse to act on the request (Article 12(5)(b)).

### **1.2. Right to rectification**

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

### **1.3. Right to erasure ("right to be forgotten")**

Pursuant to Article 17 of the GDPR, if you request the erasure of your personal data, the Controller shall erase it without undue delay:

- If it is no longer necessary for the purpose for which it was originally stored, or if their processing is unlawful;
- If you withdraw your consent and there is no other legal basis for the processing;
- If you exercise your right to object in case Recordings are made, and there are no overriding and compelling legitimate grounds for the processing.

Data cannot be erased in cases when their processing is necessary:

- a) for the exercise of the right to freedom of expression and information;
- b) to comply with an obligation under Union or Member State law to which the controller is subject, requiring the processing of personal data;



- c) for the establishment, exercise or defence of legal claims.

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

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

- The processing is unlawful, but you oppose the erasure of the data and instead request the restriction of their use;
- The Controller no longer needs the personal data for their processing, but you require them for the establishment, exercise or defence of legal claims.

#### **1.5. Right to data portability**

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

#### **1.6. Right to object**

**Pursuant to Article 21 of the GDPR, where the legal basis for processing relating to you is the legitimate interest of the Controllers or a third party (Article 6(1)(f) of the GDPR), you have the right to object to the processing of your personal data. The Controllers are not obliged to satisfy the objection if they can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms; or their processing is related to the establishment, exercise or defence of legal claims by the Controllers.**

#### **1.7. The right to complain, right to remedy**

If you consider that the processing of your personal data by the Controller infringes the provisions of the applicable data protection legislation, particularly the GDPR, you have the right to lodge a complaint with the competent data protection supervisory authority. In Hungary, a complaint may be lodged with the National Authority for Data Protection and Freedom of Information ("**NAIH**"). Contact details of NAIH:

**Website:** <http://naih.hu/>

**Postal address:** 1363 Budapest, Pf.: 9.

**Address:** 1055 Budapest, Falk Miksa utca 9-11.

**Phone:** +36 (1) 391-1400

**Fax:** +36 (1) 391-1410



**E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)**

You may also take legal action under the GDPR and the Information Act. Your detailed rights and options for remedy are set out in Chapters III and VIII of the GDPR and the provisions of Article 23 of the Information Act.

#### **1.8. Replying to the data subject's request**

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

VEB2023 shall ensure that if you exercise any of your rights in relation to this processing and contact VEB2023 in this respect, VEB2023 will respond to such requests without undue delay, but no later than 30 days and will take the necessary measures to ensure the proper enforcement of the data subject's rights with the other Controller(s), if the processing is jointly exercised with another organisation.