

SUPPLEMENTARY PRIVACY NOTICE

– use of the citadella.hu website –

The detailed Privacy Notice (hereinafter referred to as the Privacy Notice) is available at <http://www.varkapitanysag.hu>. Below, you will find a concise summary of how your personal data are processed.

Data Controller: Várkapitányság Integrált Területfejlesztési Központ Nonprofit Private Limited Company (registered office: 1013 Budapest, Ybl Miklós tér 6; company registration number: 01-10-140096; VAT number: 26592352-2-41; Data Protection Officer: Dr Péter Onder; e-mail: onder.peter@onder.hu; tel.: +36 1 3610600; hereinafter: “**Data Controller**”).

Data Subjects: participants in programmes organised by the Data Controller, visitors to the www.citadella.hu website, and individuals who voluntarily subscribe to the newsletter, as **Data Subjects**.

Chapter IV of the Privacy Notice published at <http://www.varkapitanysag.hu> shall apply in conjunction with the provisions set out below.

- 1. Legal Basis for Data Processing:** The Data Controller shall process personal data on the following legal bases: – for the conclusion and performance of a contract (to which the Data Subject is a party), – on the basis of legitimate interests (Article 6(1)(b) and (f) of the GDPR), and – on the basis of the Data Subject’s voluntary consent (Article 6(1)(a) of the GDPR).
- 2. Purpose of Data Processing:** The purposes are defined in Chapter IV of the Privacy Notice. In addition, under this supplementary notice, data shall be processed for the purposes of: online and on-site ticket sales, group bookings, enforcement of claims, sending newsletters to subscribers of the www.citadella.hu website, and – where applicable, granting discounts associated with ticket purchases. Where a discount is offered by the Data Controller in connection with newsletter subscription, a condition for receiving such discount is the provision of the data specified in this supplementary notice at the time of subscribing to the newsletter.
- 3. Scope of Processed Data, Duration of Data Processing, and Persons Authorised to Access the Data**

	Purpose of Data Processing	Category of Personal Data	Retention/Storage Period
Data processed for the conclusion of a contract (to which the Data Subject is a party), its performance, and on the basis of legitimate interest.	Online and on-site ticket sales, group bookings, contract conclusion and performance, and the enforcement of claims.	Name, address, address of correspondence, tax identification number/VAT number, mother’s name, place and date of birth, bank account number, name of account-holding bank, phone number, e-mail address, purchase transaction number, date and time; website through which the purchase was made; performance/event details (date, venue, seat(s), quantity, barcode, price).	The retention period is 5 years following the performance or termination of the contract, or the cessation of the legitimate interest, in accordance with the applicable statutory provision (Article 6(22) of the Hungarian Civil Code).

	Purpose of Data Processing	Category of Personal Data	Retention/Storage Period
Data processed with the voluntary consent of Data Subjects	Newsletter subscription	E-mail, name	Retention period: until unsubscription or withdrawal of consent.
	Registration – creating a user profile	Name, username, e-mail address. In the case of login via Facebook, Facebook account data; in the case of login via Google, Google account data. Purchase history stored in the user account. Billing name and address. Delivery name and address. Purchase history. Purchase details (event name, date, number of tickets purchased, seat info, purchase amount), number of loyalty points.	Until the deletion of the user registration and account (withdrawal of consent).

If the data are not processed, the Data Subject shall not receive newsletters and shall not be eligible for the associated discount at a later date; however, this does not prevent the Data Subject from concluding a contract with the Data Controller (e.g. purchasing tickets) without a discount, nor from freely visiting the website.

4. Personal data relating to the Data Subjects may come into the possession of the Data Controller either directly or indirectly from the Data Subjects, in accordance with the provisions set out in this Privacy Notice.
5. The Company shall ensure secure data storage in compliance with the applicable legal regulations, applying the appropriate technical and organisational measures. The data source shall be made available to the Data Subject by the Company.
6. The Data Controller does not engage any Data Processors for the processing of personal data.

Persons authorised to access the data: The Data Controller may transfer the data to its employees performing tasks related to customer service and marketing activities. In the context of official proceedings, the Company is obliged to disclose the requested data to the investigating authority or any other authority upon official request, in accordance with the applicable legal provisions.

7. Data storage format: both electronic and paper-based.

www.citadella.hu Webpage usage. Cookie Notice:

The Data Controller states that, in the absence of direct contact via the website, data collection and processing in connection with visitors to the website takes place through the use of anonymous user identifiers (cookies) and the acceptance thereof by the Data Subjects. The Data Controller summarises the essential characteristics of cookies as follows.

The Data Controller may use information packages known as cookies – alphanumeric data of variable content sent by the web server, stored on the user’s computer, and retained for a predetermined period – for the purposes of providing services and operating the website.

A cookie is a sequence of characters suitable for unique identification and the storage of profile information, which service providers place on the Data Subject’s computer. It is important to note that such a sequence of characters is, by itself, in no way capable of identifying the Data Subject; it is only suitable for recognising the Data Subject’s computer. In the interconnected world of the Internet, information linked to individuals and personalised service can only be ensured if service providers are able to uniquely identify their clients’ habits and needs. Service providers use anonymous identification partly to gain deeper insight into their clients’ information usage habits, with the aim of further improving the quality of their services, and partly to offer clients opportunities for personalisation.

For example, cookies store the preferences and settings of the Data Subjects; they assist with logging in; can display personalised advertisements, and analyse the website's performance. For these purposes, the Data Controller may use services to collect and track data on user activities such as relevance, recommendations, searches, views, and data on the most important and frequently used functions.

Flash cookies are used by website operators, for example, to determine whether the Data Subject has previously visited the website and to help identify the features or services that may be of greatest interest to them. Both browser and Flash cookies enhance the online experience by retaining the Data Subject’s preferred information while they are browsing a given page. Neither browser cookies nor Flash cookies are capable of identifying the Data Subject personally, and the Data Subject may refuse browser cookies through their browser settings; however, without such cookies, the full functionality of the website may not be available.

Anonymous user identifiers:

Cookie Name	Purpose	Personal Data Involved	Legal Basis	Expiry
Cookies placed by Google Analytics	Collection of information about website usage	The IP address of the Data Subject's device; the start and end time of time spent on the website; depending on the settings of the Data Subject's device, the type of browser and operating system; and data relating to the Data Subject's activity on the website	Consent of the Data Subject	2 years

If the Data Subject does not wish for such an identifier to be placed on their device, they can configure their browser not to allow the placement of the unique identifier and can withdraw their permission at any time, delete the unique identifier, in which case the services may not be available to the Data Subject or may not be available in the form in which they would have been, had they permitted the placement of the identifiers.

The services are used by a large number of users in a variety of software and hardware environments, with different purposes and domains. The development of services can best be tailored to the needs and capabilities of users if the website operator has a comprehensive picture of their usage patterns and needs. However, due to the large number of users, in addition to personal enquiries and feedback, it is an effective complementary method for the website operator to collect and analyse data on their habits and the environment in which the services are run using automated methods.

The purpose of data processing: to ensure the proper and high quality operation of the website, to monitor and improve the quality of the services provided by the Data Controller, to identify malicious visitors who attack the website and to measure the number of visits.

The data may be accessed by: the staff responsible for the supervision and maintenance of the Data Controller's IT system and any data processors.

The Data Controller uses the following Data Processor(s) for the specified activities in connection with the processing of personal data:

Method of storage: electronic, but in the event of a data breach, the data involved in the incident may also be stored on paper in accordance with the procedures set out in the Data Controller's Incident Handling Policy.

The Company ensures secure data storage in compliance with the applicable legal regulations, applying the appropriate technical and organisational measures. The data source shall be made

available to the Data Subject by the Company. The Data Controller uses the above-mentioned Data Processor(s) for the specified activities in connection with the processing of personal data.

The Data Subject may request access to their personal data from the Controller, or that the Controller rectify, delete or restrict the processing of personal data relating to them and may object to the processing of such personal data and may have the right to data portability. With regard to personal data processing based on consent, the Data Subject has the right to withdraw their consent at any time. The Data Subject may request in any way, i.e. in person, in writing by post or by electronic mail that the Data Controller cease processing their data. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal. Contact details of the Data Protection Officer: Dr Péter Onder, e-mail address: onder.peter@onder.hu, phone: +36 1 3610600. If the Data Subject believes their rights have been infringed, they may request information from the Data Controller regarding the processing of their personal data and may request correction or, except where processing is required by law, deletion of such data. If the Data Subject does not agree with the Data Controller's measures or notifications, they are entitled to submit a complaint to the National Authority for Data Protection and Freedom of Information, as the supervisory authority (postal address: 1363 Budapest, Pf. 9, address: 1055 Budapest, Falk Miksa utca 9–11., Hungary, tel.: +36 1 391 1400, +36 30 683 5969, +36 30 549 6838, fax: +36 1 391 1410, website: naih.hu, e-mail: ugyfelszolgalat@naih.hu), or seek judicial remedy. Jurisdiction over data protection lawsuits lies with the competent general court. Proceedings may also be initiated – at the Data Subject's discretion – before the general court with jurisdiction over the Data Subject's place of residence or habitual residence.