

FESTIVAL TRAVEL INTERNATIONAL KFT.

PRIVACY NOTICE

for events, customer relations, marketing and online services

1. Purpose and scope of this Notice

Festival Travel International Kft. (hereinafter: “FTI” or the “Controller”) respects the right of individuals to the protection of their personal data. The purpose of this Notice is to explain, in a transparent and easily understandable manner, what personal data FTI processes, for what purposes and on what legal basis, how long it retains such data, to whom it may disclose them, and what rights data subjects have.

This Notice applies in particular to events organised by or with the involvement of FTI, travel projects, customer-service activities, insurance intermediation, prize draws, marketing and newsletter activities, as well as processing carried out on FTI websites and related IT systems.

Where another company - for example, the travel organiser for a particular trip - acts as an independent controller in a project, its role and the specific features of that project are set out in the project-specific appendix to this Notice.

2. Details of the Controller

Item	Details
Name	Festival Travel International Kft.
Registered office	1055 Budapest, Szent István krt. 29. fszt.
Company registration number	01-09-991628
Tax number	24125262-2-41
Representative	Balogh Balázs, Managing Director
Websites	festivaltravel.hu, snowattack.hu, beachattack.hu and project websites operated by FTI
E-mail	info@festivaltravel.hu
Telephone	+36 70 339 6339

3. Definitions

For the purposes of this Notice, the following terms have the meanings set out below:

- **Data Subject:** an identified or identifiable natural person whose personal data are processed by FTI, including in particular a traveller, event participant, enquirer, customer, prize-draw participant or newsletter subscriber.
- **Personal Data:** any information relating to a data subject by which the data subject can be identified, directly or indirectly.

- **Processing:** any operation or set of operations performed on personal data, including in particular collection, recording, organisation, storage, alteration, retrieval, use, disclosure, making available, restriction or erasure.
- **Controller:** the natural or legal person who, alone or jointly with others, determines the purposes and essential means of processing.
- **Processor:** a natural or legal person who processes personal data on behalf of, and in accordance with the instructions of, the Controller.
- **Recipient:** a natural or legal person, public authority, agency or other body to whom personal data are disclosed or otherwise made available.
- **Consent:** a freely given, specific, informed and unambiguous indication of the data subject's wishes by which they agree to the processing of their personal data for a specified purpose.
- **GDPR:** Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation).

4. Principles of data processing

- lawfulness, fairness and transparency;
- purpose limitation: personal data may be processed only for specified and lawful purposes;
- data minimisation: only data necessary for the relevant purpose may be processed;
- accuracy and keeping data up to date;
- storage limitation: data are retained only for as long as necessary;
- integrity and confidentiality: data are protected by appropriate technical and organisational measures.

5. Possible legal bases for processing

The legal basis for each processing activity depends on its specific purpose. FTI may rely in particular on the following legal bases under the GDPR:

Legal basis	Typical example
Article 6(1)(b) GDPR – performance of a contract	ticket/event participation, customer relations, performance of the requested service
Article 6(1)(c) GDPR – compliance with a legal obligation	accounting, tax and regulatory obligations
Article 6(1)(a) GDPR – consent	marketing/newsletters where consent is required; certain uses of photos and video
Article 6(1)(f) GDPR – legitimate interests	handling legal claims, fraud prevention, certain customer-relations and event-security purposes, subject to an appropriate balancing test

6. Processing purposes, categories of data and retention

Purpose	Data processed	Legal basis	Retention
Customer relations and enquiries	name, e-mail, telephone number, message content, related booking ID	performance of a contract / legitimate interests	until the matter is closed; in the event of a legal claim, generally until expiry of the applicable limitation period

Purpose	Data processed	Legal basis	Retention
Event participation and admission	name or booking ID/QR code, entitlement and participation data and, where necessary, contact details	performance of a contract	until the event has ended and, where necessary for a legal claim, for the required period
Administration of in-office payments	booking ID, name, amount paid, receipt/document details	performance of a contract / legal obligation	in accordance with applicable accounting and legal retention obligations
Invoicing and accounting	billing data, name/company name, address, tax-identification details, invoice contents	legal obligation	for the retention period required by accounting legislation
Insurance intermediation	name, date of birth; for one contact per policy, residential address, telephone number and e-mail; details of the trip and selected insurance	performance of a contract / legal obligations applicable to insurance intermediation	for the period required by insurance and insurance-intermediation legislation
Marketing and newsletters	name, e-mail, fact and time of marketing consent and, where applicable, interest data	consent	until consent is withdrawn; evidence of withdrawal may be retained further where necessary to demonstrate compliance
Prize draws	name, contact details, entry/participation data and, for winners, additional data required for fulfilment	consent / contract / legal obligation, depending on the rules of the prize draw	until the prize draw has ended and for as long as necessary for any tax or legal claims
Photo, video and audio recordings at events	image, voice and information about event participation apparent from the recording	legitimate interests and/or consent, depending on the nature of the recording	for as long as necessary for the purpose of use; detailed rules are supplemented by the event participation terms and on-site information
Legal claims and complaints	booking and communication data, complaint, supporting evidence	legitimate interests / legal obligation	until the claim is finally resolved and/or until expiry of the applicable limitation period

7. Marketing and newsletters

Booking a trip, event or other service does not in itself mean that the data subject is automatically added to the Festival Travel / Snowattack marketing or newsletter list. Operational messages required for the booking or performance of the service are kept separate from marketing communications.

Where required by law, FTI requests separate, voluntary consent for electronic marketing communications. Refusing or subsequently withdrawing consent does not affect access to or use of the service.

8. Photo, video and audio recordings at events

At FTI events, including Snowattack events, FTI and photographers, videographers, press representatives and media partners engaged by FTI may make visual and audio recordings. Such recordings may be used in particular on FTI and Snowattack websites and social-media channels, in aftermovies, event reports and marketing materials.

The legal basis may differ between crowd, atmosphere and general event footage and recordings focusing on individually identifiable persons. FTI provides appropriate notice at the event that recordings may be made. Where the legal basis for an individual advertising use requires consent, FTI requests separate consent.

9. Websites and cookies

FTI websites, including in particular festivaltravel.hu, snowattack.hu, beachattack.hu and FTI project websites, may use cookies and similar technologies. Depending on their purpose, these may include necessary, functional, statistical/analytics, and marketing/advertising cookies.

- Strictly necessary cookies enable the website to function.
- Functional cookies may help remember settings and preferences.
- Statistical cookies may help measure and improve website usage.
- Marketing cookies and similar technologies may be used for targeted advertising and campaign measurement.

In accordance with applicable rules, the use of non-essential cookies may be subject to the user's prior choice/consent. Users may change their cookie settings through the consent-management interface available on the website.

10. Processors and recipients

FTI may use service providers and processors in connection with the processing of personal data. Any disclosure is limited in each case to the data necessary for the relevant purpose.

Recipient / category	Role / purpose
Eventure Kft.	technical operation of the booking/CRM system as a processor; it may not use the data for its own purposes
Európai Utazási Biztosító Zrt. (EUB)	insurance services and processing necessary for insurance intermediation
The travel organiser for the relevant project	independent controller for data necessary to conclude and perform the travel contract
Hosting, IT, e-mail and cloud-service providers	technical operation, data storage, communications
Newsletter service provider	technical sending of consent-based marketing communications
Accounting, bookkeeping and invoicing service providers	compliance with legal and accounting obligations
Event-technical, admission and communications contractors	only to the extent necessary to operate the event
Authorities and courts	on the basis of a legal obligation or lawful request

11. International data transfers

If the use of a technical service provider results in personal data being transferred outside the European Economic Area, FTI transfers such data only subject to a transfer mechanism compliant with Chapter V of the GDPR, in particular on the basis of an adequacy decision, appropriate safeguards or another applicable legal basis.

12. Data security

FTI applies appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, disclosure, publication, erasure or destruction, as well as accidental loss or damage. Access is subject to authorisation, employees and contributors are bound by confidentiality obligations, and personal-data breaches are handled and documented in accordance with FTI's internal incident-management procedures.

13. Rights of data subjects

Access: The data subject may request information as to whether FTI processes their personal data and may request a copy of the personal data being processed.

Rectification: The data subject may request correction of inaccurate data and completion of incomplete data.

Erasure: Where the statutory conditions are met, the data subject may request erasure of their personal data.

Restriction: In the cases specified by the GDPR, the data subject may request restriction of processing.

Data portability: For automated processing based on consent or a contract, the data subject may request the personal data they have provided in a structured, commonly used and machine-readable format.

Objection: The data subject may object, on grounds relating to their particular situation, to processing based on legitimate interests; they may object to direct marketing at any time.

Withdrawal of consent: Consent may be withdrawn at any time without giving reasons. Withdrawal does not affect the lawfulness of processing carried out before withdrawal.

Requests may be submitted to info@festivaltravel.hu or by post to FTI's registered office. FTI will respond within the time limits laid down by the GDPR.

14. Remedies and complaints

The data subject has the right to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) and to seek judicial remedy if they consider that the processing of their personal data infringes applicable law.

NAIH contact details	Item
Address	1055 Budapest, Falk Miksa utca 9–11.
Postal address	1363 Budapest, Pf. 9.
E-mail	ugyfelszolgalat@naih.hu
Telephone	+36 (1) 391-1400; +36 (30) 683-5969; +36 (30) 549-6838

NAIH contact details	Item
Website	www.naih.hu

15. Amendments to this Notice

FTI may amend this Notice to reflect changes in legislation, technology or business processes. The version currently in force is available on FTI's website. In the event of a material change, FTI will inform data subjects in a manner appropriate to the circumstances.

PROJECT-SPECIFIC APPENDIX 1

Snowattack Student – KnockOut Travel

A. Parties and data-protection roles

Party	Role
KnockOut Travel d.o.o.	travel organiser of the travel package and independent controller for data required for conclusion, performance and amendment of the travel contract, financial administration, travel complaints and organisation of tourism services
Festival Travel International Kft.	independent controller for purposes relating to the Snowattack event, admission, event communications, photo/video processing, its own marketing and prize draws; in travel matters, it has access to the necessary booking data as a customer-service support provider
Eventure Kft.	processor/system operator; in the Eventure booking and CRM system it processes data solely on the documented instructions of FTI and/or KO and does not use the data for its own purposes
Európai Utazási Biztosító Zrt. (EUB)	recipient/controller of data required to provide the insurance service; FTI assists in arranging the insurance as EUB's tied insurance intermediary

B. Booking data processed in Eventure

In the course of operating the project, the following data may in particular be processed in the Eventure system:

- name; date of birth; telephone number; e-mail address; address/residential-address details;
- room allocation and accommodation-related selections;
- coach travel and travel options;
- ski pass and other selected travel services;
- where necessary, identity-card or passport details;
- payment status, instalment-payment information and booking ID;
- the full contents of the booking and related data required for customer communications.

KO, as travel organiser, has access to the above data to the extent necessary to perform its duties. FTI also has access to the complete booking form, payment status and selected services for the purposes of operating the Snowattack event and carrying out the customer-service tasks specified in the agreement.

C. Disclosure to travel-service providers

The data required to provide accommodation, coach travel, ski passes and other tourism services are disclosed by KnockOut Travel d.o.o., as travel organiser, to its own service providers. Such recipients may include in particular accommodation providers, coach operators, ski-area/ski-pass providers, equipment-rental providers, instruction providers and other tourism service providers involved in performing the package.

D. FTI customer-service support

As the first-line customer-service support provider for the Snowattack Student project, FTI may communicate with travellers by e-mail, telephone and other announced channels. For this purpose, FTI may access the full booking details and payment status. Decisions on material amendments to the travel contract, refunds, compensation, or changes to accommodation, transport, ski passes or any other travel service are made by KnockOut Travel.

E. HUF payments at FTI's office

Where, under the project terms, the traveller makes a payment in HUF by cash or bank card at FTI's office in Hungary, FTI processes only the data required to administer the payment: booking ID, name, amount paid and data required to issue the relevant receipt/document. FTI does not store complete bank-card data.

F. Insurance – EUB

For the Snowattack Student programme, at the traveller's express request, FTI assists in arranging EUB insurance as a tied insurance intermediary of Európai Utazási Biztosító Zrt. FTI may disclose to EUB the data necessary to arrange the insurance, in particular:

- for each insured person: name and date of birth;
- for one contact person per policy: residential address, telephone number and e-mail address;
- details of the trip and the selected insurance.

G. Admission and wristbands

Admission to the Snowattack event is generally based on a booking ID and/or QR code. The wristband is not necessarily linked to a name. The identifier processed in the system is used to verify entitlement, facilitate admission and prevent misuse.

H. Verification of student status

As an eligibility condition for the Snowattack Student programme, the traveller may be required to present a valid student card or other proof of student status at departure. Neither FTI nor KO makes or retains a copy of the card/certificate; the check is carried out solely to verify eligibility on site.

I. Snowattack marketing

Snowattack travellers are not automatically added to a marketing or newsletter list merely because they create a booking or participate in a trip/event. FTI may use a common marketing database for the Snowattack and Festival Travel brands, but the consent required for electronic marketing communications is requested separately and on an optional basis. Consent may be withdrawn at any time.

J. Event photography and video

At Snowattack Student events, FTI and contributors engaged by FTI may make photographic, video and audio recordings. The recordings may be used on Snowattack/FTI websites and social-media channels, in advertisements, aftermovies and other event communications. Advertising uses focusing on individually identifiable persons and the processing of crowd/atmosphere footage may require different legal bases; supplementary on-site information may be provided at the event.

K. Project data-protection structure at a glance

Processing area	Main responsible party
Travel contract, accommodation, coach, ski pass and other travel services	KnockOut Travel d.o.o. – independent controller
Snowattack event and admission	Festival Travel International Kft. – independent controller
Technical operation of the booking/CRM system	Eventure Kft. – processor
Travel customer-service communications	FTI provides support; substantive travel decisions are the responsibility of KO
EUB insurance	FTI assists as a tied insurance intermediary; EUB is the recipient/controller of the insurance data
Marketing/newsletters	FTI – on the basis of separate marketing consent
Photo/video and event communications	FTI – on an appropriate legal basis depending on the nature of the recording