

# SNOWATTACK PRIVACY NOTICE

Consolidated privacy notice for Snowattack events, travel packages and related services

## 1. Purpose and scope of this Privacy Notice

The purpose of this Privacy Notice is to provide transparent information on the processing of personal data in connection with events, travel packages, bookings, customer service processes and related services provided under the Snowattack brand, including the roles of the organisations involved, the categories of personal data processed, the purposes and legal bases of processing, retention periods, data transfers, and the rights of data subjects.

Several independent organisations participate in the Snowattack service model. Their data protection roles are determined not generally, but according to the specific purpose of each processing activity. M Group International Kft. is the primary controller for processing related to the organisation of the event; the controller for travel packages is the tour operator of the relevant project; Festival Travel International Kft. acts as a travel intermediary and first-line customer service provider and is also an independent controller in respect of processing carried out for its own purposes.

All Snowattack bookings are recorded in the Eventure system. As the technical operator of the platform, Eventure Solutions Kft. processes the personal data available to it as a processor, in accordance with the documented instructions of the relevant controller(s). The specific features of each project are detailed in the annexes to this Privacy Notice.

## 2. Parties involved in Snowattack data processing

| Party                                    | Data protection role                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| M Group International Kft.               | Event organiser; independent controller for the event, admission and wristband management, event communications, on-site operations, security, photo/video processing and its own marketing purposes related to the Snowattack event.                                                                                                                                                              |
| Festival Travel International Kft. (FTI) | Travel intermediary and first-line customer service provider. It has access to booking and travel data to the extent necessary to perform its tasks. It is an independent controller in respect of its own insurance intermediation, invoicing, marketing, customer relationship and legal obligations; where it acts solely on the instructions of another controller, it may act as a processor. |
| Tour operator of the relevant project    | Independent controller in respect of entering into, performing and amending the travel package contract, financial administration, complaint handling and the organisation of tourism services.                                                                                                                                                                                                    |
| Eventure Solutions Kft.                  | Technical processor and operator of the shared booking/administration platform. It processes personal data on the documented instructions of the relevant controller(s), without using them for its own purposes.                                                                                                                                                                                  |
| Payment service providers                | Provide the payment solution used for the relevant project. Their own privacy terms apply to the processing of bank card and transaction data; Snowattack participants generally receive only the transaction status and data required for settlement.                                                                                                                                             |

## 3. Identification details of the controllers

| Organisation               | Key details                                                                                                                                                                               |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| M Group International Kft. | Registered office: 2040 Budaörs, Kovács u. 18.   Company registration no.: 13-09-236210   Tax no.: 24123459-2-13   Representative: Balogh Balázs, Managing Director   Email: info@meex.hu |

| Organisation                       | Key details                                                                                                                                                                                                                                        |
|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Festival Travel International Kft. | Registered office: 1055 Budapest, Szent István krt. 29. ground floor   Company registration no.: 01-09-991628   Tax no.: 24125262-2-41   Representative: Balogh Balázs, Managing Director   Email: info@festivaltravel.hu   Phone: +36 70 339 6339 |
| Eventure Solutions Kft.            | Registered office: 2040 Budaörs, Kovács u. 18.   Company registration no.: 13-09-247274   Tax no.: 33055617-2-13   Technical platform: Eventure   Representative: Kenéz László, Managing Director                                                  |

The details of the individual tour operators are set out in the project-specific annexes. Data subjects may also submit data protection requests through the central customer service channel at info@meex.hu; M Group will forward the request to the competent controller where necessary.

#### 4. Definitions

- Data subject: an identified or identifiable natural person, in particular a traveller, event participant, interested person, purchaser, contact person, 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.
- Controller: the person or entity that determines, alone or jointly with others, the purposes and essential means of the processing.
- Processor: the person or entity that processes personal data on behalf of and on the instructions of the controller.
- Recipient: a person or entity to whom personal data are disclosed or made available.
- GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council.

#### 5. Data processing principles and legal bases

Personal data are processed in accordance with, in particular, the principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality.

| Legal basis                                      | Typical scope of application                                                                                                                                                                 |
|--------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Article 6(1)(b) GDPR - performance of a contract | booking, travel package, event participation, ticket/wristband, travel intermediation, contractual customer service administration                                                           |
| Article 6(1)(c) GDPR - legal obligation          | accounting, taxation, consumer protection and regulatory obligations, records required by law                                                                                                |
| Article 6(1)(a) GDPR - consent                   | newsletter and marketing where consent is required; individual advertising use of photographs/video; processing of special categories of data where no other appropriate legal basis applies |
| Article 6(1)(f) GDPR - legitimate interests      | legal claims, abuse and fraud prevention, system security, certain event security and customer relationship purposes subject to an appropriate balancing test                                |

#### 6. Purposes of processing, categories of data and retention

| Purpose                                               | Data processed                                                                                                                                                      | Main controller / legal basis                         | Retention                                                                                 |
|-------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|-------------------------------------------------------------------------------------------|
| Booking and travel package                            | name, date of birth, contact details, address details, travel and accommodation choices, booking ID, payment status and, where necessary, identity document details | relevant tour operator; performance of a contract     | for a period aligned with contractual and legal obligations                               |
| Travel intermediation and first-line customer service | booking data, contact details, communications, payment status, selected services                                                                                    | FTI; performance of a contract / legitimate interests | until the matter is closed; in the event of a legal claim, until expiry of the limitation |

| Purpose                     | Data processed                                                                                                          | Main controller / legal basis                                                                               | Retention                                                                             |
|-----------------------------|-------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
|                             |                                                                                                                         |                                                                                                             | period                                                                                |
| Event, admission, wristband | name or booking ID/QR code, entitlement, participation data and, where necessary, contact details                       | M Group; performance of a contract / legitimate interests                                                   | until the event is closed; where required for a legal claim, for the necessary period |
| Online payment              | booking ID, amount due/paid, transaction ID and status; full card details are processed by the payment service provider | tour operator and payment service provider; performance of a contract and/or the provider's own legal basis | in accordance with settlement, accounting and legal deadlines                         |
| Invoicing, accounting       | name/company name, address, tax identification details, invoice contents                                                | invoice issuer; legal obligation                                                                            | in accordance with accounting legislation                                             |
| Insurance intermediation    | insured person's name, date of birth, contact details, travel and insurance data                                        | FTI and insurer according to their respective roles                                                         | in accordance with insurance/intermediary legislation                                 |
| Marketing, newsletter       | name, email, fact/time of consent, interest data                                                                        | relevant marketing sender; consent or another appropriate legal basis                                       | until consent is withdrawn and/or for the period necessary to demonstrate lawfulness  |
| Photo, video, audio         | image, voice, information resulting from event participation                                                            | M Group; legitimate interests and/or consent depending on the nature of the recording                       | for the period necessary for the purpose of use                                       |
| Complaint and legal claim   | booking, communication, complaint and evidence data                                                                     | controller competent in the matter; legitimate interests / legal obligation                                 | until final closure and/or expiry of the limitation period                            |

## 7. Eventure - shared booking and administration platform

All Snowattack bookings are processed through the Eventure system. The system is the common technical interface for event, travel, payment and customer service processes related to the individual projects. Eventure Solutions Kft. does not use personal data for its own Snowattack-related purposes, but processes them in accordance with the documented instructions of the controller responsible for the relevant process.

The Eventure system may process, in particular, name, date of birth, email address, telephone number, address details, room allocation, travel option, ski pass and other selected services, booking ID, payment status, refund/cancellation status, data required for customer communication and, where justified, identity document details.

Access rights must be configured on a role-based basis and in accordance with the principle of least privilege. M Group, FTI and the relevant tour operator may access only the data necessary for the performance of their respective tasks. Access rights that are no longer required must be terminated after the project has ended.

## 8. Travel intermediation and first-line customer service

As the first-line customer service provider for Snowattack projects, FTI communicates with travellers and participants by email, telephone and other announced channels. For this purpose, it may access the contents of the booking, payment status, selected services and communication data necessary to handle the enquiry.

Any material amendment to the travel contract, cancellation, refund, compensation, or modification of accommodation, transport, ski pass or other tourism services is decided by the relevant tour operator. In such cases, FTI may forward the data necessary for the decision to the tour operator and communicate the tour operator's decision to the traveller.

In event-related matters, FTI may also provide first-line customer service on behalf of M Group. Where FTI acts solely on the documented instructions of M Group in a particular matter, it acts as a processor in relation to the relevant processing; its processing for its own purposes remains separate.

## 9. Event participation, admission and wristbands

M Group International Kft. is the controller for admission, wristband management, event communications and on-site organisation related to Snowattack events. Admission may take place using a booking ID and/or QR code. The identifier is processed to verify participation entitlement, provide admission, manage access zones and prevent misuse.

M Group may access booking data from the Eventure system to the extent necessary for the operational delivery of the event. M Group does not receive unrestricted access to data required for the performance of the travel package where those data are not necessary for event-related purposes.

## 10. Processing related to payments

Online payment for the travel package is made through the payment channel of the tour operator for the relevant project. SimplePay is used for Ski Opening, Stripe for International and Monri WSPay for Student. Payment service providers process the data required for payment transactions in accordance with their own privacy and security terms.

As a general rule, M Group, FTI and the Eventure system do not access or store full bank card details where card data are processed directly by the payment service provider. The booking system may display the fact, status and amount of the payment and the transaction identifier.

## 11. Insurance intermediation

At the traveller's express request, FTI may act as an insurance intermediary in arranging travel insurance or insurance related to a ticket. FTI forwards the data necessary for taking out the insurance to the insurer. The insurer is an independent controller in respect of its own insurance services.

## 12. Marketing and newsletters

Booking a travel package, ticket or Snowattack event does not in itself constitute consent to marketing. Operational communications necessary for the booking, travel or event are separate from marketing communications.

M Group may conduct marketing activities related to the Snowattack event brand, and FTI may conduct marketing activities related to its own Festival Travel and intermediary services, on an appropriate legal basis. Where consent is required for electronic direct marketing, it must be requested separately and on an optional basis. Consent may be withdrawn at any time.

The tour operator may use data obtained through a Snowattack booking for its own marketing purposes beyond the performance of the travel contract only where it has an independent appropriate legal basis and, where required, separate consent.

## 13. Photographs, video and audio recordings

At Snowattack events, M Group and photographers, videographers, press and media partners appointed by it may make photographs, video and audio recordings. Such recordings may be used in particular on Snowattack websites and social media channels, in event reports, aftermovies and marketing materials.

The legal basis may differ for crowd, atmosphere and general event recordings and for advertising recordings featuring individually highlighted persons. M Group is responsible for providing the necessary prior and on-site information and, where required, obtaining separate consent.

## 14. Websites and cookies

snowattack.hu and the related booking/sales interfaces may use cookies and similar technologies. These may include strictly necessary, functional, statistical/analytics, marketing and advertising cookies. In accordance with the applicable rules, the use of non-essential cookies may be subject to the user's prior choice or consent. Cookie settings can be changed through the consent management interface available on the website.

## 15. Processors and recipients

| Recipient / category    | Role / purpose                                                                                                                                                 |
|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Eventure Solutions Kft. | operation of the Eventure booking, administration, ticketing and admission technical platform as a processor on the instructions of the relevant controller(s) |
| Project tour operator   | independent controller in respect of the travel contract and tourism services                                                                                  |

| Recipient / category                                                                                                                   | Role / purpose                                                                                               |
|----------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| SimplePay / Stripe / Monri WSPay                                                                                                       | processing online payment transactions for the relevant project; the provider's own privacy terms also apply |
| Európai Utazási Biztosító Zrt. or another insurer                                                                                      | provision of insurance services and processing necessary for insurance intermediation                        |
| Accommodation providers, passenger transport providers, ski area/ski pass providers, rental providers, instructors, transfer providers | recipients of data necessary for the performance of travel services, based on transfers by the tour operator |
| Hosting, IT, email and cloud service providers                                                                                         | technical operation, data storage, communications                                                            |
| Newsletter and communications service providers                                                                                        | technical delivery of marketing or operational communications on the appropriate legal basis                 |
| Authorities, courts, legal and accounting service providers                                                                            | legal obligations, legal claims and official proceedings                                                     |

## 16. International data transfers

Where a service provider or other contributor processes personal data outside the European Economic Area, the transfer may take place only subject to appropriate safeguards under Chapter V of the GDPR, including in particular an adequacy decision, standard contractual clauses or another lawful transfer mechanism.

## 17. Data security and access management

- Only persons who genuinely require access to the data for the performance of their own duties may access them.
- Where possible, system access must be assigned to named users, on a role-based basis and in accordance with the principle of least privilege.
- Access rights that are no longer required must be terminated after the project has ended or the relevant task has ceased.
- Controllers and processors protect personal data against unauthorised access, alteration, disclosure, deletion or destruction by implementing appropriate technical and organisational measures.
- If a participating organisation becomes aware of a personal data breach that also affects project data processed by another participant or used jointly, it will inform the affected organisations without undue delay.

## 18. Rights of data subjects

Subject to the conditions of the GDPR, data subjects may request access to, rectification or erasure of their personal data or restriction of processing; object to processing based on legitimate interests; withdraw consent at any time; and, where the applicable conditions are met, exercise the right to data portability.

Requests may also be submitted to [info@festivaltravel.hu](mailto:info@festivaltravel.hu). If the matter does not concern FTI's own processing, FTI will forward the request to the appropriate controller. Data subjects may also contact M Group or the relevant tour operator directly.

## 19. Remedies

Data subjects have the right to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) and to bring proceedings before a court if they consider that the processing of their personal data infringes applicable law.

| NAIH contact   | Details                                                              |
|----------------|----------------------------------------------------------------------|
| Address        | 1055 Budapest, Falk Miksa utca 9-11.                                 |
| Postal address | 1363 Budapest, P.O. Box 9.                                           |
| Email          | <a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a> |

| NAIH contact | Details          |
|--------------|------------------|
| Phone        | +36 (1) 391-1400 |
| Website      | www.naih.hu      |

## 20. Amendments to this Privacy Notice

The controllers may amend this Privacy Notice to reflect changes in legal, technical, contractual or business processes. The version in force at any given time is available on the relevant Snowattack and/or Festival Travel online interfaces. In the event of a material change, data subjects will be informed in a manner appropriate to the circumstances.

# 1. PROJECT-SPECIFIC ANNEX

## Snowattack Ski Opening 2026 - Alpesi Club / GONZA Kft.

### A. Parties and controller roles

| Party                              | Role                                                                                                                                                                                                                                                     |
|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| M Group International Kft.         | organiser of the Snowattack Murau event and independent controller in respect of the event, admission/wristband management, event communications, on-site operations and photo/video processing                                                          |
| GONZA Kft. / Alpesi Club           | tour operator of the travel package and independent controller. Registered office: 1122 Budapest, Krisztina krt. 3.; company registration no.: 01-09-708925; tax no.: 12898923-2-43; travel agency registration no.: U-000533; email: info@alpesiclub.hu |
| Festival Travel International Kft. | travel intermediary and first-line customer service provider; independent controller for its own insurance intermediation, marketing and other processing for its own purposes                                                                           |
| Eventure Solutions Kft.            | processor operating the technical platform handling all bookings, on the instructions of the relevant controller(s)                                                                                                                                      |
| SimplePay                          | online payment solution used by Alpesi Club/GONZA Kft.; processes data related to the payment transaction in accordance with its own privacy terms                                                                                                       |

### B. Booking data processed in Eventure

Bookings for the Murau project are recorded in the Eventure system. GONZA Kft. has access to the data necessary for the performance of the travel contract and tourism services, FTI to the data necessary for its intermediary and first-line customer service tasks, and M Group to the data necessary for the delivery of the Snowattack event.

### C. Processing related to payments - SimplePay

Online payment for the Murau travel package is made through the payment channel of GONZA Kft./Alpesi Club using SimplePay. GONZA Kft. is the primary travel-related controller for data connected with payment transactions, invoicing, accounting, refunds and chargebacks. FTI may access the payment status for customer service purposes but does not process full bank card details.

### D. Transfers to travel service providers

GONZA Kft., as tour operator, forwards the personal data necessary for the provision of accommodation, coach travel, ski passes, transfers and other tourism services to its own service providers, limited to the data required for performance.

### E. FTI customer service involvement

FTI is the first-line customer service provider and travel intermediary for the Murau project. GONZA Kft. decides on material amendments to the travel contract, refunds, compensation or modifications to travel services. M Group handles matters relating to the event programme, admission and on-site event organisation.

### F. Snowattack event, admission and photo/video

M Group International Kft. is the controller for admission, wristband management, event communications, on-site organisation and event photo/video processing related to the Murau Snowattack event.

## 2. PROJECT-SPECIFIC ANNEX

### Snowattack International 2027 - TravelLines / SkiLines

#### A. Parties and controller roles

| Party                                  | Role                                                                                                                                                                                                             |
|----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| M Group International Kft.             | organiser of the Snowattack International event and independent controller in respect of the event, admission/wristband management, event communications, on-site operations and photo/video processing          |
| TRAVELINES Szolgáltató Kft. / SkiLines | tour operator of the travel package and independent controller in respect of the travel contract, financial administration, complaints and tourism services; registration no.: U-000865; email: info@skilines.hu |
| Festival Travel International Kft.     | travel intermediary and first-line customer service provider; independent controller for its own insurance intermediation, marketing and other processing for its own purposes                                   |
| Eventure Solutions Kft.                | processor operating the technical platform handling all bookings, on the instructions of the relevant controller(s)                                                                                              |
| Stripe                                 | online payment solution used by TravelLines; processes data related to the payment transaction in accordance with its own privacy terms                                                                          |

#### B. Booking data processed in Eventure

Bookings for the International project are recorded in the Eventure system. TravelLines has access to the data necessary for the performance of the travel contract and tourism services, FTI to the data necessary for its intermediary and first-line customer service tasks, and M Group to the data necessary for the delivery of the Snowattack International event.

#### C. Transfers to travel service providers

TravelLines, as tour operator, forwards the personal data necessary for the provision of accommodation, coach travel, ski passes, transfers, rental, instruction and other tourism services to its own service providers.

#### D. FTI customer service and intermediary role

FTI is the first-line customer service provider and travel intermediary for Snowattack International. TravelLines decides on material amendments to the travel contract, refunds, compensation, or modifications to accommodation, transport, ski passes or other travel services. FTI may forward data necessary to prepare the decision and may communicate the tour operator's decision to the traveller.

#### E. Online payment - Stripe

Online payment for the International travel package is made through the TravelLines payment channel using Stripe. M Group, FTI and Eventure do not store full bank card details; the booking system may display the transaction status, amount and the identifier required for settlement.

#### F. Snowattack event, admission and wristbands

M Group International Kft. is the controller for admission, wristband management, event communications and on-site organisation related to the Snowattack International event. Admission may take place using a booking ID and/or QR code.

#### G. Event photography and video

M Group is the controller for photographs, video and audio recordings made at the Snowattack International event. The recordings may be used on Snowattack platforms and in event communications in compliance with the applicable legal basis and information requirements.

### 3. PROJECT-SPECIFIC ANNEX

#### Snowattack Student 2027 - KnockOut Travel

##### A. Parties and controller roles

| Party                              | Role                                                                                                                                                                                                                                                                        |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| M Group International Kft.         | organiser of the Snowattack Student event and independent controller in respect of the event, admission/wristband management, event communications, on-site operations and photo/video processing                                                                           |
| KnockOut Travel d.o.o.             | tour operator of the travel package and independent controller in respect of the travel contract, financial administration, complaints and tourism services; registered office: Slavka Cindrića 5b, 51000 Rijeka, Croatia; OIB: 39168820667; email: info@knockout-travel.hr |
| Festival Travel International Kft. | travel intermediary and first-line customer service provider; independent controller for its own insurance intermediation, marketing and other processing for its own purposes                                                                                              |
| Eventure Solutions Kft.            | processor operating the technical platform handling all bookings, on the instructions of the relevant controller(s)                                                                                                                                                         |
| Monri WSPay                        | online payment system used by KnockOut Travel; processes the data necessary for payment transactions in accordance with its own terms                                                                                                                                       |

##### B. Booking data and access rights

The entire booking process for the Student project runs through the Eventure system. KnockOut Travel has access to booking data necessary for the performance of the travel contract, FTI to the data necessary for its travel intermediary and customer service tasks, and M Group to the data necessary for the delivery of the event. Data access is purpose-limited and role-based in all cases.

##### C. Transfers to travel service providers

KnockOut Travel, as tour operator, forwards the data necessary for the provision of accommodation, coach travel, ski passes, equipment rental, instruction and other tourism services to its own service providers, limited to the data required for performance.

##### D. FTI customer service involvement

FTI is the first-line customer service provider for the Student project. KnockOut Travel decides on material amendments to the travel contract, refunds, compensation or modifications to travel services. M Group is responsible for event-side decision-making matters.

##### E. Online card payment - Monri WSPay

In the Student project, online card payments are made through the KnockOut Travel payment channel using Monri WSPay. Eventure does not store full bank card details; the booking system may display the payment status and transaction information required for settlement.

##### F. Admission, wristbands and student eligibility

M Group is the controller for admission and wristband management at the Snowattack Student event. Where eligibility for the Student programme requires proof of student status, such proof may be used solely to verify eligibility; a copy may be retained only where there is a separate legal basis.

##### G. Event photography and video

M Group is the controller for photographs, video and audio recordings at the Student event. Advertising use featuring individually highlighted persons and the processing of crowd/atmosphere recordings may require different legal bases.