

DATA PROCESSING STATEMENT
**in respect of processed customer data of Festival Travel International Ltd.,
Meex International Ltd., PlayIT Entertainment Ltd. And Efott Ltd.**

1. Introductory provisions

- 1.1 The purpose of this statement is to inform the scope of data processed of Concerned people, and the rights of Concerned people.
- 1.2 A principle of data processing is to ensure the appropriate protection of personal data according to the effective legislation.
- 1.3 The Controller takes responsibility that, with regards to data processing and records, they
- ensure data security,
 - ensures the protection of the private sphere of Concerned people,
 - protects data from unauthorized access, modification, forwarding, publishing, deletion, or elimination,
 - provide the appropriate technical and IT conditions.

2. Controller, Data Processors

2.1 Controller

Controllers as per this policy:

Controller 1:	
Name:	Festival Travel International Kft.
Registered address:	1055 Budapest, Szent István krt. 29.fsz.
Company registration number:	01-09-991628
Tax number:	24125262-2-41
Executive:	Balogh Balázs
Website:	festivaltravel.hu, snowattack.hu, beachattack.hu
Email address:	info@festivaltravel.hu
Phone number:	+36 70 339 6339
Controller 2:	
Name:	MEEX International Kft.
Registered address:	1095. Budapest, Soroksári út 48.
Company registration number:	01-09-986757
Tax number:	23963348-2-43
Executive:	Balogh Balázs
Website:	budapestcomiccon.hu, mineshow.hu
Email address:	event@meex.hu
Phone number:	+36 70 339 6339
Controller 3:	
Name:	PlayIT Entertainment Kft.

Registered address:	1135 Budapest, Szegedi út 37-39.
Company registration number:	01-09-415022
Tax number:	32264915-2-41
Executive:	Csanda Gergely
Website:	playit.hu
Email address:	info@playit.hu
Phone number:	+36 70 935 3535
Controller 4:	
Name:	EFOTT Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság
Registered address:	1095 Budapest, Soroksári út 48. 10-es épület, 1. emelet
Company registration number:	01 09 901812
Tax number:	14391738241
Executive:	Dr. Lasztovicza Gábor
Website:	efott.hu
Email address:	Info@efott.hu
Phone number:	+36 30 130 0324

2.2 Data Processor

The list of Data Processors in a partnership with the Parties as Joint Controllers, as well as the Data Processors related to the Concerned Person, considering the legitimate interest of the Data Processor, is only emailed to the Concerned Person on their explicit request:

- The websites are hosted by Contabo GmbH, Aschauer Straße 32a, 81549 Munich, Germany.
- The websites are developed by László Kenéz ev. (2518 Leányvár, Panoráma utca 54, tax number: 67653492-1-28).
- The accounting, payroll and invoicing tasks are carried out by Fabo-Markt Kft. (headquarters: 1097 Budapest, Vaskapu u 1. E. building 2. fszt. 2.), Foltnet Kft. (headquarters: 1105 Budapest, Román u. 2. I. floor 4.) and KBOSS.hu Kft. (head office: 1031 Budapest, Záhony utca 7), RLB-60 Bt. (head office: Hatvan, Balassi Bálint út 40, 3000), Számlaközpont Zrt. (head office: 7623 Pécs, Nagyváradi utca 15. fszt. 1) and Sziget Kulturális Menedzser Iroda Zrt. (Budapest Hajógyári sziget Hrsz: 23796/58, 1033).
- The European Travel Insurance Company Ltd. (registered office: 1132 Budapest, Váci út 36-38.) is responsible for the management of the insurance of the persons concerned.
- The sending of newsletters is carried out by BITHUSZÁROK B.V. (BITHUSZÁROK B.V., registered office: 2051 Biatorbágy, Damjanich utca 8.) via the Listmaster online circular sending system.
- To store all personal data, we use the services of Netpositive Kft. (2021 Tahitótfalu, Pataksor u 48.; company registration number:13 09 104997; tax number:12643565-2-13).
- The mailing and hosting services are provided by Microsoft Corporation (Redmond - Washington State, USA).

3. **The purpose and legal basis of personal data processing, the scope of personal data**

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- 3.1 The Controller processes the personal data of the Concerned person associated with them in order to fulfill their contractual obligations.

The Concerned Person must provide their personal data to the Controller in order to create a contractual relationship. Failure to provide personal data means an obstruction of fulfilling the contractual obligations.

The Controller also processes the personal data of the concerned person based on the consent as per the information provided in advance.

- 3.2 The scope of data processed of concerned people:

The Parties process following the personal data of the customers (concerned people) contacting them during the performance of their entertainment, recreational, marketing, event, prize competition, and travel planning activities:

- last name
- first name
- date of birth,
- phone number,
- email address
- post code
- gender
- education ID number

- 3.3 Purpose of data processing:

- fulfillment of contractual obligations
- issuing invoice
- newsletter subscription
- prize competitions
- marketing activities
- sending information regarding activities and products

- 3.4 Duration of data processing:

- from the service provision,
- until the fulfillment of the contractual obligations, and issuing the invoice,
- as long as the invoices are kept as per the Accounting Law
- until the consent is revoked

4. Rights of the Concerned Person:

- 4.1 To get to know the data processed of them.

- 4.2 Request information on:

- the purpose of data processing,
- who the Controller shares their personal data with, e.g. which of their data are forwarded to the National Tax and Customs Administration

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- how long the Controller is keeping their data in the system.

The Controller may not refuse executing the request to exercise the rights of a Concerned Person unless it can be proven that there is no way of identifying the Concerned Person. For further copies requested by the Concerned Person, the Controller may charge a rational fee based on administrative costs.

4.3 Request the correction and completion of their inaccurate or incomplete data.

The Concerned Person may request the completion of their data via a completion statement.

4.4 Request the deletion of the data processed of them.

The Controller is obligated to immediately delete all data that:

- is not needed in the future,
- they processed with the consent of the Concerned Person, which consent has been revoked,
- they processed illegally. Every data processing is considered illegal if the Controller did not carry it out in order to fulfill their contractual and accounting obligations, and if they are not obligated by law to do so.

The Controller must inform everyone previously involved in utilizing the personal data of the data deletion as best they can.

Deletion cannot be carried out even if it is requested by the Concerned Person if

- the data processing is based on legal obligations,
- its purpose is based on public interests related to public health, or is necessary because of
- scientific,
- historic research,
- statistics,
- archiving of public interest, and
- to fulfill legal demands (e.g. child support, employment lawsuits).

4.5 The Concerned Person may turn to the Controller with complaints in case of infringements related to their processed data.

As part of this, they may request the Controller to

- inform them how they processed the personal data,
- correct the personal data,
- delete or lock the personal data (except for mandatory data processing).

4.6 They have a right to restrict the utilization of their personal data:

- in respect of inaccurate data until the correction or completion is done,
- if they do not consent to the deletion of their data, but data processing is unlawful,
- if they need their personal data independently of the Controller in order to submit or realize a legal demand, or to protect their rights.

4.7 The Controller informs everyone they had the obligation to share the personal

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data with of the correction, deletion, or restriction of the Concerned Person's processed data.

- 4.8 They have a right to receive the personal data recorded in a readable format in order to forward them to another data processor, e.g. new controllers or accountants preparing declarations of income.

5 Data publishing right of Controller

The Controller may forward the personal data of the Concerned People to an appointed external company, accounting office, tax administration, law firms, following this prior notification to the Concerned People.

6 Data forwarding right of Controller

The Controller does not wish to forward the data of the Concerned People (to third countries, international organizations).

7 The right of legal remediation of the Concerned Person

If the Controller does not fulfill their obligation in respect of any of the demands of the Concerned Person stated above, the Concerned Person may turn to the National Authority for Data Protection and Freedom of Information (registered address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C, phone number: +36 (1) 391-1400, fax: +36 (1) 394-1410, email address: ugyfelszolgalat@naih.hu) with their complaints or demands of legal remediation, and they also have the right to turn to the court based on the location of the decision-making.

Effective as of: 1st of October, 2024.