

**The
Data Processing Notice
of Fesztiválakadémia Nonprofit Kft.**

1. THE DATA CONTROLLER

Fesztiválakadémia Nonprofit Kft. set the goal of providing a key role to the protection of the personal data of the private persons who come in contact with the company in course of the provision of its services. Fesztiválakadémia Nonprofit Kft. considers honouring the right to informational self-determination of its partner especially important. It treats the personal data confidentially, and it takes all security, technical and organizational measures which guarantee the security of the data.

In course of drafting the provisions of the present Notice, Fesztiválakadémia Nonprofit Kft. took into consideration - in particular - the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council ("General Data Protection Regulation" or "GDPR"), Act CXII of 2011 on the Right to Informational Self-determination and the Freedom of Information ("Privacy Act"), Act V of 2013 on the Civil Code ("Civil Code"), and Act XLVIII of 2008 on the Essential Conditions of and Certain Limitations to Business Advertising Activity ("Business Advertising Act").

Fesztiválakadémia Nonprofit Kft. - as data controller and data processor - honours the private spheres of all persons who provide personal data to it, and Fesztiválakadémia Nonprofit Kft. is committed to protect such personal data.

The purpose of the present data processing notice is to inform the private persons concerned about the processing of their personal data in plain language and briefly.

The present Notice is related to the data processing of the <https://www.fesztivalakademia.hu/> website.

The data of the data controller:

Name: Fesztiválakadémia Nonprofit Kft.

Registered seat: H-1061 Budapest, Király utca 50. Fsz. 3.

Tax number: 25416921-1-42

Company registration number: 01 09 273907

Represented by: KOKAS Katalin, managing director, independently
KELEMEN Barnabás, managing director, independently

Telephone number: +36 70 4177481

E-mail address:..... festivalacameybp@gmail.com

website:..... www.fesztivalakademia.hu

The data controller does not employ a data protection officer, it is not obliged to do so.

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The data controller reserves the right to modify the notice at any time, however, the data controller agrees to publish and disclose such modifications.

2. SCOPE OF DATA AFFECTED BY THE DATA PROCESSING

On the website, the data controller stores

- personal data provided voluntarily or based on consent, or
- personal data which are necessary to comply with legal obligations or
- perform contract,

the purpose of which data processing is the registration of the participation in the Ilona Fehér International Violin Competition, the publication of the data, provision and documentation related to the series of competition.

Types of personal data:

- name
- place and date of birth
- home address
- citizenship
- sex
- telephone number
- e-mail address
- image

2. DATA PROCESSOR

The data processor may execute exclusively those instructions which had been established in writing.

It is mandatory to conclude a written contract between the data controller and the data processor, which contract shall include the data provided by the data controller to the data processor, as well as the activity of the data processor carried out with such data.

The employees engaged in the processing of the personal data shall be bound by confidentiality.

In order to guarantee data security, the data processor shall execute the organizational and technical measures.

The data processor shall help the data controller in fulfilling its obligations.

Subject to the decision of the data controller, the data processor shall return all personal data to the data controller or shall erase the personal data and erase the existing copy, unless the storage of the data is stipulated by Member State or European Union law.

The data processor shall facilitate and enable the audits and on-site inspections to be conducted by the data controller or with the help of the auditor entrusted by the data controller.

If the data processor uses the help of any additional data processor, then such additional data processor shall be bound by the same obligations as those which had originally been established between the data processor and the data controller by virtue of the contract.

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The following are considered as Data Processor in respect of the data processed by Fesztiválakadémia Nonprofit Kft.:

- due to the invoicing obligation arising from the payment of the entry fee: CSORBA Andrea and JASKÓ Judit - for the purpose of accounting services.
- due to the management of the website: FELFÖLDI László - for the purpose of IT services.

3. DATA TRANSFER TO ABROAD

Fesztiválakadémia Nonprofit Kft. pays special attention to that the data protection rights of the data subjects are not prejudiced in case of data transfers within or beyond the EEA region, and that the level of protection remains the same.

If data transfer is required due to the use of any internet service provider (google, etc.), then Fesztiválakadémia Nonprofit Kft. will transfer personal data beyond the EEA region only if the third country is able to ensure proper level of protection, which ability shall be established by the European Commission, and if the country concerned is on the list of countries considered safe by the Commission.

In the USA, in the case of data transfer the recipient Company shall agree to comply with the Privacy Shield agreement, or if it fails to ensure such obligation, then the parties shall apply the terms and conditions specified in the data protection contract approved by the European Commission.

To any non-EEA country which is not included in the list of countries considered safe by the Commission, or if the above guarantee applicable to the USA, then Fesztiválakadémia Nonprofit Kft. will transfer data exclusively if the correspondence or the data transfer is a condition of fulfilment of the contract concluded with the partner of the country concerned.

4. PROCESSING OF THE PERSONAL DATA OF PEOPLE BELOW THE AGE OF 16

Fesztiválakadémia Nonprofit Kft. will process the personal data of people below the age of 16 if any person below the age of 16 registers as contributor for the series of competition through his/her legal representative. Fesztiválakadémia Nonprofit Kft. will process the data of people below the age of 16 exclusively to the extent necessary as well, with that their personal data will be protected by Fesztiválakadémia Nonprofit Kft. stronger than it is specified by the regulations of the GDPR, therefore in all cases Fesztiválakadémia Nonprofit Kft. will obtain the statement of consent of the person exercising the parental rights related to the child below the age of 16 as well.

Fesztiválakadémia Nonprofit Kft. will make all reasonable efforts to verify whether the consent was given or authorized by the person who actually exercises the parental rights related to the child.

In course of the information provided in order to request the consent, Fesztiválakadémia Nonprofit Kft. will aim especially at providing the information in a concise, transparent, intelligible and easily accessible form, using clear and plain language, in the event the recipient of the information is a child.

5. THE SCOPE OF PERSONS AUTHORIZED TO ACCESS THE PERSONAL DATA:

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The personal data may be accessed by those co-workers who have employment or personal service relationship with Fesztiválakadémia Nonprofit Kft. as data controller and for whom accessing and processing the data are essential to fulfil their tasks. In addition, the data processors under contract with data controller Fesztiválakadémia Nonprofit Kft. are authorized to access the data in respect of the data explicitly specified in their contract, in the interest of the purpose of the data processing and for a specific duration, with stipulating confidentiality obligation. In course of requesting the personal data, the separate voluntary consent of the data subject is requested on the online data request site, in order allow the following of his/her personal data to be published:

-Name, place and date of birth, the CV data related to education and qualifications, image.

6. THE PURPOSE, LEGAL BASIS AND DURATION OF THE DATA PROCESSING

The legal bases of the data processing:

Article 6(1) a) GDPR: consent of the data subject

Article 6(1) b) GDPR: necessary for the performance of a contract

Article 6(1) c) GDPR: necessary for compliance with a legal obligation

Article 6(1) f) GDPR: legitimate interests, balance of interests is required in all cases

Data processing purposes:

- **The purpose of our data processing occurring in course of invoicing** is the issuance of the accounting certificate related to the registration fee transaction and retention of such certificates for the duration specified by the laws, the performance of legal obligation. The data processed: family name and given name, the billing address provided for the issuance of the invoice, the number, date and time of the transaction, the number of the certificate.

Due to legal obligations, we will retain the invoices for at least 8 years. The retention period of the documents supporting the issuance of the invoices is 8 years. Legal basis: Article 6(1) c) GDPR

- **The purpose of our data processing occurring in course of the application for the competition** is concluding contracts with the applicants, ensuring the applicants' participation in the competition. The data processed: family name and given name, birth data, home address, education and qualification data, image, all the data which the applicant had provided to us in his/her introduction material.

If we reject the application, then we will process the data until the withdrawal of the data subject's consent, but until no later than the conclusion of the competition. Legal basis Article 6(1) a) GDPR:

If we accept the application of the participant and we conclude a contract with him/her, then we process the data related to the fulfilment of the contract for the 5-year limitation period specified by the Civil Code. Legal basis: Article 6(1) b) GDPR

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H-1061 Budapest, Király street 50. fszt. 3. • festivalacademy.org

- **In order to manage our website**, we process the IP address of the visitor and the cookies and retain those for the duration of the session in order to protect the data of the website of the data controller and the data of the users of the website, as well as in order to operate the website efficiently, or to provide web-based services and functions. The present Notice is available on the website. Legal basis: Article 6(1) f) GDPR and Article 6(1) a) GDPR.

Other data processing

The data controller will provide information about any data processing not specified in the present notice and will obtain the necessary consent before the commencement of the data processing operation.

7. COOKIE POLICY

We use cookies on our website. We cannot and do not want to identify the visitor personally based on the information stored in the cookies, we use them merely to know whether the visitor had already been to our website previously. You may dismiss these cookies through the settings of the browser, however, in this case you might not be able to use all services of our website.

7.a. What are cookies?

Any given website stores small text files on the computer, mobile phone or tablet when you visit the site. With the help of these, for example, you may have a username remembered for a certain period, so you do not have to enter it again every time. The condition of the functioning of several similar convenience services is that you allow the use of cookies. We do not sell the cookies or your data collected with the use of the cookies to any third party, and we do not use those for identification.

7.b. For what do we use cookies?

Our website keeps records of the following with the help of cookies:

- the display settings, e.g. the font size settings
- the type and version of the browser, the operating system, the referring URL address (the previously visited web site), the IP address of the computer used for the access, as well as the date and time of the visit
- whether you granted consent to that cookies be used by our website
- the patterns of visits and user behaviour, which allows us to improve our website and services.

We record these data exclusively for internal and statistical services.

Our website may use the following cookies:

Temporary cookies which are strictly necessary for functioning: these items of temporary information are stored in the cookie file only until the end of the browsing. These are essential to the proper functioning of certain functions related to our website.

Cookies designated to improve user experience: they collect information on the website use of the user, e.g. which sites the user visits the most frequently, or which error messages the user receives from the website. These cookies do not collect information identifying the visitor, i.e. they work with completely general, anonymous information. We use the data

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gained from these to improve the performance of the website. The lifespan of this type of cookies is restricted to the duration of the session.

7.c. Cookies received from third parties:

– Google Analytics _utma; _utmb; _utmv; _utmz; _utmz: These cookies collect anonymous data on how visitors use our website, and we can improve usability based on such data. It is not possible to identify the person of the User. Further information:

www.google.hu/intl/hu/policies/privacy/

– Facebook.com datr; lsd; reg_ext_ref; reg_fb_gate; reg_fb_ref; wd: You may share the content of our website with your friends on the Facebook social media site. This service may leave cookies on your computer over which we do not have control. With the use of the Facebook remarketing code, Data Controller may display various promotions to the user. It is not possible to identify the person of the User.

– accounts.google.com

GALX; GAPS; GoogleAccountsLocale_session: You may share the content of our website with your friends on the social media site of Google. This service may leave cookies on your computer over which we do not have control. It is not possible to identify the person of the User.

– Google Adwords

NID and SID cookies: The Website uses the remarketing tracking code of Google Adwords. The remarketing code uses cookies to tag the visitors. The users of the website have the option to ban these cookies. It is not possible to identify the person of the User.

The Website contains remarketing tags in order to build a remarketing list, therefore after visiting the site, external service providers - including Google and Facebook - may display advertisements on their internet web sites, these are the so-called interest-based advertisements. The remarketing lists are not suitable for personal identification, they do not contain the personal data of the visitor, they identify the browser software exclusively. The services providers use cookies for the remarketing tags. The Website uses so-called conversion tracking for measuring the efficiency of the Google Adwords advertisements. The conversion tracking cookie exists only for a limited time, accepting it is not mandatory, it does not record or use any personal information.

Traffic analysis: The statements and analyses made from the data of the users using general and/or automatic statistical methods are retained by our Website indefinitely. No item of personal data of the data provider can be reproduced from these data using any kind of procedure.

7.d.. If you want to know more about the topic, numerous articles are available on the internet, for example, the site <http://www.allaboutcookies.org>, or in Hungarian: <https://www.adatvedelmiszakerto.hu/2010/10/cookie-es-adatvedelem-felhasznalok-nyomokovetese-az-interneten/>

7.e. You may find details about changing the cookie settings in the help section of the browser or at the following link:

Mozilla Firefox: <https://support.mozilla.org/hu/kb/S%C3%BCtik%20kezel%C3%A9se>

Google

Chrome: https://support.google.com/chrome/answer/95582?hl=hu&ref_topic=3421433

Internet Explorer: <http://windows.microsoft.com/hu-hu/internet-explorer/ie-security-privacy-settings#ie=ie-9>

Opera: <http://help.opera.com/Windows/9.63/hu/cookies.html>

Safari: <http://support.apple.com/kb/PH5042>

The user can delete the cookie from his/her computer or may block the use of cookies in his/her browser. You may manage cookies usually in the Tools/Settings menu of browsers, in the Data Privacy/History/Custom Options menu, under the name “cookie” or “tracking”.

8. METHOD OF DATA STORAGE, SECURITY

The servers hosting the website of the data controller are located at eSolution Kft. 1119 Budapest, Fehérvári út 131. fszt. 3.

Data Controller shall ensure the security of the data, and shall take the technical and organizational measures, and shall establish the procedural rules which are necessary to enforce the applicable laws, and the data protection and secrecy rules. By using the appropriate measures, Data Controller shall protect the data from unauthorized access, alteration, transfer, publication, erasure or destruction, as well as from accidental destruction and damage, in addition to preventing the data from becoming inaccessible due to the changes in the technology applied.

Data Controller shall keep records of the data processed by Data Controller in compliance with the applicable laws, ensuring that the data may be accessed only by those employees and other persons acting within the sphere of interest of the Data Controller (data processor) who need such data in order to fulfil their job function or task.

9. ERASURE OF PERSONAL DATA

Data Controller will shall erase the personal data if

- the processing thereof is unlawful;
- it is requested by the data subject (except if the data processing is stipulated by law)
- the item of data is incomplete or incorrect, provided that the erasure is not excluded by law.
- the purpose of the data processing had ceased, or the period specified by law for storing the data had expired. (for the exact duration, see the purposes of data processing!) In the absence of a request by the data subject - Data Controller will process the data until the relation between the Data Controller and the data subject prevails.
- it was ordered by the court of the Hungarian National Authority for Data Protection and Freedom of Information.

10. RIGHTS OF THE DATA SUBJECT

With respect to his/her personal data, the data subject has the rights specified by law.

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- right to access (access to the data, the fact whether there is any data processing);
- if an item of data is obsolete or incorrect, then the rectification thereof;
- erasure (exclusively in case of data processing based on consent);
- restriction of the processing of the data;
- prohibiting the use of the personal data for direct marketing purposes;
- transfer or prohibiting the transfer of his/her personal data to third-party service providers;
- requesting a copy of any of the personal data processed by the data controller; or
- objection to the use of the personal data.

11. PERSONAL DATA BREACH

- A breach of data security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data processed.
- Fesztiválakadémia Nonprofit Kft. shall ensure the data security adjusted to the extent of the risk related to the data processing, in case of the breach of which the data controller/data processor shall without delay and, where feasible, not later than 72 hours after having become aware of it, notify the supervisory authority and shall inform the data subject as well.
- After having become aware of the personal data breach, Fesztiválakadémia Nonprofit Kft. shall take the necessary security measures without delay, in order to eliminate or rectify the damage which is the basis of the personal data breach.
- We will notify the data subject of the measures taken and the results thereof.
- We keep records appropriately of the requests of the data subject and the authorities and of the replies given to such requests.
- **We await the submissions of the data subjects on the e-mail address festivalacademybp@gmail.com.**

12. LEGAL REMEDY NOTIFICATION

The data protection supervisory authority in Hungary: Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság; hereinafter referred to as NAIH, address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C, e-mail address: ugyfelszolgalat@naih.hu). The data subject may file a complaint with NAIH, if in the opinion of the data subject, the processing of the personal data related to him/her fails to comply with the legal obligations.

Judicial oversight may be initiated against the decision of NAIH.

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