



PRIVACY POLICY

By regulation No 2016/679 of the European Parliament and of the Council (EU) on the protection of natural persons with regards to the processing of personal data and on the free movement of such data and on repealing Regulation (EC) No 95/46 (General Data Protection Regulation), and the information subject to the provisions of Act CXII of 2011 on the Right of Self-determination and Freedom of Information, Concerto Akadémia Non-Profit Limited Liability Company (hereinafter referred to as "the Company or Data Controller") provides information to Data Subjects (hereinafter with regards to the Privacy Policy: Data Subjects) in contact with them on the Company's organisational and technical measures concerning personal data and the remedies available to Data Subjects.

1. Data Controller

Name: Concerto Akadémia Nonprofit Limited Liability Company

Company seat:	1094 Budapest, Páva utca 10-12.
Phone number:	+36-1-215-5770
Email:	info@concertobudapest.hu
Website:	www.concertobudapest.hu
Name of Representative:	Dr Peter Edvi, Managing Director

The operation of the Company is governed by law, thus the processing of the personal data of Data Subjects is carried out by employees subject to professional confidentiality.

This Privacy Policy document contains information on the Company's activities in the course of public service activities, business activities and other activities, as well as during the activities connected to the operation and use of the Company's website, www.concertobudapest.hu.

2. Data management

<i>Description of the data asset</i>	<i>Data asset, the scope of managed data</i>	<i>Purpose of data management</i>	<i>Legal basis of data management</i>	<i>Duration period of data management</i>	<i>Eligible persons to access data</i>
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Employment-related data management

Employment contract	<p>Name, address, place and date of birth, mother's maiden name, tax ID, Social Security Number, bank account number, gross and net wages, working hours</p> <p>Source of data: submitted by Data Subject. No other data collection is performed by our Company.</p>	Fulfilment of obligations described by Section 42 of the Labour Code	consent of Data Subject, legal obligation/authorisation	5-year limitation period following the termination of employment	managing director, financial director, external data processor, payroll clerk
Reporting of insured individuals	<p>Name, address, place and date of birth, mother's maiden name, tax ID, Social Security Number, working hours, nature of employment</p> <p>Source of data: submitted previously by Data Subject. No other data collection is performed by our Company.</p>	legal obligation according to Part 24 of Section 18 of the Act on Social Security	legal obligation	limitation of tax law period following the termination of employment	managing director, financial director, external data processor, payroll clerk
Data required for payroll purposes	<p>Name, Social Security Number, tax ID, address, place and date of birth, wage data, data of tax and other contributions</p> <p>Source of data: submitted by Data Subject. No other data</p>	legal obligation according to Part 24 of Section 18 of the Act on Social Security	legal obligation	pension entitlement - prescribed preservation period	managing director, financial director, external data processor, payroll clerk

	collection is performed by our Company.				
Declaration of personal tax benefit	Name, tax ID, address, place and date of birth potentially, disease: ICD code Source of data: submitted by Data Subject. No other data collection is performed by our Company.	legal obligation according to Part 24 of Section 18 of the Act on Social Security	legal obligation	limitation of tax law period following the termination of employment	managing director, financial director, external data processor, payroll clerk
Family tax relief	Name, Tax ID, address, place and date of birth, data of dependants Source of data: submitted by Data Subject. No other data collection is performed by our Company.	legal obligation according to Part 24 of Section 18 of the Act on Social Security	legal obligation	limitation of tax law period following the termination of employment	director, financial director, external data processor, payroll clerk
Attendance sheet	Name, data, signature Source of data: submitted by Data Subject. No other data collection is performed by our Company.	legal obligation according to Section 134 of the Labour Code	legal obligation	limitation of tax law period following the termination of employment	director, financial director, external data processor, payroll clerk
Internet use	logfile, IP addresses Source of Data: the internet system. No other data collection is performed by our Company.	Employee monitoring according to Part 1 of Section 11 of the Labour Code	legitimate interest With regards to a legitimate interest, the result of the consideration process will be published on the Privacy tab of our website.	statute of limitation	managing director, financial director
Phone use	Name, phone number, date Source of Data: the closed internal phone system and mobile	Employee monitoring according to Part 1 of Section 11 of the Labour Code	legitimate interest With regards to legitimate interest, the result of the consideration process will be published on the	statute of limitation	managing director, financial director

	provider of the Company. No other data collection is performed by our Company.		Privacy tab of our website.		
Email traffic	cannot be precisely determined Source of Data: the mailing system of the Company. No other data collection is performed by our Company.	Employee monitoring according to Part 1 of Section 11 of the Labour Code	legitimate interest With regards to a legitimate interest, the result of the consideration process will be published on the Privacy tab of our website.	statute of limitation	managing director, financial director

Management of data relating to contractual partners in connection with public assignments, business and other activities:

Data of contact person	Name, phone number, email address Source of data: submitted by Data Subject. No other data collection is performed by our Company.	fulfilment of contract, prevention of legal disputes	legitimate interest With regards to legitimate interest, the result of the consideration process will be published on the Privacy tab of our website.	contractual limitation of obligation resulting from contract	managing director, financial director, financial personnel
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Data management in connection with images:

Camera system with the purpose of property protection	image Source of data: recordings of the camera system	property protection, prevention of legal disputes	With regards to legitimate interest, the result of the consideration process will be published on the Privacy tab of our website.	3 working days	managing director, financial director
Educational video featuring on video sharing platforms or in other social media	image Source of data: consent of Data Subject. No other data collection is performed by our Company.	dissemination of information, communication related to public assignments	consent of Data Subject	upon the request of the Data Subject	managing director, financial director

Data management connected to event organisation:

Personal data of individuals registered at events	Name, title, email address, phone number, billing address, video and audio recording Source of Data: submitted by the Data Subject, consent of the Data Subject for the video or audio recording. No other data collection is performed by our Company.	required for the organisation of events, for invoices and the postage of purchased publications	fulfilment of contract and legitimate interest With regards to legitimate interest, the result of the consideration process will be published on the Privacy tab of our website.	contractual limitation of obligation resulting from contract or straight after the event until the Data Subject requests the deletion of the video or audio recordings.	managing director, financial director, event organisers and viewers of sharing platforms
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Data management in connection with ticket sales:

Personal data of individuals registered during the ticket sales process	obligatory: name, address, optional: email address and phone number, required for contact, bank account number for a potential	required for the organisation of events, for invoices and for keeping Data Subject posted on events.	fulfilment of contract and legitimate interest With regards to legitimate interest, the result of the consideration	contractual limitation of obligation resulting from contract or straight after the event until the Data Subject	managing director, financial director and event organisers
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	refund Source of data: submitted by Data Subject. No other data collection is performed by our Company.		process will be published on the Privacy tab of our website.	requests the deletion of the video or audio recordings.	
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In relation to the above data management policy, the Company, as Data Controller, draws attention to the fact that without the Data Subject's submission of data, which can be interpreted as a legal obligation or the preparation or fulfilment of a contract or as a requirement for the provision of a specific service, the specific service cannot be provided.

3. Entities the Data Subject's personal data are shared with

While meeting the data management objectives described in this document - in relation to the processing of the Data Subject's personal data -, the Data Controller may engage a data processor in certain data management operations, and thus may transmit the Data Subject's personal data to other recipients. The following table shows the data processing and recipient data processing (in particular, the data processors employed) used by the Data Controller. More detailed information can be found in the Privacy Policy tab on the website www.concertobudapest.hu/adatvedelmitajekoztato, or the personnel of the Data Controller will provide you with further information in person.

Supplier/contractor	Comment	Data transfer	Detailed transfer	Seat	Phone number
Vajda and Co. Solicitors' Office	legal services	In the event of court procedures: customer data, in the event of labour procedures, the necessary personal data		1205 Budapest, Kossuth L. u. 188.	+36 70 457 9243
Csőngedi and Co. Ltd.	accounting services (bookkeeping)	data made obligatory by legal act for taxes and other contributions		1023 Budapest, Darázs u. 1.	+36 1 350 8467
CFAA Corporate Finance Accounting and Audit Kft	payroll services	data made obligatory by legal act for payroll process of wages and commission fees		1037 Budapest, Lánglilium u. 2. 14. ép.	+36 30 311 6207
Ministry of Human Capacities	sponsor	data made obligatory by legal act for monitoring of accounting and utilisation of funds from the central state budget		1054 Budapest, Akadémia u. 3.	
InterTicket Ltd	ticket services	data made obligatory by legal act (for issuing invoices) within the framework of system operating services for the sales of concert tickets and subscriptions		1139 Budapest, Váci út 99.	+36 1 266 0000

In relation to the above, we inform you that your personal data will not be transferred to recipients outside the European Union or those operating outside the European Union.

4. Miscellaneous data management

Use of cookies

The website operated by the Company uses cookies, in other words, short data files are placed on the visitor's computer. This allows our websites to recognise the device used by the Data Subject when a connection is re-established between their computer and one of our websites.

Temporary cookies are placed on the visitor's device only during a specific session and are deleted after the session is completed.

We also use permanent cookies on our website that remain on the Data Subject's computer until they delete them.

- Life-time of cookies: 1 year
- The legal basis for data processing is the consent of the Data Subject, governed by Part 1 a) of Section 6 the GDPR and Part 1 of Section 5 of the Act on Information and Part 4 of Section 13/A of the Act of Electronic Commerce.

The Facebook page managed by the Company

Visitors can send comments and messages - thereby providing personal information - on the Facebook page managed by the Company at @concertobudapest.

Scope of data managed: any data provided voluntarily by the Data Subject through their comments, expression of interest and messages.

The legal basis for data processing is the consent of the Data Subject, governed by Part 1 a) of Section 6 the GDPR and Part 1 of Section 5 of the Act on Information.

The Facebook page uses cookies. The operation of the cookies of the Facebook page is independent of the Data Controller.

The Instagram page managed by the Company

Visitors can send comments and messages - thereby providing personal information on the Instagram page managed by the Company at @concerto_budapest.

Scope of managed data: any data provided voluntarily by the Data Subject through their comments, expressions of interest and messages.

The legal basis for data processing is the consent of the Data Subject, governed by Part 1 a) of Section 6 the GDPR and Part 1 of Section 5 of the Act on Information.

The Instagram page uses cookies. The operation of the cookies of the Instagram page is independent of the Data Controller.

5. On Data security

Personal privacy is ensured by the Data Controller through the following organisational and technical measures:

- according to the Company's internal regulations, personal data may be accessed only by those staff members whose work activities require the processing of personal data,
- The Company has an internal security policy for the potential handling of personal data on paper documents,
- The Company ensures the protection of personal data stored electronically using continuous virus protection processes, firewall and logging activities, which can also be used to verify who and when accessed personal data. These solutions ensure the protection of the IT system against computer fraud and hacking.
- The personal data is stored in the Company's internal IT system at its headquarters.
- The physical protection of servers storing personal data is ensured by means of security-management solutions.

6. Data Subjects' rights and their enforcement

6.1. Measures taken by the Data Controller while Data Subject is exercising their rights

While exercising the rights of the Data Subject covered by these points, the Data Controller shall notify the Data Subject, without undue delay and by all means, within one month of the receipt of the request, of the measures taken in response to the Data Subject's request. If necessary, taking into account the complexity of the request and the number of requests, this period may be extended by a further two months. The Data Controller shall inform the Data Subject of the extension of the deadline within one month of receipt of the request, indicating the reasons for the delay. If the Data Controller does not take action on the request of the Data Subject, they shall inform the Data Subject without delay, and at the latest within one month of receipt of the request, of the reasons for non-action and of the fact that the Data Subject may lodge a complaint with a supervisory authority and exercise their right of judicial review.

The Data Controller shall provide the information and action free of charge. If the request made by the Data Subject is clearly unfounded or excessive, in particular, because of its repetitive nature, the Data Controller may charge a reasonable fee, taking into account the administrative costs involved in providing the information requested or may refuse to take action in response of the request. The Data Controller is in charge of proving that the request is clearly unfounded or excessive.

If the Data Controller has reasonable doubts as to the identity of the natural person making the request, they may request further information to confirm the identity of the Data Subject.

6.2. The Data Subject's Right of Access

The Data Subject is entitled to receive feedback from the Data Controller as to whether their personal data is being processed. If such a data management process is in progress, the Data Subject is entitled to access personal data and the following information:

- purposes of data management;
- categories of the personal data concerned;
- recipients or categories of recipients to whom personal data have been or will be communicated, including in particular third-country nationals or international organisations;
- if appropriate, the intended duration of the storage of personal data or, if this is not possible, criteria for determining that period;
- the right of the Data Subject to request from the Data Controller the rectification, erasure or limitation of the processing of personal data relating to them and to object to the processing of such personal data;
- the right to lodge a complaint addressed to a supervisory authority;
- if the data were not collected from the Data Subject, all available information regarding their source;
- the fact of automated decision-making, including profiling, and, at least in these cases, comprehensible information on the logic applied and the importance of such data management and its likely consequences for the Data Subject.

The Data Controller shall provide the Data Subject with a copy of the personal data to be processed. For additional copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs. If the Data Subject has submitted the request electronically, the information shall be made available in a widely used electronic format, unless otherwise requested by the Data Subject.

6.3. Right to rectification

The Data Subject shall have the right to have the Data Controller rectify inaccurate personal data relating to them at their request, without undue delay. Taking into account the purpose of data management, the Data Subject is entitled to request - also by a supplementary declaration - the completion of incomplete personal data.

The Data Controller shall inform all recipients of the rectification to whom the personal data has been disclosed unless this proves impossible or requires disproportionate effort. At the request of the Data Subject, the Data Controller shall inform them of the identity of these recipients.

6.4. Right to deletion ('right to be forgotten')

The Data Subject shall have the right to have their personal data deleted without undue delay at their request if one of the following reasons prevails:

- personal data are no longer required for the purposes for which they were collected or otherwise handled;
- the Data Subject withdraws the consent on which data management is based, and there is no other legal basis for data management;
- the Data Subject objects to data processing, and there are no legitimate reasons of priority for data processing or for such data processing that can be linked to direct business acquisition;
- personal data was unlawfully processed;
- personal data should be deleted in order to fulfil the legal obligation imposed by the European Union or national law applicable to the Data Controller;
- personal data were collected in connection with offering the provision of information society-related services.

The above rule does not apply, inter alia, if data management is required:

- for the purpose of fulfilling an obligation of personal data management imposed on the Data Controller by the European Union or national law or for the purpose of carrying out a task in public interest or while exercising power of public authority conferred upon them (the Data Controller).
- for the submission, enforcement or protection of legal claims.

The Data Controller shall inform all recipients of the deletion to whom the personal data has been disclosed unless this proves impossible or requires disproportionate effort. At the request of the Data Subject, the Data Controller shall inform them of the identity of these recipients.

6.5. Right to restricting data handling

The Data Subject has the right to limit data management at their request if one of the following criteria is met:

- the Data Subject disputes the accuracy of the personal data, in which case the restriction applies to the period that allows the Data Controller to verify the accuracy of the personal data;
- the processing is illegal, and the Data Subject opposes the deletion of the data and instead requests a limitation of their use;
- the Data Controller no longer needs the personal data for the purposes of data processing, but the Data Subject requests them for the submission, validation or protection of legal claims; or
- the Data Subject objected to the processing; in this case, the limitation shall apply to a period for which it is established whether the Data Controller's legitimate reasons prevail over those of the Data Subject.

If data processing is limited, such personal data can be managed - with the exception of storage - only with the Data Subject's consent or the presentation,

enforcement or protection of legal claims or to the protection of the rights of another natural or legal person or in the public interest of the Union or of the Union or of a member state.

The Data Controller shall, in advance, inform the Data Subject - at whose request data management has been restricted pursuant to Section 1 - of lifting the limitation on data management.

The Data Controller shall inform all recipients of the limitation of data management to whom the personal data has been disclosed unless this proves impossible or requires disproportionate effort. At the request of the Data Subject, the Data Controller shall inform them of the identity of these recipients.

6.6. Right to data portability

The Data Subject shall be entitled to receive the personal data relating to them in a machine-readable format, which is structured and widely used by the Data Controller, and to forward such data to another controller, without being prevented from doing so by the Data Controller to which the personal data have been made available, if:

- the processing is based on consent or a contract; and
- the processing of data is carried out in an automated manner.

While exercising the right to data portability under Section 1, the Data Subject shall have the right to request, where technically feasible, the direct transfer of personal data between controllers.

6.7. Right to object

The Data Subject has the right to object at any time to the processing of their personal data if the legal basis is in the legitimate interest of the Data Controller. In this case, the Data Controller ceases to process the personal data unless he proves that processing them is justified by compelling legitimate reasons which take precedence over the interests, rights and freedoms of the Data Subject or is related to the submission, enforcement or protection of legal claims.

If personal data are processed for the purposes of business acquisition, the Data Subject shall have the right to object at any time to the processing of personal data relating to them, including profiling, in so far as it relates to direct marketing. If the Data Subject objects to the processing of their personal data for direct business purposes, personal data shall no longer be processed for this purpose.

6.8. Legal remedies

In the event of a breach of the Data Subject's rights in connection with data management, they may apply to the court concerned. The court shall have jurisdiction to hear and determine the action. The action may, at the choice of the Data Subject, be brought before the court in charge of the township the Data Subject is a permanent or temporary resident of.

He may also seek redress at:

National Agency for Privacy
1055 Budapest, Falk Miksa u. 9-11.
mailing address: 1363 Budapest, Pf.: 9.
phone: +36-1 / 391-1400
fax: +36-1 / 391-1410
email: ugyfelszolgalat@naih.hu
web: www.naih.hu

If the Data Controller or the processor authorised by the Data Controller causes damage to the Data Subject by the unlawful processing of the data or by the breach of the requirements of data security, the Data Controller shall compensate for the damage.

If the Data Controller violates the Data Subject's privacy rights by misappropriating their data or violates the requirements of data security, the Data Subject may claim damages.

Budapest, 17 November 2020

Data Controller
Concerto Académia Nonprofit Ltd.
represented by: Erika Kovács
financial director