

Privacy notice and information on the processing of personal data

I. Introduction:

The Hungarian Festival-, Event-, Cultural and Tourist Programme Foundation (hereinafter: Foundation or Data Controller) provides opportunity for the visitors of the website www.mtpa.hu to perceive information about the activity of the Foundation.

With the contact information disclosed, through the registration interface, newsletter and contact platforms installed in the surface of the website www.mtpa.hu, the Foundation provides additional opportunity for the visitors of its website to perceive information about the activity of and connect with the Foundation thereof.

Henceforth, the abovementioned online services shall be regarded as „Services”.

The Foundation as a data controller hereby informs the visitors of and the natural or legal persons seeking contact with the Foundation through the website www.mtpa.hu, about its practice regarding data processing activities.

This 'Privacy notice and information on the processing of personal data' comprises the practice of processing personal data by the Data Controller and each and every issue the Data Controller indicates to apply it for.

This 'Privacy notice and information on the processing of personal data' includes the principles and practice of the processing of data, the purposes thereof, the type of data about to be processed by the Data Controller, the rights of the data subjects and the methods of exercising the rights referred to.

The Data Controller is entitled to modify or amend this 'Privacy notice and information on the processing of personal data' on its own right, however, if doing so, the Data Controller is obliged to simultaneously notify the data subjects about the modification or amendment done to the document concerned. The modifications or amendments are applicable vis á vis the data subject after the first use of the website by them following the disclosure of the modification or amendment. The disclosure of the modification or amendment and the notification of the data subjects takes place via publication of the modification or amendment on the surface of the website 30 days before it would enter into force.

The 'Privacy notice and information on the processing of personal data' is available in the footer of the website www.mtpa.hu.

By accepting this 'Privacy notice and information on the processing of personal data', the user of the Service – or in case the user is under the age of 16, his parent or legal representative on his behalf – declare that he gives his explicit consent to the process of his personal data within the scope of this 'Privacy notice and information on the processing of personal data'.

II. The rights of the data subject and the ensurance of their enforcement:

Rights of the data subject:

With regard to the personal data of the data subject processed by the controller or the processor acting on behalf of, or instructed by, the controller, the data subject shall be entitled to

- a) receive information, prior to the start of processing, on the facts connected to the processing (“right to prior information”),
- b) have his personal data and the information related to their processing provided by the controller on his request (“right to access”),
- c) have his personal data rectified or completed by the controller on his request (“right to rectification”),
- d) have the processing of his personal data restricted by the controller on his request (“right to the restriction of processing”),
- e) have his personal data erased by the controller on request (“right to erasure”).

The assurance of the enforcements of the rights of the Data Subject:

For the purpose of facilitating the enforcement of the Data Subject’s rights, the Data Controller shall implement appropriate technical and organisational measures, in particular

- providing the data subject with any notification or information in easily accessible and legible form, with concise, clear and plain content, and
- assessing, within the shortest possible time from its submission, but not later than within twenty-five days, the request submitted by the data subject for the purpose of the enforcement of his rights, and it shall notify the data subject of the decision in writing or in electronic form if the request has been submitted in electronic form.

The Data Controller shall perform its duties in connection with the enforcement of the rights free of charge.

If

- the data subject submits, in the current year, a repeated request to enforce his rights specified in points b) to e), and
- on the basis of this request, the Data Controller lawfully refrains from rectifying, erasing or restricting the processing of the data subject’s personal data processed by the Data Controller or the Data Processor acting on behalf of, or instructed by, the Data Controller,

the Data Controller may claim from the Data Subject the reimbursement of its direct costs incurred in relation to the repeated and unfounded enforcement of the data subject’s rights according to the abovementioned provisions.

If there are reasons to assume that the person submitting a request for the enforcement of the rights under points b) to e) is not identical to the data subject, the controller shall fulfill the request after verifying the identity of the person submitting the request.

a) Right to prior information

Hereby the Data Controller informs the Data Subjects about the name and contact information of the Data Controller, about the Data Protection Officer, the purposes of the processing of data and about the

rights of the Data Subject as prescribed in Act CXII. of 2011, the methods available for enforcing the rights concerned and provides additional information about the processing of personal data.

1.) Name and contact of the Data Controller

Name: Magyar Fesztivál, Rendezvény, Kulturális és Turisztikai Program Alapítvány (Hungarian Festival, Event, Cultural and Tourism Program Foundation)

Contact information: place of business: 1075 Budapest, Károly krt. 13-15. B. stairwell 7/46.
postal address: 1075 Budapest, Károly krt. 13-15. B. stairwell 7/46.

e-mail address: info@mtpa.hu
sajto@mtpa.hu

registration no.: 01-01-0013105

tax no.: 01-01-0013105

website: www.mtpa.hu

phone: +36 70 941 8035

On behalf of the Data Controller, the employees of and the members of the management board of the Data Controller are entitled to access the personal data processed and to process it within the ambit of their employment contract or within the scope of their activity based on other legal title.

The persons entitled to process the personal data concerned are entitled to initiate the:

Erasure, blocking, rectification or completion, controlling of, and accessing to

the data concerned.

The Data Subjects shall file an application regarding their remarks or complaints to the following person via the following contact:

Name: Natália Oszkó-Jakab, Co-Chair of Curatorium

E-mail address: jakab.natalia@mtpa.hu

2.) Name and contact of the Data Protection Officer:

According to Article 37, Section 1 of the Regulation (EU) 2016/679. of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (Hereinafter: GDPR), the Data Controller is not obliged to designate a Data Protection Officer, therefore, the Data Controller refrain from designating such officer.

3.) The purpose and scope of the data processed

The Data controller process only personal data.

The scope of the processed data:

	Scope of the data	Purpose of the process
Data processed by explicit consent of the Data Subject (collected via the contact-, registration-, communication-, newsletter surfaces of the website www.mtpa.hu)	-e-mail address -first name -last name -date of birth -country of origin -mobile phone number	- identification tracking and distinction of the Data Subject, - maintaining relationship with the Data Subject, - Registration and certification of the statements and activity of the Data Subject,

	-IP address	<ul style="list-style-type: none"> - operating complaint mechanisms, - sending informative material to the Data Subjects - blocking and prohibiting access for unauthorized persons - sending newsletters, - providing the website Services that are requested by the Data Subject, - providing information for the Data Subject using methods including but not limited to newsletter, direct marketing, notification, advertisements, sending non-binding offers, etc., - the utilization of the collected data for statistic, demonstrative, surveyance purposes, - providing registration surface for programmes including but not limited to RaKÉTa scholarship programme, - personalization of the data concerned.
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Data provided access to via the surface of the website www.mtpa.hu are not publicly available and shall not be accessible for third persons, however, the Data Controller sustains its right to employ a Data Processor for processing the Data shared by the Data Subject.

Henceforth, where this 'Privacy notice and information on the processing of personal data' refers to the rights, obligations or liability of the Data Controller, the Data Processor acting on behalf of, or instructed by the Data Controller shall be meant as well, if the regulations governing the issue concerned are applicable vis á vis the Data Processor.

Any share or disclosure of data via the website is based on the explicit consent of the Data Subject.

The Data Controller processing the data of the Data Subject only to the extent necessary, in accordance with the prescriptions of the legislation in force.

The Data Subject is entitled and able to unsubscribe from the newsletters of the Data Controller at any time, by request sent to the e-mail contact adress info@mtpa.hu.

4.) Rights of the Data Subject based on Act CXII of 2011 and the methods of enforcing the rights concerned:

The Data Subject in relation with the enforcement of his rights is entitled to:

- may initiate an inquiry with the Authority for the purpose of investigating the lawfulness of the Data Controller's measure if the Data Controller restricts the enforcement of his rights or dismisses his request aimed at the enforcement of these rights, and

- may request the Authority to carry out an authority procedure for data protection if he considers that the controller or the processor acting on behalf of, or instructed by, the controller infringes, in the course of processing his personal data, the provisions laid down in laws or a binding legal act of the European Union on the processing of personal data.

In the context of processing operations, the Data Subject may seek judicial remedy against the Data Controller if he considers that the Data Controller infringes, in the course of processing his personal data, the provisions laid down in laws or the binding legal act of the European Union on the processing of personal data.

The Data Controller shall be obliged to prove that the processing complies with the provisions laid down in laws or the binding legal act of the European Union on the processing of personal data. The Data Subject may bring the action before the regional court having territorial jurisdiction over his domicile or place of residence, according to his choice.

Any person who otherwise does not have the capacity to be a party may be a party to the court action. The Authority may intervene in the action in order to facilitate the success of the data subject.

If the court upholds the claim, it shall establish the existence of the infringement and oblige the controller or the processor to

- terminate the unlawful processing operation,
- restore the lawfulness of processing, or
- undertake the prescribed conduct to ensure the enforcement of the data subject's rights

and it shall also adopt a decision as necessary on the claim for damages or a grievance award.

The court may order the publication of its judgment so as to disclose the identification data of the Data Controller if the judgment affects a wide scope of persons or if the gravity of the infringement justifies such publication.

The Data Controller shall be liable for compensating any damage which another person may suffer as a result of processing that infringes the provisions laid down in laws or the binding legal act of the European Union on the processing of personal data.

The Data Controller shall be liable for paying a grievance award for the violation of personality rights that another person may suffer as a result of processing that infringes the provisions laid down in law or the binding legal act of the European Union on the processing of personal data, if the person whose personality rights had been violated has made a claim addressed to the Data Controller for such a grievance award.

The Data Controller shall be exempted from liability for damage and from the obligation to pay the grievance award if it proves that the damage or the violation of the Data Subject's personality rights occurred as a consequence of an unavertable reason falling outside the scope of processing.

The Data Processor shall be exempted from the liability for the damage caused and for the payment of a grievance award if it proves that, during the processing operations it carried out, it acted in compliance with the obligations explicitly imposed upon processors in laws or the binding legal act of the European Union on the processing of personal data and with the lawful instructions given by the Data Controller. Damages shall not be paid and a grievance award shall not be claimed if the damage was due to the intentional or grossly negligent conduct of the person suffering the damage, or if the infringement of the personality rights arose from the intentional or grossly negligent conduct of the person whose personality rights were infringed.

Enforcement of personality rights after the death of the Data Subject:

Within five years of the death of the data subject, the rights to which the data subject was entitled in his life, specified in Section 14 b) to e) of the Act CXII of 2011, or in the case of processing operations under the GDPR, the rights specified in Article 15 to 18 and in Article 21 of the GDPR, may be enforced by a person authorised to do so by the data subject in the form of an administrative disposal or a declaration made at the controller and incorporated in a public deed or a private deed of full probative value, taking into account the declaration of the later date if the data subject has made more than one declaration to the same controller.

If the data subject has not made a juridical act complying with the previous paragraph, his close relative according to the Civil Code may enforce, even in the absence of it, within five years of the death of the data subject, the rights to which the data subject was entitled in his life, specified in Section 14 c) of the Act CXII of 2011, or in the case of processing operations under the GDPR, the rights specified in Article 16 and Article 21 of the GDPR, as well as in Section 14 d) and e) of the Act CXII of 2011, or in the case of processing operations under the GDPR, the rights specified in Article 16 and Article 18 of the GDPR, if the processing had already been unlawful in the life of the data subject or if the purpose of processing terminated upon the death of the data subject. The close relative who is the first to exercise his right shall be entitled to enforce the data subject's rights under this paragraph.

In the course of enforcing such rights, in particular during the procedures against the controller and before the Authority or a court, the person enforcing the data subject's rights shall be entitled to the rights and be bound by the obligations laid down in Act CXII of 2011 with regard to the data subject.

The person enforcing the data subject's rights shall verify the fact and the date of the data subject's death with a death certificate or with a court decision, as well as his own personal identification, together with his status as a close relative in the case it is necessary, with a public deed.

Upon request, the Data Controller shall inform the data subject's close relative according to the Civil Code on the measures taken, unless the data subject had prohibited it in his declaration.

5.) Additional information:

Hereby the Data Controller discloses information regarding the legal title of the data processing, the duration of the data processing, the retention of the personal data, the determination of the period of data processing, in case of data transfer or intended transfer regarding the recipients of the data transfer and other relevant information about the data process management.

Proportionately to the desired objective, the Data Controller may delay the performance of providing the information, it may restrict the content of the information or it may dispense with providing the information, if this measure is indispensable for ensuring the efficient and effective conduct of the inquiries, in particular criminal proceedings, carried out by or with the participation of the Data Controller, the efficient and effective prevention and detection of criminal offences, the enforcement of penalties and measures applied against the perpetrators of criminal offences, the efficient and effective protection of public security, the efficient and effective protection of the state's external and internal security, in particular national defence and national security or the protection of the fundamental rights of third parties.

5.1.) Legal basis for the processing of data:

Data processing performed in accordance with this 'Privacy notice and information on the processing of personal data' is based on explicit consent of the Data Subject.

The Data Controller declares and ensures that no pecuniary or non-pecuniary claim shall be pursued as a consequence of denial to provide personal data.

The consent of the Data Subject is based on the implicit acceptance of this 'Privacy notice and information on the processing of personal data'.

The processing of personal data shall be lawful without explicit consent of the Data Subject and shall be continued after the withdrawal of such consent if the processing is necessary for compliance with a legal obligation to which the Data Controller is subjected to, if the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

The Data Controller applies an interest balancing test in order to determine the lawfulness of the data processing based on the legal basis mentioned in the previous paragraph. The interest-balancing test is a three-step examination of the issue concerned, whereby the Data Controller identifies the interest of the Data Controller (i), the interests or fundamental rights and freedoms of the data subject (ii), and finally, by striking the balance between the two, decides whether the processing of personal data shall be deemed lawful or not.

5.2.) The duration of the data processing and the determination of that period:

The processing of data shall be ceased if the Data Subject requests the erasure of his data, if the Data Controller relinquishes its Service or if the final decision of the competent authority or the final and enforceable judgement of a domestic court order the erasure or destruction.

The Data Controller is entitled for processing the personal data of the Data Subject until explicit withdrawal of the consent by the Data Subject. The duration of the data processing shall not last longer than 24 months after the cessation of the purpose of the data processing.

5.3.) In case of data transfer, the recipients of the data:

5.3.1. Data processor used by the Data Controller:

The Data Controller uses the following data processors in order to ensure the operation of its IT systems during its data processing activity to process data on its behalf:

- **Digital Thinkers Limited Liability Company (GmbH.)** (place of business: 1097 Budapest, Vaskapu Str. 10-14. C. building, door 110.)

Data being processed by the Data processor:

e-mail address, first name, last name, date of birth, country of origin, phone number, IP address

Purpose of the data transfer:

- identification tracking and distinction of the Data Subject,
- maintaining relationship with the Data Subject,
- Registration and certification of the statements and activity of the Data Subject,
- operating complaint mechanisms,
- sending informative material to the Data Subjects
- blocking and prohibiting access for unauthorized persons
- sending newsletters,
- providing the website Services that are requested by the Data Subject,
- providing information for the Data Subject using methods including but not limited to newsletter, direct marketing, notification, advertisements, sending non-binding offers, etc.,
- the utilization of the collected data for statistic, demonstrative, surveyance purposes,
- providing registration surface for programmes including but not limited to RaKÉTa scholarship programme,
- personalization of the data concerned.

5.3.2. Data transfer performed by the Data Controller:

The Data Controller is entitled to transfer and enable access to the personal data of the Data Subjects for the following third persons, based on the purpose as follows:

- **Google Analytics**

The Data Subject agrees that, by using the Services provided by the website www.mtpa.hu, the Data Controller is entitled to record and analyze the user activity on the website by the application of web analytic procedures, in order to improve and update the website for the better user experience. The web analytic procedure includes the following:

The web analytic software developed by Google LLC provides detailed statistics on the user activity pursued during the use of the website. Its main purpose is to support the activity of the Data Controller by allowing it to characterize the activity of its users of the website www.mtpa.hu on the basis that it identifies the source through the users encountered with the link of the website, the duration of their activity and locates the user's geographical location.

Data processed by the Google Analytics (GA):

5.3.2.1. Protocol data gained via HTTP(S) protocol, which are collected due to technical reasons by the use of GA. The mentioned protocol data include, but is not limited to the type of data as follows: data of the operating system, the data of the web-browser, the link of the website visited before the use of the website of the Data Controller, the day and time of visiting the website of the Data Controller;

5.3.2.2. Cookie data stored in the user's hardware for GA, especially the individual visitor ID that is destined to recognize returning visitors;

5.3.2.3. Data that are stored in the user profiles created by the GA's analysis software. These data include information such as the use of the website, the frequency and method of visiting, the time spent by visiting the website. Each data is processed individually and unlinked.

GA processes the data mentioned above on behalf of the Data Controller in order to rate the use of the website, to analyze the activity pursued at the website, to provide services and suggestions for the update of the website to the owner of www.mtpa.hu. The data of the operational system and the web browser are processed in order to determine the location of the user and to protect the services granted via the website.

The data processed are oftentimes stored anonymously on the servers of Google, in the United States.

Google conducts the data processing activity as a Data Controller. Google applies general contract terms for the transfer of personal data outside Europe, collected by its online advertisements and analysis. In terms of services provided by Google as a Data controller the general terms of Google Ads are in conformity with the recommendations of the European Commission regarding GDPR and the terms demanded by the regulations of the United Kingdom.

The data are anonymized while being on the servers of the Data Controller before being transferred to Google. If the anonymization does not occur, Google is obliged to do so on his own servers.

The period for which the data detailed in 5.3.2.1) and in 5.3.2.3. are stored is 14 months. For data detailed in 5.3.2.2., see the section „Cookies”.

The legal basis regarding data process is Article 6, paragraph (1) point a) of the GDPR.

The Data subject is able to prevent data process and the usage of cookies by setting his browser accordingly. However, the Data Controller alerts all data subjects that not all the features and services of www.mtpa.hu shall be available if doing so.

The information regarding prevention of data processing by GA is available via the link <https://tools.google.com/dlpage/gaoptout?hl=en-GB>. By using the link, an unsubscribing cookie shall become available that prevents the use of cookies for the future.

Further User information and information regarding privacy protection is available via the website of Google in the following link: <https://policies.google.com>.

Providing data is not mandatory, it is not an obligation prescribed by law or specific contract, it is not a prerequisite for the conclusion of a said contract. The Data Controller shall not apply web analytics by GA if the abovementioned settings are installed in the Data Subjects' browsers.

Automated decision-making is not applied regarding the data concerned.

5.4. Further information regarding the circumstances of the data process:

5.4.1. Information regarding measures of data security:

Personal data being processed are protected by software and hardware security.

The Data Controller uses firewall protection to ban the unauthorized access to personal data. The personal data are being secured by the responsible e-mail service platform of the Data Subject.

The website www.mtpa.hu uses https communication. Therefore, all personal data provided to the Data Controller shall become irreversibly classified.

5.4.2. The application of cookies, acceptance, settings

Cookies shall be applied by the Data Controller in order to further the user experience and update the services provided via the website. Cookies are small data packs that are collecting and storing information detailed by the Data Controller.

Cookies destined to collect data during the workflow will be erased after closing the web browser. Permanent cookies are stored in the hard-drive of the Data Subjects' devices and will exist until manual deletion. Browser cookies stored in the users' devices shall be deleted anytime, by setting the browser, the data collection and application of cookies shall be rejected by the user. In case of such rejection, certain services may not be available to the user. The rejection shall be conducted in every device separately. Managing cookies are oftentimes available in the browser menu > settings > privacy menu points. Flash cookies are placed in the hard drive of the device and are applied until deletion or the ban of their plug-in.

The server of the Data Controller store the Data Subjects' browser name, title of the website opened beforehand or opened after visiting www.mtpa.hu, the e-mail address of the Data Subject and the duration and date of visiting the abovementioned website.

The system applied by the Data Controller automatically generates statistic data out of the data mentioned in the previous paragraph. The Data Controller does not connect the data gained with other personal data, the said data is only used for the purpose of the measurement of visitors. The collection and storing of the abovementioned data is a specific requirement for the functioning of the website, the data processing mechanisms are crucial and used only for statistic purposes.

b) Right to access to personal data:

On demand of the Data Subject, the Data Controller provides information on the data being processed about the data Subject by the Data Controller, about the source of such data, the purpose, legal basis, period of the data processing, about the name, address and data processing activity of the Data Controller.

The competent court, prosecution service, investigating authority, an authority responsible for the investigation of administrative offences, administrative authority, the National Authority for Data Protection and Freedom of Information, or other bodies and agencies of government entitled by law shall seek the Data Controller in order to transfer, provide access to, provide information related to and provide documentation on the processed data. The Data Controller is obliged to provide the information concerned to the abovementioned bodies and agencies if the said body or agency determines the required data and the data transfer is necessary to the aim pursued by the request.

The Data Controller is obliged to fulfil his duties based on the demand for the rectification or on the demand for information filed by the Data Subject in shortest time, however, at latest 25 day after the date of delivery. The information provided for the Data Subject shall be made in a plain manner.

c) Right to rectification:

If the personal data processed by the Data Controller are inaccurate, incomplete or no longer up to date, the the controller shall, in particular upon the data subject's request, further specify or rectify them without delay, or it shall supplement them with further personal data provided by the data subject or with a declaration attached by the data subject to the personal data processed, provided that it is compatible with the purpose of processing (hereinafter jointly "rectification").

The controller shall be exempted from this obligation if the accurate, correct or complete personal data are neither available nor provided by the data subject, or the authenticity of the personal data provided by the data subject cannot be verified beyond doubt.

If the Data Controller if fulfills his abovementioned obligation, shall notify the Data Subject to whom it has transferred the personal data, affected by the rectification on the existence of rectification, as well as on the rectified personal data.

d) Right to restriction of processing

If the

(i) accuracy, the correctness or the completeness of the personal data processed by the Data Controller is contested by the Data Subject, and the accuracy, the correctness or the completeness of the personal data processed cannot be verified beyond doubt, for a period enabling the existing doubt to be clarified, (ii) the data should be erased, but there are reasons to assume, on the basis of the Data Subject's written declaration or the information available to the controller, that the erasure of the data would infringe the lawful interests of the data subject, for the period of the existence of the lawful interests that justify refraining from their erasure,

(iii) the data should be erased, but the retention of the data is necessary as evidence in the course of inquiries or proceedings specified by the law, in particular in criminal proceedings, carried out by, or with the participation of, the Data Controller or another organ performing public duties, for the period of the conclusion with administrative finality or final and binding effect of such inquiries or proceedings,

(iv) the data should be erased, but the retention of the data is necessary for the purpose of fulfilling the obligation of documentation for ten years after the erasure of the data, for the purpose of enforcing the right to the restriction of processing,

the controller shall restrict processing to the processing operations specified as follows:

During the period of the restriction of processing, the Data Controller may only perform processing operations with the personal data affected by the restriction, with the exception of storage, for the enforcement of the data subject's lawful interests or according to the provisions laid down in a domestic Act, an international agreement or a binding legal act of the European Union

In the course of terminating the restriction of processing specified in (i), the Data Controller shall provide the data subject in advance with information on releasing the restriction of processing.

e) Right to erasure ('right to be forgotten')

For the purpose of the enforcement of the right to erasure, the controller shall erase the data subject's personal data without delay if

- the processing is unlawful, in particular, if
 - o the processing is contrary to the principles laid down in Section 4 of the Act CXII. of 2011,
 - o the purpose of processing has terminated, or further processing is not necessary for the realisation of the purpose of processing,
 - o the period laid down in an Act, an international agreement or a binding legal act of the European Union has elapsed, or
 - o the legal basis of processing has terminated and there is no other legal basis of processing,
- the data subject has withdrawn his consent given to the processing or requests the erasure of his personal data,
- the erasure of the data is required by the law, a legal act of the European Union, by the Authority or by a court, or
- the period laid down in Section 19 (1) b) to d) of the Act CXII. of 2011. has elapsed.

The Data Subject shall demand the erasure of his personal data.

The Data Controller shall erase the personal data on demand of the Data Subject, or if the Data Controller denies access to the website due to serious breach of law or such breach of other regulation or contract term governing the use thereof.

Statistics shall be created by the personal data on log files which shall be stored and processed on the servers of the Data Controller for 24 months at most.

The Data Controller is entitled to erase the personal data of the Data Subject in case of inactivity or as a sanction.

The Data Controller erases the personal data of the Data Subject if the processing of such data is illegal, the purpose of the process ceased to exist, the period of the data processing prescribed by law elapsed, a competent Court or the National Authority for Data Protection and Freedom of Information ordered so, or the processing of data is incomplete or inaccurate and its defect shall not be rectified, provided that it is not forbidden by law.

In case of the termination of the service provided by the Data Controller all personal data shall be erased with the exception of the data that are necessary to process due to the fulfillment of legal (such as

accounting) obligations. Renaming, reshaping or merging the service shall not be qualified as termination.

The Data Controller shall block the personal data on demand of the Data Subject, or it shall be presumed that the erasure may hurt his legitimate interests. Blocked data shall be processed as long as the purpose excluding the erasure exists.

Budapest, 19th December, 2023

**Hungarian Festival, Event, Cultural and
Tourism Program Foundation**

Repr.: Natália Oszkó-Jakab
Co-Chair of Curatorium