

# PRIVACY POLICY

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## 1. Purpose of the Privacy Policy

The goal of our Privacy Policy is to provide all necessary information for natural persons using our services (hereinafter referred to as Visitors) in a concise, transparent, intelligible and easily accessible form, using clear and plain language, and assist the Visitors in exercising their rights under Section 4. Our services are available on the website <https://ticketninja.io/> and other domains.

The legal basis of our duty to communicate information is Article 12 of Regulation 2016/679 of the European Parliament and Council (hereinafter referred to as: GDPR), Section 16 of Act CXII of 2011 on the right of informational self-determination and on freedom of information (hereinafter referred to as Information Act) and Section 4 of Act CVIII of 2011 on electronic commerce and on information society services (hereinafter referred to as Electronic Commerce Act).

The Privacy Policy was prepared by taking into account the GDPR, the Information Act and further legal acts relevant from the viewpoint of specific data processing. The list of the legal acts are detailed in Annex 11.1, the main concepts and definitions are determined in Annex 11.2 and the detailed information on the right of the data subject is included in Annex 11.3 of the Privacy Policy.

During the drafting and applying this Privacy Policy, we proceeded in the spirit of the findings of the recommendation of the Hungarian National Authority for Data Protection and Freedom of Information on the data protection requirements of prior information and Article 5 of the GDPR, especially the principle of accountability laid down in Article 5, Paragraph 2 thereof.

We also monitor the practice of the European Union with regard to the protection of personal data, accordingly, we shall also implement the findings of Article 29 Working Party of the European Commission in its Guideline on Transparency into our data processing practice.

## 2. General communication

TicketNinja is an online cloud service, focusing on the IT support of activities with respect to event organization. Based on the data provided by the Organizer the system generates a landing page (website), where the Visitor may find information on the events. Depending on the settings of the event, the Visitor may purchase or preregister the tickets published on the landing page. The tickets published on the website include the information, which assist the Visitor in selecting the appropriate type.

The Visitor is a natural person proceeding as a representative of a company or a natural person who constitutes a consumer pursuant to Act V of 2013 (hereinafter referred to as Civil Code), who uses the services of Szintézis-Net Kft. on the online interface, including the Software applications, supplements and tools.

The Organizer is a natural person or an undertaking pursuant to the Civil Code who/which organizes events and whose duties and purposes/the duties and purposes of which are the following:

- Distribution of tickets
- Collecting the Visitors' data (invoicing data, e-mail address, telephone number, name) according to this Privacy Policy, the Organizer's own general terms and conditions and privacy policy
- Preparation of statistics of information individually provided by the Visitors
- Storing data on the sponsor in the system (name, logo, web)
- Ensuring the export of the Visitors' personal data
- Storing the personal data of the Performers (name, position, social links, place of employment, description)

The Performer is an organization or natural person performing on the event established by the Organizer.

***This Privacy Policy does not extend to such personal data, which the Visitor provided to other Visitors or Organizers during the use of the service, including the data transmitted by the Visitors to the Organizers on the website of the event or the data published on the interfaces of the service available to the public.***

***The provisions and procedures set forth in this Privacy Policy exclusively extend to the services of Szintézis-Net Kft. The service may include links pertaining to the websites of third parties, nevertheless, Szintézis-Net Kft. does not undertake any liability for the content of such websites and the privacy policies and data protection provisions of said third parties.***

### 3. Data of the controller

<b>SZINTÉZIS-NET Szoftverfejlesztő és Szolgáltató Korlátolt Felelősségű Társaság</b>	
Abbreviated company name	SZINTÉZIS-NET Kft.
Registered seat	9024 Győr, Vasvári Pál út 1/C.
Registry number	08-09-011535 (Hungarian Company registry)
Tax number	13116057-2-08
E-mail address	hello@ticketninja.io
Telephone number	0696/550-521

## 4. Data processing procedures

We shall set forth in detail in this Section the essential circumstances regarding specific data processing which the GDPR and other sectoral legal acts require from every controller.

### 4.1 *Contacting and communication*

It is possible to connect us through our contact information located on the website. Also, by communicating with our business partners, we process the personal data of their contact person. The details of these processing are described hereunder.

#### 4.1.1. Processed personal data and purpose of processing

personal data	purpose of processing
name	identification of the Visitor, or the contact person of our business partner
e-mail address	contacting and communication with the Visitor, or the contact person of our business partner
phone number	contacting and communication with the Visitor, or the contact person of our business partner
public profile data available on social media	identification of the Visitor

#### 4.1.2. Legal basis of processing

If the Visitor contacts us through our website, we process the Visitor's personal data on his/her freely given consent provided by him/her by an express conduct (phone call, sending of an e-mail), at the moment of contacting, for the purposes set out in Section 4.1.1 (Article 6, Paragraph 1, Point a) of GDPR).

Should we use the Visitor's data for a purpose other than the original purpose of collecting such data, then we shall inform the Visitor thereof and acquire his/her prior and expressed consent thereto, furthermore, we shall ensure the possibility to object to such processing (see Section 10.1).

If you, as the representative of our business partners provide your personal data to communicate with us, the legal basis of processing personal data is the legitimate interest of us and our business partners (Article 6, Paragraph 1, Point f) of GDPR). It is each Party's legitimate interest to maintain an effective business communication during the use of the Website and the negotiations between the partners, and to perform the contract, and in order thereto, to provide information to the designated representatives of each Party, on the essential circumstances affecting such contract. Since it is the employment or contractual duty of the contact persons of the business partners to promote the communication between the Parties and to provide the personal data for that purpose, in our view, processing the name and contact data of your contact persons does not restrict disproportionately the privacy and freedom of self-determination of such persons. The contact person of our business partner may object to such data processing.

#### *4.1.3. Duration of the processing*

We process the personal data until the withdrawal of consent. The Visitor has the right to withdraw his/her consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

In relation to the processing of the personal data of our business partners' contact persons, we process their personal data until it is no longer necessary in relation to the purposes of communication, or as long as it is possible according to the relevant acts (5 years following the performance or the termination of the contract pursuant to the Civil Code, or 8 years following invoicing, in accordance with Act C of 2000).

#### *4.1.4. Mode of processing*

Your personal data are collected in electronic form.

#### *4.1.5. Data protection contractual clause*

Taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing concerning communicating with our business partners, we, as data controllers, while performing the contracts concluded with our business partners, both at the time of the determination of the means for processing, and at the time of the processing itself, implement appropriate technical and organizational measures, such as pseudonymisation, which are designed to implement data-protection principles, such as data minimization, in an effective manner and to integrate the necessary safeguards into the processing in order to meet the requirements of GDPR.

## ***4.2 Processing concerning customer service***

In order to answer your questions or to inspect the circumstances you submitted a complaint for, you as Visitor may turn to the Organizer of the specific event via e-mail or telephone. In this case, the controller is the Organizer, therefore the data protection principles applied by the Organizer shall be governing for such cases. The concerning details of data processing, provided that that Organizer does not deviate therefrom, are indicated below.

### ***4.2.1. Processed personal data and purpose of processing***

personal data	purpose of processing
name	identification of the Visitor
e-mail address	connecting with the Visitor and providing information
phone number	connecting with the Visitor and providing information

### ***4.2.2. Legal basis of processing***

We process the personal data we collect from you by legal obligations [with respect to Article 6, Paragraph 1, Point c) and Paragraph 2 of GDPR, Section 5, Subsection 1, Paragraph b) of the Information Act and Act CLV of 1997 on consumer protection (Consumer Protection Act)].

### ***4.2.3. Duration of processing***

Under Section 17/A, Subsection 7 of the Consumer Act, we process your personal data for 5 years following the receipt of your complain.

### ***4.2.4. Mode of processing***

Personal data are collected in electronic form.



### ***4.3 Processing concerning registration***

Among others, the prerequisite of the use of the Website is the registration on the appropriate interface, during which the account may be created. There is also the possibility to participate in the Organizer's events without registration, based on an invitation sent by another Visitor. You may also register by your Facebook profile, Google account, LinkedIn profile or e-mail address.

The details of data processing relating thereto is indicated below:

#### ***4.3.1. Processed personal data and purpose of processing***

personal data	purpose of processing
name	identification of the Visitor
e-mail address	connecting with the Visitor
password	performing technical measures
name of the Visitor in case of registration by social media profile (Facebook, Google, LinkedIn)	identification of the Visitor

#### ***4.3.2. Legal basis of processing***

We process the personal data we collect from you by legal obligations (with respect to Article 6, Paragraph 1, Point c) and Paragraph 2 of GDPR, Section 5, Subsection 1, Paragraph b) of the Information Act and Section 13/A, Subsection 1 of the Electronic Commerce Act).

The data processing is required for the performance of the contract (general terms and conditions) between the Visitor and us (Article 6, Paragraph 1, Point b) of GDPR).

#### ***4.3.3. Duration of processing***

We process the Visitor's personal data until the request for erasure. If the Visitor does not use his/her account, then, with respect to the general rule of the statute of limitations of the Civil Code, we shall anonymize the profile following the lapse of 5 years after the last order. We shall regularly review the scope of the collected data of the Visitors in order for the principle of accuracy to apply in all cases.

#### ***4.3.4. Mode of processing***

Personal data are collected in electronic form.

## ***4.4 Processing concerning the events***

### ***4.4.1. Participating in the events***

Should the Visitor indicate his/her intent to participate in a specific event through the TicketNinja system, purchase a ticket, register for the selected event or sign up for optional programs in the events, then the Organizer of such an event may request you to provide further data for the participation. We do not request these data from the Visitors, however, they are stored in the system operated by use, therefore we shall process them. The Organizer of such events may determine the provision of such data as a condition for participating in the event or in specific programs. In this case, the legal basis of processing is the preparation and performance of the contracts between the Visitor and us and the Visitor and the Organizer (Article 6, Paragraph 1, Point b) of GDPR).

### ***4.4.2. Contacting during the organizing and conducting of the events: Organizer's messages***

The Organizer of the event shall receive the data and contact information of the Visitors registering for the event from the TicketNinja system. The Organizer shall send a message to the participants of the information regarding the event, the tasks of the participants and the state of their registration. We shall not check the content of the letters sent in this manner, nonetheless, the Organizers shall take the relevant data protection regulations into account. The purpose of sending the Organizer's message is to inform the Visitors of the details of the event and to confirm the participation to the selected programs. If the Visitor receives a system notice from TicketNinja, the legal basis of the processing is the preparation and performance of the contracts between the Visitor and us and the Visitor and the Organizer (Article 6, Paragraph 1, Point b) of GDPR).

### ***4.4.3. Inviting third persons***

The TicketNinja system provides the possibility for a Visitor to purchase or order tickets for more persons. In this case, the Visitor shall invite the other persons drawn in by him/her to the system. The invited person receives an e-mail of the invitation to the e-mail address provided by the Visitor sending such invitation for that purpose. The invited person may register to the TicketNinja system based on the invitation, which is the condition for participating in the events. We shall not send any further messages to the invited person other than the first message notifying of the invitation itself until such time that he/she registers to the TicketNinja system. The Visitor sending the invitation shall be liable for the veracity and true nature of the data indicated in the invitations, as well as for the lawfulness of the provision of data, that is, Szintézis-Net Kft. does not monitor the veracity of the provided data. In this case, the legal basis of processing is the preparation and performance of the contracts between the Visitor and us and the Visitor and the Organizer (Article 6, Paragraph 1, Point b) of GDPR).

## ***4.5 Data processing concerning the service***

### ***4.5.1. Use for internal business purposes***

Szintézis-Net Kft. may use the personal data for internal business purposes, including for the facilitating of the content and functions of the services, the better understanding of the Visitors' needs, the development of the services, the protection and identification of malicious activities, the enforcement of the General Terms and Conditions, the support of the Visitors' account, the assistance of the customer service and the general support of the services and business activities of Szintézis-Net Kft. In this case, the legal basis of processing is the legitimate interest of Szintézis-Net Kft. as controller (Article 6, Paragraph 1, Point f) of GDPR).

### ***4.5.2. Building databases***

Szintézis-Net Kft. stores the data of the Visitors registering to the TicketNinja system (including the obligatory data to be provided at the registration, the scope of the events visited by the Visitor and any other data requested by the Organizers of specific events) and sort them into databases. The purpose of creating databases is to determine and sort the range of interest of the Visitors in order to send or transmit notifications in the future to the Visitors of relevant events being in their range of interest in the scope of providing business services. During this activity, Szintézis-Net Kft. may transmit or transfer neither the database, nor any of its party, nor the specific data of the Visitors to third parties and it may not publish such data. The legal basis of building databases is the legitimate interest of Szintézis-Net Kft. as controller (Article 6, Paragraph 1, Point f) of GDPR).

## **5. What are the Visitors' rights?**

It is relevant to us that our data processing shall comply with the requirements of fairness, lawfulness and transparency. In light thereof, we shall present the rights of the data subjects in this Section, and thereafter we shall explain them in detail in Appendix 11.3.

Our Visitors may request free information on the details of the processing of their personal data and in cases laid down in legal acts, they may also request the rectification, erasure or blocking thereof, or the restriction of such processing, and they may also object to the processing of such data. Our Visitors may address their request for information and the request indicated in this Section to our contact information set out in Section 3.

### ***5.1 Right to access***

Our Visitor has the right to obtain confirmation as to whether or not personal data concerning him/her are being processed, and, where that is the case, access to the personal data and the information regarding the details of processing.

### ***5.2 Right to rectification***

Our Visitor has the right to obtain from us without undue delay the rectification of inaccurate personal data concerning him/her and to have incomplete personal data completed, including by means of providing a supplementary statement.

### ***5.3 Right to erasure***

At the request of our Visitor, we shall erase personal data concerning him/her, if the processing of such data is no longer necessary, if the Visitor has revoked his/her consent thereto, if the Visitor objects thereto or if the processing is unlawful.

### ***5.4 Right to be forgotten***

If we made the personal data public and are obligated to erase the Visitor's personal data at request, we shall inform any such controller which was made aware of or could have made aware of the possibly published data of the Visitor.

### ***5.5 Right to restriction of processing***

At the request of our Visitor, we shall restrict data processing if the accuracy of the personal data is challenged, or the data processing is unlawful, or our Visitor objects to the processing of data, or if we do not deem the provided personal data necessary in the future.

### ***5.6 Right to data portability***

Our Visitor has the right to receive the personal data concerning him/her, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller.

### ***5.7 Right to object***

Our Visitor has the right to object, on grounds relating to his/her particular situation, at any time to the processing of personal data concerning him/her based on the data processing purposes of legitimate interest (see Sections 4.1 and 4.5). In such a case, we no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. In case of objection, as a general rule, the personal data for such purposes may not be processed further.

### ***5.8 Right to respond to requests***

We shall examine the requests as promptly as possible following its submission to us, but not later than within 30 days, and in case of objections, within 15 days and we shall decide whether they are well founded, of which we shall notify the person submitting the request in writing. If we do not fulfil the request of our Visitor then we shall inform him/her of the factual and legal reasons for denying thereof in our decision.

### ***5.9 Possibilities for redress***

Protecting personal data is of utmost importance to us, and we shall also respect your right of informational self-determination, therefore we strive to respond to all requests and claims in a correct manner and within the deadlines. With respect thereto, we ask you to contact us before possibly pursuing your claim before authorities and courts, for the purposes of submitting your complaint or request to us, in order to have your possible objections resolved as soon as possible.

Should this be unsuccessful, our Visitor may

- pursue his/her rights and claims before the courts pursuant to Act V of 2013 on the Civil Code (the legal proceedings may be lodged before the regional court of our Visitor's domestic or habitual residence; the list and contact information of the regional court may be viewed in the following link: <http://birosag.hu/torvenyszekek>) and
- turn to and submit a complaint to the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11., telephone number: +36-1-391-1400, facsimile: +36-1-391-1410, e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: <https://www.naih.hu/panaszuegyintezes-rendje.html>, pursuing the claim online: <https://www.naih.hu/online-uegyinditas.html>, hereinafter referred to as NAIH) pursuant to the provisions of the Information Act.

## **6. Our procedure regarding requests for exercising rights**

### ***6.1 Informing recipients***

We communicate any rectification or erasure of personal data or restriction of processing carried out, to each recipient to whom the personal data of the Visitors have been disclosed, unless this proves impossible or involves disproportionate effort. We also inform the Visitor about these recipients at request.

### ***6.2 Mode and deadline of notification***

We provide information on actions performed at the request indicated in Section 5 within one month of the receipt of such request at the latest in electronic form, unless otherwise requested by the Visitor. That period may be extended by an additional two months where necessary, taking into account the complexity and number of the requests. We inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

At the request of the Visitor, an oral notification may also be granted, provided that the Visitor offers an identification in any manner.

If we do not take actions at your request, we inform you within one month of receipt of the request at the latest of the reasons for not taking actions and on the possibility of lodging a complaint at NAIH and seeking a judicial remedy (see point 5.9).

### ***6.3 Monitoring***

In exceptional cases, if we have reasonable doubts concerning the identity of the natural person submitting the request, we may request the provision of additional information necessary to confirm the identity of the data subject. This measure is required for the purposes of facilitating the confidentiality of data processing and preventing unlawful access to personal data as laid down in Article 5, Paragraph 1, Point f) of GDPR.

### ***6.4 Costs of measures and notifications***

We provide you information with regard to the requests concerning Section 5 and take the necessary measures to be carried out based thereon free of charge.

If your requests are manifestly unfounded or excessive, in particular due to their repetitive nature, we may charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested or we refuse to act at the request.

## **7. Possible recipients of personal data, processors**

### ***7.1. Organizer***

In case of purchasing tickets or registration, Szintézis-Net Kft. transmits the personal data to the party organizing the event.

The Visitor acknowledges and accepts that the Organizer may also transmit the personal data to third parties who/which cooperate in the creating of the event in question, including exhibitors and organizers organizing promotional activities or any other events. In this case, the Organizer shall be liable for the protection of the personal data based on its own privacy policy, therefore, during the registration for an event, the Visitor may request information from the Organizer, whether his/her/its personal data is appropriately protected.

The Visitor acknowledges that the Organizer may deliver his/her data to the sponsors participating in the events.

### ***7.2 Online payment and invoicing service providers***

In case of online payment, Szintézis-Net Kft. transmits the personal data of the Visitor to the service providers it is in a legal relationship with.

- szamlazz.hu: data transfer in order to prepare and issue the invoice. The Company transmits the following data:
  - invoicing name,
  - invoicing address (country, city, street),
  - tax number/EU VAT number,
  - e-mail address and name of the contract person
  - identification of TicketNinja order
- Billingo: data transfer in order to prepare and issue the invoice. The Company transmits the following data:
  - invoicing name,
  - invoicing address (country, city, street),
  - tax number/EU VAT number,
  - e-mail address and name of the contract person
  - identification of TicketNinja order
- SimplePay: the purpose of data transfer is enabling online payment. The scope of the transmitted data:
  - e-mail address and name of the contract person
  - identification of TicketNinja order

- Barion Payment Zrt.: The data concerning the bank card are not transferred to the trader. Barion Payment Zrt. providing the service is an institute under the supervision of the Hungarian National Bank, the number of the licence of operation: H-EN-I-1064/2013. The scope of the transmitted data:
  - e-mail address and name of the contract person
  - identification of TicketNinja order
- paypal.com: the purpose of data transfer is to enable online payment. The scope of the transmitted data:
  - invoicing name,
  - invoicing address (country, city, street),
  - tax number/EU VAT number,
  - e-mail address and name of the contract person
  - identification of TicketNinja order
- OTP Mobil Kft. (1093 Budapest, Közraktár u. 30-32.). The purpose of data transfer: providing assistance by the customer service to the Visitors, confirming transactions and fraud monitoring for the protection of the Visitors. The scope of the transmitted data:
  - the name of the Visitor,
  - surname, first name,
  - country,
  - phone number,
  - e-mail address.

### ***7.3 Service providers used concerning contacting***

- sendgrid.com: the purpose of data transfer is sending e-mails. The transmitted data:
  - Name,
  - e-mail address.

### ***7.4 Hosting service provider***

The hosting service provider used by Szintézis-Net Kft. is Google LLC, its data protection guidelines are available in the following link:



<https://policies.google.com/privacy?hl=hu>

### ***7.5 Using data processors***

Szintézis-Net Kft. is entitled to transmit the personal data to its partners processing such data for it in order to perform particular functions for business purposes, including undertakings carrying out marketing, managing databases, back-up and disaster recovery, e-mail services based on a contract. These recipients constitute data processors pursuant to the data protection legal acts. The data processor may only perform its duties according to the instruction of the Company, it may not make individual decisions with respect to the management of your personal data. The Company previously made sure that the data processor has a registered seat in the territory of the European Union and it offers appropriate guarantees that the data processing by such an undertaking complies with the data protection legal acts of Hungary and the European Union. The data processor offers appropriate guarantees to the Company that it shall apply and maintain data protection measures ensuring the confidential processing, integrity and accessibility of the personal data processed by it.

### ***7.6 Request of courts and authorities***

Apart from the abovementioned, the Company shall also transmit the personal data of the Visitor exclusively to courts or other authorities in the cases and in the manner laid down in legal acts, based on requests or obligations imposed on by legal acts or resolutions.

## 8. Data security

Our employees and the employees of the data processors have the right to get acquainted with the personal data of the Visitor, to the extent necessary, for the performance of the tasks which belong to their job. We make all security, technical and organizational measures that guarantee the security of the data.

### ***8.1 Organizational measures***

We provide access to our IT systems with personalized rights. The “necessary and sufficient rights” principle applies to the allocation of accesses, consequently all employees may use our IT systems and services only to the extent necessary for the performance of their duties, with the appropriate rights and for the required time. Access to IT systems and services may only be granted to a person who is not restricted for security or other reasons (e.g. conflicts of interest) and who has the professional, business and information security knowledge required to use it securely.

We and the data processors undertake strict confidentiality rules in a written statement, and we are obligated to act in accordance with these confidentiality rules during the course of our activities.

### ***8.2 Technical measures***

The data is stored in the systems of our data processors, at cloud service providers.

We protect our internal network with multi-level firewall protection. In all cases, a hardware firewall (border protection device) is located at the entry points of the applied public networks. The data is stored redundantly, that is, in several places, so it is protected from destruction, loss, damage, or illegal destruction due to the failure of the IT device.

Our internal networks are protected from external attacks with a multi-level, active protection against complex malicious code (e.g. virus protection). The external access to the IT systems and databases is operated by us via an encrypted data connection (VPN).

We take steps to ensure that the IT tools and softwares continuously to comply with the generally accepted technological solutions in the market.

We develop systems, during our development, in which logging can be used to control and monitor the operations performed, and to detect incidents, such as unauthorized access.

Our server is protected and closed, located on the dedicated servers of the hosting provider.

By taking into account the recommendation of NAIH on the data protection requirements with respect to data processing on the website of political parties, we use *https protocol* on the website, which offers a higher level of security than the *http protocol*.

## **9. Cookies and analytical tools**

In order to the proper functioning of our websites, we have placed smaller data files in the Visitors' computer devices in certain cases, similarly to most of the modern websites.

### ***9.1 Concepts***

Cookies are small text files, which the website places to the computer device (including mobile phones) of the Visitor. Consequently, the website is able to "remember" the settings of the Visitor (such as: applied language, letter size, design, etc.), therefore, it is not necessary to set it each time the Visitor visits our website.

The pixel tag is a small tag or graphic element, which is placed on the services, on other websites, in e-mails or other downloadable materials other than the computers, mobile devices or web browsers unless the Visitor downloads the content. The pixel tag does not store information on the computer, mobile device or web browser (although an e-mail or other downloadable material on the computer may contain such), therefore it may not be set, only by deleting the material including such pixel tag.

The "local shared object" is similar to the cookies with the difference that it is stored on the computer or on the mobile device but not in the web browser and it may include more than texts. The direction thereof required another method than those of the cookies, as indicated below. These are stored by the computers or mobile devices, and it may be set individually.

### ***9.2 Technologies used on the Website***

#### ***9.2.1. Main purposes***

Szintézis-Net Kft. uses the abovementioned technologies for the provision of services, as a part thereof, for instance, the use of cookies assist in the appropriate division of the data flow between the servers. The purpose of part of the tools is to better examine our Visitors' needs, to further develop our services and to offer personalized contents and better experience for the Visitors. These cookies may only be placed on the computers upon the Visitor's consent thereto.

#### ***9.2.2. Performance measurement and analytics***

Szintézis-Net Kft. uses the technologies for monitoring the services and analysing the Visitors' activities. The placement of cookies assist in transferring the Visitors' needs to the servers and in measuring the duration of response (1) for the purposes of new developments; (2) in the statistical recordings of the website of the services, in monitoring the Visitors' activities and in determining where the Visitor uses the services.

Szintézis-Net Kft. uses the cookies of third parties for measuring and analysing the above performance of the Organizers, including the services of Google Analytics, Hotjar and Facebook Pixel. Unsubscribing from these may be carried out on the websites of the third parties' services: by the Google Analytics Opt-out Browser Add-on.

Cookies placed for these purposes may only be installed upon the Visitor's consent thereto.

#### ***9.2.3. Ensuring the proper operation of the Website***

By using the technologies, the use of functions with respect to certain services and the determination of the Visitors' preferences are enabled. Selecting the "remember me" box when signing in is such a permanent cookie in the web browser which fills in the name of the Visitor, while other cookies are appropriate for recording the preferences of the Visitor (such as language or geographical location), by which the vulnerability of the web applications may be reduced.

Without placing cookies serving the operation of the website, the website would not operate as intended, therefore, we shall not request the Visitor's consent to the placement of such cookies. If you do not wish for these cookies to be placed, please leave this website.

We do not use the cookies for identifying the Visitor personally. These cookies only serve the abovementioned purposes.

#### 9.2.4. Necessary cookies

Szintézis-Net Kft. uses storage parameters on its landing pages. Without these, the page in question could not be used:

Key	Type	App	Creator	Expiry	Description
<b>core.locale</b>	localStorage	Landing / Admin	own	update/delete	language settings
<b>core.security.user</b>	localStorage	Landing / Admin	own	update/delete/sign off	signed in user
<b>core.security.token</b>	localStorage	Landing / Admin	own	update/delete/sign off	current token
<b>landing.cookie-policy.{version}</b>	localStorage	Landing	own	update/delete	it stores the decision of the cookie policy
<b>landing.utm</b>	sessionStorage	Landing	own	update/delete	storing campaig information for the purchase
<b>landing.embed.settings</b>	sessionStorage	Landing	own	update/delete	embedding settings
<b>landing.continue</b>	localStorage	Landing	own	update/delete/end function	assisting the continuing of the purchase
<b>landing.auth.profile</b>	sessionStorage	Landing	own	update/delete/create profile	user data without an account
<b>landing.permaId</b>	sessionStorage	Landing	own	update/delete/create profile	identification of user without an account
<b>landing.cart.version.{version}</b>	localStorage	Landing	own	update/delete	version number of cart

<b>landing.cart.order.{siteId}</b>	localStorage	Landing	own	update/delete/make an	content of the cart order
<b><u>admin.site</u></b>	localStorage	Admin	own	as long as there is an active event/sign off	data of the event
<b>admin.organizationId</b>	localStorage	Admin	own	select an organization/sign off	identification of the organizer
<b>admin.coupon.duplicate</b>	localStorage	Admin	own	perform a function	coupon data

### 9.2.5. Technologies used by the Organizers

Additional technologies used by the Organizers which may be found on the landing page:

Google Analytics, TagManager

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

Facebook Pixel

<https://www.facebook.com/policy/cookies/>

Barion Pixel

[https://docs.barion.com/Barion-Pixel-hozzajarulaskezelesi\\_kovetelmenyek](https://docs.barion.com/Barion-Pixel-hozzajarulaskezelesi_kovetelmenyek)

HotJar

<https://help.hotjar.com/hc/en-us/articles/115011789248-Hotjar-Cookie-Information>

### 9.2.6. Google Analytics

1. The Google Analytics is the web analysis service of Google Inc. („Google”). Google Analytics uses so-called “cookies”, text files, which are saved to the computers of the Visitors, thereby facilitating the analysis of use of the website visited by the Visitor.

2. The information generated by the cookies with respect to the website used by the Visitor are generally placed to and stored in one of the servers of Google in the USA. By activating IP anonymization on the website, Google previously shortens the IP address of the Visitor within the Member States of the European Union or in other countries that are party to the treaty on the European Economic Area.

3. Only in exceptional cases shall the full IP address be transferred to the Google server in the US and abridged there. On behalf of Szintézis-Net Kft., Google shall use these information to assess how the Visitor used the specific website and to make reports pertaining to the activity regarding the website for Szintézis-Net Kft., furthermore, to perform additional services with respect to the use of the internet and the website.

4. In the scope of Google Analytics, the IP address transferred by the web browser of the Visitor shall not be combined with other Google data. By appropriate configuration of the Visitor’s browser, you may prevent these cookies from being stored, nevertheless, we shall point out that in this case you may not be able to fully use all functions of this website. Furthermore, you have the option to prevent the collection of the Visitors’ data generated by the cookies and related to the use of the website (including your IP address) by Google as well as processing this data by Google by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=h>

The events detailed above shall be transferred to Google Analytics, if Szintézis-Net Kft. sets such a function and the Organizer is also using it. Szintézis-Net Kft. shall not automatically place Google Analytics code on the landing pages.

Szintézis-Net Kft. uses the technology indicated in this Section (Google Analytics) on its marketing page (<https://ticketninja.io>).

#### *9.2.7. Facebook Pixel*

The Facebook Custom Audience is the online analysing and advertising service of Facebook, Inc. (Facebook), by which Szintézis-Net Kft. gains information of the manner in which the Visitors of the particular website use said website.

For the service of Facebook Pixel, the placement of cookies on the Visitors' device is required. The Facebook pixels place cookies on the device, on which there is browsing regarding the specific website, the purpose of which is to collect an appropriate community to advertise to, to measure conversion between devices, aiming of advertisement and optimalising them to the appropriate audience, presenting personalized advertisement, and preparing reports and statements of the website.

The Visitor may regulate and set said data processing activity of Facebook in his/her Facebook and Google account, and the Visitor himself/herself may consent to the data collection by Facebook cookies on the Website. Following signing in, the Visitor may view these cookies in the Facebook Ads Settings and he/she shall set or modify the preferences with respect to the cookies. The Visitor may give his/her consent to the cookies according to the specific type thereof, on the particular website.

Szintézis-Net Kft. uses Facebook Pixels on certain website, which shall only be loaded on the landing pages if the Visitor accepts the recommended cookie settings which also includes the website analytics.

Should the Visitor accept the cookies including the analytics on the landing pages, then the Facebook Pixel applied by Szintézis-Net Kft. be loaded in any case, irrespective of the fact whether the Organizer set it out for itself. Based on these information, Szintézis-Net Kft. shall monitor and analyse all of its landing pages according to the following:

<https://developers.facebook.com/docs/facebook-pixel/reference>

If the Organizer also sets the Facebook Pixel, then two pixel codes shall be loaded on the landing page, which are the following

- Facebook Pixel applied by Szintézis-Net Kft.
- Pixel code of the particular Organizer

Szintézis-Net Kft. uses the technology indicated in this Section (Facebook Pixel) on its marketing page (<https://ticketninja.io>).

### ***9.3 How can the cookies be processed?***

The cookies placed by our website are stored on your computer, therefore you may erase them at any time. For the erasure of the cookies, the following guidelines may offer you assistance: in case of Mozilla Firefox web browser: (<https://support.mozilla.org/hu/kb/weboldalal-atal-elhelyezett-sutik-torlese-szamito>),

In case of Chrome web browser:

([https://support.google.com/chrome/answer/95647?hl=hu&ref\\_topic=7438325](https://support.google.com/chrome/answer/95647?hl=hu&ref_topic=7438325)),

In case of Microsoft Edge web browser (<https://privacy.microsoft.com/hu-hu/windows-10-microsoft-edge-and-privacy>).

## **10. Other provisions**

### ***10.1 Processing for different purpose***

If we intend to further process the personal data for a purpose other than that for which the personal data were collected, we shall inform the Visitors thereof, we shall acquire their prior and expressed consent thereto and ensure the possibility for them to object to such processing.

### ***10.2 Record of processing***

To comply with Article 30 of GDPR, we maintain a record of processing activities (record of processing activities) which we are liable for.

### ***10.3 Data breaches***

Data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. In case of data breach, we are obligated to act according to Articles 33 and 34 of GDPR. We shall record data breaches by indicating the facts pertaining to data breaches, their effect and the measures taken to remedy them.

### ***10.4 Amendments***

We are entitled to unilaterally amend this Privacy Policy.

Effective as of: 11.01.2021

**SZINTÉZIS-NET Kft.**  
Controller



# 11 Appendixes

### ***Appendix 11.1 The relevant legal acts***

In the course of drafting this Privacy Policy, the Controller has taken into account the relevant effective legal acts and the international recommendations, with special regard to the following:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (GDPR)
- Act CXII of 2011 on the right of informational self-determination and on freedom of information (Information Act);
- Act V of 2013 on the Civil Code (Civil Code);
- Act CXXX of 2016 on the Code of Civil Procedure (Pp.);
- Act C of 2000 on accounting (Accounting Act);
- Act CLV of 1997 on consumer protection (Consumer Protection Act);
- Act CVIII of 2011 on electronic commerce and on information society services (Electronic Commerce Act).

## ***Appendix 11.2 Definitions with regard to the processing of personal data***

- 'controller' means the legal person, which determines the purposes and means of the processing of personal data;
- 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 'data transfer' means making accessible of the data for a third person;
- 'data erasure' means making the data unrecognisable in a manner that the recovery of the data is no longer possible;
- 'marking of data' means the provision of an identification mark for the data for the purposes of differentiation;
- 'restriction of processing' means the marking of stored personal data with the aim of limiting their processing in the future;
- 'destruction of data' means the entire physical destruction of the data carrier containing the data;
- 'processor' means the legal person, which processes personal data on behalf of the controller;
- 'recipient' means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.
- 'cookie' means the small data package (text file) sent by the web server and placed for a definite time on the Visitor's computer, which the server, depending on its nature, may complement at the time the website is visited again, that is, if the web browser sends back a previously saved cookie, then the service provider processing such cookie has the possibility to combine the Visitor's current visit with the previous one, but only with respect to its own content;
- 'data subject/Visitor' means an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
- 'third party' means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;
- 'consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- 'IP address' means the IP address, that is, an identification number of server machines in every network that uses the TCP/IP protocol for communication, which enables the identification of

the specific devices through the network. It is well-known that each computer device connected to the network has an IP address, by which it may be identified;

- 'personal data' means any information relating to the data subject;
- 'objection' means the statement of the data subject, by which he/she objects to the processing of his/her personal data and requests the termination of data processing or the erasure of the processed data.

### ***Appendix 11.3 The rights o the data subject***

#### **Right to access**

The Visitor is entitled to receive access to the personal data being processed by us, at his/her request, submitted to any address as indicated in our contact details. In the scope thereof, the Visitor may be informed of the following:

- whether his/her personal data are being processed;
- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed,
- where possible, the envisaged period for which the personal data will be stored,
- his/her rights
- the possibility for redress
- information in relation to the source of data

The Visitor may request a copy of his/her personal data that is subject to the processing of data. In this case we shall provide the personal data in a structured, commonly used and machine-readable format (PDF/XML) and on paper, in a printed format. Requesting the copy is free of charge.

#### **Rectification**

Based on a request submitted to any address as indicated in our contact details, the Visitor is entitled to request the rectification of the inaccurate personal data concerning him/her and to have the incomplete data completed. If we do not have the necessary information for the correction and completion of the incorrect information, we may request the provision of such supplementary data and the certification of the accuracy of the data. In the absence of such supplementary information, we shall restrict the processing of the relevant personal data and we shall temporarily suspend the measures carried out thereon with the exception of storing until such a time that the correction and completion of data may be performed.

#### **Erasure**

Based on a request submitted to any address as indicated in our contact details, the Visitor is entitled to request the erasure of the personal data concerning him/her and processed by us, provided that any of the following conditions, by taking into account Section 5.5 of the general terms and conditions for Visitors, are met:

- we no longer need the provided personal data;
- the Visitor expresses concern with regard to the lawfulness of his/her data being processed by us.

Should we determine based on the Visitor's request that we are obligated to erase the personal data processed by us, we shall cease the processing of such data and we shall destruct the previously processed personal data. Besides that, we are also obligated to erase the personal data upon the revocation of consent, the exercising of the right to object and based on our obligations laid down in legal acts.

### **Restriction of data processing**

Based on a request submitted to any address as indicated in our contact details, the Visitor is entitled to request the restriction of the personal data concerning him/her processed by us in the following cases:

- the Visitor expresses concern with regard to the lawfulness of the data concerning him/her, being processed by us and restriction is requested instead of erasure;
- we no longer need the provided data, but they are required for the establishment, exercising or defending of the Visitor's claims.

We automatically restrict the processing of personal data if the Visitor challenges the accuracy of the personal data and the Visitor exercises its right of objection. In this case, the restriction shall extend to such a time period which enables the checking of the accuracy of the personal data and, in case of objection, the determination of the fact whether the prerequisites of the data processing are met.

During such restriction, the data processing measures of the indicated personal data may not be carried out, only the storage thereof. In case of the restriction of data processing, the personal data may only be processed in the following cases:

- based on the consent of the data subject
- for the submission, enforcement and protecting of legal claims;
- for the protection of the rights of other natural or legal persons;
- for important reasons of public interest.

We shall inform the Visitors of the lifting of the restrictions in advance.

### **Data portability**

Based on a request submitted to any address as indicated in our contact details, the Visitor is entitled to request the provision of personal data concerning him/her, and processed by us to further use determined by the Visitor. Besides that, the Visitor may also request that we transfer the personal data to another controller indicated by the Visitor.

This right only covers the personal data provided by the Visitor and processed for the performance of the contract. There is no possibility for the portability of other data. We shall provide the personal data to the Visitor in a structured, commonly used and machine-readable format (PDF/XML) and on paper, in a printed format.

We inform the Visitor that the exercising of this right does not automatically involve the erasure of such personal data from our systems. Besides that, the Visitor is entitled to contact us and keeping in contact with us again, even following such data portability.

**Objection**

Based on a request submitted to any address as indicated in our contact details, the Visitor is entitled to object to the processing of his/her/its personal data for the purposes indicated in Sections 4.1 and 4.5 of this Privacy Policy. In this case, we shall examine whether the data processing is justified by such mandatory legal reasons which take precedence over the interests, rights and freedoms of the Visitor or which are pertaining to the submission, enforcement or protection of legal claims. Should we determine that such reasons exist, we shall continue processing the personal data. In failure thereof, we shall not process the personal data in the future.