

PRIVACY POLICY

www.webszinhaz.com

Date of Publication: DD/MM/2022

I. Introduction, legal background, data management

The data controller Webszinhaz.com (hereinafter: „the Website”) manages the personal data of the users (hereinafter: „the User”) who visit the Website and use its services, in order to provide services for them.

The aim of this document („Policy”) is to provide clear, transparent, concise and easily accessible information about the following:

- setting out the data controller’s privacy and data management policy, that is to be recognized binding by the Foundation as the data controller,
- giving help to the data subject in exercising their rights,
- provide specific information to the data subject about specific privacy management processes.

While creating the provisions of this Policy, the Foundation has taken particular account on the regulation (EU) 2016/679 of the European Parliament and of the Council, Act CXII of 2011 on the right to informational self-determination and on the freedom of information, and Act V of 2013 from the Civil Code (“CC”).

The data controller of your personal data is Angolnyelvű Színház Közhasznú Alapítvány (hereinafter: the Foundation or Data controller). This foundation is responsible for the lawful processing of your personal data.

Data and contact details of the Data controller:

Data controller:	Angolnyelvű Színház Közhasznú Alapítvány
Located at:	Keleti Károly street 13/A. 2/5., 1024, Budapest, Hungary
Registration number:	01-01-0000848
Represented by:	the current chairman of the Board of Trustees
Postal address:
E-mail address:
Phone number:
Data protection officer:	the Foundation is not required to have one

The Data Subject can request information on the management of his/her data in the following ways:

- by mailing to the above postal/e-mail address
- on weekdays from 10 AM to 5 PM on the above phone number

II. Definitions of terms:

“GDPR”: General Data Protection Regulation, the new data protection regulation of the European Union;

“Personal data”: Any information (such as name, number, location, online identifier, or data concerning the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person) considering the natural person (data subject); **“special data”**: Such as data referring to racial or ethnical background, political viewpoint, religious or ideological convictions, data referring to membership of workers’ union, or genetic and biometric data for the purpose of uniquely identifying natural person, health data and personal data concerning the sexual life or sexual orientation of natural person;

“Health data”: personal data relating to the physical or mental health of a natural person, including data relating to health services provided to a natural person which contain information about the health of the natural person;

“Data Subject”: the natural person who can be identified as the subject of personal data. Considering your personal data, you’re the Data Subject.

“Data management”: any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

“Data processing”: the performance of technical tasks related to data management

“Data processor”: a natural or legal person, public authority, agency or any other authority that processes personal data on behalf of the employer’s decision

“Profiling”: any form of automated processing of personal data whereby personal data are used to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict characteristics associated with that person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

“Third party”: a natural or legal person, public authority, agency or any other authority, that is not identical to the Data Subject, the Data manager, the Data processor or to any individuals who are authorised to process personal data under the direct authority of the controller or processor;

“The Data Subject’s consent”: a freely given, specific and unambiguous indication of the Data Subject's wishes (that is based on being properly informed) by which he or she signifies, by a statement or by the expression of his or her unambiguous consent, that he or she signifies his or her agreement to the processing of personal data concerning him or her;

“Biometric data”: any data concerning the natural person’s psychical, physiological or behavioural characteristics that are collected by specific technical procedures which allows or confirm the unique identification of the natural person, such as a portrait or a dactyloscopic data;

“Trade secret”: any fact, information, solution or data relating to an economic activity, the disclosure, acquisition or use of which by unauthorised persons or persons, would damage or jeopardise the legitimate financial, economic or market interests of the right holder, excluding the Hungarian State, and for the protection of which the right holder has taken the necessary measures to maintain secrecy.

III. Guidelines for Data Management

The data controller declares that he/she will process personal data in accordance with the provisions of the Privacy Policy and will comply with the applicable laws, in particular with regard to:

The processing of personal data should be lawful, fair and transparent for the Data Subject.

The collection of personal data should be of a determined, clear and lawful aim.

The aim of personal data processing should be adequate, relevant and limited to what is necessary.

The personal data must be accurate and up to date. Inaccurate personal data must be deleted without delay.

Personal data must be stored in a form which permits the identification of Data Subjects for no longer than is necessary. Personal data may only be stored for longer periods if the storage is for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes.

Personal data must be processed in such a way as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage, by using appropriate technical or organisational measures.

The principles of the Privacy Policy apply to any information relating to an identified or identifiable natural person.

IV. Important Data Management Information

The purpose of data processing carried out by the data controller, the legal basis, the data subjects, the duration of data processing and the persons entitled to know them are set out in [Annex 1](#), which forms an integral part of this information.

The Data Subject may request the controller to access, rectify, remove or restrict the processing of personal data relating to him or her and may object to the processing of such personal data and the data subject's right to data portability.

The Data Subject may at any time withdraw his or her consent to the processing, if it was based on his/her consent, but this shall not affect the lawfulness of the processing carried out on the basis of the consent before its withdrawal.

The Data Subject shall have the right to obtain from the controller, at his or her request the rectification or integration of inaccurate personal data relating to him/her without undue delay.

You, as the Data Subject, have the right to have any inaccurate or untrue personal data relating to you erased by the controller without undue delay upon your request, and the controller is obliged to erase personal data relating to you without undue delay unless there is another legal basis for the processing.

Changes or removal of personal data may be initiated by e-mail, telephone or letter using the contact details provided above.

V. The Rights of the Data Subject Considering Data Management

You, as Data Subject have the following rights considering data management:

The right to request information

You can request information whether your personal data is being processed, and if so:

- For what purpose?
- Which of your data is being processed?
- Who do we forward these data for?
- How long do we store these data?
- What are your rights and remedies considerin that?
- Who do we get your data from?
- Do we make automated decisions about you with the use of your personal data? In such cases, you may also request information about the logic (method) we use and the significance and likely consequences of such processing.
- If you have found that your data has been transferred to an international organisation or a third country (non-EU member state), you can ask for a demonstration of how the fair processing of your personal data is guaranteed.
- You can ask for a copy of your processed personal data. (We may charge a fee for further copies based on administrative costs.)

Upon your request, we will send the requested information to the e-mail address you have provided without delay, but within 30 days at the latest.

The right to rectification

You may ask us to correct or complete personal data that is inaccurate or incomplete. The controller may also ask you to provide other documentary evidence (e.g. a document) for a proof of the information you have provided. The controller will carry out the rectification without undue delay. Upon your request, information will be sent within 30 days to the e-mail address you have provided.

Right to erasure "right to be forgotten"

You can ask us to delete your personal data if:

- a) the personal data are no longer necessary for the purposes of which they were processed;
- b) in case the processing is based solely on your consent;
- c) if it is found that the personal data are unlawfully processed;
- d) if required by EU or national law.
- e) the personal data must be erased in order to comply with a legal obligation under the EU or a Member State law to which the controller is subject;
- f) the personal data were collected in connection with the provision of services to information society children;
- g) if we have processed the data on the basis of legitimate interest and you object to the processing, on the assumption that we as controller do not have a right to continue to process the personal data.

If the Controller has disclosed the personal data and is required to delete it pursuant to the above, it shall take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the controllers that process the data that the data subject has requested the deletion of the links to or copies or replicas of the personal data in question.

Upon your request, we will do so promptly, but within 30 days at the latest, by sending you an email to the email address you provided.

We may not delete your personal data if it is necessary for:

- a) the exercise of the right to freedom of expression and information;
- b) to comply with an obligation under EU or Member State law that requires the controller to process personal data or for reasons of public interest;
- c) on grounds of public interest in the field of public health;
- d) archiving purposes in the public interest, scientific and historical research purposes or statistical purposes, where deletion is likely to render such processing impossible or seriously jeopardise it; or
- e) for the presentation, exercise or defence of legal claims.

Right to blocking or restriction

You may request us to restrict processing if one of the following conditions is met:

- You question the accuracy of the personal data; in which case the restriction applies for the period of time that allows us to verify the accuracy of the personal data;
- The processing is unlawful, but you object to the removal of the data and instead request the restriction of their use;
- We no longer need your personal data for the purposes of processing, but you need it to establish, exercise or defend legal claims;
- You have objected to the processing; in this case, the restriction applies for the period until it is established whether the controller's legitimate grounds prevail over your legitimate grounds.

In case of restriction, personal data may be processed (except for storage) only with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the EU or of a Member State.

At your request, we will do so promptly, but within 30 days at the latest, by sending you an email to the email address you provided.

You will be informed in advance of any lifting of the restriction.

The right to objection

You can object against the processing of your personal data, if:

- Processing is necessary for the performance of a task carried out in the public interest, including profiling based on the public interest;
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, including profiling based on that.

In the above cases, personal data will be deleted, unless the processing is justified by compelling legitimate grounds which override your interests, rights and freedom or for the establishment, exercise or defense of legal claims.

You may also object to the processing of your personal data if:

- The data is processed for direct marketing purposes (in this context, you may also object to profiling). In this case, the personal data will be deleted.
- Personal data are processed for scientific and historical research purposes or statistical purposes. In this case, the personal data will be deleted unless the processing is necessary for the performance of a task carried out for reasons of public interest.

We will examine the objection and decide whether it is justified within the shortest possible time from the date of the request, but not later than 15 days, and inform you of our decision by letter or e-mail.

Rights relating to automated decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing (including profiling), which would have legal effects concerning you or similarly significantly affect you.

The above does not apply if the decision:

- necessary to perform the contract concluded with you;
- is permitted under EU or Member State law which also lays down appropriate measures to protect your rights, freedom and legitimate interests;
- or based on your permission.

You can still express your views and object to the decision even in these cases, except when prohibited by law.

Request for the transfer of personal data

You have the right to receive your personal data that we process in a machine-readable format and the right to have that data transferred to another controller - or at your request - if the processing is based solely on your consent or on a contract with you or on your behalf and is automated.

The mentioned right does not apply if the processing is necessary for the performance of a task carried out in the public interest. It must not infringe the right to erasure or adversely affect the rights and the freedom of others

Obligation of notification in case of the rectification or erasure of personal data or restriction of processing

The Controller shall inform about the rectification, erasure or restriction of processing any recipient to whom or with which the personal data have been disclosed, unless this proves to be impossible or involves a disproportionate effort. Upon your request, the Controller will inform you of these recipients.

VI. Enforcement and remedies in relation to data management

If you experience unlawful data processing, please notify us so that we can restore the lawful status within a short period of time.

you may request the competent authority to carry out an official investigation, data protection authority proceedings, in accordance with Act CXII of 2011's Chapter VI.:

Nemzeti Adatvédelmi és Információszabadság Hatóság

Postal address: 1530 Budapest, Pf.: 5.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

VII. Judicial remedy

If you believe that the processing of your personal data is in breach of the GDPR and that your rights under the Data Protection Regulation have been infringed, or if you disagree with the decision taken in relation to the processing, you have the right to take legal action.

The court has jurisdiction to hear the case. The action may also be brought, at the option of the Data Subject, before the court of the place of residence or domicile of the Data Subject. A person who does not otherwise have legal capacity may also be a party to the proceedings. The Authority may intervene in the proceedings in order to ensure that the Data Subject is successful.

In addition to the provisions of the Data Protection Regulation, the court proceedings shall be governed by the provisions of Act V of 2013 from the Civil Code, Book Two, Part Three, Title XII (§ 2:51 - § 2:54) and other legal provisions applicable to court proceedings.

VIII. Compensation

If the Data Controller or a processor acting on its behalf or at its instructions infringes the provisions on the processing of personal data laid down by law or by a binding legal act of the European Union and causes damage to another person, it shall compensate the latter. If your right to privacy has been violated, you may claim compensation from the Data Controller or from a processor acting on its behalf or at its instructions.

The Data Controller shall be exempt from liability for the damage caused and from the obligation to pay compensation if it proves that the reason of this damage or the harm was the infringement of the right to privacy that is caused by an unforeseeable event outside the scope of the processing.

The processor shall be exempted from liability for the damage caused and from the obligation to pay damages if it proves that, in the processing operations it has carried out, it has acted in compliance with the obligations specifically apply to processors under the law or a legally binding act of the European Union relating to the processing of personal data and with the lawful instructions of the Controller. The Data Controller and the processors appointed or instructed by it, as well as the joint controllers and the processors appointed or instructed by them, shall be jointly and severally liable to the Data Subject for any damage caused by a breach of the provisions on the processing of personal data laid down by law or by a legally binding act of the European Union and shall be jointly and severally liable to pay to the Data Subject the compensation for personal data breaches.

No compensation should be paid as far as the damage was caused by the intentional or grossly negligent conduct of the victim.

IX. Data safety

We will do our utmost to implement appropriate technical and organisational measures to ensure a level of data security appropriate to the level of risk, taking into account the state of science and

technology, the cost of implementation, the nature of the processing and the risks to the rights and freedom of natural persons.

Personal data is always treated confidentially, with limited access, encryption, providing recovery in case of issues. Our systems are regularly tested to ensure security. In determining the appropriate level of security, we have taken into account the risks arising from the processing of personal data, especially from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, whether it is caused by transit, storage or otherwise.

We will do our utmost to ensure that those persons (acting under our control) who have access to personal data only be allowed to process that data in accordance with our instructions, unless they are required to do otherwise by EU or Member State law.

X. Data transmission

Data relating to you may be used and disclosed for statistical purposes only in manner that is not personally identifiable.

We reserve the right to disclose the processed personal data to the competent authorities or courts, if it is requested by them, in the cases specified by law, even without the specific consent of the Data Subject.

We will only transfer your personal data to the data controllers and processors indicated in this Privacy Policy and only in ways that are included in this document. The controller can only transfer your personal data to other controllers with your prior consent.

You can find the contact details of the data processors at Annex 2.

XI. Confidentiality

The data controller may disclose facts, data or opinions concerning you to a third party only in the cases provided by law or with your consent.

You are obliged to keep any business secrets you learn in the course of your work, as well as essential information about the controller and its activities. In addition, you must not disclose to any unauthorised person any information which you have obtained in the course of your employment and the disclosure of which could have a detrimental effect on the controller or any other person. Confidentiality shall not extend to the obligation to provide information and to supply information laid down by a specific law on the disclosure of data of public interest and on data which are in the public interest.

The Data Controller is entitled to amend this Privacy Policy at any time.

Annex 1

for

www.webszinhaz.com's Privacy Policy

Specific information on each processing operation carried out by the controller.

1. Registration

Data management process	You must be a registered user to be able to buy tickets on the www.webszinhaz.com website and to view the film of your choice with the purchased ticket.
Purpose and legal basis for processing	The purpose of the data processing is to provide the opportunity to buy tickets and view films for real persons. Registration allows the identification of the person who is registered for the purpose of payment and film watching, and the verification of the right to use the service (i.e. to view the film). The legal basis for processing is the consent of the data subject pursuant to Article 6, paragraph 1/a of the GDPR.
Processed personal data	Name, address, e-mail address, telephone number
Source of personal data	Disclosure by data subject.
Duration of processing	Until the purpose is achieved, i.e., until the data subject cancels his/her registration. Once the registration has been cancelled, the user cannot buy a new ticket on the website and cannot view the film already purchased, even within the validity period of the ticket.
Data transmission, data processors	There is no data transfer, the Data Controller does not use a data processor.

2. Ticket purchase

Data management process	The Data Controller allows registered users to purchase tickets, in the course of which the Data Controller processes the personal data provided by the user at the time of registration. Users who have not yet registered will be able to register when they purchase their first ticket.
Purpose and legal basis for processing	The purpose of data management is to create the opportunity to watch movies for real people. The purchase of a ticket creates the right to use the service (i.e., to watch the film). The legal basis for processing is the consent of the data subject pursuant to Article 6, paragraph 1/a of the GDPR.
Processed personal data	Name, address, e-mail address, telephone number
Source of personal data	Disclosure by data subject.
Duration of processing	8 years
Data transmission, data processors	Data transmission to NAV, Data processor: Accountant

3. Online payment

Data management process	In connection with its business activities, the Data Controller issues invoices and pro forma invoices to sole traders and individuals (also) and keeps a record of them.
Purpose and legal basis for processing	Completion of statutory invoicing obligations (Act C of 2000 165§-166. §, 169. §).
Processed personal data	Name, address, tax number
Source of personal data	Disclosure by data subject.
Duration of processing	8 years
Data transmission, data processors	Data transmission to NAV, Data processor: Accountant

4. Invoicing

Data management process	In connection with its business activities, the Data Controller issues invoices and pro forma invoices to sole traders and individuals (also) and keeps a record of them.
Purpose and legal basis for processing	Completion of statutory invoicing obligations (Act C of 2000 165§-166. §, 169. §).
Processed personal data	Billing name, billing address, tax number, transaction details.
Source of personal data	Disclosure by data subject.
Duration of processing	8 years from the date of issue of the invoice, or the mandatory retention period laid down in the accounting and tax legislation in force.
Data transmission, data processors	Data transmission to NAV, Data processor: Accountant, provider of online invoicing software

5. Newsletter

Data management process	The Data Controller informs its users who agreed to receive newsletters by sending a newsletter about the films and news available on its website, as well as other programmes and promotions organised or recommended by the Data Controller. You can subscribe to the newsletter by entering your name and email address at www.webszinhaz.com during registration (or at any other time). By ticking the box next to the text of the consent form, the user agrees to the use of the subscriber's data for this purpose before using the service. This consent may be withdrawn at any time.
Purpose and legal basis for processing	Completion of statutory invoicing obligations (Act C of 2000 165§-166. §, 169. §).
Processed personal data	Name, e-mail address
Source of personal data	Disclosure by data subject.
Duration of processing	Until the purpose is achieved, i.e., until the data subject cancels his/her registration or unsubscribes.
Data transmission, data processors	There is no data transfer, the Data Controller does not use a data processor.

6. Other electronic mailing

Data management process	The Foundation communicates with users and their representatives by e-mail.
Purpose and legal basis for processing	The purpose of data processing is the exchange of information between the Foundation and third parties (in this case, the users and their representatives). The legal basis for the processing is the legitimate interest of the controller as set out in Article 6 (1) paragraph (f) of the GDPR.
Processed personal data	Name, e-mail, telephone number
Source of personal data	Disclosure by data subject.
Duration of processing	5 years from the date of receipt of the letter, or 72 hours thereafter if the purpose of the correspondence has been achieved earlier.
Data transmission, data processors	There is no data transfer. The data processor is the provider of the electronic mailing system. The data processor typically does not have access to personal data, but may have access to personal data in case of a troubleshooting for the duration necessary to troubleshoot the problem.

7. Procedure in case of dispute

Data management process	Processing of personal data of the opposing party in case of a possible legal claim against the Data Controller.
Purpose and legal basis for processing	The purpose of the processing is the storage and use of personal data necessary for the purposes of the dispute. The legal basis for the processing is the validation the legitimate interest of the controller as set out in Article 6 (1) paragraph (f) of the GDPR.
Processed personal data	Personal data of the opposing party and of the individuals involved in the transaction (representatives, agents).
Source of personal data	Disclosure by the data subjects, in case of change of address, address registry.
Duration of processing	Pending the final conclusion of the legal proceedings, and possibly the recovery of the claim.
Data transmission, data processors	Data Processor: the legal representative of the Data Controller.

Annex 2 for www.webszinhaz.com's Privacy Policy

Details of the data processors

1. The financial back office for electronic payment during purchasing tickets

Data processor:	Barion Payment Zrt.
Head Office:	1117, Budapest, Irinyi József utca 4-20. 2. emelet.
E-mail:	itsupport@otpmobil.com
Telephone number:	+36 1 464 70 99
Represented by:	their legal representative

2. Accountant

Data processor:	...
Head Office:	...
E-mail:	...
Telephone number:	...
Represented by:	the current managing director of the company

3. The provider of the online invoicing software (<https://www.szamlazz.hu/>)

Data processor:	KBOSS.hu Kft.
Head Office:	1031 Budapest, Záhony utca 7.
E-mail:	info@szamlazz.hu
Phone number:	+3630 35 44 789
Represented by:	the current managing director of the company

4. The provider of the online e-mailing system

Data processor:	...
Head Office:	...
E-mail:	...
Phone number:	...
Represented by:	the current managing director of the company