

# **PRIVACY, DATA MANAGEMENT AND DATA SECURITY POLICY**

Valid from September 1, 2020

## **Introduction**

Based on Act CXII of 2011 on the right of self-determination and freedom of information, regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Regulation (EC) No 95/46 (hereinafter: GDPR) and other relevant legislation, Pro Progressione provides for the data management, data transfer, data protection, security, access to and publication of data of public interest in these Privacy, Data Management and Data Security Regulations (hereinafter: the Regulations).

We attach great importance to the protection of your personal data, therefore we wish to provide you with information on the data processing activities carried out by Pro Progressione Kft. (H-1011 Budapest, Hunyadi János u. 11.) as a controller, and the principles and rules we abide by during these activities.

Data processing is only carried out during the use of Pro Progressione's website ([www.pro-cult.com](http://www.pro-cult.com)) and our services with your prior notification and explicit consent. In addition, Pro Progressione processes data based on legitimate interest or express statutory provisions for the fulfilment of the contract between you and Pro Progressione.

The rules are valid from September 1, 2020 until withdrawal

## **1. Security of your data, our data processing principles**

Pro Progressione shall treat your personal data in a manner that is as transparent as possible for the sole purpose of a specific, clear and legitimate purpose, only to the extent required and for the briefest period necessary to achieve the purpose, in a manner that is legitimate and fair in all respects. We pay great attention to ensuring that the data we process is accurate and up-to-date.

However, we are aware that compliance with the above is worthless if technical and organisational measures are not taken to protect personal data. For this reason, Pro Progressione's employees will keep confidential any data, information or documents, regardless of the form and manner in which they became known, in the course of or in connection with the performance of their duties.

We have also created our organisational structure, which we operate through internal organisational rules and the allocation of different access rights, so that we are able to provide the necessary guarantee for the transparency of our data processing and in respect to the security of your personal data in every aspect. Pro Progressione will not disclose any personal data to third parties without the consent or prior notification of the data subject unless specifically required to do so by law or a by instruction of a competent authority. Pro Progressione will make every effort to ensure that your personal data cannot be accessed by any unauthorised person by implementing appropriate technical measures (operation of a single internal IT system).

## **2. Scope of the data processed by Pro Progressione**

### **a) [www.pro-cult.com](http://www.pro-cult.com) server 'logging'**

When visiting the website of Pro Progressione, the web server automatically logs the user's activity. Without this, we would not be able to ensure the proper functioning of the website and we would not be able to prevent any external attacks, therefore this kind of data processing is based on the legitimate interest of Pro Progressione. The log file is used for quality assurance; we do not link it with any other information as we do not intend to identify the user concerned.

- Stored data: IP address (anonymously), approximate geographic location, address of visited pages, date and time data
- Storage period: the data are erased after 30 days

### **b) Web analytics measurements**

Google Analytics as an external service provider helps to independently measure the website hits and other web analytics data of the pro-cult.com website. The data is recorded anonymously, Pro Progressione uses them for statistical purposes only and to optimize the operation of the site. For detailed information about the processing of measurement data, please visit: <http://www.google.com/analytics>. Web analytics data collection for such statistical purposes is a widespread practice that you consent to by visiting our website.

### **c) Management of cookies**

A cookie (in Hungarian: süti) is a small data file that our server sends to your web browser in order to provide a customised and high-quality service. If you return to our

website, your browser will send the cookie back to our server and make it possible to create a connection between individual sessions.

#### **You may see two types of cookies on our website:**

- The use of **session-id** and **use facilitating (temporary) cookies** is required for the proper use of the site. Without this, the website or parts thereof will not be displayed, the consent to the management of cookies cannot be stored, browsing becomes obstructed and entry into the basket or the bank payment area cannot be properly executed. Therefore, by visiting this website, you acknowledge the use of these cookies.
- **Permanent cookies:** Depending on how the web browser is set up, they will remain on the device for a long time or until they are deleted by the User. If the web server of Pro Progressione installs the cookie and the data is transferred within its own database, then we are referring to an internal cookie. If the cookie is installed by the web server of Pro Progressione or a third party service provider, but the data is transferred to an external service provider, then we are referring to an external cookie.

While visiting the pro-cult.com website, you can see a pop-up message appearing on the home page of the site, and by visiting the website, you automatically consent to the use of permanent cookies.

- Stored data: identification code, date, time, the page previously visited
- Storage period:
  - temporary cookies that assist session use, until the session is closed,
  - permanent cookies are usually stored for 1 year on your computer or until you delete them.

Please note that cookies can be deleted from your computer at any time or disabled in your browser.

For more information about logging and cookie management from Google or Facebook service providers for managing measurement data and personalising your ads, visit <https://www.facebook.com/about/privacy> or [www.google.com/intl/hu/policies/privacy](http://www.google.com/intl/hu/policies/privacy).

#### **d) Purchasing tickets**

When you purchase a ticket online, the ticket is purchased in the system operated by Interticket Kft. The range of personal data processed and the ticket purchase process are the same as the process at the ticket office.

In connection with our public performances, the data you provide is processed by Pro Progressione for the fulfilment of the contract between you (e.g.: notification of cancelled performances, handling of ticket refunds, issuing of invoices).

Due to our receipt and invoicing obligation, personal data provided by you to us are kept for the period of time required by the applicable financial legislation.

We believe that if you have purchased a ticket for one of our performances, our other programmes may also be of interest to you. Therefore, we will inform you about some of our other programmes in the future through the e-mail address you provided during your ticket purchase.

You have the right to object to such data processing directly by sending an e-mail to [info@pro-cult.com](mailto:info@pro-cult.com).

If the payment was made with a bank card, the customer provides the data requested by the affected bank by itself, on the payment service provider's own interface, so neither Interticket Kft. nor Pro Progressione has access to the card data in this connection, and does not perform any data management operations.

#### **e) Processing of personal data in connection with projects**

In connection with domestic and EU projects Pro Progressione may only process personal data in the context of the project, to the extent specified in the project calls and the relevant specific regulations, and usually up to the settlement of the project. When implementing projects, we ensure the principle of data saving, according to which the given project activity can only be accompanied by the processing of the most necessary personal data.

#### **f) Data content of contracts**

The general rules are applied to the protection of personal data in contracts entered into by Pro Progressione, with the addition that only the personal data necessary for the performance of the contract is handled by the organization.

#### **g) Recording of video and audio footage**

By attending the online and offline events of Pro Progressione, you expressly acknowledge that pictures, audio and video recordings may be made, in which you, as a visitor, may also appear. By participating in Pro Progressione events you agree that Pro Progressione may use the recording in connection with its core cultural activity. The completed recordings may be published on Pro Progressione's own website, as well as on Facebook, LinkedIn, Instagram pages ("Websites"), in printed magazines, reports and advertising surfaces. In connection with such use of the recording, no claim may be submitted against Pro Progressione, the organisers or the creators of the recording, or against any other person using the recording with proper entitlement.

## **h) Other data processing**

Information on data processing not listed in this policy will be provided at the time of data collection. We inform our clients that the court, the prosecutor, the investigating authority, the infringement authority, the administrative authority, the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság), the Hungarian National Bank (Magyar Nemzeti Bank), or, based on the authorization of legislation, other bodies may contact Pro Progressione to provide information, disclose data, or make documents available. If the authority had indicated the exact purpose and scope of the data collection, we will only provide personal data to the authorities to the extent strictly necessary to achieve the purpose of the request.

Pro Progressione does not check the provided personal information. The person who provided the data is solely responsible for the accuracy of the information. When you, as a user provide an email address, you're also responsible for ensuring that you are the only person who gets in contact with Pro Progressione via the email address you provided. If the user does not provide his / her personal data, he / she is obliged to obtain the contribution of the data owner.

## **3. Data security rules**

### **(a) Physical protection**

To ensure the security of personal information processed on paper, Pro Progressione applies the following rules:

- the data can only be known to those entitled to it, it cannot be accessed by or disclosed to others;
- place documents in a well-locked room;
- documents in active management can only be accessed by competent persons;
- Pro Progressione's data processing staff member may leave the room where the data processing takes place during the day or at the end of the work only by closing the data carriers entrusted to him or her or closing the office;
- If personal data processed on paper is digitized, the security rules of digitally stored documents will be applied.

### **b) IT protection**

To ensure the security of personal data stored on computer or network, we use the following rules and warranty elements:

- the computers used for data management are the property of Pro Progressione or the organization has ownership rights over them;
- computer access is possible only with valid, personal, identifiable permission - at least with a username and password. We ensure that passwords are changed regularly or in reasonable cases;
- all computer records are traceably logged;

- the data stored on the network server machine (hereinafter: server) can be accessed only with appropriate authority and only by designated persons;
- if the purpose of data management has been achieved, the deadline for data management has expired, the file containing the data will be irretrievably deleted, the data cannot be recovered again;
- we perform regular backups of the active data of the databases containing personal data, the backup applies to the entire data file of the central server;
- we continuously provide virus protection on the personal data management network;
- we prevent unauthorized persons from accessing the network with the available computer equipment and their use.

#### 4. Rights of data subjects and method of their enforcement

Your letter in relation to the below requirements shall be sent to the [info@pro-cult.com](mailto:info@pro-cult.com) e-mail address.

- You may request Pro Progressione for **inform** you at any time regarding whether it is processing your personal data, and if so to provide access to the personal data processed by them. We wish to inform you that Pro Progressione may consider any request for information sent by e-mail authentic only if it is sent from the e-mail address previously given us, however this does not exclude the fact, that prior to providing the information Pro Progressione may also identify the requestor in another way.
- If you find that personal data processed relating to you are not realistic, you may request that your personal data processed by us is **rectified**.
- You may request the **erasure** of your personal data processed by us at any time. The erasure may be rejected (i) in relation to the exercising the right to the freedom of expressing an opinion and obtaining information, or (ii) when the law provides authorisation for the processing of Personal Data and (iii) for the presentation, enforcement or defence of legal claims. Pro Progressione shall always inform the data subject of the rejection of the request for erasure specifying the reason for denying the erasure. Former (erased) data can no longer be recovered after the requests for erasure of personal data have been fulfilled.
- You may request Pro Progressione to **restrict** the processing of your personal data if you dispute the accuracy of the processed personal data. In that case the restriction related to the period during which we can verify the accuracy of the personal data. You may also request a restriction on data processing if the data processing is carried out unlawfully or its purpose has already been achieved, but you are opposed to erasing the processed personal data and instead request the restriction of their use.

- You may at any time **object** to the processing of your personal data (i) if the processing of personal data is required only for performing a legal obligations of controllers (Pro Progressione) or for the enforcement of a legitimate interest of the controller or a third party; (ii) where the purpose of data processing is direct business acquisition, a public opinion survey or scientific research; or (iii) if data processing takes place in order to fulfil a task in the public interest. Pro Progressione examines the lawfulness of the objection and, if it establishes that the objection is well founded, it terminates the processing of data.

## 5. Data processors

Personal data processing on behalf of Pro Progressione is carried out by data processors in a contractual relationship with us. The data processor cannot make an independent decision on the data and is entitled to proceed only according to the provisions of the contract concluded with Pro Progressione and instructions received. Our data processors have been selected to ensure that your personal data is secured to the greatest possible extent during data processing.

You can view the current list of our data processors here:

### **InterTicket Kft.**

1139 Budapest, Váci út 99., 6. emelet (BUSINESS CENTER 99 OFFICE PARK)  
10384709-2-42

### **Magyar Posta Zrt.**

1138 Budapest, Dunavirág u. 2-6.  
10901232-2-44

### **Vodafone Magyarország Távközlési Zrt.**

1096 Budapest, Lechner Ödön fasor 6.  
11895927-2-44

### **Magyar Telekom Nyrt.**

1013 Budapest, Krisztina krt 55.  
10773381-2-44

### **CIB Bank Zrt.**

1027 Budapest, Medve utca 4-14.  
10136915-4-44

## 6. Right enforcement options

If you would like more information please contact us by e-mail at [info@pro-cult.com](mailto:info@pro-cult.com), by post at H-1011 Budapest, Hunyadi J. út 11. or in person. We wish to inform you that, if you submit your request relating to data processing in person, our colleagues may ask you to verify your identity.

With your data processing complaint you may turn directly to the Hungarian National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.; phone: +36-1-391-1400; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu)).

In the event of any infringement of their rights, the data subject may bring their case before the court. The case shall be heard by the competent general court. If so requested by the data subject, the case may be brought before the general court in whose jurisdiction the data subject's home address or temporary residence is located.

Pro Progressione is entitled to unilaterally change this Privacy Policy at any time. If this entails changing the principles or the purpose of the data processing, it shall obtain the consent of the data subject in advance for further data processing.

Budapest, 1 September 2020