

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 and representatives of legal persons using our services (hereinafter referred to as Organizers) in a concise, transparent, intelligible and easily accessible form, using clear and plain language, and assist the Organizers 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 t

he 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, realizing the IT support of activities with respect to event organization. The Organizer using the services acquires access to the administration interface by registering into the system.

The Organizer may create any number of events under its own account, in the administration interface. There is also the possibility to invite additional administrators for the managing of the events, therefore, the system may be managed by more Organizers. All events have their own setting possibilities.

Following the creation of a specific event, the main data with regard thereto may be provided. Following the creation of events, performers, locations, programs and tickets may also be managed by using the organizational functions. Programs may be ordered to tickets, which determine in which event may the visitor participate with that particular tickets. (For checking the entitlements, TicketNinja provides its own mobile application).

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 Ideathon 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 (such as 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)

Licencee: the organization constituting an Organizer which downloads and uses the Software applications, supplements and tools, including mobile applications on the online interface. The legal successor of the Organizer is also deemed an Organizer.

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

3. Data of the controller

Ideathon Korlátolt Felelősségű Társaság	
Abbreviated company name	Ideathon Kft.
Registered seat	9113 Koroncó, Kelta utca 12.
Registry number	08-09-035240(Hungarian Company registry)
Tax number	32154108-2-08
E-mail address	hello@ticketninja.io

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 Data processing with regard to sending newsletter

In order to provide information to the visitors of our Website, it is possible to subscribe to our newsletter. Information on the pertaining data processing are detailed below:

4.1.1. Processed personal data and purpose of processing

personal data	purpose of processing
name	by the provision thereof, we may address the Organizer in our newsletter
e-mail address	by the provision thereof we are informed of the electronic contact detail of the Organizer where we may send our newsletter

4.1.2. Legal basis of processing

The consent of the Organizer (Article 6, Paragraph 1, Point a) of GDPR and Section 6, Subsection 1 of Act XLVIII of 2008 on the essential conditions of and certain limitation to business advertising activity (hereinafter referred to as Business Advertising Activity Act).

4.1.3. Duration of the processing

We shall process the provided personal data until the revocation of consent. The Organizer may revoke his/her/its consent at any time by clicking on the box “Unsubscribe” in the sent e-mail. The revocation of consent does not affect the legality of the data processing prior to such revocation.

4.1.4. Mode of processing

The personal data are collected in electronic form.

4.2 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.

4.2.1. Processed personal data and purpose of processing

personal data	purpose of processing
name	identification of the Organizer, or the contact person of our business partner
e-mail address	contacting and communication with the Organizer, or the contact person of our business partner
phone number	contacting and communication with the Organizer, or the contact person of our business partner

4.2.2. Legal basis of processing

If the Organizer contacts us through our website, we process the Organizer's personal data based on his/her/its freely given consent provided by him/her/it 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 Organizer's data for a purpose other than the original purpose of collecting such data, then we shall inform the Organizer thereof and acquire his/her/its 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.

4.2.3. Duration of the processing

We process the personal data until the withdrawal of consent. The Organizer has the right to withdraw his/her/its consent at any time. The withdrawal of consent does not affect the legality 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).

4.2.4. Mode of processing

The personal data are collected in electronic form.

4.2.5. 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.

4.3. Data processing concerning invoicing

After the performing of the orders we, with regard to Act C of 2000 on accounting (hereinafter referred to as Accounting Act), we shall issue an accounting document. The details of such processing are described hereunder.

4.3.1. Processed personal data and purpose of processing

personal data	purpose of processing
name	supporting the accounting treatment of the performance of the order (economic event)
address/registered seat in case of sole proprietors (ZIP code, city, street name, house number together)	supporting the accounting treatment of the performance of the order (economic event)
tax number of the sole proprietor	supporting the accounting treatment of the performance of the order (economic event)

4.3.2. Legal basis of processing

Processing is necessary for compliance with legal obligations (with regard to Article 6, Paragraph 1, Point f) of GDPR, Section 5, Subsection 1, Paragraph b) of Information Act and Section 166, Subsections 1 to 3 of the Accounting Act).

4.3.3. Duration of the processing

8 years after the issuance of the accounting document (with regard to Section 166, Subsection 6 of the Accounting Act, Section 169, Subsection 1 of the Accounting Act).

4.3.4. Mode of processing

Personal data are collected in electronic form.

By taking into account the provisions of the legal act on the rules of the digital archiving, the accounting document issued in electronic form shall be stored in a manner that the applied method shall ensure the provision and continuous readable form of all of the data of the document without delay and that excludes the possibility of subsequent modification.

4.3.5. Provision of personal data

Since we cannot perform our accounting obligations without knowing the concerning personal data, the provision of personal data is a statutory requirement.

4.4 Data processing concerning registration

For the use of our service by the Organizer, prior registration is required. The details of such processing are described hereunder.

4.4.1. Processed personal data and purpose of processing

personal data	purpose of processing
name or the name of the contact person (owner and administrator)	identification of the Organizer
invoicing address	checking the invoicing data
e-mail address	contacting the Organizer
password	carrying out technical measures

4.4.2. Legal basis of data processing

The data processing is necessary for the performance of the contract (general terms and conditions) concluded by and between us and the Organizer provided that the Organizer is a natural person.

If the registering person is a legal person, the legal basis of processing the abovementioned personal data of the contact person is the legitimate interest of the controller and the Organizer (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 system, and to provide information to the designated representatives of each party, on the essential circumstances affecting such contracts. Since it is the employment or contractual duty of the contact person to promote the communication between the parties and to provide his/her personal data for that purpose, the right of the Organizer's contact person to informational self-determination is not violated.

4.4.3. Duration of the processing

8 years after the issuance of the accounting document (with regard to Section 166, Subsection 6 of the Accounting Act, Section 169, Subsection 1 of the Accounting Act).

With respect to Section 6:22, Subsection 1 of Act V of 2013 on the Civil Code, personal data not required for the performance of accounting obligations shall be stored for the abovementioned purposes for 5 years after the performance of the order.

4.4.4. Mode of processing

Personal data are collected in electronic form.

4.5 Differentiations, the declaration of the processor

Pursuant to GDPR, the controller is the natural or legal person, public authority, agency or other body who/which, alone or jointly with other, determined the purposes and means of the processing of personal data. **In case of TicketNinja, your company/institution constitutes the controller in the course of registering, using and transmitting the Organizers' personal data.** Consequently, the setting of the system, the provision of information to the data subjects, that is, whose data are processed by the system, and the preparation and acquisition of the necessary declarations of consent, complying with the legal acts, is your duty and liability. We may determine the scope of the data to be collected by your company/institution in specific cases to the extent that we set the suggested data to be collected from the visitors or the categories of questions to be addressed to the visitors in advance. We draw your attention to the fact that Ideathon Kft. also uses the data of the Organizers and the data requested and provided by you for the event stored in the system, therefore it constitutes a controller with regard to certain data. Ideathon Kft. informs the visitors on the TicketNinja page thereof and any other additional information with respect to data processing. Pursuant to GDPR, the **processor** is a natural or legal person, public authority, agency or other body who/which processes personal data on behalf of the controller. **During the operational activity, Ideathon Kft, provided that it performs data processing measures with regard to personal data on your behalf (that is, it reads, stores, transmits, analyses, erases or modifies them) constitutes a processor. In this capacity, Ideathon Kft. hereby attests that it proceeds during the processing of personal data with the compliance of the effect data protection legal acts and it shall continuously ensure the confidential processing, integrity and accessibility of the personal data during the process. Nevertheless, in certain cases Ideathon Kft. proceeds as independent controller with regard to the processing of the visitors' data (pertaining thereto, the provisions of the privacy policy for the visitors shall apply).**

Ideathon Kft. as processor according to the aforementioned, with regard to the provisions of Article 28 of GDPR, hereby makes the following declarations to the Organizer as controller according to the abovementioned:

During the processing activity detailed in this Section, we shall provide appropriate guarantees for the compliance with the requirements of GDPR and the implementation of the appropriate technical and organizational measures that ensure the rights of the data subjects (that is, the Visitors participating in the events organized by the Organizer on the interface operated by us).

We shall only process the personal data processed by the Organizer for the purposes detailed above.

We shall ensure that our colleagues authorized for the processing of personal data undertake confidentiality obligations or that they are subject to appropriate confidentiality obligations based on legal acts.

For the protection of personal data processed during the use of the Website operated by us, we shall carry out appropriate technical and organizational measures which are proportionate to the risks (see Section 8 in detail).

Apart from the service providers indicated in Section 7 of this Privacy Policy, we shall not use any additional processor or we shall only use them upon the instruction of the Organizer, within the scope of the contracts concluded by and between us.

Within the scope of the contracts concluded by and between us, we shall fully cooperate with the Organizer with respect to implementing data security measures, examining data breaches and requests of the data subjects, and carrying out data protection impact assessments.

Following the possible finishing of the performance of the service, we shall erase or return all personal data to the Organizer upon his/her/its decision, and we shall also erase the existing copies unless otherwise provided for by the law of the European Union and those of the Member States with respect to further storing of personal data.

We shall give any and all information to the Organizer which is necessary for certifying the performance of the obligations determined in GDPR with regard to the use of processors.

4.6 Organizational duties to be carried out in the TicketNinja system

4.6.1. Provision of information and consent

The Organizers are obligated to inform the participants of such data processing which they request from the users, beyond the user registration. Should these supplementary data be required for the organization, successful conducting and the participation of the users (e.g. the user chooses a program from more, simultaneously available programs and signs up for it), then the user shall only be informed of such data processing but his/her/its consent is not needed, as in this case, data processing is required for the appropriate performance of the contract. In case of requesting any such data which does not serve the conducting of the event or the appropriate participation therein, the expressed, informed consent of the user, based on purpose limitation, is required. The user may also express his/her/its consent by the indication of the appropriate checkbox.

We draw your attention to the fact that in case of data processing based on consent, consent may only be lawfully provided by an express, active conduct. The “non-objection” and the previously indicated checkbox do not constitute lawful consent. Consent to the processing of optional data, beyond those provided for the use of the service may not be made a condition to the use of the service.

4.6.2. Purpose limitation

The Organizer may only use the personal data provided by the users for the purpose the users have provided them for and of which purpose of use the Organizer previously informed them. The users shall be informed of the use for a purpose other than the original purpose and their consent shall be acquired. The Organizer may only transmit these data to third parties if he/she/it has previously informed the users thereof.

4.6.3. Duration of storing the data

The Organizer may only store the data provided by the users, for the organizing of the event until such a time that it is necessary for the realization of the original purpose of data processing (organizing, conducting of the event, invoicing, etc.). Following that, the Organizer may only store the personal data in his/her/its possession, if the users were previously informed thereof and the Organizer has appropriate legal basis for such data processing.

4.6.4. Data security

The Organizer is obligated to ensure by appropriate organizational and technical measures that the confidential nature, integrity and accessibility of the personal data in his/her/its possession is protected from any intentional or negligent human conduct, omission, act carried out in bad faith, unavoidable external circumstance, disaster or any other event. In addition, the Organizers shall take into consideration that no network, server, database, internet or e-mail connection may be completely free of defects or malfunctions, therefore they shall take special attention to that fact at the time of publishing personal data.

5. What are the Organizer' 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 Organizer may request free information on the details of the processing of his/her 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 Organizer may address his/her/its 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 Organizer 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 Organizer 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 Organizer, we shall erase personal data concerning him/her, if the processing of such data is no longer necessary, if the Organizer has revoked his/her consent thereto, if the Organizer 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 Organizer'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 Organizer.

5.5 Right to restriction of processing

At the request of our Organizer, we shall restrict data processing if the accuracy of the personal data is challenged, or the data processing is unlawful, or our Organizer 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 Organizer 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 Organizer 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 4.2 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 Organizer 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 Organizer 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 Organizer'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, 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 Organizers have been disclosed, unless this proves impossible or involves disproportionate effort. We also inform the Organizer 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 Organizer. That period may be extended by an additional two months where necessary, taking into account the complexity and number of the requests. We inform the Organizer of any such extension within one month of receipt of the request, together with the reasons for the delay.

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

If we do not take actions at the request, we inform the Organizer 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 the Organizer's 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 Online payment and invoicing service providers

In case of online payment, Ideathon Kft. transmits the personal data of the Organizer 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 periodic payment
- 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 periodic payment
- 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 periodic payment
- 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 periodic payment.
- 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 periodic payment
- 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.
 -

7.2 CRM service provider

Ideathon Kft. uses CRM (customer relationship manager) system, into which it transmits the data of the Organizer or its contact persons. The service provider stores the following in an organized manner: name of the contact person, company name, company details, communication notes of the contact person, etc. The data of the service provider:

- HubSpot (<https://www.hubspot.com>, <https://www.hubspot.com/data-privacy/gdpr>)

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 Infrastructure operator

SZINTÉZIS-NET Szoftverfejlesztő és Szolgáltató Korlátolt Felelősségű Társaság

Seat: 9024 Győr, Vasvári Pál út 1/C.

Company registration number: 08-09-011535

Tax number: 13116057-2-08

7.5. Hosting service provider

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

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

7.6 Using data processors

Ideathon 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.

7.7 Request of courts and authorities

Apart from the abovementioned, the Company shall also transmit the personal data of the Organizer 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 Organizer, 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 computer devices of persons using the website (hereinafter referred to as users) 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 user. Consequently, the website is able to “remember” the settings of the user (such as: applied language, letter size, design, etc.), therefore, it is not necessary to set it each time the user 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 user 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

Ideathon 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 the users’ needs, to further develop our services and to offer personalized contents and better experience for the users. These cookies may only be placed on the computers upon the user’s consent thereto.

9.2.2. Performance measurement and analytics

Ideathon Kft. uses the technologies for monitoring the services and analysing the users’ activities. The placement of cookies assist in transferring the users’ 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 user’ activities and in determining where the user uses the services.

Ideathon Kft. uses the cookies of third parties for measuring and analysing the above performance of the users, 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 user’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 users' 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 user, while other cookies are appropriate for recording the preferences of the user (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 user'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 user personally. These cookies only serve the abovementioned purposes.

9.2.4. Necessary cookies

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

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

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

9.2.5. 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 users, thereby facilitating the analysis of use of the website visited by the user.

2. The information generated by the cookies with respect to the website used by the user 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 user 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 Ideathon Kft., Google shall use these information to assess how the user used the specific website and to make reports pertaining to the activity regarding the website for Ideathon 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 user shall not be combined with other Google data. By appropriate configuration of the user’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 users’ 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>

Ideathon Kft. shall not automatically place Google Analytics code on the landing pages.

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

9.2.6. Facebook Pixel

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

For the service of Facebook Pixel, the placement of cookies on the users’ 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 optimising them to the appropriate audience, presenting personalized advertisement, and preparing reports and statements of the website.

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

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

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

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

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

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 Organizers 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 19th December, 2022

Ideathon 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 XLVIII of 2008 on the essential conditions of and certain limitation to business advertising activity (Business Advertising Activity 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 Organizer'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 Organizer's current visit with the previous one, but only with respect to its own content;
- 'data subject/Organizer' 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 Organizer 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 Organizer 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 Organizer 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 Organizer 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 Organizer is entitled to request the erasure of the personal data concerning him/her and processed by us, provided that any of the following conditions are met:

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

Should we determine based on the Organizer'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 Organizer is entitled to request the restriction of the personal data concerning him/her processed by us in the following cases:

- the Organizer 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 Organizer's claims.

We automatically restrict the processing of personal data if the Organizer challenges the accuracy of the personal data and the Organizer exercises his/her/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 Organizers 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 Organizer is entitled to request the provision of personal data concerning him/her, and processed by us to further use determined by the Organizer. Besides that, the Organizer may also request that we transfer the personal data to another controller indicated by the Organizer.

This right only covers the personal data provided by the Organizer 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 Organizer in a structured, commonly used and machine-readable format (PDF/XML) and on paper, in a printed format.

We inform the Organizer that the exercising of this right does not automatically involve the erasure of such personal data from our systems. Besides that, the Organizer 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 Organizer 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 Organizer 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.