

INFORMATION AND POLICY REGARDING SUPPORTING THE DANCING ON THE SQUARE PROJECT

The Budapest Festival Orchestra (registered office: H-1033 Budapest, Polgár utca 8–10, Flórián Udvar Building B, Hungary; “BFO”) is taking this opportunity to provide information concerning the processing of your personal data by BFO pursuant to the provisions of Article 13 of 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 (General Data Protection Regulation) (“GDPR”).

1. The Purpose and Legal Basis for the Data Processing, Scope of Processed Data, the Duration of Data Processing, the Scope of Those Who Have Access to Data, Data Transfers:

1.1 Data processing in relation to supporting the Dancing on the Square project

If you support the Dancing on the Square project, organised by BFO and to be held on 17 June 2018, BFO will process the following data concerning you in relation to this:

name, email address, postal address, phone number, amount of payment

In this case, GDPR Article 6(1)(b) (“*performance of a contract*”) and (c) (“*compliance with a legal obligation*”) will be the legal basis of processing, having regard to the fact that a contract is established by and between you and BFO upon your supporting the Dancing on the Square project, and BFO is subject to taxation and accounting liability in relation to the performance of that contract.

BFO will process your data under this clause for five years after performance of the contract, and processing required by BFO for compliance with its tax liability will last until the statutory limitation under tax law (for 5 (five) years from the last day of the calendar year in which a tax return should have been filed or, in the absence of such a tax return, the tax should have been paid), i.e. for up to a maximum of seven years. Data required for BFO to comply with its accounting liability will be processed for up to a maximum of eight years.

BFO’s appointed employees, legal entities providing IT back-office services to BFO, BFO’s online payment services provider and the persons involved in conducting the Dancing on the Square project and in the preparation and delivery of related gifts will have access to your data under this clause.

If you have consented to this at the time of providing a donation, BFO will display your name on online platforms and in publications relating to the Dancing on the Square project.

2. Data Controller:

The data controller of your personal data specified above (controller) will be BFO.

BFO’s Data Protection Officer and contact details:

Name: Dr Gábor Pataki, lawyer specialising in privacy and data protection

Email address: adatvedelem@bfz.hu

List of our data processors:

Data processor	Registered address	Activity
Balázs Springel	H-1112 Budapest Sasadi út 108-110., C épület, fsz. 1	website service
Printing Solutions Bt.	H-6000 Kecskemét, Csányi J. krt. 12. 3/302.	delivery of gifts
Crane Kft.	H-1138 Budapest, Révész utca 27-29.	database software service

3. Description of Technical and Organisational Measures Applied in the Interest of the Data Storage and Data Security

Your personal data will be stored at BFO's registered office (H-H-1033 Budapest, Polgár utca 8-10, Flórián Udvar Building B) and in the IT systems used by BFO (e.g. CRM system), which are located at BFO's registered office and on cloud storage drives.

BFO will take every technical precaution that may be reasonably expected in the interest of the secure storage of stored data that is free of access by third parties.

IT security description of the storage of the personal data, technical and organisational measures taken for data security:

BFO ensures security of the personal data by protecting its electronic equipment with passwords and by only allowing access to the personal data for the employees and processors who need such access in order to conduct the relevant activity.

BFO only authorises the transmission of personal data in encrypted form, and it regularly informs its employees regarding this both in writing and in the scope of training.

4. Your rights in relation to the processing (data subject's rights):

You have the following rights in relation to the processing of your personal data:

a) **right to access (Article 15 of the GDPR):** You are entitled to receive information from BFO regarding whether your personal data are being processed, and if they are, you are entitled to access the personal data and the information set out in this notice.

BFO will provide you with a copy of the personal data that are being processed. BFO may charge a reasonable fee for further copies your request based on the administrative costs. If you submit your request by electronic means, we will provide the information in a widely used electronic format, unless you request otherwise.

b) **right to rectification (Article 16 of the GDPR):** You are entitled to have BFO rectify any inaccurate personal data concerning you without undue delay upon your request. You are also entitled to request completion of your personal data.

c) right to erasure (Article 17 of the GDPR): You are entitled to have BFZ erase personal data concerning you without undue delay upon your request, and BFO is obliged to delete personal data concerning you without undue delay if any of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- if the legal ground of the processing is your consent, and you withdraw such consent, where there is no other legal ground for the processing;
- you objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which BFO is subject.

The provisions of this point (c) are not applicable where (i) processing of the personal data is required in order for fulfilment of an obligation arising from EU or Member State legislation applicable to BFO, or (ii) processing is required in order for posing, enforcing or protecting legal claims.

d) right to restriction of processing (Article 18 of the GDPR): You are entitled to have BFO restrict processing upon your request where one of the following applies:

- you contest the accuracy of the personal data, in which case the restriction will apply for a period enabling BFO to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- BFO no longer needs the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
- you have objected to the data processing, in which case restriction will apply for the period necessary to verify whether the legitimate grounds of BFO override those of the data subject.

e) right to object (Article 21 of the GDPR): You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you. In this case, BFO may no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Where processing takes place in order for fulfilment of a legal obligation, exercising of the right to objection will not result in termination of the processing specified in this notice.

f) right to information regarding the foregoing rights (Article 12 of the GDPR): BFO will inform you promptly, but at the latest within one month of receipt of your request specified in points (a)-(e) regarding the circumstances of the processing in a concise, transparent and clear form. When necessary, having regard to the complexity of the request and number of requests, this deadline may be extended by a further two months. BFO will inform you regarding extension of the deadline within one month after receipt of the request, also indicating the reasons of the delay.

Information is free of charge. If your request is clearly unfounded or excessive, in particular because of their repetitive character, BFO may (i) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested or (ii) refuse to act on the request. BFO bears the burden of demonstrating the manifestly unfounded or excessive character of the request.

BFO will inform regarding those set out in points (b)-(d) above (i.e. all rectifications, erasures and restrictions of processing) all recipients to whom the personal data has been disclosed, unless this proves to be impossible or would require disproportionate effort. BFO will inform you regarding these recipients upon your request.

g) right to lodge a complaint (Article 77 of the GDPR): You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR. You may lodge a complaint with the National Authority for Data Protection and Freedom of Information (address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.; phone: +36 1 391 1400; fax: +36 1 391 1410 www.naih.hu; ugyfelszolgalat@naih.hu).

h) right to judicial remedy (Article 79 of the GDPR): You have the right to judicial remedy where you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in non-compliance with the GDPR. Proceedings against BFO must be brought before the courts of the Member State where BFO has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where you have your habitual residence.

i) right to data portability (Article 20 of the GDPR): you have the right to data portability where the processing is based on Article 6(1)(a) or (b) of the GDPR, i.e. your consent or the fulfilment of a contract concluded with you. In this case, you have the right to receive the personal data concerning you, which you have provided to BFO, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from BFO. You also have the right to have the personal data transmitted directly from BFO to another controller, where technically feasible.

5. You may request information regarding the processing of your personal data in the following manners and from the following persons:

You may request further information regarding the processing of your personal data from Simona Máthé Kiss by postal mail (H-1033 Budapest, Polgár utca 8-10., Flórián udvar B ép.) or email (info@bfz.hu). Upon your request, you may also be given verbal information, which must be recorded. If you request verbal information (e.g. via phone), you will need to certify your identity to BFO. In order to exercise your rights specified above, you will also have to contact Simona Máthé Kiss.

Effective from: 10 May 2018