

Miracoloso Event Kft.

Data Management Policy

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1. Purpose of the Privacy Notice

Miracoloso Event Kft., hereinafter: 'the Service Provider', acting as the data controller, undertakes to be bound by this legal notice. We represent and warrant that all data processing related to our activity will comply with the requirements set out in this policy and in the applicable national laws and European Union legal acts.

The privacy policies relating to data processing by Miracoloso Event Kft. are continuously available at www.ticket-m.hu. Miracoloso Event Kft. reserves the right to change this notice at any time. Any amendments to the policy shall take effect upon their disclosure on the above website.

Miracoloso Event Kft. is committed to protecting the privacy of its customers and partners, and considers it to be of utmost importance to respect its customers' right of informational self-determination. Miracoloso Event Kft. treats all personal data confidentially and have all security, technical and organizational measures in place that guarantee the safety of data.

2. Data Controller's data:

Name: Miracoloso Event Kft.
Registered seat: 1054, Honvéd utca 8.
Tax number: 25197222-2-41
Company registration number: 01-09-205472
E-mail address: info@miracolosoevent.hu
Phone: +36 30 4416655

3. Data processing operations

3.1 Website contact form

- The fact of data collection, the scope of data managed and the purpose of data management:

Name - liaising (legitimate interest)

E-mail address - liaising (legitimate interest)

Phone number - liaising (legitimate interest)

- Data subjects concerned: All data subjects who fill in the contact form on the website.
- Duration of data management, deadline for deleting personal data: 24 months

3.2 Ordering

- The fact of data collection, the scope of data managed and the purpose of data management:

Name - issuing the order form, invoice

E-mail address - liaising

Phone number - liaising.

Billing address - issuing the order form, invoice

- Data subjects concerned: All data subjects ordering the service.
- Duration of data management, deadline for deleting personal data: The retention period of accounting documents is 8 years pursuant to Section 169(2) of Act C of 2000 on Accounting.

3.3 Cookies

What are cookies for

- Cookies collect information about visitors and the devices used by them;
- they record the individual settings of visitors that are (or may be) used;
- they make it easier to use the website;
- they provide high-quality user experience. In order to provide custom-tailored services, we place cookies i.e. small data packages on the user's computer which are retrieved in case of a subsequent visit to the website. If the browser returns a previously saved cookie, the cookie manager may link the user's current visit with previous ones but only with respect to its own content.

Strictly necessary session cookies

The purpose of these cookies is to enable visitors to fully and seamlessly browse the website www.ticket-m.hu and use its functions and services. Cookies of this type expire after the browsing session, and when you close your browser this type of cookie is automatically deleted from your computer or other device used for browsing.

Third-party cookies (analytics)

www.ticket-m.hu uses the third-party cookies of Google Analytics. By using the Google Analytics statistical service, Miracolo Event Kft. collects information about how visitors use its website. The data is used for developing the website and improving users' experience. These cookies will also remain in the browser on the visitor's computer or other browsing device until their expiry or until they are deleted by the visitor.

The retention period for user and event data collected by Google Analytics: 24 months

4. Sub-processors

4.1 Hosting service provider

- Activity carried out by the data processor: Web hosting
- Name and contact information of the data processor:

Name: Microware Hungary Kft.
Registered seat: 1148 Budapest, Fogarasi út 3-5.
Phone: +3614323236

- The fact of data management and the scope of data being managed: All personal data provided by the data subject.
- Data subjects concerned: All data subjects visiting the website.
- The purpose of data management: Enabling website access, appropriate functioning.
- Duration of data management, deadline for deleting personal data: Data processing takes place until the termination of the agreement between the data processor and the hosting service provider, or the data subject's request to the hosting service provider to erase the data.
- Legal basis for data processing: the consent of the User, Section 5(1) of the Info Act, Article 6(1)(a) of the GDPR and Section 13/A(3) of Act CVIII of 2001 on Certain Issues of Information Society Services.

4.2 Technical supervision of the website

- Activity carried out by the data processor: Technical supervision of the website
- Name and contact information of the data processor:

Name: Varga Media and Marketing Office - Ákos Varga private entrepreneur
Registered seat: 6120 Kiskunmajsa, Vörösmarty u. 2.
Phone: +36 70 515 886

- The fact of data management and the scope of data being managed: All personal data provided by the data subject.
- Data subjects concerned: All data subjects visiting the website.
- The purpose of data management: Enabling website access, appropriate functioning.
- Duration of data management, deadline for deleting personal data: Data processing takes place until the termination of the agreement between the data processor and the hosting service provider, or the data subject's request to the hosting service provider to erase the data.
- Legal basis for data processing: the consent of the User, Section 5(1) of the Info Act, Article 6(1)(a) of the GDPR and Section 13/A(3) of Act CVIII of 2001 on Certain Issues of Information Society Services.

4.3 Social media sites

- The fact of data collection, the scope of data managed: The registered name and public profile photo of the user on Facebook
- Data subjects concerned: All data subjects who registered at the social media site Facebook and 'liked' the website.
- The purpose of data collection, To collect data about sharing, likes and promotion on social media sites of certain content, products or campaigns on the website or of the website itself.
- The duration of data management, deadline for deleting personal data, the identity of the data controllers authorized to access the information and the data subjects' rights in relation to data management: The data subject may get information about the source of personal data, their management, the method and legal basis of disclosure on the relevant social media site. The data management is done on the social media site, therefore the duration and method of data management and the opportunity to request deletion or modification of users' data are governed by the regulations of the given social media site.
- The legal basis of data management on social media sites is the data subject's voluntary consent to the management of their personal data.

5. The rights of data subjects

5.1 Right of access

The data subject has the right to learn from the controller whether their personal data is being processed. If that is the case, they may request the controller to provide access to their personal data and the information listed in the Regulation.

5.2 Right to rectification

The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, they have the right to have any incomplete personal data completed, including by means of providing a supplementary statement.

5.3 Right to Erasure

The data subject has the right to obtain from the controller the erasure of their personal data without undue delay and the controller shall be obliged to erase such personal data without undue delay where particular grounds apply.

5.4 Right to be forgotten

Where the controller has made the personal data public and is obliged to erase the personal data, the controller, taking account of available technology and the cost of implementation, will take reasonable steps, including technical measures, to inform all other controllers that are processing such personal data that the data subject has requested the erasure of any links to, or copy or replication of, those personal data.

5.5 The right to restrict processing.

The data subject has the right to obtain from the controller restriction of processing where any of the following conditions applies:

- the accuracy of the personal data is contested by the data subject, in which case the restriction shall last for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but the data subject requests the same for the assertion, exercise or defence of legal claims;
- the data subject has objected to processing; in this case such restriction shall be valid until it is determined whether the legitimate grounds of the controller override those of the data subject.

5.6 Right to data portability

The data subject has the right to receive the personal data concerning them, which they have provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data has been provided.

5.7 Right to object

The data subject has the right, on grounds relating to their particular situation, to object at any time to the processing of their personal data for public interest or for exercising public authority vested in the controller, or if processing is necessary for enforcing the legitimate interests pursued by the controller or by a third party, including profiling based on the aforementioned regulations. In case of objection, the controller shall no longer process the personal data unless there are compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or are connected with the establishment, exercise or defence of legal claims.

5.8 Automated individual decision-making, including profiling

The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or otherwise significantly affects them.

6. Deadline for taking action

The controller shall inform the data subject of the measures taken on the basis of their request within a reasonable period, but no later than within one month after receiving such request.

If necessary, this can be extended by two months. The controller will inform the data subject about the extension of the deadline by indicating the reasons for the delay within one month after receiving the request.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

7. Security of processing

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor undertake to implement appropriate technical and organisational measures to ensure a level of data security appropriate to the risk.

8. Miscellaneous

- We will give you information about any data management not covered by this policy upon recording the relevant data.
- In case of exceptional enquiry by an authority or by other organisations acting with an authorisation set out in the laws, the Service Provider shall disclose the requested data or information and deliver the relevant documents.
- In these cases, the Service Provider may disclose personal data to the authorities only to such extent which is absolutely necessary for achieving the purpose of the data request, provided that the authority has specified the exact purpose and the scope of data requested.

9. Management of data breaches

9.1 Communication of a data breach to the data subject

When the data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the data breach to the data subject without undue delay.

The communication to the data subject shall describe in clear and plain language the nature of the data breach and contain the name and contact details of the data protection officer or other contact point where more information can be obtained; describe the likely consequences of the data breach; describe the measures taken or planned by the controller to remedy the data breach including, where appropriate, the measures to mitigate any adverse consequences arising from the data breach.

The communication to the data subject is not required if any of the following conditions are met:

- the controller has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- after a data breach, the controller has taken additional measures to ensure that the high risk to the rights and freedoms of the data subject is no longer likely to materialize;
- it would involve disproportionate effort. In such a case, there shall be a public communication or similar measure instead whereby the data subjects are informed in an equally effective manner.
- If the controller has not already communicated the data breach to the data subject, the supervisory authority, having considered the likelihood of the data breach resulting in a high risk, may require that the data subject be informed.

9.2 Notification of a data breach to the supervisory authority

In the case of a data breach, the controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the data breach to the supervisory authority competent in accordance with Article 55, unless the data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

10. Complaints procedures

In case of any legal infringement by the data controller, you can file a complaint with the National Authority for Data Protection and Freedom of Information:

National Authority for Data Protection and Freedom of Information
1125 Budapest, Szilágyi Erzsébet fasor 22/C.
Mailing address: 1530 Budapest, P.O.B. 5.
Telephone: +36 -1-391-1400
Fax: +36-1-391-1410
Email: ugyfelszolgalat@naih.hu

11. Closing words

In preparing this document, we relied on the following laws and regulations:

- 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).
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: Info Act)
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Activities and Information Society Services (in particular: Section 13/A)
- Act XLVII of 2008 on the Prohibition of Unfair Trading Practices against Consumers
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (in particular Section 6)
- Act XC of 2005 on the Freedom the Electronic Information
- Act C of 2003 on Electronic Communications (in particular: Section 155)
- Opinion 16/2011 on the EASA/IAB best practice recommendation on online behavioural advertising
- The recommendation of the National Authority for Data Protection and Freedom of Information concerning the data protection requirements of providing preliminary information
- 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