

## FAN CARD PRIVACY NOTICE

**FTC Zártkörűen Működő Részvénytársaság** (hereinafter: “FTC”) provides the following information on recording the data processing processes related to the Fan Card and ensuring the rights of data subjects (hereinafter referred to as “Notice”):

Name of controller: FTC Labdarúgó Zrt.  
Company registration number: Cg.01-10-044877  
of controller: 1091 Budapest, Üllői út 129.  
Registered address of controller: [adatvedelem@fradi.hu](mailto:adatvedelem@fradi.hu)  
Contacts of controller: dr. Attila Árpád Berzeviczi, Chairman of the Board

### PROCESSING DURING REGISTRATION FOR A FAN CARD

#### I. Processing of data that must be provided in connection with the fan card:

1./ Purpose of processing: Issuing the fan card and identifying the fan card holder, for example when buying tickets. Data subjects are not able to buy tickets for events organised by the Controller and attend/participate in these events without obtaining a fan card.

Scope of processed data:

Mandatory data		
-	Processed data	Purpose of processing
1	Name	identification, registration
2	Birth name	identification, registration
3	Country of birth	identification, registration
4	Place of birth	identification, registration
5	Date of birth	identification, registration
6	Mother's name	identification, registration
7	Home address	identification, registration
8	In the case of persons under the age of 16, name and signature of the legal guardian	Compliance with Section 6(3) of the Info Act
9	In the case of a type “A” Fan Card, a HASH code (biometric template) generated on the basis of a palm-vein	Identification for faster access
10	Phone number	event-related public interest delivery of information to the data subject for, if necessary, data reconciliation
11	Email	event-related public interest delivery of information to the data subject for, if necessary, data reconciliation

Legal basis of processing: The Controller is authorised for data collection by your consent (data subject's consent pursuant to Article 6(a) of EU Regulation 2016/679) Section 72(2) paragraph b) of Act I of 2004 on Sports.

Duration of processing: Until the consent is withdrawn.

Consequences of not processing: The data subject misses the registration process and therefore cannot receive a fan card.

**2./ Purpose of processing:** Identification of the fan card holder also in the period following the match.

Scope of processed data:

<b>Mandatory data</b>		
	<b>Processed data</b>	<b>Purpose of processing</b>
1	Name	identification, registration
2	Birth name	identification, registration
3	Country of birth	identification, registration
4	Place of birth	identification, registration
5	Date of birth	identification, registration
6	Mother's name	identification, registration
7	Home address	identification, registration
8	In the case of persons under the age of 16, name and signature of the legal guardian	Compliance with Section 6(3) of the Info Act
9	In the case of a type "A" Fan Card, a HASH code (biometric template) generated on the basis of a palm-vein	Identification for faster access
10	Phone number	Event-related public interest delivery of information to the data subject for, if necessary, data reconciliation
11	Email address	Event-related public interest delivery of information to the data subject for, if necessary, data reconciliation

Legal basis of processing: Authorised for data collection by Section 72(2) paragraph b) of Act I of 2004 on Sports.

Duration of processing: 1 months of the withdrawal of consent.

Consequences of not processing: The data subject misses the registration process and therefore cannot receive a fan card.

## **II. Processing of data to be optionally provided in connection with the fan card:**

### **1./ Possible data processing for faster access**

Purpose of processing: In order to facilitate faster entry to the match, a photograph may be taken of the data subject during registration:

Scope of processed data:

<b>Processed data</b>	<b>Purpose of processing</b>
Photograph	Identification
Phone number	Event-related public interest delivery of information to the data subject for, if necessary, data reconciliation

Legal basis of processing: Your consent (data subject's consent under Article 6(a) of EU Regulation 2016/679)

Duration of processing: Until the consent is withdrawn.

Consequences of not processing: The data subject misses the registration process and therefore cannot receive a fan card.

## **2./ Possible processing to facilitate communication**

Purpose of processing: Data subjects may provide the following information to the Controller during or after the registration for the purpose of facilitating communication.

Scope of processed data:

<b>Processed data</b>	<b>Purpose of processing</b>
mobile telephone number	contact (information of public interest about the event)
landline telephone number:	contact (information of public interest about the event)
E-mail address	contact (information of public interest about the event)

Legal basis of processing: performance of a contract (processing necessary for the performance of a contract under Article 6(b) of EU Regulation 2016/679).

Duration of processing: until the expiry of the fan card.

Consequences of not processing: The data subject misses the registration process and therefore cannot receive a fan card.

## **III. Processing in connection with pre-registration for requesting a fan card**

Purpose of processing: To ensure pre-registration on the online interface for obtaining the permanent fan card.

Legal basis of processing: Your consent (Article 6(a) of EU Regulation 2016/679).

Scope of processed data:

<b>Data processed (mandatory data)</b>	<b>Purpose of processing</b>
Full name	Identification
Mother's name	Identification
Place of birth	Identification
Date of birth	Identification
Home address	Identification
e-mail	contacting, sending fan card number
<b>Data processed (optional data)</b>	<b>Purpose of processing</b>

landline telephone number:	Communication
Mobile telephone number	Communication

Duration of processing 90 days after the registration form is submitted

Consequences of not processing: The data subject misses the registration process and therefore cannot receive a fan card.

#### **IV. Analysis and decision-making for personalised marketing communications**

Purpose of processing: Developing effective marketing communications, sending personalised messages to the data subjects based on their behaviour on the FTC platforms.

Scope of processed data:

<b>Processed data</b>	<b>Purpose of processing</b>
Name	identification, registration
Email address	Personalised communication
Birth name	identification, registration
Country of birth	identification, registration
Place of birth	identification, registration
Date of birth	identification, registration
Mother's name	identification, registration
Home address	identification, registration
mobile telephone number	Personalised communication
landline telephone number:	Personalised communication

Legal basis of processing: Your consent (data subject's consent under Article 6(a) of EU Regulation 2016/679).

Duration of processing: Until the consent is withdrawn.

Consequences of not processing: the data subject does not receive personalised information about current news, novelties, events and offers.

#### **V. Processing related to purchases made with a Fan Card**

The Fan Card allows you to make purchases in the catering outlets in the Stadium area. To do this, you can upload cash onto your Fan Card via the online payment method on the website, through the purpose-designed interface of OTP Bank Nyrt. Then, you can check your purchases and current balance at any time, or have your balance refunded in cash.

Purpose of processing: To facilitate shopping for fans at the catering outlets in the Stadium.

Scope of processed data:

<b>Processed data</b>	<b>Purpose of processing</b>
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Full name	Identification, cash uploading
Fan Card number	Identification, cash uploading
Fan Card ID	Identification, cash uploading
Time and amount of purchases made with the Fan Card	Subsequent verification of purchases

Legal basis of processing: Legitimate interest of the Controller under Article 6(f) of EU Regulation 2016/679.

Duration of processing: 5 years from the date of revocation of the Fan Card.

Consequences of not processing: The data subject is unable to upload cash online and check his balance and purchases.

## **VI. Processing related to purchases made with a Fan Card**

The Fan Card allows you to make purchases in the catering outlets in the Stadium area. To do this, you can upload cash onto your Fan Card via the online payment method on the website, through the purpose-designed interface of OTP Bank Nyrt. Then, you can check your purchases and current balance at any time, or have your balance refunded in cash.

Purpose of processing: Administrative data processing related to the processing of the purchase.

Scope of processed data:

<b>Processed data</b>	<b>Purpose of processing</b>
Full name	Identification, cash uploading
Fan Card number	Identification, cash uploading
Fan Card ID	Identification, cash uploading
Time and amount of purchases made with the Fan Card	Subsequent verification of purchases

Legal basis of processing: Consent of the data subject.

Duration of processing: Until consent is revoked, but not more than 5 years.

Consequences of not processing: No personalised communication tailored to the purchases is received.

## **VII. Direct marketing**

Purpose of data processing: The data controller utilizes the method of direct contact to send targeted marketing newsletters to the Data Subject. The data controller uses the personal data provided by the Data Subject for the purpose of providing information, offers, or requesting feedback regarding similar or identical services that the Data Subject has previously used. Electronic direct marketing (e-DM) will only be sent based on legitimate interest when there is a relevant and appropriate relationship between the Data Subject and the data controller, for example, if the Data Subject is a customer of the data controller, meaning they have already used some kind of service (e.g., purchased match tickets, used a fan card).

The Data Subject has the right to object to direct marketing communications at any time. In such cases, the data controller will no longer use the Data Subject's data for this purpose.

<b>Processed data</b>	<b>Purpose of processing</b>
Full name	Identification of the Data Subject and sending of direct marketing newsletters.
Email address	Identification of the Data Subject and sending of direct marketing newsletters.
Phone number	Identification of the Data Subject and direct marketing outreach.
Services utilized by the Data Subject.	Sending information, offers, or requesting feedback regarding services similar or identical to the ones previously used by the Data Subject.

Legal basis of processing: Pursuant to Article 6(1)(f) of the Regulation, the legitimate interest of the data controller.

Duration of processing: The data controller will use the personal data for sending direct marketing newsletters until the Data Subject objects to this.

Source of data: Obtained directly from the Data Subject.

Consequences of not processing: If the Data Subject unsubscribes or objects to the data processing, they will no longer receive direct marketing newsletters from the data controller.

### **VIII. Result of the balancing of interests test – direct marketing based on legitimate interests.**

Based on the legitimate interest as the legal basis, the data controller conducted a balancing of interests test and determined that the legitimate interests of the data controller proportionately restrict the legitimate interests of the data subjects. The processing of personal data of the data subjects is essential for sending general marketing messages, promotional offers, and information, as well as ensuring the relevant rights of the data subjects. There are no alternative data processing solutions available that involve handling fewer personal data or following different methods to achieve these purposes.

Considering that the data controller sends marketing messages to data subjects who have entered into a contract with the data controller (e.g., online purchasers), the data subject, as a customer of the data controller, can reasonably expect the possibility of receiving marketing messages, promotional offers, and information, in accordance with the provisions stated in the GDPR (paragraph 47), which consider the processing of personal data for direct marketing purposes as based on legitimate interests.

## **IX. PROCESSING**

The Controller is entitled, in accordance with the applicable law, to use a processor for certain technical operations or for the provision of the service. The processor is only entitled to implement the instructions and decisions of the Controller.

### **Sportfive Hungary Zrt.**

Registered address: 1091 Budapest, Üllői út  
129.

Email address: [info@groupamaarena.com](mailto:info@groupamaarena.com)

Telephone number: 003614552300

Activity: database operation, data recording

## **X. RIGHTS OF DATA SUBJECTS**

The data subject may request information about the processing of his/her personal data; request the rectification of his/her personal data; request the erasure of his/her data by email at the [adatvedelem@fradi.hu](mailto:adatvedelem@fradi.hu) email address; request the restriction of processing; and have the right to data portability and to judicial remedy. In the event of a complaint, you may refer the matter in Hungary to the National Authority for Data Protection and Freedom of Information or, at your option, to a court. The regional court has jurisdiction in court proceedings.

### **1. Information and access to personal data**

The Data Subject has the right to access his/her personal data held by the Controller and information about their processing; to check what data the Controller holds about him/her and to have access to the personal data. The Data Subject must submit his/her request for access to the data to the Controller in writing (by email or post). The Controller shall provide the information to the Data Subject in a commonly used electronic form, unless the Data Subject requests it in writing on paper. The Controller does not provide oral information when access is exercised over the telephone.

In case of exercise of the right to access, the information shall include:

- the scope of the data processed, the purpose, time and legal basis of the processing for the scope of the data processed,
- data transfer: to whom the data have been or will subsequently be transferred,
- indication of the data source.

The Controller will provide the Data Subject with a copy of the personal data (in person at the Customer Service) for the first time free of charge. For any further copies requested by the Data Subject, the Controller may charge a reasonable fee based on administrative costs. If the Data Subject requests a copy by electronic means, the information will be provided to the Data Subject by the Controller by e-mail in a commonly used electronic form.

After providing the information, if the User disagrees with the processing and the accuracy of the data processed, he/she may request rectification, supplementation, erasure or restriction of the processing of personal data concerning him/her as specified in clauses VII.2 to 6, or object to the processing of such personal data, or initiate the procedure specified in clause VIII.



## **2. Right to rectification and right to have incomplete personal data completed**

At the Data Subject's written request, the Controller shall, without undue delay, rectify inaccurate personal data specified by the Data Subject in writing or in person at one of the Controller's shops, or complete the incomplete data with the content specified by the Data Subject. The Controller notify any rectification or completion carried out to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Data Subject will be informed of the data of these recipients if he/she so requests in writing.

## **3. Right to restriction of processing**

The Data Subject may, by written request, ask the Controller to restrict the processing of his/her data if

- the accuracy of the personal data is contested by the Data Subject, 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 data and requests the restriction of their use instead,
- the Controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims,
- the Data Subject has objected to processing: in this case the restriction applies to the period pending the verification whether the legitimate grounds of the Controller override those of the data subject.

If the Data Subject's objection is justified, the Controller shall restrict the data, i.e. only storage as processing may take place until

- the Data Subject consents to the processing;
- the processing of personal data is necessary for the exercise of legal claims;
- the processing of personal data becomes necessary in order to protect the rights of another natural or legal person; or
- the processing is required by law in the public interest.

If the restriction of processing is requested by the Data Subject, the Controller shall inform the Data Subject in advance of the lifting of the restriction.

## **4. Right to erasure (to be forgotten)**

The Data Subject has the right to obtain from the Controller the erasure of personal data concerning his/her without undue delay where one 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 by the Controller;
- the Data Subject withdraws consent on which the processing is based, and there is no other legal ground for the processing;
- the Data Subject objects to the processing for reasons relating to his/her particular situation and there are no legitimate grounds for the processing;
- the Data Subject objects to the processing of personal data concerning him/her for direct marketing purposes, including profiling, where it is related to direct marketing;

- the personal data have been unlawfully processed by the Controller;
- the personal data have been collected in relation to the offer of information society services directly to a child.

The Data Subject may not exercise his/her right to erasure (to be forgotten) if the processing is necessary

- for exercising the right of freedom of expression and information;
- for reasons of public interest in the area of public health;
- for archiving in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure would render impossible or seriously impair the achievement of the objectives of that processing; or
- for the establishment, exercise or defence of legal claims.

### **5. Right to data portability**

Data portability enables the Data Subject to obtain and further use “his/her” data provided by the Data Subject and available in the system of the Controller for his/her own purposes and through various service providers as he/she may determine. In any case, the right is limited to the data provided by the Data Subject, no other data can be carried. (e.g. statistics, etc.)

Personal data relating to the Data Subject that are stored in the Controller’s system (e.g. when subscribing to a newsletter):

- can be obtained by the Data Subject in a structured, widely used, machine-readable form,
- may be forwarded to another controller by the Data Subject,
- may be directly transferred to another controller if requested by the Data Subject if this is technically feasible in the Controller’s system.

The Controller will only comply with a request for data portability on the basis of a request sent by email or post. In order to comply with the request, the Controller must ensure that it is indeed the entitled Data Subject who wants to exercise the right. This requires the Data Subject to appear in person at the Controller’s headquarters following the notification, in order for the Controller to be able to identify the Data Subject making the request using the data in its system. Under this right, the Data Subject may request portability of the data that he/she has provided to the Controller. The exercise of this right does not automatically entail the erasure of the data from the Controller’s systems, therefore the Data Subject will be recorded in the Controller’s systems even after exercising this right, unless he/she requests erasure of his/her data.

### **6. Objection to the processing of personal data**

The Data Subject may object to the processing of his/her personal data where the legal basis for the processing is

- public interest under Article 6(1) e) of the GDPR, or
- legitimate interest under Article 6(1) f) of the GDPR.

In case the right to object is exercised, the Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims. The Controller's managing director will decide whether the processing is justified by compelling legitimate grounds. He shall inform the User Subject of his position in this regard in an opinion.

The Data Subject may object in writing (by email or by post).

## **XI. DEADLINES FOR GRANTING THE REQUEST, PROCEDURAL RULES**

The Controller shall inform the Data Subject of the measures taken without undue delay, but in any event within one month of receipt of any of the requests pursuant to clauses VII.1 to 6. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months, but in this case the Controller shall inform the Data Subject within one month of receipt of the request, stating the reasons for the delay, and that the Data Subject may lodge a complaint with the supervisory authority and exercise his/her right to judicial remedy.

If the Data Subject's request is manifestly unfounded or excessive (in particular, in view of its repetitive nature), the Controller may charge a reasonable fee for complying with the request or refuse to act on the basis of the request. The proof of this lies with the Controller.

If the Data Subject submitted his/her request by electronic means, the information will be provided by the Controller electronic means, except requested otherwise by the Data Subject.

The Controller shall communicate any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Controller shall inform the Data Subject about those recipients at the Data Subject's request.

## **XI. ENFORCEMENT OPTIONS**

The Data Subjects may exercise their rights vis-à-vis the Controller by sending a written request by e-mail or post.

The Data Subject cannot enforce his/her rights if the Controller proves that it is not in a position to identify the Data Subject. If the Controller has doubts about the identity of the natural person making the request, it may request providing further information necessary to confirm the identity of the applicant.

Pursuant to the Info Act, the Regulation and the Civil Code (Act IV of 2013), the Data Subject may

- address the National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet fasor 22/c.; [www.naih.hu](http://www.naih.hu)), or
- enforce their rights in court.

## **XII. DAMAGES AND COMPENSATION**

Any person who has suffered material or non-material damage as a result of an infringement of the Regulation shall have the right to receive compensation from the Controller or processor for the damage suffered. The processor shall be liable for the damage caused by processing only where it has not complied with the obligations specified by the law specifically directed to processors or where it has disregarded or acted contrary to the lawful instructions of the Controller. The Controller or the processor shall be exempt from liability able to prove that it is not in any way responsible for the event giving rise to the damage.

## **XIII. HANDLING OF PERSONAL DATA BREACH**

A 'personal data breach' is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed. The Controller shall keep records for the purpose of monitoring the measures taken in relation to the data breach, informing the supervisory authority and informing the Data Subject, which shall include the scope of personal data affected by the breach, the number and scope of the data subjects, the time and date of the breach, its circumstances and effects, and the measures taken to remedy the breach. In the event of a personal data breach, the Controller shall inform the Data Subject and the supervisory authority of the personal data breach without undue delay and within 72 hours at the latest, unless the personal data breach does not pose a risk to the rights and freedoms of natural persons.

## **XIV. BACKUP MANAGEMENT POLICY**

In the context of its duties related to IT security, the Controller shall ensure, in particular, that measures are in place to ensure the possibility of restoring data files, including regular backups and the separate and secure handling of copies (backup).

Accordingly, in order to prevent the loss of electronically stored data, the Processor shall regularly back up the data in its database containing personal data to a separate storage medium three times a day.

Location where backups from the website server are stored: Sportfive Hungary Kft. /1091 Budapest üllői út 129./

Duration for which backups are stored: 5 years

Order of erasing backups: individual erasure can be tracked in an anonymised registry and automatic erasure takes place according to the settings.

Access to backup: Access to backups is restricted, only persons with special authorisation may access them. Access to the data is only possible after proper identification (at least username and password).

## **XV. MISCELLANEOUS PROVISIONS**

The Controller reserves the right to unilaterally amend this Privacy Notice. The amendments shall enter into force vis-à-vis the Data Subjects on the date specified in the notice, unless the Data Subject objects to the amendments.

If the Data Subject has provided the data of a third party for the use of the service and caused damage, the Controller is entitled to claim damages from the Data Subject.

The Controller does not verify the personal data provided to it. The person providing the data is solely responsible for the correctness of the data. By providing the data, the Applicant also assumes responsibility that it has an appropriate legal basis for providing the personal data of the contact person and that it has provided his/her employee with the information required by the Regulation prior to the transfer of his/her data to the Controller.

### **Contact details of the Data Protection Officer**

Name: Dr. Adrienn Malich

Telephone number: 06 1/ 91-00-241

E-mail: [vanda.juhasz@fradi.hu](mailto:vanda.juhasz@fradi.hu)

Date of entry into force of this Privacy Notice: 10 July 2023.

Available for download: [www.fradi.hu](http://www.fradi.hu)

Annex No. 1

**System of Processors used for registration:**

- **Sportfive Hungary Kft.**

Registered address: 1091 Budapest, Üllői út 129.

Activities related to processing: database operation, data recording

- **BioSec Group Korlátolt Felelősségű Társaság**

Registered address: 1124 Budapest, Apor Vilmos tér 18.

Activities related to processing: data recording (HASH code - biometric template)

- **Novus Cura Korlátolt Felelősségű Társaság**

Registered address: 1048 Budapest, Székpatak u 13. 3. em. 7.

Activities related to processing: software operation, data recording

- **Honeywell Szabályozástechnikai Kft.**

Registered address: 1139 Budapest Petneházy utca 2-4.

Activities related to processing: Issuer of Fan Cards, software operator

- **TIGRA Computer - és Irodatechnikai Korlátolt Felelősségű Társaság**

Registered address: 1145 Budapest, Törökőr utca 2.

Activities related to processing: hardware device system administration

**Registration form**

*Name:	
*Birth name:	
*Mother's name:	
*Country of birth:	
*Place and date of birth:	
*Home address:	
*Email address:	
*Mobile phone:	

*\*This field is mandatory. (Either the email address or mobile phone number fields must be filled out!)*

*Please note that where Article 8(1) of EU Regulation 2016/679 applies, in relation to the offer of information society services directly to a child, the processing of the personal data of a child is lawful where the child is at least 16 years old. Where the child is below the age of 16 years, such processing is lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child, so the registration form of a minor applicant below the age of 16 years is acceptable only with the approval of the statutory representative.*

Yes, I would like to receive information about FTC discounts, special offers, promotions, preferential purchase opportunities and personalised information about current news, novelties, events and offers, so I agree to the use of my personal data for analysis purposes. Detailed information on this can be found on the [www.fradi.hu](http://www.fradi.hu) and [www.meccsjegy.fradi.hu](http://www.meccsjegy.fradi.hu) website.

*Please note that the Privacy Notice on the registration of Fan Cards is available from the registration staff at the registration points and is also available on the [www.fradi.hu](http://www.fradi.hu) and [www.meccsjegy.fradi.hu](http://www.meccsjegy.fradi.hu) website. The GTC for Fan Cards is available on the [www.fradi.hu](http://www.fradi.hu) and [www.meccsjegy.fradi.hu](http://www.meccsjegy.fradi.hu) website. Please note that in order to accept the registration form, our staff will ask you to present a valid photo identification (ID card, driving licence, passport, etc.) to prove that the information provided above is true. The identity card is only used to verify the authenticity of the data, the card is not stored in any way (it will not be scanned or photocopied).*

Date: .....

Signature of applicant

*To be completed for a minor applicant under the age of 16!*

*As the applicant's statutory representative, I consent to the processing of the personal data of the person I represent. In awareness of my criminal liability, I declare by my signature that I am the statutory representative of the applicant and that I can therefore make the following declaration.*

Name of statutory representative: .....

Signature of applicant's statutory representative