

PRIVACY NOTICE FOR MARKETING COMMUNICATION

FTC Labdarúgó Zártkörűen Működő Részvénytársaság (hereinafter referred to as “FTC”) provides the following information to data subjects regarding the processing of data in connection with personalised marketing communications:

Name of controller: FTC Labdarúgó Zrt. (hereinafter referred to as “FTC”)
Company registration number of controller: 01-10-044877
Registered address of controller: 1091 Budapest, Üllői út 129.
Contacts of controller: adatvedelem@fradi.hu
Representatives of controller: dr. Attila Árpád Berzeviczi, Chairman of the Board

I. PROCESSING (personalised marketing communication)

1.) Processing in relation to marketing communications in the default case (without ticket or pass purchase)

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

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

Scope of processed data:

| Processed data | Purpose of processing |
|-------------------|--|
| Full name | User identification |
| E-mail address | Personalised communication |
| Date of birth | aspect taken into account in personalised communication |
| Telephone number | Communication |
| Permanent address | communication, aspect taken into account in personalised communication |
| Postal address | Communication |

Duration of processing Until the consent is withdrawn.

Possible consequences of not providing data: The data subject does not receive personalised service and promotions from the Controller.

2.) Processing related to marketing communication for the buyers of tickets and passes and those holding a Fan Card who are shopping in the catering units in the Stadium

Purpose of processing: To develop more effective marketing communication, sending personalised messages to the data subject based on his/her behaviour on the FTC platforms and in the Stadium.

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

Scope of processed data:

| Processed data | Purpose of processing |
|---|---|
| Partner ID | identification, assigning tickets to cardholders |
| Fan card number | identification, assigning tickets to cardholders |
| Time and amount of purchases made with the fan card, and balance | effective marketing targeting |
| Ticket/pass type (Sector B, Sector C, Sector D, Guest, VIP, online ticket, handicapped, student, pensioner) | ensuring access to the right sector (by price category) |
| Ticket purchase date | ensuring access on the right event date |
| Name of current match | ensuring access on the right event date |
| Seat corresponding to the ticket/pass purchased | ensuring access to the right sector |
| Duration of the pass purchased | ensuring access to matches during the right period |
| Exact time of entry to the matches | Personalised communication on entry to the Stadium |
| Full name | User identification |
| E-mail address | Personalised communication |
| Birth name | aspect taken into account in personalised communication |
| Place of birth | aspect taken into account in personalised communication |
| Date of birth | aspect taken into account in personalised communication |
| Telephone number | aspect taken into account in personalised communication |

Duration of processing until the consent is withdrawn, for 3 years for the exact time of entering to matches.

Possible consequences of not providing data: The data subject does not receive personalised service and promotions from the Controller.

3.) Processing of data related to marketing communication for VIP ticket buyers

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

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

Scope of processed data:

| Processed data | Purpose of processing |
|-----------------------|------------------------------|
| Full name | Identification |
| Mother's name | Identification |
| Place of birth | Identification |
| Date of birth | Identification |
| Home address | Identification |

| | |
|---|---|
| Ticket/pass type (Sector B, Sector C, Sector D, Guest, VIP, online ticket, handicapped, student, pensioner) | ensuring access to the right sector (by price category) |
| Ticket purchase date | ensuring access on the right event date |
| Name of current match | ensuring access on the right event date |
| Seat corresponding to the ticket/pass purchased | ensuring access to the right sector |
| Duration of the pass purchased | ensuring access to matches during the right period |
| E-mail address | Communication, marketing communication |
| Exact time of entry to the matches | Personalised communication on entry to the Stadium |

Duration of processing: until the consent is withdrawn, for 3 years for the exact time of entering to matches.

Possible consequences of not providing data: The data subject does not receive personalised service and promotions from the Controller.

II. 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.

Lagardere Sports Hungary Korlátolt Felelősségű Társaság

Registered address: 1091 Budapest, Üllői út 129.

Email address: info@groupamaarena.com

Telephone number: 003614552300

Activity: database operation, data recording

III. 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 e-mail at the adatvedelem@fradi.hu e-mail 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 electronically, the information will be provided to the Data Subject by the Controller in a commonly used electronic form by email.

After providing the information, if the Data Subject 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 III.2 to 6, or object to the processing of such personal data, or initiate the procedure specified in clause V.

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).

IV. DEADLINES FOR GRANTING THE REQUEST, PROCEDURAL RULES

The Controller shall provide information to the Data Subject on the action taken without undue delay and in any event within one month of receipt of the request under clauses III. 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.

V. 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), or
- enforce their rights in court.

VI. 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.

VII. 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.

VIII. 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: Lagardere Sports Hungary Korlátolt Felelősségű Társaság /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).

IX. 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. Vanda Juhász

Telephone number: 06 1/ 91-00-241

E-mail: vanda.juhasz@fradi.hu

Date of entry into force of this Privacy Notice: 18 September 2019

Available for download: www.fradi.hu

FTC Labdarúgó Zrt.