

Privacy Notice

on the processing of personal data to contracts concluded with contractual partners

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Privacy Notice

on the processing of personal data

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter referred to as 'GDPR'),

„ANTENNA HUNGÁRIA” Magyar Műsorszóró és Rádióhírközlési Zártkörűen Működő Részvénytársaság provides the following information concerning the processing of personal data to the Data Subjects.

1. The Controller and the Data Protection Officer

Data of the Controller:

Name:	„ANTENNA HUNGÁRIA” Zrt.
Registered seat:	1119 Budapest, Petzvál József u. 31-33.
Mail address:	1519 Budapest, Pf. 447/8
Electronic contact:	antennah@ahrt.hu
Telephone:	Tel: 464-2464
Fax:	+36 1 464 2245
Website:	http://www.ahrt.hu

Contact information of the Data Protection Officer

Mail address:	1119 Budapest, Petzvál József u. 31-33.
E-mail:	dpo@ahrt.hu

2. Legislation underlying processing

Processing of data shall be subject to the following major legislation:

- Regulation (EU) 2016/679 of the European Parliament and of the Council 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) (hereinafter referred to as 'GDPR').
- Act CXII of 2011 on Informational Self-determination and Freedom of Information (hereinafter referred to as 'Information Act').

3. Data relating to processing

Pursuant to the GDPR, 'personal data' means any information relating to an identified or identifiable natural person ('Data Subject').

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.

'Contractual partners' mean all partners with whom 'ANTENNA HUNGÁRIA' Zrt. has concluded a contract.

'Contract data' means the data of the natural person representatives of the contractual partner.

3.1. Purpose, legal grounds, duration of storage of the processing of the personal data processed

Purpose of processing:	<ul style="list-style-type: none"> • Basically, exercise of the rights and fulfilment of the obligations arising from the contractual relationship (entry permit, accreditation), and • processing of the data for the purposes of communication during the contract <p>in the tendering and ordering stages and in the course of conclusion and performance of the contract.</p>
Legal basis for processing:	<ul style="list-style-type: none"> • Performance of a contract (for Data Subject, a natural person that is the contractual partner) • Legitimate interest (for the natural person intermediary of the contractual partner, i.e. the Data Subject)
Duration of storage:	<ul style="list-style-type: none"> • Typically, data are retained until the end of the contractual relationship or, if a legal claim is enforced, within a 5-year limitation period. • The data connected with accounting records shall be retained for 8 years.
List and categories of data:	<ul style="list-style-type: none"> • Basic category: <ul style="list-style-type: none"> ○ For contacts: Name, phone number, e-mail address ○ For performance of the contract: Name, number, location data • Special data: Facial image (only if appropriate)
Source of data:	The contractual partner or the Data Subject

Provision of the personal data is based on a contractual obligation and/or is subject to performance of the contract. Accordingly, the contractual partner or the Data Subject shall provide the personal data, the failure of which results in failure of conclusion or performance of the contract as a legal consequence.

3.2 Information on automated decision-making or profiling

Is such used by the Controller?	No
Information relating to the logic involved:	Not relevant
What is the importance and consequence it has in respect of the Data Subject:	Not relevant

3.3. Whom may the personal data of the Data Subjects be transferred to?

Description of the recipients:	<ul style="list-style-type: none"> • The personal data are transferred to additional contractual partners for the purposes to obtain the necessary entry permit or accreditation for performing work at the relevant site, event or program. • If accreditation of an international organization is necessary for the relevant program, the personal data are sent to that organization for the purposes of entry and, as a result, work. If it becomes necessary, the Controller shall always notify the Data Subject accordingly.
Purpose of disclosure:	Verification of rights, providing for entry, compliance with security requirements in the relevant work area or in the area of the program/event.

If the Controller manages the contact data for the purpose of rental / use / entry at the premises / territory of the contractual partner, the data will not be transferred to another recipient.

3.4 Who is to know the personal data of the Data Subject?

As a rule, the personal data of the Data Subject may only be disclosed to the Controller's authorized employees during performance of the contract for the purposes to carry out their duties. The Controller's competent employees may have access to the Data Subject's personal data for the purposes of preparation, performance and registration of the contract and transmission of the aforementioned data.

The Controller shall, by means of information security measures, provide – among others – for the protection of the Data Subject's personal data against unauthorized access or the unauthorized change thereof. The Controller shall, by means of appropriate organizational measures, avoid that the personal data becomes accessible to indefinite number of persons.

3.5 Data security measures

The Controller shall store the personal data provided by the Data Subject at the Controller's registered seat or registered office.

The Controller shall, by means of information security measures, provide – among others – for the protection of the Data Subject's personal data against unauthorized access or the unauthorized change thereof. So, for example, any access to the personal data stored on the servers shall be logged, based on which it can be verified who had access to the personal data, when and in respect of what personal data. The Controller shall, by means of appropriate organizational measures, avoid that the personal data becomes accessible to indefinite number of persons.

4. Rights of the Data Subject in relation to processing

4.1 Right of access

The Data Subject shall have the right to obtain from the Controller confirmation as to the following:

- a) whether or not the processing is in progress;
- b) the purposes of processing;
- c) the categories of personal data;
- d) the recipients (to whom the data may be disclosed);
- e) the period for which the personal data will be stored or the criteria used to determine that period;
- f) the rights of the Data Subject;
- g) the available legal remedies;
- h) where the data are not collected from the Data Subject, as to their source;
- i) the existence of automated decision-making, including profiling;
- j) transfers abroad.

4.2. Right to rectification

At the Data Subject's such request, the Controller shall, without undue delay, rectify the inaccurate personal data concerning him or her.

Taking into account of the purposes of the processing, the Data Subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

4.3. Right to erasure

The Data Subject shall have the right to request the Controller for the erasure of the personal data concerning him or her. The Controller shall have the obligation to erase the personal data concerning the Data Subject without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary;
- b) the Data Subject has withdrawn his or her consent and where there is no other legal ground for the processing;
- c) the Data Subject objects to the processing in the public interest, in the exercise of an official authority or to processing in the controller's (third party's) legitimate interest, and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation to which the Controller is subject.

The further retention of the personal data should be lawful where it is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims.

4.4. Right to restriction of processing

The Data Subject shall have the right to request the Controller for restriction of processing where one of the following applies:

- a) 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;
- b) the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) 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; or
- d) the Data Subject has objected to processing in the public interest, in the exercise of an official authority or to processing in the controller's (third party's) legitimate

interest, and there are no overriding legitimate grounds for the processing, pending the verification whether the legitimate grounds of the Controller override those of the Data Subject.

4.5. Right to object

The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her in the public interest, in the exercise of an official authority or to processing in the controller's (third party's) legitimate interest, including profiling based thereon. In such a case the Controller shall no longer process the personal data unless the Controller 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.

4.6. Actions taken for the exercise of the rights of the Data Subject

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

That period may be extended by two further months where necessary, taking into account of the complexity and number of the requests. The Controller shall inform the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

Where the Data Subject filed the request by electronic means, the information shall be provided by electronic means where possible, unless otherwise requested by the Data Subject.

The Controller shall provide any communication and any actions to the Data Subject free of charge. Where requests from a Data Subject are manifestly unfounded or excessive, in particular because of their repetitive character, the Controller may charge a reasonable fee taking into account of the administrative costs of providing the information or communication or the action requested or refuse to act on the request.

5. Right of the Data Subject to legal remedy

The Data Subject may contact the Controller's Data Protection Officer with regard to all issues related to processing of his or her personal data, whose contact details are set out in section 1 of this Notice.

The Data Subject may bring a legal action against the Controller if he or she finds any unlawful processing. The action shall be assessed within the scope of the jurisdiction of the tribunal. The action may be brought, at the choice of the Data Subject, before the tribunal competent in his or her place of residence (the list and contact details of the tribunals are accessible at the following link: <http://birosag.hu/torvenyszekek>).

Without prejudice to any other administrative or judicial remedy, every Data Subject shall have the right to lodge a complaint with a supervisory authority if the Data Subject considers that the processing of personal data relating to him or her infringes the Regulation.

In Hungary the competent supervisory authority is:

**Nemzeti Adatvédelmi és Információszabadság Hatóság ('NAIH') /
Hungarian National Authority for Data Protection and Freedom of
Information**

Address: 1055 Budapest, Falk Miksa utca 9-11. Mail

address: 1530 Budapest, Pf.: 5

E-mail: ugyfelszolgalat@naih.hu

Telephone: +36 (1) 391-1400

Fax.: +36 (1) 391-1410

Website: www.naih.hu