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Privacy Policy

13 July 2021

Introduction

As we attach great importance to the protection of your personal data, we would like to inform you that **Müpa Budapest Nonprofit Kft.** (registered address: 1095 Budapest, Komor Marcell u. 1., email info@mupa.hu or adatvedelem@mupa.hu, phone +36 1 555 3000) as data controller (hereinafter: **Müpa Budapest** or **Controller**) is bound by the following principles and rules related this process.

Primary governing regulations:

- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Regulation (EC) No 95/46 (General Data Protection Regulation) (hereinafter: **GDPR**)
- Act CXII of 2011 of Hungary on the Right to Informational Self-Determination and Freedom of Information

The use of the Müpa Budapest website (www.mupa.hu) and the use of our services will be subject to data processing only with your prior information and explicit consent. In addition, Müpa Budapest will process data for the performance of a contract with you, for legitimate interests or on the basis of an express legal requirement.

1. Security of your data, our data processing principles

Müpa will process your personal data in accordance with the requirements of lawfulness and fairness in all respects, in the most transparent manner possible for you, only for specified, explicit and legitimate purposes, to the extent necessary and for the minimum time required to achieve the given purposes. We take great care to ensure that the data we process are always accurate and up to date.

However, we are aware that compliance with the above is meaningless without technical and organisational measures to protect personal data.

This is why we have chosen Crane Kft. as our data processing partner for the majority of our personal data processing activities, because it has been operating in compliance with the ISO 27001 information security standard since 2017, which guarantees that the processing of your



personal data meets the highest standards. Our IT partner, Frontside Kft. also operates our website in accordance with the highest IT and information security standards.

We have also designed our organisational structure and operate it through strict internal organisational rules and the allocation of different access rights in such a way that it provides adequate guarantees at all points to ensure the transparency of our data processing activities and the security of your personal data. Müpa Budapest will not disclose any personal data to third parties without the consent or prior information of the Data Subject, unless expressly required to do so by law or by a public authority. Müpa Budapest makes every effort to ensure that your personal data cannot be obtained by unauthorised persons in any way by taking appropriate technical measures (operation of a unified internal IT system).

We keep Müpa Budapest's staff involved in the processing of personal data up to date with the latest technical and legal requirements through internal training and organised training sessions, in order to ensure that our data processing complies with legal and information security requirements at all points.

2. Scope of the data we process

a) 'Logging' the www.mupa.hu server

When you visit the Müpa Budapest website, the web server automatically logs your activity. Without this, we would not be able to ensure the proper functioning of the website and prevent possible external attacks. The log file is used for quality assurance purposes and is not linked to any other information, and we do not seek to identify the user concerned.

Legal basis for processing: legitimate interest of the Controller (GDPR Article 6(1)(f))

Stored data: IP address (anonymised), approximate geographic location, address of the pages visited, date and time

Duration of processing: data will be deleted after 30 days

b) Cookies

A cookie is a small block of data that our server sends to your browser to provide you with a personalised and high-quality service. When you visit our website again, your browser will send the cookie back to our server, allowing a connection to be established between sessions. You will find three types of cookies on our website:

- **Functional cookies**

These are session-id cookies and (temporary) cookies enhancing user experience that are essential for using the site. Without their use, the website or parts of the website will not be displayed, consent to the handling of cookies cannot be stored, browsing will be blocked, and adding tickets to the shopping cart or bank payment will not be possible. The use of these cookies is necessary, for example, to log users in, to



store language settings, to optimise traffic between web servers, and to identify the size of the screens used by users.

Given that these cookies are strictly necessary for the proper functioning of the website, by visiting the website you accept the use of these functional cookies. The cookies that are strictly necessary cannot therefore be activated or deactivated individually. You can, however, disable cookies in your browser at any time (for more information, see Manage and delete cookies).

Legal basis for processing: to ensure the proper functioning of the website (GDPR Article 6(1)(b))

- **Cookies for analytical purposes**

Additional (statistical and marketing) cookies on our website may remain on the device for a longer period of time or until they are deleted by the User, depending on the web browser settings. If Müpa Budapest's web server installs the cookie and the data are transferred to its own database, this is an internal cookie. If the cookie is installed by Müpa or a third-party web server, but the data are transferred to an external service provider, it is an external cookie.

Statistical cookies on our website fall into the following two categories:

a) full Google Analytics measurement code cookie

Google Analytics, as an external service provider, assists in the independent measurement of traffic and other web analytics data for the müpa.hu website. The data are recorded anonymously and are used by Müpa Budapest only for statistical purposes and to optimise the operation of the site. For details on processing measurement data, please visit <http://www.google.com/analytics>. The collection of such web analytics data for statistical purposes is a widespread practice.

Google Inc. is responsible for Google products. (Amphitheatre Parkway, Mountain View, CA 94043, USA). For Google products in Europe, Google Dublin is responsible (Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001).

Google Analytics Terms of Service:

marketingplatform.google.com/about/analytics/terms/gb/, General Overview of Google Analytics Security and Privacy Principles: support.google.com/analytics/, and Google Privacy Policy: policies.google.com/privacy.

b) Hotjar

Hotjar is a tool used on our website to measure in detail the activity (clicks, scrolls or explicit feedback in the form of questionnaires) on selected pages.

Detailed information on the service is available on this link <https://www.hotjar.com/cookies>

Hotjar services are provided by Hotjar Ltd (Dragonara Business Centre, 5th Floor, Dragonara Road,, Paceville St Julian's STJ 3141, Malta).



Statistical cookies collect and store only anonymous data. The data collected allow us to draw conclusions about how visitors use our website: the number of visits, the time spent on the website, the country, the region, and possibly the city from which the visitor entered our site. Such cookies store a list of the subpages visited by the user and the number of technical steps an activity has taken on our site. These cookies help us determine, for example, which subpages are visited and which content users are particularly interested in in order to improve the functionality of our website, the user experience during browsing (Google Analytics measurements, Hotjar measurements). As a result, we can tailor the content of our website to the needs of our users. The IP address of your computer, transmitted for technical reasons, is automatically anonymised and does not allow conclusions to be drawn about the individual user.

Duration of data processing: up to 26 months, regardless of settings

Legal basis for processing: consent of the Data Subject (GDPR Article 6(1)(a))

- **Marketing cookies**

- a) Google Ads

This cookie allows us to display personalised offers to you on external websites through Google ads. This cookie enables Google to recognise your browser when you browse the Internet. By using this cookie, we do not obtain any personal data about you, Google only transmits data to us for analytical purposes.

Detailed information on the service is available on this link:

www.google.com/intl/hu/policies/privacy

- b) Google Ads remarketing

The purpose of this Google Ads feature is to provide personalised ads on other websites based on your activity on our website. If you have consented to your Google browsing activity being linked to your Google Account and to the information from your Google Account being used to personalise your advertising, Google will use your logged-in user data, together with Google Analytics data, to create targeting lists for cross-device remarketing. To support this functionality, Google Analytics processes the Google-authenticated identifiers of these users. These personal data processed by Google are temporarily linked to our Google Analytics data in order to create target groups.

For more information on how to turn off the display of ads, see www.google.com/settings/u/0/ads/anonymous?hl=hu on the website.

- c) Facebook

This cookie allows us to display personalised offers on the platforms of Facebook products (Facebook, Messenger, Instagram).

The Facebook Custom Audiences and Facebook Conversion (“Facebook Pixel”) services allow us to display interest-driven ads based on your interest in our services when you use the Facebook social networking platform or visit other external websites that also use this tool. They also allow us to ensure that our Facebook ads match your actual



interests and to track your activity on our ads so that we can update our ads accordingly and ensure that they do not disturb you.

Detailed information on the service is available on this link <https://www.facebook.com/policies/cookies/> Facebook Inc. (1601 S. California Ave, Palo Alto, CA 94304, USA) is responsible for the content of this website. Facebook.com is managed in Europe by Facebook Ireland Limited (Hanover Reach, 5-7 Hanover Quay, Dublin 2, Ireland).

Duration of data processing: up to 2 years, regardless of settings

Legal basis for processing: consent of the Data Subject (GDPR Article 6(1)(a))

Handling and deleting cookies

When you visit the mupa.hu website, you can give your consent to the use of cookies for analytical and marketing purposes by clicking on the “Accept All” button on the cookie warning that pops up on the page.

If you only want to give your consent to the use of the cookies you have selected, you can manage the cookies individually by clicking on the “Manage cookies” button. You can change this setting at any time by following your browser’s instructions for deleting cookies, then returning to our website and re-adjusting the cookie warning that pops up on the login page.

You can also control the use of cookies and the length of time they are stored by your Internet browser at any time, independently of our website. You can set your browser to not allow cookies to be saved as a default and/or to ask you each time you use your browser whether you agree to cookies being enabled. You can delete cookies that you have repeatedly turned on at any time.

Use the help function in your browser to access detailed information on how this functions.

- [Internet Explorer](#)
- [Firefox](#)
- [Chrome](#)
- [Safari](#)
- [Edge](#)

Please note that disabling the use of cookies in general may limit the functionality of certain features of our website.

c) Buying tickets

When you purchase tickets through the website, the data you provide will be processed by Müpa Budapest in order to meet its contract with you (e.g. notification of cancelled performances, handling of subsequent ticket redemptions, issuing of invoices).

Scope of processed data: name, title, email address, postal address, telephone number.

Duration of data processing: 5 years from the date of ticket purchase



Legal basis for processing: to ensure the proper functioning of the website (GDPR Article 6(1)(b))

With regard to our obligation to issue receipts or invoices, we are obliged to retain the personal data you provide us with and which are necessary for the fulfilment of our financial obligations for the period of time required by applicable financial legislation.

Duration of processing: retention period as defined in the applicable financial legislation

The legal basis for processing: compliance with a legal obligation, GDPR Art. 6(1) (c)).

We think that if you have purchased tickets for one of our performances, you may be interested in our other events. We may therefore send you information about some of our other programmes in the future via the email address you provided when you purchased your ticket.

Duration of processing: maximum 1 year from the date of purchase

Legal basis for processing: legitimate interest of the Controller based on the purchase of tickets as a contract (GDPR Article 6(1)(c))

You have the right to object to such processing by sending an email to adatvedelem@mupa.hu.

d) Müpa Newsletter

Müpa Budapest, as one of Hungary's leading cultural institutions, considers it its main task to ensure that the highest quality productions of Hungarian and international classical and popular music and theatre reach the widest possible audience. Therefore, we aim to welcome you as a guest at as many of our events as possible.

If you do us the honour of subscribing to the Müpa Newsletter, so that we can contact you directly by email with your consent, we promise to keep you informed of all relevant information about our programmes in a timely manner.

The following data will be processed: name, title, email address, language, postal address, year of birth, genre preference, activities, ticket purchase data, student/teacher status, browsing history.

Duration of processing: until consent is withdrawn

Legal basis for processing: consent of the Data Subject (GDPR Article 6(1)(a))

If you do not wish to receive future direct communication about our programmes, you can withdraw your consent by clicking on the "unsubscribe" link in the newsletter in the settings interface that appears there, or you can manage your preferences for notifications at any time by logging into your personal user account on the mupa.hu website.

e) Facebook remarketing

Müpa Budapest also tries to inform its registered users about programmes and services that are likely to be of interest to them through remarketing enquiries. The purpose of this feature is to display relevant and personalised ads to people who are active users of both Facebook



and Instagram social networking sites when they use these sites and Facebook's Audience Network.

When registering on the website, you can give your permission by giving your specific consent to be contacted by us via Facebook and Instagram with personalised advertisements based on your previous shopping activity and browsing history, using the name and email address you provided during registration.

If you opt-out of Facebook remarketing, no further data will be transferred to Facebook. You have given your consent to the related processing at any time by logging into your personal user account on the mupa.hu website.

For information and options on deactivation on Facebook, please see the retargeting feature, which requires you to log in to your account beforehand https://www.facebook.com/settings/?tab=ads#_=_

Duration of processing: until the withdrawal of the Data Subject's consent

Legal basis for processing: consent of the Data Subject (GDPR Article 6(1)(a))

f) Registration

Müpa strives to ensure that you have the best possible user experience when using its services, through a highly customer-oriented approach. Providing a high-quality service that meets your needs in every respect is made much easier for us when you register on our website.

By registering on www.mupa.hu, you consent to the processing of the following data: email address, password, name, title, gender, year of birth, place of residence (country), postal code, genre preference, student/teacher status. Through your activities as a registered user of the website, we may process additional personal data, such as: purchase history, website transactions, browsing activity. These data are used to help us better serve our customers and to resolve problems.

If, during registration or afterwards, you consent to being contacted directly for marketing purposes, you allow us to use the above data to provide you with up-to-date and personalised offers that reflect your needs at a high level.

Duration of processing: until the withdrawal of the Data Subject's consent

Legal basis for processing: consent of the Data Subject (GDPR Article 6(1)(a))

You can access and freely manage your personal data at any time through your user account. The email address you have provided is the most authentic channel of communication and can only be changed by sending a request to adatvedelem@mupa.hu.

Please be informed that, in compliance with the data processing principles set out in Article 5(1) of the GDPR, in particular the principles of purpose limitation, data minimisation and accuracy, Müpa Budapest does not process data that do not serve the original purposes of processing. With this in mind, if there is no activity associated with your account for two-and-



a-half years, we will send you a warning notice informing you that your account will be terminated. If you do not carry out any activities as a registered user for the following six months, your account and the personal data we process in this context will be deleted. This provision does not apply to users who are members of the Müpa+ Membership Programme, in order to ensure that the Data Subject does not suffer any disadvantage as a result of the deletion (e.g. loss of Membership points).

g) Müpa+ Membership Programme

Müpa Budapest operates a Membership programme for its most loyal guests, offering progressively increasing benefits – ticket discounts, exclusive events, pre-sales, and priority parking – to participants.

When you give your consent when joining the Müpa+ Membership Programme, we will process the following personal data – direct contact, benefits, etc. – in addition to the personal data you provided when registering in order to provide the (continuously expanding) services agreed in the General Terms and Conditions of the Membership Programme: address, telephone number, Membership card number, number of Membership points, Membership level, vehicle registration number, individual requests (e.g. sending the programme guide by post).

You are entitled to terminate your membership of the Membership Programme at any time and withdraw your consent to the processing of your data in this regard, in which case your Membership points will be lost and your Membership level cannot be restored upon rejoining. Your request can still be withdrawn within 48 hours.

Müpa+ Membership Programme Newsletter

The Müpa+ Membership Programme Newsletter is the most important channel of communication with our guests participating in the Müpa+ Membership Programme. This will inform you about special discounts, promotions, exclusive services and programmes specifically for Müpa+ Membership Programme members. By subscribing to the Müpa+ Newsletter, you agree that Müpa Budapest can directly contact you via email with email messages about the Membership Programme, its benefits and extra services.

If you join the Membership programme but do not subscribe to the Müpa+ Newsletter, we can only send you technical information about the Membership Programme (Membership point increase, changing Membership level). Müpa Budapest accepts no liability for any loss resulting from failure to provide full information. If you do not wish to receive these notifications, you can opt out of the programme on your personal page.

If you do not wish to receive future direct communication about our programmes, you can withdraw your consent by clicking on the “unsubscribe” link in the newsletter in the settings interface that appears there, or you can manage your preferences for notifications at any time by logging into your personal user account on the mupa.hu website.

Duration of processing: until the withdrawal of the Data Subject's consent

Legal basis for processing: consent of the Data Subject (GDPR Article 6(1)(a))



h) Making video and audio recordings

By entering Müpa Budapest, you expressly accept that images and sound recordings may be made on the premises of Müpa Budapest and in its halls, in which you may appear as a visitor. By participating in (public) events at Müpa Budapest, you agree that Müpa Budapest may use these recordings in connection with its core cultural activities. You may not make any claim against Müpa, the organisers or producers of the recording or any other valid user of the recording in connection with such use.

3. Rights of Data Subject and how to exercise them

Your correspondence regarding the following requests will be received via email at adatvedelem@mupa.hu.

You may at any time request that Müpa Budapest inform you whether Müpa Budapest is processing your personal data and, if so, provide you with appropriate access to the personal data Müpa Budapest is processing. By logging into your user account, you also have direct access to your personal data, but you can still request information about the processing of your personal data in writing at any time. Please note that Müpa Budapest can only consider a request for information sent by email as authentic if it is sent from the user's registered email address, but this does not prevent Müpa Budapest from identifying the applicant in another way before providing the information.

If you find that the personal data we are processing about you are not accurate, you may request that we correct the personal data we are processing about you. If you are a registered user, you can change your data yourself via your user profile.

You can request the deletion of your personal data that we process at any time. Deletion may be refused (i) for the exercise of the right to freedom of expression and information, or (ii) where the processing of Personal Data is authorised by law, and (iii) for the establishment, enforcement or defence of legal claims. In all cases, Müpa Budapest will inform the Data Subject of the refusal of a request for deletion, stating the reasons for the refusal. Once a request for deletion of personal data has been met, the previous (deleted) data can no longer be restored.

You may request that Müpa Budapest restricts the processing of your personal data if you dispute the accuracy of your personal data processed. In this case, the restriction applies for the period of time that allows us to verify the accuracy of your personal data. You may also request restriction of processing if processing is unlawful or has already fulfilled its purpose, but you object to the erasure of your personal data processed and instead request restriction of its use.

Personal data provided by you and processed by Müpa in an automated way in a structured, commonly used, machine-readable format shall be disclosed and/or transferred to another controller by Müpa upon your request.



You may object to the processing of your personal data at any time (i) if the processing of the personal data is necessary for the fulfilment of a legal obligation to which the controller (Müpa Budapest) is subject or for the purposes of the legitimate interests pursued by the Controller or a third party; (ii) if the processing is for direct marketing, public interest surveys or scientific research; or (iii) if the processing is necessary for the performance of a task carried out in public interest. Müpa Budapest will examine the legitimacy of the objection and, if it finds that the objection is justified, it will terminate the processing.

4. Data processors

The processing of personal data on behalf of Müpa Budapest is carried out by data processors under contract with us. The data processor may not make any independent decision regarding the data, but is entitled to act only in accordance with the provisions of the contract concluded with Müpa Budapest and the instructions received from Müpa Budapest. We have selected our data processors to ensure that the security of your personal data is guaranteed to the greatest extent possible. We require a contractual declaration of compliance with applicable legislation from all our data processing partners, and only upon receipt of this may they carry out any processing on behalf of Müpa Budapest. You can view the current list of our data processors by [clicking on the following link](#).

5. Legal enforcement options

If you need further information, please contact us by email at adatvedelem@mupa.hu, by post at 1453 Budapest, P.O. Box 57, or in person. Please note that if you make your request in regard to data processing in person, our colleagues may ask you to prove your identity.

You may lodge a complaint about the processing of your data directly with the Hungarian National Authority for Data Protection and Freedom of Information (Address: 1055 Budapest, Falk Miksa utca 9-11., Postal address: 1363 Budapest, Pf.: 9., Phone: +36 1 391 1400, Fax: +36 1 391 1410, Email ugyfelszolgalat@naih.hu, Website: <http://www.naih.hu/>).

The Data Subject may take legal action against the Controller in case of violation of his or her rights. The court has jurisdiction to hear the case and bring a decision on it. The action may also be brought before the court of the person's domicile or residence, at the person's choice. Müpa Budapest is entitled to amend this Privacy Notice at any time at its exclusive discretion. If this entails a change in the principles or purposes of processing, Müpa Budapest will obtain the Data Subject's consent to further processing in advance.

Budapest, 13 July 2021