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# Privacy Policy

25 May 2018

## Introduction

We attach great importance to the protection of your personal data, therefore we wish to provide you with information on the data processing activities carried out by Müpa Budapest Nonprofit Kft. (1095 Budapest, Komor Marcell u. 1) as a controller, and the principles and rules we abide by during these activities.

Data processing is only carried out during the use of Müpa Budapest's website ([www.mupa.hu](http://www.mupa.hu)) and our services with your prior notification and explicit consent. In addition, Müpa Budapest processes data based on legitimate interest or express statutory provisions for the fulfilment of the contract between you.

## 1. Security of your data, our data processing principles

Müpa Budapest shall treat your personal data in a manner that is as transparent as possible for the sole purpose of a specific, clear and legitimate purpose, only to the extent required and for the briefest period necessary to achieve the purpose, in a manner that is legitimate and fair in all respects. We pay great attention to ensuring that the data we process is accurate and up-to-date.

However, we are aware that compliance with the above is worthless if technical and organisational measures are not taken to protect personal data.

That is why we chose our processor partner, Crane Kft to assist us in processing the majority of our personal data, as it has been operating in accordance with ISO 27001 Information Security Standards since 2017, therefore guaranteeing that your personal data is processed in accordance with the highest standards. Our website operating partner, Frontside Kft. also performs its activities according to the highest standards of IT and information security requirements.

We have also created our organisational structure, which we operate through strict internal organisational rules and the allocation of different access rights, so that we are able to provide the necessary guarantee for the transparency of our data processing and in respect to the



security of your personal data in every aspect. Müpa Budapest will not disclose any personal data to third parties without the consent or prior notification of the data subject unless specifically required to do so by law or a by instruction of a competent authority. Müpa Budapest will make every effort to ensure that your personal data cannot be accessed by any unauthorised person by implementing appropriate technical measures (operation of a single internal IT system).

Through internal courses and organised training, we continuously keep the Müpa Budapest employees involved in personal data processing informed about the latest technical and legal requirements to ensure that our data processing activity meets all legal and information security technical requirements at all times.

## 2. Scope of the data processed by us

### a) **www.mupa.hu server 'logging'**

When visiting the website of Müpa Budapest, the web server automatically logs the user's activity. Without this, we would not be able to ensure the proper functioning of the website and we would not be able to prevent any external attacks, therefore this kind of data processing is based on the legitimate interest of Müpa Budapest. The log file is used for quality assurance; we do not link it with any other information as we do not intend to identify the user concerned.

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

Storage period: the data are erased after 30 days

### b) **Web analytics measurements**

Google Analytics as an external service provider helps to independently measure the website hits and other web analytics data of the mupa.hu website. The data is recorded anonymously, Müpa Budapest uses them for statistical purposes only and to optimize the operation of the site. For detailed information about the processing of measurement data, please visit: [www.google.com/analytics](http://www.google.com/analytics). Web analytics data collection for such statistical purposes is a widespread practice that you consent to by visiting our website.

### c) **Management of cookies**

A cookie (in Hungarian: süti) is a small data file that our server sends to your web browser in order to provide a customised and high-quality service. If you return to our website, your browser will send the cookie back to our server and make it possible to create a connection between individual sessions.



You may see two types of cookies on our website:

- The use of **session-id and use facilitating (temporary) cookies is required for the proper use of the site**. Without this, the website or parts thereof will not be displayed, the consent to the management of cookies cannot be stored, browsing becomes obstructed and entry into the basket or the bank payment area cannot be properly executed. Therefore, by visiting this website, you acknowledge the use of these cookies.
- **Permanent cookies:** Depending on how the web browser is set up, they will remain on the device for a long time or until they are deleted by the User. If the web server of Müpa Budapest installs the cookie and the data is transferred within its own database, then we are referring to an internal cookie. If the cookie is installed by the web server of Müpa Budapest or a third party service provider, but the data is transferred to an external service provider, then we are referring to an external cookie.

Based on the purpose of use we identify the following types:

- Statistical cookies:
  - a. full Google Analytics measuring code cookie
  - b. measuring code suitable for measuring other web analytics (e.g. HotJar)
  - c. cookie of a heat map analytics tool (e.g. HotJar)
  - d. cookie of a device for recording mouse movement (e.g. HotJar)
- Advertising cookies
  - e. all cookies, remarketing codes, and pixels (e.g. Facebook, AdWords) placed by all external providers

While visiting the mupa.hu website, you can consent to the use of permanent cookies by clicking on the 'ACCEPT' button on the pop-up message appearing on the home page of the site.

Stored data: identification code, date, time, the page previously visited

Storage period:

- temporary cookies that assist session use, until the session is closed,
- permanent cookies are usually stored for 1 year on your computer or until you delete them.

Please note that cookies can be deleted from your computer at any time or disabled in your browser.



For more information about logging and cookie management from Google, Facebook, and Hotjar service providers for managing measurement data and personalising your ads, visit [www.facebook.com/about/privacy](https://www.facebook.com/about/privacy), [www.google.com/intl/hu/policies/privacy](https://www.google.com/intl/hu/policies/privacy) or [www.hotjar.com/legal/policies/privacy](https://www.hotjar.com/legal/policies/privacy).

#### **d) Purchasing tickets**

When you purchase a ticket through the website, the data you provide is processed by Müpa Budapest for the fulfilment of the contract between you (e.g.: notification of cancelled lectures, handling of ticket refunds, issuing of invoices).

Due to our receipt and invoicing obligation, personal data provided by you to us are kept for the period of time required by the applicable financial legislation.

We believe that if you have purchased a ticket for one of our lectures, our other programmes may also be of interest to you. Therefore, we will inform you about some of our other programmes in the future through the e-mail address you provided during your ticket purchase.

You have the right to object to such data processing directly via the link in the newsletter or by sending an e-mail to [adatvedelem@mupa.hu](mailto:adatvedelem@mupa.hu).

#### **e) Marketing inquiries**

Müpa Budapest, as one of the leading cultural institutions in Hungary, considers it their obligation to reach the widest possible range of Hungarian audiences with its outstanding performances of Hungarian and international classical and popular music and theatrical pieces. That is why we aim to welcome you at as many of our events as possible.

If you grant us with the possibility to directly contact you via e-mail or through other communication channels by giving you consent, we promise to provide you with all relevant information about our programmes in a timely manner. During this process your following personal data shall be processed: name, title, e-mail address, language, address, birth year, genre preference, activity, ticket purchase data, student/teacher status, browsing history.

If you do not wish to be notified directly of our programmes in the future, your consent can be withdrawn directly via the link at the bottom of the newsletter or by sending an e-mail to [adatvedelem@mupa.hu](mailto:adatvedelem@mupa.hu).

If you are a member of our loyalty programme, we will only be able to provide you with technical information about the loyalty programme after your consent is withdrawn. Müpa Budapest does not assume any liability for any loss due to the lack of full disclosure.



## f) Registration

Müpa Budapest makes every effort to ensure that you have the most diverse user experience possible when using our services, owing to our exceptionally customer-focused communication. Your registration on our website greatly assists us in all respects in providing you with the most appropriate and high quality service.

By registering on the [www.mupa.hu](http://www.mupa.hu) website, you consent to the processing of your following personal data: e-mail address, password, name, title, gender, birth year, residence (country), postcode, genre preference, student/teacher status, individual needs (e.g. webcast notification). When using the site as a registered user, your activities may result in additional personal data being processed (e.g.: purchase history, special requirements, etc.). We use this data to provide the most efficient customer-focused communication and problem management service.

If, during or after registration, you also consent to us directly contacting you for marketing purposes, it will allow us to send you up-to-date and personalised offers that meet your requirements at ever increasing levels, by using the above data.

You can access your personal data through your user account at any time and you may manage them freely. Your e-mail is the most authentic channel of communication, therefore its modification is only possible by sending a request to the [adatvedelem@mupa.hu](mailto:adatvedelem@mupa.hu) e-mail address.

The data you provide will only be processed in the context of our cultural activity until your consent is withdrawn unless, based on other legal ground, we are otherwise entitled to or are subject to performing data processing.

## g) Müpa+ loyalty programme

Müpa Budapest offers a loyalty programme to its most loyal guests, providing participants with gradual benefits, such as discounted tickets, exclusive events, the possibility to pre-order and priority parking.

For the fulfilment of the services undertaken in the General Contacting Terms and Conditions of the Müpa+ Loyalty Programme - direct communication, provision of benefits -, in addition to the personal data provided during registration, we process the following data of loyalty programme members: address, telephone number, loyalty card number, number of loyalty points, loyalty level, vehicle registration number, individual requirements (e.g. mailing of a programme guide by post).

If you join the loyalty programme but do not consent to us sending you marketing messages directly, we will only be able to provide you with technical information about the loyalty



programme. Müpa Budapest does not assume any liability for any loss due to the lack of full disclosure.

You may at any time have the right to terminate your membership of the loyalty programme and to withdraw the consent provided for the processing of your data relating to the loyalty programme, but in that case your loyalty points will be lost and your loyalty level cannot be restored even if you re-activate it. Your request may be withdrawn within 48 hours.

#### **h) Recording of video and audio footage**

By entering the premises of Müpa Budapest, you expressly acknowledge that pictures and audio recordings may be made on the premises and within the rooms Müpa Budapest, in which you, as a visitor, may also appear.

By participating in Müpa (public) events you agree that Müpa Budapest may use the recording in connection with its core cultural activity. In connection with such use of the recording, no claim may be submitted against Müpa Budapest, the organisers or the creators of the recording, or against any other person using the recording with proper entitlement.

### **3. Rights of data subjects and method of their enforcement**

Your letter in relation to the below requirements will be sent to the [adatvedelem@mupa.hu](mailto:adatvedelem@mupa.hu) e-mail address.

- You may request Müpa Budapest for **inform** you at any time regarding whether it is processing your personal data, and if so to provide access to the personal data processed by them. By accessing your user profile, you also have direct access to your personal data, but regardless of this, you may at any time request written information about the processing of your personal data. We wish to inform you that Müpa Budapest may consider any request for information sent by e-mail authentic only if it is sent from the user's registered e-mail address, however this does not exclude the fact, that prior to providing the information Müpa Budapest may also identify the requestor in another way.
- If you find that personal data processed relating to you are not realistic, you may request that your personal data processed by us is **rectified**. If you are a registered user, you may modify the data yourself through your user profile.
- You may request the erasure of your personal data processed by us at any time. The **erasure** may be rejected (i) in relation to the exercising the right to the freedom of expressing an opinion and obtaining information, or (ii) when the law provides authorisation for the processing of Personal Data and (iii) for the presentation, enforcement or defence of legal claims. Müpa Budapest shall always inform the data subject of the rejection of the request for erasure specifying the reason for denying the



erasure. Former (erased) data can no longer be recovered after the requests for erasure of personal data have been fulfilled.

- You may request Müpa Budapest to **restrict** the processing of your personal data if you dispute the accuracy of the processed personal data. In that case the restriction related to the period during which we can verify the accuracy of the personal data. You may also request a restriction on data processing if the data processing is carried out unlawfully or its purpose has already been achieved, but you are opposed to erasing the processed personal data and instead request the restriction of their use.
- Müpa Budapest is obliged to **disclose** and/or **transfer** to another controller the personal data supplied by you and processed by it in an automated manner in a segmented, widely used format, readable with a machine, upon your request.
- You may at any time **object** to the processing of your personal data (i) if the processing of personal data is required only for performing a legal obligations of controllers (Müpa Budapest) or for the enforcement of a legitimate interest of the controller or a third party; (ii) where the purpose of data processing is direct business acquisition, a public opinion survey or scientific research; or (iii) if data processing takes place in order to fulfil a task in the public interest. Müpa Budapest examines the lawfulness of the objection and, if it establishes that the objection is well founded, it terminates the processing of data.

#### 4. Data processors

Personal data processing on behalf of Müpa Budapest is carried out by data processors in a contractual relationship with us. The data processor cannot make an independent decision on the data and is entitled to proceed only according to the provisions of the contract concluded with Müpa Budapest and instructions received. Our data processors have been selected to ensure that your personal data is secured to the greatest possible extent during data processing. To comply with the applicable laws, we request all our data processing partners to provide a contractual statement, and only after doing so can they perform any data processing on behalf of Müpa Budapest. You can view the current list of our data processors [by clicking on this link](#).

#### 5. Right enforcement options

If you would like more information please contact us by e-mail at [adatvedelem@mupa.hu](mailto:adatvedelem@mupa.hu), by post at 1453 Budapest, P.O. Box.: 57 or in person. We wish to inform you that, if you submit your request relating to data processing in person, our colleagues may ask you to verify your identity.



With your data processing complaint you may turn directly to the Hungarian National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.; phone: +36-1-391-1400; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu)).

In the event of any infringement of their rights, the data subject may bring their case before the court. The case shall be heard by the competent general court. If so requested by the data subject, the case may be brought before the general court in whose jurisdiction the data subject's home address or temporary residence is located.

Müpa Budapest is entitled to unilaterally change this Privacy Policy at any time. If this entails changing the principles or the purpose of the data processing, it shall obtain the consent of the data subject in advance for further data processing.

Budapest, 25 May 2018