

DATA PROTECTION AND DATA MANAGEMENT REGULATION of Filharmonia Magyarország Nonprofit Korlátolt Felelősségű Társaság (Filharmonia Hungary Non-profit Limited Liability Company)

I. Purpose of the Regulation

The purpose of the Regulation is to lay down data protection and data management principles to be followed by Filharmonia Magyarország Nonprofit Korlátolt Felelősségű Társaság, company registration no.: 02-09-081011, address: 7626 Pécs, Felsővámház u. 52 (hereinafter the Company) and the Company's data protection and data management policy, and the Company undertakes to be bound by this regulation and policy. When stipulating these rules, the Company considered especially the provisions of Act XCII of 2011 on Informational Self-Determination and Freedom of Information (Information Act).

The purpose of the Regulation is to secure, concerning all services provided by the Company for every individual, regardless of his or her nationality or domicile, respect for his or her rights and fundamental freedoms, and in particular his or her right to privacy, with regard to automatic processing of personal data relating to him or her (data protection).

The data protection registry identification number of the Company is NAIH 132443/2017.

II. Definitions

Personal data or data: means any data relating to a natural person (hereinafter the subject) or any conclusion on the subject that can be drawn from that data. Any personal data will remain as such as long as its connection with the subject can be restored;

Date file: means the entirety of the data managed in the same register;

Data management: means, regardless of the procedure employed, any process or set of operations performed on personal data, including especially collection, recording, capture, systematization, storage, alteration, use, retrieval, transmission, disclosure, alignment or interconnection, blocking, deletion and destruction of personal data and prevention of further use of these data;

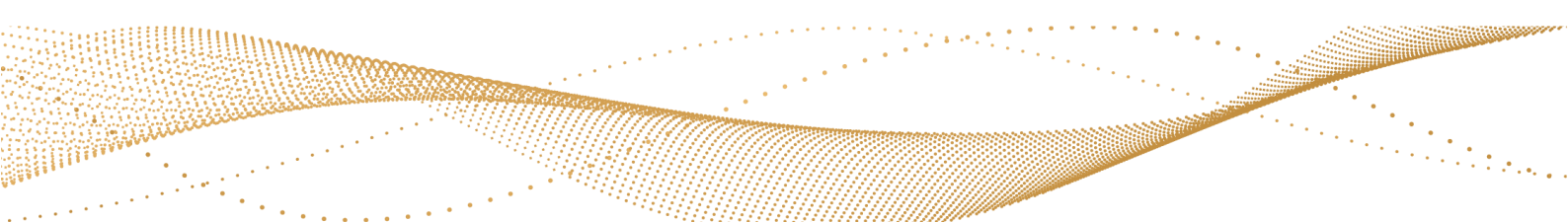
Data Controller: Filharmonia Magyarország Nonprofit Korlátolt Felelősségű Társaság;

Data processing: means the carrying out of data management operations and technical tasks, irrespective of the method and device used to perform operations and the location of the application, provided that the technical task is carried out on the data;

Data destruction: means complete physical destruction of data-containing media;

Data transmission: when data are made accessible to a predetermined third party;

Disclosure: making the data available to anyone;



Data Processor: means a natural or legal person or organization without legal personality which processes personal data on behalf of the Data Controller;

Data deletion: making data unrecognizable in such a way that their recovery is no longer possible;

Automated data file: a series of data processed by automatic means;

Automatic processing: includes the following operations when these are performed, partially or wholly, by automatic means: data storage, logical or arithmetic operations carried out on data as well as alteration, deletion, retrieval and dissemination of data.

System: means the set of technical solutions that operate Data Controller's websites and services accessible through Internet.

User: means a natural person who registers, as a participant, in online voting for Maestro Solti International Conducting Competition, and, to this end, he or she gives his or her data listed in Section III below.

III. Scope of personal data being managed

3.1 During the Data Management process the Company will handle the following data: name, e-mail address and domicile.

IV. Scope of additional personal data being managed by the Company

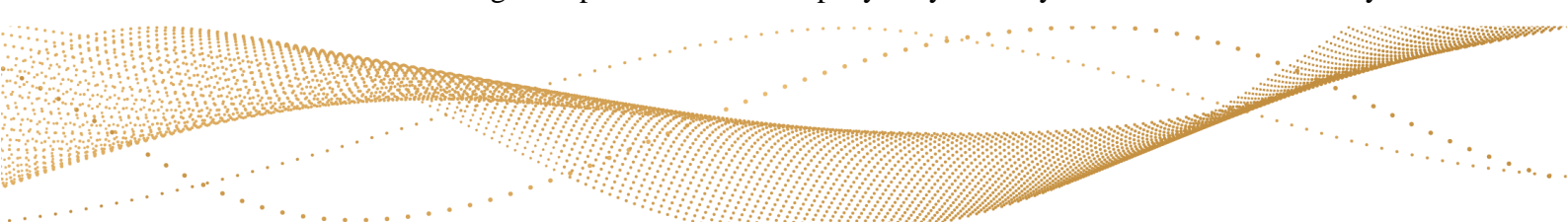
4.1 In order to provide customized services, the Company places a small file (so called "cookie") on the User's computer. The purpose of the cookie is to ensure operation of a given site at the highest level possible to improve user experience. The User can delete the cookie from its own computer and can set the browser to disable cookies. By disabling cookies the User acknowledges the fact that the operation of the site concerned is incomplete.

4.2 Data technically recorded during the operation of the systems are: data of the User's computer being logged which are generated while the service is being used and are recorded by the Data Controller's system as an automatic result of technical processes. When logging in and logging out, the system will automatically log data to be recorded automatically, without User's separate statement or act. Only Data Controller has access to these data.

V. Legal basis, purpose and method of Data Management

5.1 Data Management is carried out on the basis of the voluntary informed statements made by the Users of the Company, and these statements contain Users' express consents to use their personal data provided by them when using the website or personal data generated in connection with the Users. Under Point a) of Paragraph 1 of Article 5 of the Information Act the legal basis of Data Management is the subject's voluntary consent.

5.2 The purpose of the management of automatically recorded data is to ensure participation in online voting, which is accessible on the Company's Internet websites, in Maestro Solti International Conducting Competition. The Company may use any data made accessible by



the Users when using services to create user groups and to display targeted contents and/or advertisements on the Company's websites to the user groups.

5.3 Data Controller must not use any personal data provided for any purposes other than described in these sections. Data may be transmitted between Data Controllers identified in the Regulation without requesting Users' separate approvals. Unless otherwise stipulated by law in a legally binding manner, personal data may only be disclosed to third parties or authorities on the basis of an official resolution or after obtaining User's prior express approvals.

5.4 Data Controller will not check personal data provided to it. The person who provides the data shall be solely responsible for the correctness thereof.

5.5 When giving its e-mail address, each User takes responsibility for using services by nobody else but the User from the e-mail address given. With regard to this responsibility, the User who registered the e-mail address shall have sole responsibility relating to entering the e-mail address concerned.

VI. Data Management Principles

6.1 Data may only be obtained and processed in a fair and lawful manner.

6.2 Data may only be stored for specified and lawful purposes and must not be used otherwise.

6.3 Data must be proportionate to the purpose of their storage and must serve this purpose but must not go beyond that.

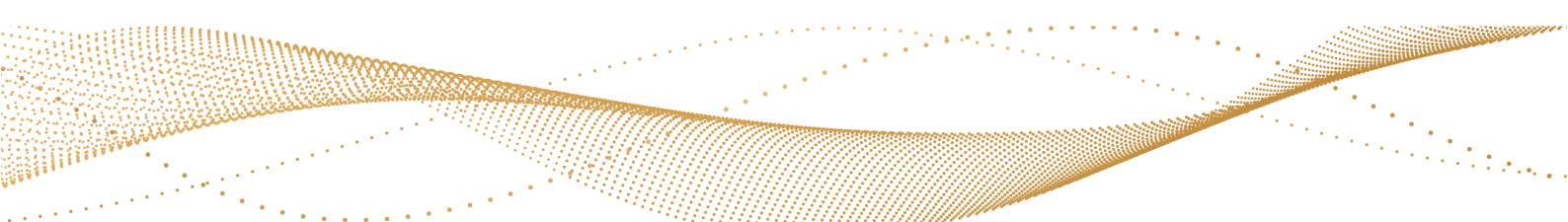
6.4 All necessary security measures should be taken to protect personal data stored in automated data files in order to prevent any accidental or unauthorized destruction, accidental loss or any unauthorized access, modification or dissemination.

VII. Data protection guidelines adopted by the Company

7.1 The Company will only use personal data whenever these are absolutely necessary for using the services of the Company, on the basis of subjects' approvals and only for the intended purpose.

7.2 The Company, as Data Controller, undertakes to handle any data received in accordance with the provisions of the Information Act and the data protection principles set forth in this Regulation and not to transfer them to third parties other than the Data Controllers laid down in this Regulation.

Using data in a statistically summarized form constitutes an exemption from the provision stipulated in this section, which form must not contain the name of the User concerned and any data in any form that is suitable to identify the User therefore this application does not constitute Data Management or Data Transmission.



7.3 In certain cases - when receiving requests from the police or a court, a legal action has been launched for copyrights or proprietary rights or reasonable suspicion thereof or when the interests of the Company are adversely affected and its services are endangered, etc. – the Company discloses the accessible data of the User concerned to third parties.

7.4 The system of the Company may collect data on Users' activities which cannot be linked to other data provided by the Users upon registration or data generated when other websites or services are being used.

7.5 The Users shall be informed about the purpose of Data Management and those who will manage and process the data. Information on Data Management is considered as having been provided also when the law provides for the existing Data Management – recording data through data transmission or interconnection.

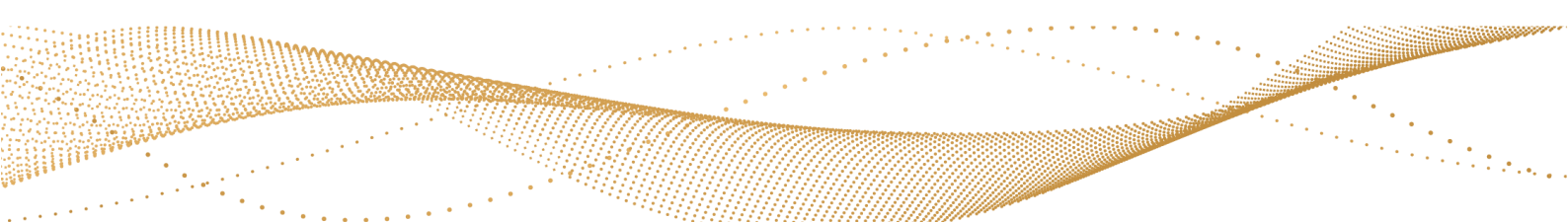
7.6 Whenever the Company wishes to use data having been received for any purpose other than that of primary data recording, the Company shall inform the User about its intention and obtain User's prior express approval and provide the User with the opportunity to prohibit use of data.

7.7 The Company will always observe restrictions laid down by laws while taking down, recording and managing data.

7.8 The Company undertakes to ensure data security and take all necessary technical and organizational measures and specify procedural rules that ensure that any data recorded, stored and managed are protected, and shall prevent their destruction, unauthorized use and unauthorized alteration. The Company committed itself to call upon any third parties to whom these data may be transmitted or provided by the Company to fulfil their relevant obligations.

7.9 Data Controller shall block the Personal Data if it is requested by the person concerned or if, on the basis of the information available, it can be assumed that deletion would prejudice the legitimate interests of the person concerned. The Personal Data blocked this way may only be managed as long as the purpose of data management that excluded the deletion of the personal data exists.

7.10 The Users concerned shall be informed about correction, blocking and deletion of the Personal Data being managed, and everybody to whom data were transmitted for Data Management beforehand shall be notified. The notification may be omitted if it does not prejudice the legitimate interests of the person concerned, with regard to the purpose of Data Management.



VIII. Duration of Data Processing

8.1 The Personal Data provided by the User will be managed until the User, with the user name concerned, unsubscribes the service and, at the same time, requests to delete the data. Data shall be deleted on the 10th working day after receipt of User's request for deletion. In this case these data are deleted at all Data Controllers identified in this Regulation.

In the case of using unlawful or misleading data or when the User commits a crime or the system is being attacked, the Data Controller shall be entitled to delete User's data simultaneously with terminating its registration and, on the other hand, to retain the data for the duration of the proceedings to be conducted, if there is a reasonable suspicion of criminal offence or civil liabilities.

8.2 Even if the User does not unsubscribe the services or just removes the possibility to enter with the deletion if its registration but the remarks stored therein and uploaded contents will remain, the Company and the Data Controller may manage personal data provided by the User until the User expressly requests in writing to terminate their management. User's request to terminate Data Management without unsubscribing services will not affect its right to use services, but it may happen that the User cannot use some services for lack of Personal Data. Data shall be deleted within 10 working days of the request for that.

8.3 Data technically recorded in an automatic manner during the operation of the system will be stored in the system after their generation for a reasonable period of time required to ensure operation of the system. The Company ensures that these automatically recorded data cannot be interconnected with other personal user data, except in cases when it is required by law. If the User has terminated its approval to managing its personal data or unsubscribed services then the User must be made unidentifiable from technical data, apart from investigative authorities and their experts.

IX. Disposition over personal data

9.1 Any changes in personal data can be set or modified on the website of Maestro Solti International Conducting Competition ensured for online voting. Personal data can be deleted on the same website.

9.2 The newsletters of the Company can be unsubscribed through the unsubscribe link provided therein.

9.3 After a request for deleting or modifying personal data has been fulfilled, previous (deleted) data cannot be restored any longer.

9.4 Users may request information in writing at any time about the management of their personal data from the Company or the Data Controller via a registered letter or a registered letter with acknowledgement sent to Data Controller's address or via an e-mail sent to the following address: filharmonia@filharmonia.hu or viktor.vildanger@filharmonia.hu. The Company will consider any request for information sent in a letter credible if the User can be identified unambiguously on the basis of the request having been sent. The Data Controller will consider any request for information sent via e-mail credible only if it is sent from User's registered e-mail address. The request for information may include User's data managed by

the Data Controller and the source of data, the purpose, legal basis and duration of Data Management, names and addresses of possible Data Processors, activities related to Data Management and, if Personal Data are transmitted, who will get User's data and for what purpose.

9.5 The Data Controller shall answer any question related to Data Management within 15 working days after receipt thereof. In case of e-mails the first working day following the date on which the e-mail was sent shall be considered to be the date of receipt.

X. Data processing

10.1 The Company does not hire any external data processor. In case of need Ferling Kft. will process any personal data managed by the Company.

XI. External service providers

11.1 In connection with the operation of the service the Company may transfer certain data provided by the Users to an External Service Provider, but the External Service Provider may only use the data provided for the purpose set forth in this Regulation.

XII. Possibility to transfer data

12.1 The Company, as Data Controller, is entitled and obliged to transmit any available Personal Data stored properly by the Company to competent authorities, if any law or a legally binding resolution compels the Company to transmit these data. Data Controller cannot be held responsible for any such Data Transmission and the consequences thereof.

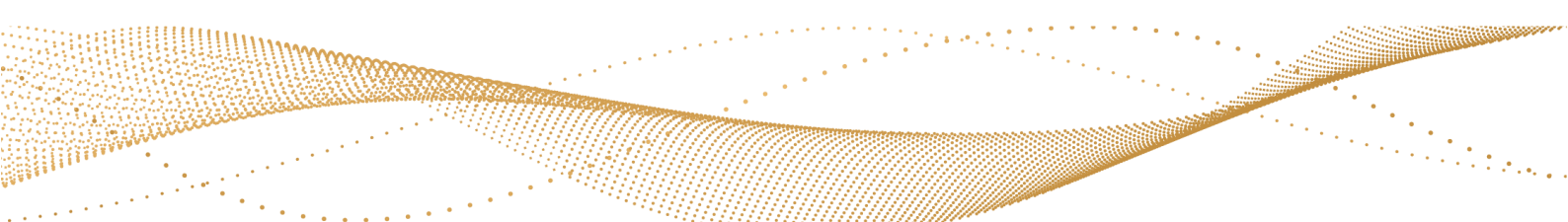
12.2 If the Company passes over, partially or wholly, the operation or utilization of content services and hosting services provided on its websites to a third party then the Company may, without requesting for a separate approval, hand over all data managed by it to this third party for subsequent management. This Data Transmission must not place the User in a situation worse than that created by the data management rules set out in the latest applicable version of this Regulation.

12.3 The Company keeps records of data transmissions in order to verify legality of Data Transmission and to inform those concerned.

XIII. Amendment to the Data Management Regulation

13.1 The Company reserves the right to modify this Data Management Regulation at any time by making unilateral decisions.

13.2 At the same time as the application to online voting in Maestro Solti International Conducting Competition is lodged, the User accepts the provisions of the Data Management Regulation in force at any time, and there is no need to request for Users' consent.



XIV. Enforcement possibilities

14.1 Under the Information Act and Act V of 2013 (Civil Code), Users can seek a judicial remedy, and concerning any personal data issue Users may also ask the Hungarian National Authority for Data Protection and Freedom of Information (1125 Budapest Szilágyi Erzsébet fasor 22/C; postal address: 1530 Budapest, P.O. Box 5.) for help.

14.2 If you have any question or observation in connection with data management, please contact the administrator of the Data Controller at the following e-mail address viktor.vildanger@filharmonia.hu or filharmonia@filharmonia.hu.

The Data Protection Regulation entered into force on 15 October 2017.

Pécs, 15 October 2017

Filharmonia Magyarország Nonprofit Korlátolt
Felelősségű Társaság

represented by Szabolcs Szamosi Managing Director

