## **PRIVACY POLICY**

# Regarding data processing of the websites operated by the Debrecen Sports Center

Debrecen Sports Center (Debreceni Sportcentrum) provides the following information regarding the data processes carried out on the websites it operates for the visitors and users of the websites (hereinafter: Data Subjects) based on Articles 13 and 14 of the EU's General Data Protection Regulation (GDPR).

The scope of this policy covers the following websites:

https://www.debrecenisportcentrum.hu/

https://www.debrecenisportiskola.hu/

https://www.debrecenijegcsarnok.hu/

https://www.fonixarena.hu/

https://www.debrecenisporthotel.hu/

https://www.debrecenisportuszoda.hu/

https://jegy.debrecenisportcentrum.hu/

https://www.fonixfitt.hu

https://www.pallagiteniszcentrum.hu

https://www.fonixkupa.hu

#### Data Controller's name and contact details

Name: Debrecen Sports Center Nonprofit Public Benefit Ltd.

(Debreceni Sportcentrum Közhasznú Nonprofit Kft.)

Address: 5 Oláh Gábor Street, Debrecen, H-4032

Phone number: +36 52 514 400

Mailing address: 5 Oláh Gábor Street, Debrecen, H-4032

E-mail address: info@debrecenisportcentrum.hu

Website: <a href="https://www.debrecenisportcentrum.hu/index">https://www.debrecenisportcentrum.hu/index</a> en.php

#### Information about cookies on the website

#### Use of cookies

In order to ensure the basic functions of the web pages, personalization and interactive display and use, certain data on how visitors use our website are stored. This is done with the help of small text files called cookies. Cookies are small files that are downloaded from a web server to your computer or other device. Your web browser will then send these cookies back to the website on each subsequent visit, so it can recognize you and remember your settings (such as user preferences, clicks, previous views).

The use of cookies can be enabled, restricted or possibly prohibited in the browser settings. Before changing the settings, please note that some websites can only provide maximum user experience with the use of cookies and the full functionality of the website is only available if cookies are enabled. You can find information about the management of cookies in the help and support menu of your browser.

#### What cookies do our websites use?

The use of cookies does not involve the processing of personal data by all means, if it does, in the case of non-mandatory cookies, the consent of the data subject is the legal basis for data processing, in the case of cookies that are essential for the proper functioning of the website, the legal basis for data processing is the legitimate interest of the Data Controller.

It is the legitimate interest of the Data Controller to be able to ensure that users can display and use the website as intended, and that the use of the functions available through the website is without problems when using the service. It is also the Data Controller's legitimate interest to receive feedback on people accessing and using the website.

#### Cookies used on the websites:

Name	Legal basis	Storage time	
PHPSESSIONID	legitimate interest	The period until the visitor session is closed	
A cookie generated by applications based on the PHP language. This is a general purpose identifier used to maintain user session variables. This is usually a randomly generated number, how you use it may depend on the site, but a good example is maintaining a user's logged in state between pages.			
_ga	consent	2 years	
This cookie is associated with the Google Universal Analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client ID. It is included in every page request of the website and is used to calculate visitor, session and campaign data for website analytics reports.			
_gid	consent	1 day	
This cookie is set by Google Analytics. Each page visited stores and updates a unique value and is used to count and track page views.			
_gat	consent	1 minute	
This cookie name is associated with Google Universal Analytics, used to reduce the rate of requests - limiting data collection on high-traffic websites.			

test_cookie	consent	15 minutes	
This cookie is set by DoubleClick to determine whether the website visitor's browser supports cookies.			
_fbp	consent	3 months	
Meta uses it to deliver a range of advertising products, such as real-time bidding from third-party advertisers.			
IDE	consent	1 year	
This cookie is set by Doubleclick and provides information about how the visiting user uses the website and any advertisements that the user may have seen before visiting the website.			
YSC	consent	The period until the visitor session is closed	
This cookie is set by YouTube to track views of embedded videos.			
VISITOR_INFO1_LIVE	consent	6 months	
This cookie is set by Youtube to track user preferences for Youtube videos embedded in websites; it can also determine whether the website visitor is using the new or old version of the Youtube interface.			
fonixarenavideotlatta	consent	7 days	
We set this cookie on the fonixarena.hu page so that the visitor who has already seen the presentation video and returns to the page within 7 days, does not have the video played again.			

# Use of Facebook and Instagram plugins

On some of the websites operated by Debrecen Sports Center, we use so-called community plugins or otherwise known as controllers. The purposes of the use of these plugins are to connect the website with our social platforms and ensure their direct availability for visitors.

When you visit the websites, these controls/plugins are turned off, they do not send data to the given social networks without your cooperation. Plugins are activated when you click on them. The controller remains active until you turn it off again or delete the corresponding cookie. In the case of Facebook, you can recognize the installed plugins by the Facebook logo or the "like" button, and in the case of Instagram by the Instagram logo (Instagram camera icon) on our site.

By using the plugins, your browser establishes a direct connection with the servers of the operator of Facebook and Instagram, who receives information that our site was visited with your IP address.

For Facebook and Instagram, the data controller is Meta Platforms Ireland Ltd. (address: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland).

# Request for offers via the website

By using the request form on the website and providing the necessary data, it is possible to request an online offer for certain services provided by the Debrecen Sports Center (e.g. venue rental, Skybox rental).

The purpose of data processing: requesting an online offer or making contact

<u>Legal basis for data processing</u>: consent of the data subject [GDPR Article 6 (1) point a)].

The data subject can freely withdraw his consent at any time. Withdrawal of consent does not affect the legality of data processing based on consent prior to withdrawal.

<u>Scope of processed personal data</u>: name, e-mail address, phone number, name of represented company

The name is required for the identification of the requester, the e-mail address for confirmation of successful form submission and contact (sending an offer). By entering the phone number, our staff can contact you directly.

<u>Duration of data processing</u>: the data will be processed until the end of the bidding process or the withdrawal of consent, after which they will be deleted.

The Data Controller will not forward the provided personal data to third parties.

#### Online ticket sales

On the website <a href="https://jegy.debrecenisportcentrum.hu/">https://jegy.debrecenisportcentrum.hu/</a>, Debrecen Sportcentrum operates an online ticket sales interface, where it is possible to purchase tickets and passes for events organized by the Sports Center or to buy a pass to one of its fascilities.

#### Registration on the website

<u>The purpose of data processing</u>: to simplify the process of shopping through the website, to identify the user/customer

<u>Legal basis for data processing</u>: consent of the data subject [GDPR Article 6 (1) point a)].

The data subject can freely withdraw his consent at any time. Withdrawal of consent does not affect the legality of data processing based on consent prior to withdrawal.

<u>Scope of processed personal data</u>: name, e-mail address, phone number, address, password (encrypted)

The name and password are required for user identification, and the e-mail address is required for confirmation of successful registration and for contact. By entering the phone number, our employees can contact the customer directly if necessary. The address is required for identification and invoicing.

<u>Duration of data processing</u>: the data will be processed until consent is revoked or the user account is deleted.

#### Purchase on the website

After registering the user account, the user has the opportunity to purchase the products.

<u>Purpose of data processing</u>: sales of online products or services, to fulfill orders for the customer

<u>Legal basis for data processing</u>: data processing is necessary for the performance of a contract to which the data subject is party [GDPR Article 6 (1) point (b)].

<u>Scope of processed personal data</u>: name, e-mail address, phone number, address, details of the order

The name is required to identify the user, and the e-mail address is required to confirm the successful order and to maintain contact. By entering the phone number, our employees can contact the customer directly if necessary. The address is required for identification, to provide possible discounts, to deliver the product and to issue the invoice.

During online ticket sales related to individual events, it is possible that in addition to the data provided above, it is also necessary to enter some additional data specifically related to the event (e.g. age in the case of summer camps, T-shirt size in running races, etc.). You can find out more about this from the privacy policy related to the specific event.

<u>Duration of data processing</u>: in accordance with 6:22 § of the Hungarian Civil Code, the data are kept for 5 years after the date of purchase.

<u>Data transmission</u>: in connection with the realization of online product sales as a data processing purpose, data related to purchases made on the Internet through the bank card acceptance network of OTP Bank Nyrt. (1051 Budapest, Nádor u. 16.), for the purpose of the financial processing of the transaction, the security of the transaction and the monitoring of transactions are transmitted.

#### Billing

The Data Controller retains the personal data required for issuing the invoice (name, billing address) even after the service has been completed, in accordance with Section 169 (2) of the Accounting Act and Section 169 of the VAT Act. in compliance with its legal obligation [GDPR Article 6 (1) c)]. It is kept for 8 years, solely for the purpose of fulfilling the accounting obligation.

# Application to the "Special Academy"

It is possible to apply for a staff position or as an athlete at the Special Academy on the website: <a href="https://www.debrecenisportcentrum.hu/info-kulonleges-akademia">https://www.debrecenisportcentrum.hu/info-kulonleges-akademia</a>

<u>Purpose of data management</u>: to submit online application to the Special Academy for a staff position or as an athlete

<u>Legal basis for data processing</u>: consent of the data subject [GDPR Article 6 (1) point a)].

The data subject can freely withdraw his consent at any time. Withdrawal of consent does not affect the legality of data processing based on consent prior to withdrawal.

Scope of processed personal data: name, e-mail address, phone number

The name is required for the identification of the applicant, the e-mail address for confirmation of successful form submission and for online contact. By entering the phone number, our staff can contact you directly by phone.

<u>Duration of data processing</u>: the data will be processed until the application process is completed or the consent is withdrawn, after which they will be deleted.

The Data Controller will not forward the provided personal data to third parties.

# Data processing on social media sites

In addition to the websites, Debrecen Sports Center also has social media pages, where processing of personal data takes place.

Our official Facebook pages:

https://www.facebook.com/debrecenisportcentrum

https://www.facebook.com/debrecenisportuszoda

https://www.facebook.com/debrecenijegcsarnok

https://www.facebook.com/sporthotel.debrecen

https://www.facebook.com/DebreceniSportiskola

https://www.facebook.com/fonixarena

https://www.facebook.com/fonixfitt

https://www.facebook.com/veledkerekavilag/

Our official Instagram pages:

https://www.instagram.com/sportolj.debrecen/

https://www.instagram.com/fonixarena/

https://www.instagram.com/fonixfitt/

In the case of social media sites, in addition to Debrecen Sports Center, the developer and operator of Facebook and Instagram, Meta Platforms Ireland Ltd. (address: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland) is also considered a data controller. Further information in this regard is available here: <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a>

<u>The purpose of data processing</u>: to maintain social media sites and provide users with the opportunity to access and comment.

<u>Legal basis for data processing</u>: consent of the data subject [GDPR Article 6 (1) point a)].

The data subject can freely withdraw his consent at any time. Withdrawal of consent does not affect the legality of data processing based on consent prior to withdrawal.

<u>Scope of processed personal data</u>: name, username, public profile data, content published by the user (e.g. posts, image, video)

<u>Duration of data processing</u>: the data will be processed until consent is revoked or the user account is deleted.

# Data processors and data security

The Data Controller ensures the security and legal use of the data by taking appropriate technical and organizational measures. The provided personal data is managed by the employees of the Debrecen Sports Center who are responsible for the content of the websites and social media pages.

In connection with the operation of websites and social media pages, the Debrecen Sports Center (as Data Controller) uses so-called data processors who contribute to the performance of related tasks.

Data processors are persons or businesses that manage personal data on behalf of the Sports Center on the basis of a contract.

We use the following data processors:

- hosting provider: LittleShark Marketing Ltd.
- social media communication: Csaba Rácz s.e.
- operation of the online ticket sales system, management of newsletters and web forms:
  - LittleShark Marketing Ltd.

#### Rights of the data subject

The Data Subject can submit his/her request in any way (in writing, electronically or even orally) to the contact details of the Data Controller listed above.

The Data Controller will inform the Data Subject of the decision made following the request without undue delay, but within one month at the latest - which can be extended by another two months if necessary.

# Right of access by the data subject

The Data Subject is entitled to receive feedback from the Data Controller as to whether his/her personal data is being processed, and if so, he/she is entitled to access the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed;
- d) the envisaged period for which the personal data will be stored;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) the source of the personal data;
- h) the existence of automated decision-making.

Based on Article 15 (3) of the GDPR, the data subject is entitled to request a copy of the data relating to him free of charge, in accordance with the procedure contained in Article 12.

#### Right to rectification

The Data Subject may request the correction or completion of his personal data processed by the Data Controller.

#### Right to erasure

The Data Subject may request the deletion of his/her personal data processed by the Data Controller if one of the following reasons exists:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed or the data subject withdraws consent on which the processing is based
- b) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2)
- c) the personal data have been unlawfully processed;
- d) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

# Right to restriction of processing

At the request of the Data Subject, the Data Controller restricts data processing if one of the following conditions is met:

- 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;
- d) the data subject has objected to processing on public interest or legitimate interest, in this case, the restriction applies to the period until it is established whether the legitimate grounds of the controller override those of the data subject.

If the processing is subject to restrictions based on the above, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. Right to object

The Data Subject may object to the processing of his/her personal data if the processing of personal data is necessary solely for the fulfillment of a legal obligation arising from public interest or for the enforcement of the legitimate interests of the Data Controller or a third party.

# Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, with the exceptions listed in Article 20 of the Regulation.

In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The right to data portability shall not adversely affect the rights and freedoms of others.

# Right to complain and legal remedy

The Data Subject may <u>file a complaint</u> regarding the data management directly with the Hungarian National Data Protection and Freedom of Information Authority (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH).

Address: 1055 Budapest, Falk Miksa street 9-11.

Mailing address: 1363 Budapest, P.O.B 9.

Phone number: +36-1-391-1400

E-mail address: ugyfelszolgalat@naih.hu

Website: www.naih.hu

In the event of a violation of your (the Data Subject) rights, <u>you may go to court</u>. Adjudication of the lawsuit falls within the jurisdiction of the Regional Court. At the

choice of the data subject, the lawsuit can also be initiated before the Regional Court of the data subject's place of residence or temporary residence in Hungary.

Effective from: xx.xx.2022.