

Privacy Policy

1. The Data Manager

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as **Data Manager hereafter**.

If you have any questions before using our website about our Privacy Policy, or if you would like to share any kind of information with us, please contact us.

2. Measures that serve as a basis of data management

The following measure applies to data management done by Data Manager:

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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)

Privacy Act (CXII. act, 2011)

3. The effect and acceptance of our Privacy Policy

Various refreshments may cause changes in our Privacy Policy from time to time. The data manager reserves the right to make changes in this document without warning. Therefore it is advised to revisit our page every now and then. Last update: 21.06.2018.

In case this document doesn't appear, the data manager can send you the latest version on request. By making the information available, you state that you are aware of the latest version of this document and you accept it.

4. Data collected from parties

In general, you can use the data manager's website without giving out any information however in case you would like to sign up for this page and have resort to its services than the data manager will ask you the data in connection with this.

The information you provide may contain the following data

- Your name and contact information including your address and email address, fax and phone number, and other online contacts
- The name of your company and your position
- Your or your company's bank account number and billing address

Pieces of information collected by the data manager are personal information according to the Privacy Act. It means that the information can be connected to you and you can be identified based on this information, particularly your name, your identification mark as well as one or more physical, physiological, mental, economic piece of knowledge revealing cultural or social identity and a conclusion can be made about you based on the data. Personal data used during the data management will not expire until the connection with you can be restored. Connection with you can be restored if the data manager possesses all the technical conditions required for restoration.

In this document the expression „personal data” and “data connected to you” are synonymous.

Data connected to you is collected with different methods: (a) when you make it available through the websites of the data manager and his partners (b) when you reach the data manager personally or on the phone or in written format or through the internet using his services and make the information available.

Data manager keeps the information connected to you until it is necessary for reaching the goal of data management, until it is suitable for reaching the goal for which the collection of the data had been done, or until any of these contracts or measures allows it.

5. Personal data, and the purpose, period and title of data management

5.1. Data management takes place based on a voluntary contribution of the affected or statutory authorization. In case voluntary contribution, the affected may ask for information about the managed data anytime, except some particular cases when data management is based on legal obligation (in these cases the data manager will provide you information on the following management of information).

5.2 Data providers are obligated to transmit information as accurately as they can.

5.3 In case it is not his personal information the data provider transmits, then it is the obligation of the data provider to get permission from the party concerned.

5.4 In case the data manager transmits the data for a third party then the data manager keeps a record of the address, the method and the date of data transmission, as well as of the transmitted data.

5.5 Data management belonging to particular activities by the data manager:

(a) Contact via telephone number/email address

Claim of data management: Permission of the concerned party

Data managed: email address, telephone number

Goal of data management: Contacting the client and explaining the reason of contact.

Claim of data transmission: Data usage solely for contraction.

Data processor: Data manager mentioned under point 1.

Deadline for deleting data: If the contracting fails, following technical agreements the data is to be immediately deleted

Probable consequences of the failure of data providing: failure of contraction

b) Offline inquiry (main page, contacts)

Claim of data management: Permission of the concerned party

Data managed: email address, telephone number

Goal of data management: Determining adequacy of the applicant for personal consultation; telephone number is needed for data reconciliation and agreement on date

Data transmission: Data is transmitted into an internal system of client contacts

Claim of data management: The fulfilment of requirements stated in the contract

Data processor: Data manager mentioned under point 1.

Deadline of deleting data: Immediate deletion of data in case of failed contraction

Probable consequences of the failure of data providing: Failure of personal consultation

6. Managing data

Your personal data is managed for the sake of the following: (a) Registering you on the data manager's webpage, or for the sake of providing services offered by the website (including the search or request for every piece of information concerning the data manager as well as his services); (b) For the sake of evaluating and analysing the data manager based on his market, clients and services (including asking for your opinion on the data manager's services, as well as making assessments on clients' needs); (c) for the sake of providing, verifying, working over and expanding the locations and services suggested by data manager; (d) for the sake of fulfilling contractual obligations that concern you (which includes the data manager selling you his services) moreover every other contractual obligations similar in nature; for the sake of organizing promotions; (e) in case you have provided information for it to be used by the data manager or another company belonging to a business partner of the data manager, then for the sake of decision making; and (f) for the sake of communicating with you in relation with the matters above.

There can be several claims based on which your information is managed: (a) the data manager manages your data with your consent; (b) your personal data is provided for contraction, therefore the data manager may use your data based on this claim too; (c) data management is required for the fulfilling of legal obligations of the data manager thus for instance probable tax inspections the contracts are to be preserved until the limitation period is over.

Your personal information can be deleted on your request with the conditions and exceptions defined in this document. In case of contraction, your data will be preserved for seven years after the termination of contract.

7. Access to data and data security measures

7.1 For the sake of lawful data management, data manager guarantees that no unauthorized person can have access to your data. There have been reasonable physical, electronical and identity checking actions to prevent your personal data from unauthorized access, changes, transmission, publication, deletion or destruction, and accidental destruction or damage furthermore inaccessibility by technical changes. During this activity, the data manager pays special attention to prevent any unlawful or unauthorized procedures while managing your data. The data manager keeps the documents in a locker. Only authorized people can have access to the documents. Information stored online is protected with a password and can only

be accessed by authorized people. For the sake of lawful data management, data manager protects his computer with a firewall and an antivirus program.

7.2 Your personal data is not shared with a third party without your permission except the following cases: (a) when it is necessary for the data manager's employees, colleagues, suppliers or trading partners to be able to complete tasks related to the purpose of data management (including services related to marketing, offering help in marketing, consumer research, services offered to clients, account management, giving and supervising services and products provided to you and promoting)

(b) it is necessary for crime prevention or consumer protection to share information related to you with other companies, financial organizations or the state (c) if any legal proceedings have to take place, a lawyer standing for the data manager can also have access to your information; (d) if any measure prescribes or allows it or a final authority deliverance obliges the data manager to share it.

If the data manager has to share your personal data with a third party, in every case he complies with the regulations in data protection measures, if needed he contracts with the third party and this way he guarantees that: (a) the third party cannot use your data in any other circumstance than what is written in this document; (b) makes appropriate security measures in order to protect your personal data, especially against unauthorized access, change, transmission, making it public, deletion or destruction, as well as against accidental destruction or damage, furthermore against becoming inaccessible due to changes in the technology applied.

The data manager will make every necessary precautionary measure to guarantee that his employees, colleagues and contractual partners that have access to your information, can manage it according to these guidelines and obligations stated in privacy rules. He ensures that his employees, colleagues and contractual partners undertake confidentiality obligation.

7.3 Personal information that you provide will be stored digitally and safely preserved in the company's headquarters or branch office or the computers of the company.

8. Data of the data manager's page's visitors

8.1 Data Manager's webpage (see point 1) does not save any data to identify the visitor while visiting the page.

8.2 For the sake of web analytic measurements the html code of data manager's webpage can include referents that come from or point to an independent external server. This measurement includes following conversions. This web analytic supplier only stores information related to your browsing habits, these pieces of information cannot be used to identify people based on them. Currently Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043) gives web analytic services.

8.3 Data manager runs so called remarketing ads through the advertising systems of Facebook and Google AdWords. These providers can collect or get information from the data manager's page or other webpages using cookies and similar technologies. Using collected data they can create targeted ads and provide measurement services. Ads targeted this way can appear on Facebook and other websites in Google's partner network. Remarketing lists does not include visitors' personal data; they cannot be used for identification.

8.4 The user can delete cookies from his own computer or block them in his browser. These possibilities depend on your browser but are typically available under Settings/Data Protection. For more information on Google's and Facebook's data protection guidelines please visit:

<http://www.google.com/privacy.html>

<https://www.facebook.com/about/privacy/>

9. Your rights regarding data handling

9.1 The right to inform and access

You can request the data manager to inform you if he is using your personal data or not. If he is, then you can request him to grant you access to the data he is managing. You have the right to have access to the following personal information in case it is personal information related to you: (a) the goal of data management; (b) the category of your personal data; (c) the recipients or categories of recipients who/which your personal information is shared or will be shared, especially recipients in a third country; (d) if the data the data manager manages is not from you then the available information about their source; (e) in case of personal data transfer to a third country the assurance that grants the lawful provision of data transmission; (f) of the circumstances, the effects and action to prevent any possible privacy incident.

You may ask for further information about the management of your personal data in a registered letter sent for the data manager's address (see point 1) or in an e-mail sent for his e-mail address. The request for further information in a letter can only be judged as authentic if you can be unmistakably identified from it.

The request for further information in an e-mail can only be judged as authentic if it is sent from your verified e-mail address although the data manager may use further methods for your identification before providing you the requested information. The information you may request can contain your personal data, their source, goal of data management, claim, time period of data management, names and address of data processors, activities related to data management and in case personal data is transmitted, you can request information on the names for whom your data is transmitted and the purpose of data transmission.

data manager will answer your request as quickly as possible, but in 30 days at most.

9.2 You may ask for correction or modification in your personal data. Considering the purpose of data management, you may ask for the completion of your personal data in case it is insufficient. You may ask for correction or modification in the same method that is stated in point 9.1 (in letter or e-mail). data manager will satisfy your request in 30 days at most and will inform you about it in letter sent to the stated contact of yours.

9.3 You may request the deletion of your personal data. Deletion can be refused if the data is necessary. (i) for the sake of free speech and practising the right of orientation, or (ii) a measure gives permission for the management of personal data; and (iii) presenting, validating and protecting legal claims. In every case of refusing deletion, the Data Manager will inform you, providing the reason of the refusal.

In case of deleting personal data on request, the deleted data cannot be restored anymore.

Deletion can be requested in the same method (in letter or e-mail) as asking for further information, mentioned in point 9.1. data manager will answer your request as quickly as possible, but in 30 days at most.

9.4 At any time, you can request the data manager to delete your data from the data base free of charge and without giving any restriction or justification, by contacting the Data Manager using the contacts stated in point 1. Furthermore, you in case you get further information from the Data Manager in e-mail or text message, it will contain the information that at any time you can request the Data Manager to delete your data from the data base free of charge and without giving any restriction or justification. If you request the deletion of your data, the data manager will immediately delete your personal data from the stated data base.

9.5 You may ask for the restriction of your personal data in the following cases: (i) if you doubt the correctness of the managed personal data, then the restriction refers to the time period in which the data manager can check the correctness of your personal data. (ii) the management of the data is unlawful and you are against deleting the data and you ask for the restriction of it; (iii) the data manager does no longer need your personal data, but require keeping them for submitting, validating or protecting legal claims; (iv) you objected to data management according to paragraph (1) article 21 GDPR. In this case, restriction refers to the period of time in which it is determined whether your legitimate reasons are prior to the data manager's legitimate reasons.

In every case the data manager will identify the personal data if you object to its correctness or preciseness, but it is uncertain if the personal data is correct or precise.

The User may request the restriction of his personal data if the data management is unlawful but he is against deleting the data so he asks for the restriction of it. Data manager will inform you about the lifting of restriction. You can request restriction can be requested in the same method (in letter or e-mail) as asking for further information, mentioned in point 9.1.

9.6 You may ask the data manager to transmit the personal data, you have provided and which he manages in an automatic method, to you in a widely-used, machine-readable format and/or to transmit them to another data manager. Transmitting your personal data can be requested in the same method (in letter or e-mail) as asking for further information, mentioned in point 9.1. Data manager will answer your request as quickly as possible, but in 30 days at most.

9.7 You may object to the management of your personal data (i) if the management of personal data is only necessary for the data manager's fulfilment of legal obligation or for the data manager or a third person for enforcing a legitimate interest of theirs, except if the interests and freedom that make the protection of personal data necessary have priority especially if the affected is a child; (ii) if the purpose of the data management is direct solicitation, opinion poll or scientific research; or (iii) if data management serves the purpose of fulfilling a public interest task. The data manager will inspect the legality of your objection and if he finds that your objection is valid, he will terminate data management and blocks the managed personal data, furthermore he will inform every party to whom your personal data had been transmitted about the objection and the actions based on this objection.

10. Possibilities of enforcement

10.1 Colleagues of the data manager can be accessed by the e-mail address stated in point 1.

10.2 If you would like, you can directly contact the Hungarian National Authority for Data Protection and Freedom of Information (address: 22/c Szilágyi Erzsébet alley, Budapest, 1125; telephone number: +36-1-391-1400; e-mail address: ugyfelszolgalat@naih.hu; website: www.naih.hu) about your complaints.

10.3 If your rights are violated you can contact the local court (you can access the list of courts and their contacts through the following link: <https://birosag.hu/torvenyszekek>).

Pécs, 21. June 2018.