

Privacy Policy

related to using the telekomspots.hu website ("Website")

Magyar Telekom Nyrt., as data controller, informs Data Subjects regarding the processing of their personal data as follows, in accordance with 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 their personal data and on the free movement of such data, and on repealing Directive 95/46/EC ("**General Data Protection Regulation**").

1. Data controller company name and contact details:

Magyar Telekom Nyrt. (headquarters: 1097 Budapest, Könyves Kálmán krt. 36.; company registration number: 01-10-041928; tax number: 10773381-2-44; "**Magyar Telekom**")

As part of the ticket sale service (Ticket Spots), Art Village Kft. (registered office: 1082 Budapest, Vajdahunyad utca 4; hereinafter referred to as "Art Village"), as the merchant of record, provides a ticket sales service on the Website owned by Magyar Telekom Nyrt. on behalf of Magyar Telekom Nyrt.

Contact information: hello@telekomspots.hu

2. Data protection officer contact details:

addr.: 1097 Budapest, Könyves Kálmán krt. 36.; e-mail: DPO@telekom.hu

Art Village Kft. does not have a data protection officer

3. Scope of personal data processed, legal basis for data processing, purpose and duration of data processing:

3.1. Magyar Telekom Nyrt. acts as an independent data controller in connection with the general operation of the Telekom Spots platform, registration, and its own marketing activities, as follows:

Purpose of data processing	Legal basis of data processing	Scope of processed personal data	Duration of data processing or considerations for determining the duration

Newsletter subscription (e-mail inquiries) in connection with the content of the Website (for example, regular program offers, prize games, questionnaires).	Consent of the data subject (General Data Protection Regulation) article 6 Paragraph (1) section a). *	e-mail address, area of interest (optional)	Until the consent is withdrawn or the data subject's (User) profile is deleted by the User or Data Controller. Consent can be withdrawn at any time (unsubscribe) by clicking on the link at the bottom of the newsletters or in the user profile.
User registration on the Website, creating a user profile	Consent of the data subject (General Data Protection Regulation) article 6 Paragraph (1) section a). *	E-mail title, profile photo (optional), name (optional)	In the absence of verification of the e-mail address, 14 days. In the event of verification of the e-mail address, 1 year from the last activity of the User in the profile of the data subject (User)

Purpose of data processing	Legal basis of data processing	Scope of processed personal data	Duration of data processing or considerations for determining the duration
			Or until the registration is terminated in another manner as specified in the Terms of Use, including the case when the data subject (User) terminates their registration, i.e. withdraws their consent.
User registration on the Website, creating a user profile	Consent of the data subject (General Data Protection Regulation) article 6 Paragraph (1) section a). *	Content uploaded by the data subject (User) and content saved by the data subject (User) in their user account (including searches, favorites, subscribed content).	Until the consent is withdrawn, i.e. until the deletion of the given content initiated by the data subject or until the deletion of the User's profile in another way specified in the Terms of Use (except for uploaded events, venues, performers, the deletion of personal data contained in these can be initiated by contacting the Data Controller), or until the deletion of the given content in other cases specified in the Terms of Use (including moderation).
reminders, notifications sending the registered User set by on the channel (the user chosen by on channel: on application inside and/or by email) set by registered users	Consent of the data subject (General Data Protection Regulation) article 6 Paragraph (1) section a). *	Content subscribed to in the user account, user application ID data (in case of in-app notification) and/or email address (in case of notification sent via email channel)	Until the consent is withdrawn, i.e. until the deletion of the given notification request initiated by the data subject (User), or until the deletion of the User profile, or until the deletion of the content from the Website.

Purpose of data processing	Legal basis of data processing	Scope of processed personal data	Duration of data processing or considerations for determining the duration
Reliable Partner nomination request as a registered user	Consent of the data subject (General Data Protection Regulation) article 6 Paragraph (1) section a). *	Username, name, organizers website, or to that in the absence of event organizers social media platforms: Facebook, Instagram, other comments, contact information data	In the cases specified in the Terms of Use, for 30 days after the request is rejected, or until the consent is withdrawn by the data subject (User), i.e. until the badge is deleted at the request of the data subject (User), or until the User profile is deleted at the request of the data subject (User), or until the badge or User profile is deleted at the request of the Data Controller, if the conditions specified in the Terms of Use are met

Filtering events available on the Website by geographic location, displaying them on a map, and sorting them by distance from the User, at the User's request. ¹	The data subject's consent (General Data Protection Regulation, Article 6(1)(a)), which the User provides by activating the location-based filtering feature and by allowing access to location data through their browser or device. *	Data regarding the User's current geographic location (e.g., GPS-based location data or approximate location data determined by the device or browser).	Data processing is limited exclusively to the duration of the feature's use; the Data Controller does not store location data, which is used solely for the purposes of filtering and display.
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* Consent may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of data processing based on consent prior to withdrawal.

The Website User guarantees that, if they provides personal data about a third party, they have an appropriate legal basis for uploading the personal data to the Website and publishing it. The Data Controller is not responsible for the processing of incorrect or untrue data provided by Users, nor for any damage caused to the Data Subject or a third party due to incorrect or untrue data provided by Users.

3.2. Data Processing Related to Ticket Sales

The table below lists the data processing activities related to the ticket sales service (Ticket Spots).

As part of the ticket sales service (Ticket Spots), Art Village Kft. (headquarters: 1082 Budapest, Vajdahunyad utca 4; hereinafter: "Ticket Seller") acts as the merchant of record, enters into a contract with the ticket purchaser, collects payment for the tickets, issues invoices, and is subject to statutory data reporting obligations. In this context, the Ticket Seller is an independent data controller. Magyar Telekom Nyrt. is an independent data controller in connection with the general operation of the Telekom Spots platform, registration, and its own marketing activities.

The parties shall carry out the necessary data transfers between them as data transfers between independent data controllers, in a purpose-limited and transparent manner.

¹ The use of the location-based filtering feature is optional; events can be viewed and filtered on the map even without a location specified by the user.

Purpose of data processing	Legal basis of data processing	Scope of the processed personal data	Duration of data processing or considerations for determining the duration	Data Controller
Processing ticket purchase transactions and invoicing (including, but not limited to: ticket purchases, ticket delivery, communication regarding the event, issuing invoices, and processing payments)	Performance of a Contract — General Data Protection Regulation, Article 6(1)(b).	name; phone number; email address; billing address; transaction number, date, and time; details of the receipt	For 5 years following the transaction	Merchant of Record (Art Village Kft)
Data Retention for Accounting Purposes	Compliance with a legal obligation – General Data Protection Regulation (GDPR), Article 6(1)(c), with reference to Section 169(2) of Act C of 2000 on Accounting	information on the invoice/receipt, transaction details	8 years from the date of approval of the annual financial statements for the year in which the invoice was issued	
NTAK Data Reporting (Compliance with the mandatory statistical data reporting requirements for the National Tourism Data Center (NTAK))	Compliance with a legal obligation – General Data Protection Regulation (GDPR), Article 6(1)(c), with regard to Act CLVI of 2016 on the State's Responsibilities for the Development of Tourist Regions, as well as Decree No. 235/2019. (X. 15.) Provisions of the Government	Only aggregated, anonymized data may be disclosed, as follows: Main and subcategories of the program according to NTAK, VAT category, program type, payment method, ticket validity type, discounts, age group, (referenced) program ID, and visitor data (country code/zip code and foreign	For 5 years following the creation of the data, until the expiration of the statute of limitations for claims arising from the contract, in accordance with Section 6:22 of the Civil Code	

Purpose of data processing	Legal basis of data processing	Scope of the processed personal data	Duration of data processing or considerations for determining the duration	Data Controller
	Decree	visitor indicator).		
Complaint management (processing reports related to ticket purchases, investigating complaints, and resolving them)	Compliance with a legal obligation – General Data Protection Regulation (GDPR), Article 6(1)(c), with regard to Section 17/A of Act CLV of 1997 on Consumer Protection	- the consumer's name, address, or email address, and contact information, - the place and date, and the mode of lodging the complaint; - detailed description of the consumer's complaint, including the submitted records, documents, and other evidence, - the business entity's statement as to its position concerning the consumer's complaint, if the complaint can be investigated immediately; - the signature of the person taking the report and of the consumer, except if the complaint is made verbally through the phone or other means of electronic communications; - the place and date of the report; - the individual	The data controller shall retain the record of the complaint and a copy of the response for 3 years (Fgytv. Section 17/A, paragraph (7))	

Purpose of data processing	Legal basis of data processing	Scope of the processed personal data	Duration of data processing or considerations for determining the duration	Data Controller
		identifier if the complaint was lodged verbally through telephone or other means of electronic communications. - the information provided by the subscriber in the complaint.		

4. Automated decision-making (also including profiling):

No automated decision-making, including profiling, takes place during data processing.

5. Transfer of personal data, recipients of personal data and categories of recipients:

5.1. Magyar Telekom, as Data Controller uses the following data processors in connection with data processing:

Company name: UNIFLEX Kft. (registered office: 1082 Budapest, Vajdahunyad utca 4, 1132; company registration number: 01 09 065405; tax number: 10328259-2-42); its activities related to data processing: Website operation, development, moderation, newsletter sending

Sub-data processors used by the data processor:

AppCorner Kft. (registered office: Budapest, Victor Hugo u. 11,1132)

Brevo (registered office: 7 Rue de Madrid, 75008 Paris, France)

Heroku (registered office: 650 7th St, San Francisco, CA 94103, United States)

Vercel (registered office: Vercel Inc. 340 S Lemon Ave #4133 Walnut, CA 91789, United States)

Amazon Web Services (registered office: 38 Avenue John F. Kennedy, L-1855, Luxembourg)

5.2. Art Village Kft. (Ticket Seller), as the data controller, transfers personal data to the following independent data controllers as recipients:

The National Tourism Data Reporting Center (NTAK) is the recipient of government data reports required by law.

Payment service providers:

- Stripe Technology Europe, Limited (székhely: 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, D02 H210, Ireland)
- OTP Mobil Szolgáltató Kft. (SimplePay) (Tax ID: 24386106-2-44, company registration number: 01-09-174466, registered seat: 1143 Budapest, Hungária körút 17-19.)

Payment service providers operate in accordance with their own privacy policies; the scope of the data they process and the retention periods are determined by the payment, anti-money laundering, and accounting laws that apply to them. The transfer of data between Art Village Kft. (Ticket Seller) and payment service providers constitutes a transfer of data between independent data controllers. Art Village Kft. and Magyar Telekom Nyrt. do not store card information.

5.3. Art Village Kft., as the data controller, uses the following data processors in connection with data processing:

5.3.1. One Properties Kft. - (headquarters: 1039 Budapest, Királyok útja 245/17; representative: (Gábor Stocker) The billing system operated by One Properties Kft. supports the processing of billing data as part of the ticket sales process. The personal data involved in data processing include, in particular: name, email address, phone number, billing information, ticket purchase and transaction data, ticket identifiers, payment status data, and technical log data necessary for the operation of the service.

Sub-processors used by the data processor:

- Contabo GmbH – (headquarters: Welfenstraße 22, 81541 Munich, Germany) - server and infrastructure services, provision of an application operating environment;
- Amazon Web Services (registered seat: 38 Avenue John F. Kennedy, L-1855, Luxembourg) – database and cloud infrastructure services, specifically the provision of a managed database environment.

5.2. Personal data shall not be transferred to a third country (i.e., outside the European Union) or to an international organization. (The data processor used by the Data Controller uses sub-processors with registered seat outside the European Union, however, these sub-processors use the European infrastructure and therefore no data transfer takes place.)

6. Data processing related rights of the data subject:

The Data Subject has the following rights in relation to data processing:

- a) the right to access personal data concerning them,
- b) the right to correct their personal data,
- c) the right to erasure or restriction of processing of their personal data - with the exception of mandatory data processing,
- d) the right to data portability, if the conditions specified in the law are met, and
- e) the right to object in the case of data processing based on legitimate interest.

6.1. The right to access:

The data subject has the right to receive feedback from the Data Controller as to whether their personal data is being processed and, if such processing is in progress, has the right to obtain access to their personal data. The Data Controller shall provide the Data Subject with a copy of the personal data subject to processing. For additional copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs. If the Data Subject has submitted the request electronically, the information shall be provided in a widely used electronic format, unless the Data Subject requests otherwise.

6.2. The right to correction:

The Data Subject has the right to have the Data Controller correct inaccurate personal data concerning them without undue delay, at their request.

6.3. The right to erasure:

The Data Subject shall have the right to obtain from the Controller the erasure of personal data concerning them without undue delay, and the Controller shall be obliged to erase

personal data concerning them without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the Data Subject withdraws their consent to the processing pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) of the General Data Protection Regulation, and there is no other legal basis for the processing;
- c) the Data Subject objects to the processing pursuant to Article 21(1) of the General Data Protection Regulation and there are no overriding legitimate grounds for the processing, or the Data Subject objects to the processing pursuant to Article 21(2) of the General Data Protection Regulation;
- d) the personal data have been processed unlawfully;
- e) the personal data must be erased for compliance with a legal obligation to which the Controller is subject under Union or Member State law;
- f) the personal data were collected in connection with the offering of information society services referred to in Article 8(1) of the General Data Protection Regulation (conditions for the consent of a child)

6.4. The right to restrict data processing:

- a) The Data Subject shall have the right to obtain from the Controller restriction of processing where one of the following applies:
- b) the accuracy of the personal data is contested by the Data Subject, in which case the restriction shall apply for a period enabling the Data Subject to verify the accuracy of the personal data;
- c) the processing is unlawful and the Data Subject opposes the erasure of the data and requests the restriction of their use instead;
- d) the Data Subject no longer needs the personal data for the purposes of the processing, but the Data Subject requires them for the establishment, exercise or defence of legal claims; or
- e) the Data Subject has objected to the processing pursuant to Article 21(1) of the General Data Protection Regulation; in which case the restriction shall apply for a period of time until it is determined whether the legitimate grounds of the Data Subject override those of the Controller.

If processing is subject to restrictions, such personal data may only be processed, with the exception of storage, with the consent of the Data Subject, 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 important public interest reasons of the Union or of a Member State.

6.5. The right to data portability:

The Data Subject shall also have the right to receive the personal data concerning them, which they have provided to the Controller, in a structured, commonly used and machine-readable format and shall have the right to transmit those data to another controller without hindrance from the Controller to whom the personal data have been provided, where: (i) the processing is based on consent pursuant to point (a) of Article 6(1) of the General Data Protection Regulation or point (a) of Article 9(2) of the General Data Protection Regulation, or on a contract pursuant to point (b) of Article 6(1) of the General Data Protection Regulation; and (ii) the processing is carried out by automated means.

6.6. The right to objection:

The data subject shall have the right to object at any time, on grounds relating to their particular situation, to processing of personal data concerning them based on point (e) or (f) of Article 6(1), including profiling based on those provisions. In such a case, the controller shall no longer process the personal data unless the controller demonstrates compelling

legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning them for such purposes, including profiling where it is related to direct marketing. If the data subject objects to the processing of personal data for direct marketing purposes, the personal data shall no longer be processed for such purposes.

6.7. General rules for exercising data subject rights:

The Data Controller shall inform the Data Subject of the action taken on their request without undue delay, but no later than one month from the date of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this deadline may be extended by a further two months. The Data Controller shall inform the Data Subject of the extension of the deadline, indicating the reasons for the delay, within one month from the date of receiving the request. If the Data Subject submitted the request electronically, the information shall be provided electronically, if possible, unless the Data Subject requests otherwise.

The Data Controller shall provide the Data Subject with the information and action free of charge. If the Data Subject's request is manifestly unfounded or, in particular, excessive due to its repetitive nature, the Data Controller, taking into account the administrative costs of providing the requested information or taking the requested action:

- a) may charge a reasonable fee, or
- b) may refuse to take action on the request.

The burden of proving that the request is manifestly unfounded or excessive shall be on the Data Controller.

If the Data Controller has reasonable doubts as to the identity of the natural person submitting the request, it may request the provision of additional information necessary to confirm the identity of the Data Subject.

7. Legal enforcement options:

The Data Subject may contact the Data Controller's data protection officer at any time regarding the processing of their personal data (address: 1097 Budapest, Könyves Kálmán krt. 36.; email: DPO@telekom.hu).

In the event of a complaint regarding the processing of their personal data, the Data Subject may also contact the National Data Protection and Freedom of Information Authority (postal address: 1363 Budapest, Pf. 9., address: 1055 Budapest, Falk Miksa utca 9-11., website: www.naih.hu).

In the event of a violation of their rights, the Data Subject may take legal action against the Data Controller. The court shall proceed with the case ex officio. The Data Controller shall be obliged to prove that the data processing complies with the provisions of the law. The trial shall be adjudicated by the court, or in the capital, by the Metropolitan Court. The trial may also be initiated before the court of the place of residence or stay of the Data Subject.

The Data Controller is obliged to compensate for any damage caused to another by unlawful processing of the Data Subject's data or by breaching data security requirements. The Data Controller is exempt from liability if it proves that the damage was caused by an unavoidable cause outside the scope of data processing. Damage does not have to be compensated to the extent that it resulted from the intentional or grossly negligent conduct of the injured party.

Dated: Budapest, April 28, 2025

Last modified: June 05, 2026