

Privacy Notice

on the processing of personal data of persons authorised to represent a party and sign contracts during contract conclusion (whether natural persons acting in their own name, authorised representatives, or persons with signatory authority for the company), persons certifying performance, contact persons designated in contracts, and other persons participating or involved in the performance of contracts

This Notice applies to the processing of personal data of natural persons designated as contact persons, contributors or representatives in contracts or other documents concluded by Magyar Zene Háza Közhasznú Nonprofit Kft. (hereinafter: the "Company" or the "Controller"). It also applies to natural persons acting as contact persons, contributors or representatives of the Company's prospective business partners (companies and other organisations), and of other bodies in contact with the Company (such as local governments, authorities, courts and public administration bodies).

This Notice does not apply to data relating to persons other than natural persons.

1. The Controller

Name	Magyar Zeneháza Nonprofit Korlátolt Felelősségű Társaság
Registered office	H-1146 Budapest, Olof Palme sétány 3., Hungary
Company registration number	01-09-371951
Tax number	28742838-2-42
Represented by	Dr. András János Batta, Managing Director
E-mail	info@zenehaza.hu

2. Name and contact details of MZH's Data Protection Officer

Data Protection Officer	ARB Privacy Consulting Kft.
Name	ARB Privacy Consulting Korlátolt Felelősségű Társaság
Registered office	H-1016 Budapest, Derék utca 4., 2nd floor 12., Hungary
Company registration number	01-09-324472
Tax number	26330194-2-41
Represented by	Dr. Balázs Révész, Managing Director
E-mail	mzh_adatvedelem@zenehaza.hu

2. Purposes of processing

The Controller processes the personal data of persons authorised to represent a party and sign contracts during the contracting process (whether natural persons acting in their own name, authorised representatives, or persons with signatory authority for the company), persons certifying performance, contact persons designated in the contract, and other persons participating or involved in the performance of the contract, for the purpose of preparing, concluding and performing the contract.

3. In practice, the personal data are processed for the following purposes:

- **Preparing and concluding the contract:** identifying the data subjects and documenting their mandate and legal authority.
- **Certifying performance:** processing the data of contact persons and contributors for handling the matter.
- **Ensuring communication:** enabling the communication with the parties concerned that is necessary for performing the contract.

4. Legal basis and categories of personal data processed

Data subjects	Personal data processed	Legal basis
Contracting party who is a natural person	Name, data necessary for identification (birth name, mother's birth name, place and date of birth), contact details (permanent address, mailing address, telephone number, e-mail address), data necessary for invoicing and any payroll processing (tax identification number, name of account-holding bank, bank account number, social security number (TAJ), data on pension entitlement and pensioner registration number), signature	Article 6(1)(e) GDPR (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller)
Person authorised to sign the contract on behalf of a contracting party that is not a natural person	Name; data necessary for identification as shown in the specimen signature (aláírási címpéldány or aláírásinta in hungarian) or power of attorney (mother's name, place and date of birth, position); contact details (mailing address, telephone number, e-mail address), signature	Article 6(1)(e) GDPR (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller)
Person designated by the contracting party to certify performance or act as contact person, or otherwise participating or involved in the performance of the contract	Name, data necessary for identification (position), contact details (mailing address, telephone number, e-mail address)	Article 6(1)(e) GDPR (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller)
Person authorised to sign the contract on behalf of the Company (employee)	Name; data necessary for identification as shown in the specimen signature (aláírási címpéldány or aláírásinta) or power of attorney (mother's name, place and date of birth, position); contact details (postal address,	Article 6(1)(e) GDPR and Section 10(1) of Act I of 2012 on the Labour Code (processing is necessary for the performance of a task carried out in the public interest or in the exercise of

	telephone number, e-mail address); signature	official authority vested in the Controller)
Person designated by the Company to certify performance or act as contact person, or otherwise participating or involved in the performance of the contract (employee)	Name; data necessary for identification (position); contact details (postal address, telephone number, e-mail address)	Article 6(1)(e) GDPR and Section 10(1) of Act I of 2012 on the Labour Code (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller)

5. Retention period

Processing starts with the preparation of the conclusion of the contract or agreement, and the Company retains the personal data until the contract is disposed of. The data may be erased once the document retention obligation relating to the agreement expires under the applicable Hungarian and EU legislation and the Company's internal rules adopted in accordance with them.

Where an invoice is issued that contains the contact person's data, the data are erased at the end of the 8th year following the date of the invoice, in accordance with Section 169(2) of Act C of 2000 on Accounting.

6. Recipients of personal data and data transfers

The Company discloses the personal data to the contractual partner for the purpose of performing the contract. Depending on the contractual partner, the data may also be transferred to a third country or an international organisation. In addition, the Company uses the following processors for concluding and performing contracts and for operating its contract repository:

Processor	Service
Microsoft Magyarország Számítástechnikai Szolgáltató és Kereskedelmi Kft.	E-mail system and office applications
ENIAC Computing Rendszertervező és Tanácsadó Korlátolt Felelősségű Társaság	Document management system
SDA DMS Zrt.	Document registration (filing) system
Kelesys Számítástechnikai Kereskedelmi és Szolgáltató Kft.	Event records
KBOSS.hu Kereskedelmi és Szolgáltató Kft. (szamlazz.hu)	Invoicing software

7. Automated decision-making

The Company does not use automated decision-making in the course of the processing.

8. Data subject rights

Right	Description
Access	The data subject may at any time request confirmation as to whether the Controller processes their personal data. In that case, the data subject is entitled to receive information about the processing (e.g. the recipients who may access the data, or how long the data are stored) and may request a copy of their personal data. The copy may be provided in a commonly used, machine-readable format (PDF/XML) or on paper, as a printout. The first copy is provided free of charge.
Rectification	The data subject may request (a) the rectification of inaccurate personal data concerning them, or (b) the completion of incomplete personal data. Until the necessary information is available, the Controller may request the submission of additional data or proof of the accuracy of the data, and will restrict processing until such proof is received.
Erase	The data subject may request the erasure of personal data concerning them processed by the Controller where (a) the Controller no longer needs the data, or (b) the data subject has concerns about the lawfulness of the processing of their data. Where the obligation to erase applies, the Controller ceases processing and erases the data. The right to erasure cannot be exercised where the processing is necessary for compliance with a legal obligation under EU or Member State law, or for the performance of a task carried out in the public interest. Erasure also cannot be carried out where the processing is necessary (a) for exercising the right of freedom of expression and information; (b) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, where erasure is likely to render impossible or seriously impair the achievement of those purposes; or (c) for the establishment, exercise or defence of legal claims.
Withdrawal of consent as erasure	Where personal data are processed on the basis of consent, the data subject may withdraw their consent at any time, without giving reasons. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal. However, the Controller will no longer carry out any operations using the personal data concerned and will erase them.
Restriction of processing	While processing is restricted, the Controller may not carry out any processing operations other than storage. Restriction may be requested where (a) the data subject has concerns about the lawfulness of the processing of their personal data and requests restriction instead of erasure, or (b) the Controller no longer needs the data, but the data subject requires them for the establishment, exercise or defence of legal claims. The Controller automatically restricts processing where the data subject contests the accuracy of the personal data or exercises their right to object. The restriction applies until the Controller has verified the accuracy of the data or has identified compelling legitimate grounds requiring the continuation of processing. During restriction, personal data may be processed, with the exception of

	storage, only where (a) the data subject consents; (b) processing is necessary for the establishment, exercise or defence of legal claims; (c) processing is necessary for the protection of the rights of another natural or legal person; or (d) processing is necessary for reasons of important public interest. The Controller will inform the data subject when the restriction is lifted.
Data portability	The data subject may request to receive the personal data concerning them, or to have them transmitted directly to another controller designated by them. The personal data are provided in a structured, commonly used, machine-readable format (PDF/XML). Exercising this right does not automatically result in the erasure of the personal data from the Controller's systems. This right applies only to personal data processed by the Controller by automated means (electronically) on the basis of the data subject's consent or for the performance of a contract. Portability of other data is not possible.
Objection	The data subject may object to the processing of their personal data where the processing is necessary for the performance of a task carried out in the public interest or is based on the Controller's legitimate interests. If there are no compelling grounds requiring further processing, the Controller will cease processing and erase the data. The Controller may continue to process the data despite the objection where the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject, or which relate to the establishment, exercise or defence of legal claims.
Exercising rights after the death of the data subject	Within five years of the data subject's death, the rights of access, rectification, erasure, restriction of processing and objection may be exercised by the person authorised by the data subject through an administrative disposition (ügyintézési rendelkezés), or through a declaration made to the Controller in a public deed or a private deed of full probative value. In the absence of such a declaration, the rights to rectification and objection, and, where the processing was already unlawful during the data subject's lifetime or its purpose ceased upon the data subject's death, the rights to erasure and restriction of processing may also be exercised by a close relative of the data subject (spouse, relative in direct line, adopted child, stepchild or foster child, adoptive parent, step-parent or foster parent, sibling). The person exercising these rights must prove the fact and date of the data subject's death by a death certificate or a court decision, and their own identity, and where applicable their status as a close relative, by a public document.

9. Right to lodge a complaint and to judicial remedy

Anyone who believes that the Company's processing has infringed their rights may:

- submit a complaint to the Company through any of the following contact details: registered office: H-1146 Budapest, Olof Palme sétány 3.; postal address: H-1386 Budapest, P.O. Box

910; central telephone number: +36 70 799 9449; central e-mail address: info@zenehaza.hu; e-mail address of the Data Protection Officer: mzh_adatvedelem@zenehaza.hu;

- bring an action before a court for the protection of their data. The court proceeds with priority. The action may be brought before the Budapest-Capital Regional Court (Fővárosi Törvényszék), competent for the Controller's registered office (H-1055 Budapest, Markó utca 27., tel.: +36 1 354 6000, website: <https://fovarositorvenyszek.birosag.hu/>), or before the regional court competent for the data subject's place of residence or stay, which can be found at <https://birosag.hu/torvenyszekek>;
- lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) (registered office: H-1055 Budapest, Falk Miksa utca 9–11.; postal address: H-1374 Budapest, P.O. Box 603; tel.: +36 1 391 1400; fax: +36 1 391 1410; e-mail: ugyfelszolgalat@naih.hu; website: <https://www.naih.hu/>).

10. Data security

In the course of its processing activities, the Company applies appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, transmission, erasure or destruction, and against accidental loss.

A. Physical security measures

- Devices and documents containing data are stored in closed, secure premises.
- Only authorised persons have access to office areas and data processing systems.
- Access to paper-based data is restricted and logged.
- The CCTV system operating on the premises serves exclusively property protection and security purposes, within the limits of the law.

B. Logical (IT) security measures

- Our IT systems are protected by firewalls, anti-virus software and up-to-date software.
- Access to personal data is password-protected and based on individual access rights management.
- Regular backups are made to ensure the preservation of data.
- Logging of user access and system use enables any misuse to be traced.

C. Administrative (organisational) measures

- Staff awareness of data protection and data security is ensured through internal policies and regular training.
- Detailed internal procedures and guidelines govern the processing and protection of personal data.
- The record of processing activities is kept up to date.
- A written data processing agreement containing data security guarantees is concluded with our processor partners in every case.

Budapest, 2026.