



DATA PROTECTION AND DATA MANAGEMENT SUPPORT

(DATA MANAGEMENT RELATED TO COMMUNICATIONS)

I. INTRODUCTION OF THE CONTROLLER

The **Sport Marketing Agency Ltd.** (hereinafter referred to as the "**Data Controller**" or "**Event Organizer**") attaches great importance to respecting the right to information self-determination of its employees, partners, customers and visitors. The Data Controller shall treat personal data confidentially, in accordance with the applicable European Union and national legislation and relevant data protection (official) practices, and shall take all security and organisational measures to ensure the security, confidentiality, integrity and availability of the data.

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 (hereinafter "**GDPR**") and the 2011 Regulation on the right to information and freedom of information (Regulation (EU) 2016/679). CXII of 2011 (hereinafter referred to as the "**Information Act**"), the HARLEY-DAVIDSON® 120th ANNUAL EVENT (hereinafter referred to as the "**Event**" or "**hd120Budapest**") publishes the following information (hereinafter referred to as the "**Information**") in order to protect the personal data processed in the course of the contact with visitors, partners and customers.

The Notice is effective from **12.05.2023** until its withdrawal in relation to the **processing of personal data disclosed by the Data Controller in the course of its communications with data subjects.**

The Data Controller reserves the right to unilaterally change this Policy at any time. In the event of any modification of this Notice, the Data Controller shall inform the data subjects thereof.

Data controller's data:	
company name:	Sportmarketing Ügynökség Korlátolt Felelősségű Társaság (short name: Sportmarketing Ügynökség Kft.)
company registration number:	01-09-287952
is based in:	1065 Budapest, Podmaniczky utca 12. fszt. 3.
postacíme:	1065 Budapest, Podmaniczky utca 12. fszt. 3.
your electronic address:	info@dakar.hu
website address:	http://sportugynokseg.hu/
representative:	Balázs Árpád Szalay Managing Director
data protection relationship:	gdpr@sportugynokseg.hu

The Data Controller processes personal data in accordance with all applicable laws, but in particular with the following:

- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter referred to as "**the Infotv.**");
- Regulation (EU) 2016/679 of the European Parliament and of the Council 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; hereinafter "**the Regulation**" or "**GDPR**").

The Data Controller shall treat personal data confidentially, and shall take all technical and organisational measures related to data storage and management, and other technical and organisational measures to ensure the security of the data.

Concepts

The terminology of this Information Notice is identical to the interpretative definitions set out in Article 4 of the Regulation, and in certain points supplemented by the interpretative provisions of Article 3 of the Infotv. The definitions relevant for the interpretation of this Information Notice are set out in Annex 1.

When this Notice refers to data or data processing, it means personal data or the processing thereof.

II. DATA PROCESSING PURPOSES

CONTRACTING THE MANAGER FOR THE PURPOSE OF COMMUNICATING WITH VISITORS, PARTNERS AND CUSTOMERS IN CONNECTION WITH THE COMPANY

In today's fast-paced world, the Data Controller keeps in contact with visitors, partners and customers primarily by electronic means, but anyone can also contact it by letter with questions. Anyone can contact the Data Controller directly by e-mail, whether it is a request for a quote, information, technical questions or any other subject, or by post.

The Data Controller's published electronic contact details are:

SPONSOR Rita Túri sales@hd120budapest.hu	BIKE SHOWS Bálint Kovács shows@hd120budapest.hu
VENDORS Kristóf Horváth vendor@hd120budapest.hu	CLASSIC BIKES AND CARS Istvan Neveri classic@hd120budapest.hu
FOOD AND DRINK Zoltán Wild Horvath foodservice@hd120budapest.hu	PRESS Anita Toth toth.anita75@gmail.com
TICKETS Nóra Somogyi-Sipos tickets@hd120budapest.hu	PROJECT MANAGER Daniel Dobai dobai.dani@sportugynokseg.hu
VIP TICKETS Rebeka Gyulay vip@hd120budapest.hu	FINANCE Eva Szilagyí finance@hd120budapest.hu
MARKETING Stephen Csányi istvan@hd120budapest.hu	CEO Balazs Szalay info@dakar.hu

The published postal address of the Data Controller:

- **H-1065 Budapest, Podmaniczky u. 12. Fsz.3.**

In the course of communication with the data subject in relation to any matter, the Data Controller will handle emails and letters as described in this Notice. In this context, the Data Controller will process personal data relating to the data subject that have come to its knowledge as follows:

2.1. Purpose of data processing

Communication between the controller and the data subject. Communication, response to enquiries from interested parties. The data provided by the data subject will be processed by the Data Controller solely for the purposes of communication with the data subject and for the administration of the matters contained in the message. The data subject has the right to contact the Data Controller by post and by electronic means on any matter.

The Data Controller shall only contact any data subject in connection with the performance of a contract already in force or on other legitimate grounds, in compliance with the rules on data protection.

2.2. Legal basis for data processing

The legal basis for the processing of personal data is Article 6(1)(b) of the Regulation, i.e. processing is necessary for the performance of a contract (obligation) to which the data subject is a party or for the purposes of taking steps at the request of the data subject prior to entering into a contract. The Data Controller considers that the communication with the data subject is either preliminary processing in relation to a contract (agreement) to be concluded at a later stage or processing in relation to a contract already concluded.

In addition, Article 6(1)(f) of the Regulation (legitimate interest) also provides a legal basis for the Controller to process the data. The Data Controller has a legitimate interest to process personal data necessary to respond to a request for information.

2.3. Personal data processed

The Controller processes the following personal data of the data subjects:

- full name;
- e-mail address;
- postal address in case of postal mail;
- any other information which the data subject considers relevant to the matter in question.

2.4. Source of the personal data processed

The person who contacts the controller for communication purposes, i.e. the data subject. As the data subject is the source of the personal data, the Data Controller informs him or her directly of any changes to the scope of the data processed when they are collected.

2.5. Recipients of personal data made available

The data subject's personal data may be processed by the Data Controller only by its employees whose job involves the processing of personal data relating to communication requests and who have the right to make suggestions or decisions in relation to the message sent by the data subject or the processing of the case required on the basis of the message.

Data Processor(s):

The Processor, acting on behalf of and under the instructions of the Controller, may process the personal data of the data subject only for the purposes specified by the Controller and contractually agreed upon, in accordance with the instructions of the Controller, and shall not have the right to make its own decisions with regard to the processing. The Processor shall be bound by confidentiality obligations and contractual guarantees regarding the retention of personal data obtained in the course of its tasks.

In order to handle email inquiries, the Data Controller uses the following Data Processor for the purposes of its email hosting service and the operation of the email server:

Data processor details:	
Name of the data processor:	Netmask Interactive Ltd.
Seat:	1131 Budapest, Nővér u. 110
Tax number:	23134339-2-41
Company registration number:	01-09-954570
represents:	Tamás Szomor
E-mail:	info@netmask.hu
Activity covered:	Hosting, e-mail server service

Data processor details:	
Name of the data processor:	Syscode Ltd.
Seat:	1115 Budapest, Bartók Béla út 152/H.
Tax number:	13817820-2-43
Company registration number:	01-09-874820
represents:	Balázs Kosdi
E-mail:	info@syscode.hu
Activity covered:	Website development, Content update

Data processor details:	
Name of the data processor:	Kazi L-Mix Ltd.
Seat:	2000 Szentendre, Szatmári utca 42/A.
Tax number:	23379176-2-13
Company registration number:	13-09-147623
represents:	László Kazi
E-mail:	support@kazi-it.hu
Activity covered:	running an email server

Data processor details:	
Name of the data processor:	CSAO Economic Services Ltd.
Seat:	3346 Belpátfalva, Marx K. u. 20.
Tax number:	11171627-2-10
Company registration number:	10-09-022239
represents:	Kristóf Csajtai
E-mail:	csajtai.kristof@gmail.com
Activity covered:	Website development, content update, email server hosting

2.6. Transfer of personal data

Personal data as defined in point 2.3 of this Notice will not be transferred to third countries or international organisations.

2.7. Duration of processing of personal data

If a contract (obligation) of any kind is established between the Data Controller and the data subject, the Data Controller will process the personal data obtained during the communication in relation to the contract in accordance with the relevant privacy notice. The Controller shall process the personal data of the data subjects until the expiry of the general limitation period of 5 (five) years set out in Act V of 2013 on the Civil Code, which shall be calculated from the time when the personal data became known to the Controller during the communication. An exception to this shall be made for any legal action or claim, court, prosecution, investigative authority, infringement authority, administrative authority, the National Authority for Data Protection and Freedom of Information or other bodies authorised by law .

If no contract is concluded between the Data Controller and the data subject following the pre-contractual processing, or if the communication is not related to a contract and the communication cannot have any future legal effect, the Data Controller will process the personal data that have come to its knowledge during the communication until the communication is finally terminated.

2.8. Automated decision-making and profiling

The Data Controller does not make decisions based solely on automated processing in relation to the data subject and does not profile the data subject on the basis of the available personal data.

2.9. Technique of data management

The Controller processes the personal data of the data subject electronically and manually (on paper).

2.10. Provision of personal data

The provision of personal data is voluntary on the part of the data subjects and is a condition for the reply to the message and thus for the communication between the data subject and the Data Controller.

III. ADAPTABILITY

The Data Controller and the data processors shall have the right to access the personal data of the data subject only to the extent necessary for the performance of their tasks.

The Data Controller shall transfer personal data in a uniform, pre-audited and secure manner, while informing the data subject, avoiding redundant data transfers or data transmission through different registration platforms.

In the interests of data security, the Data Controller shall assess and record all data processing activities carried out by it.

On the basis of the records of processing activities, the Data Controller shall carry out a risk analysis to assess the conditions under which each processing operation is carried out and the risk factors that may cause a breach or a potential data protection incident during processing. The risk analysis shall be carried out on the basis of the actual data processing activity. The purpose of the risk analysis shall be to determine the security rules and measures

that effectively ensure the adequate protection of personal data in accordance with the performance of the controller's activities.

The Controller shall implement appropriate technical and organisational measures to ensure and demonstrate that the processing of personal data is carried out in accordance with the GDPR, taking into account the nature, scope, context and purposes of the processing and the varying degrees of probability and severity of the risk to the rights and freedoms of natural persons. Including, where applicable:

- the pseudonymisation and encryption of personal data;
- the continued confidentiality, integrity, availability and resilience of the systems and services used to process personal data;
- in the event of a physical or technical incident, the ability to restore access to and availability of personal data in a timely manner;
- a procedure to test, assess and evaluate regularly the effectiveness of the technical and organisational measures taken to ensure the security of processing.

In determining the appropriate level of security, explicit account should be taken of the risks arising from the processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

The Data Controller shall implement appropriate technical and organisational measures to ensure that, by default, only personal data that are necessary for the specific purpose of the processing are processed. This obligation relates to the amount of personal data collected, the extent to which they are processed, the duration of their storage and their availability. These measures should in particular ensure that personal data cannot, by default, be made available to an indeterminate number of persons without the intervention of the natural person.

In the event of damage or destruction of personal data, attempts should be made to replace the damaged data as far as possible from other available data sources. The fact of the replacement shall be indicated on the replaced data.

The Data Controller protects its internal network with multiple layers of firewall protection. At all access points to the public networks used, a hardware firewall (border protection device) is installed at all times. Data is stored redundantly, i.e. in multiple locations, by the Data Controller to protect it from destruction, loss, damage or unlawful destruction due to IT equipment failure.

Protect your internal networks from external attacks with multi-layered, active, complex malware protection (e.g. virus protection).

The Data Controller shall take the utmost care to ensure that its IT tools and software continuously comply with the technological solutions generally accepted in the market.

IV. THE RIGHTS OF THE DATA SUBJECT IN RELATION TO THE PROCESSING

It is important for the Data Controller that its processing complies with the requirements of fairness, lawfulness and transparency. The data subject may exercise at any time his or her rights under the Regulation in relation to the processing.

4.1. Right to information

The data subject shall have the right to be informed about the processing of the data, which the Data Controller shall provide by means of this Notice.

4.2. Consent-based processing

Where the legal basis for a processing operation is the data subject's consent, he or she has the right to withdraw his or her consent to the processing at any time. It is important to note, however, that the withdrawal of consent may only relate to data for which there is no other legal basis for processing. If there is no other legal basis for the processing of the personal data concerned, the Controller will permanently and irretrievably delete the personal data following the withdrawal of consent. Withdrawal of consent under the Regulation shall not affect the lawfulness of the processing carried out on the basis of consent prior to its withdrawal.

4.3. Right of access

At the request of the data subject, the Data Controller shall at any time, unless it is restricted by a legitimate interest, inform the data subject whether or not his or her personal data are being processed and, if so, provide access to the personal data and the following information:

- the purposes of the processing;
- the legal basis for the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom or with which the Controller has disclosed or will disclose the personal data, including in particular recipients in third countries or international organisations;
- the envisaged period of storage of the personal data or, if this is not possible, the criteria for determining that period;
- the data subject shall also be informed of his or her right to obtain from the Controller the rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data;
- the right to lodge a complaint with a supervisory authority or to take legal action;
- if the data have not been collected directly from the data subject by the Data Controller, any available information on the source of the data;
- where automated decision-making is carried out, the fact of such processing, including profiling, and, at least in those cases, the logic used, i.e. the significance of such processing and the likely consequences for the data subject.

4.4. Right to rectification of personal data

The data subject shall at any time have the right to obtain, at his or her request and without undue delay, the rectification of inaccurate personal data relating to him or her by the Controller. Taking into account the purposes of the processing, the data subject shall also have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

In the case of a request for rectification (amendment) of data, the data subject must substantiate the accuracy of the data requested to be amended and must also certify that the person entitled to the amendment is the person who requests the amendment. Only in this way can the Data Controller assess whether the new data is accurate and, if so, whether it can amend the previous data.

If it is not clear whether the data processed is correct or accurate, the Data Controller does not correct the data, but only marks it, i.e. indicates that the data subject has objected to it, but it may not be incorrect. The Controller shall, without undue delay, correct inaccurate personal data or supplement the data concerned by the request, after confirming the authenticity of the request. The Controller shall notify the data subject of the correction or marking.

The Data Controller further draws the attention of the data subject to the need to notify any change in his/her personal data as soon as possible, thus facilitating lawful processing and the exercise of his/her rights.

4.5. Right to erasure ("right to be forgotten")

At the request of the data subject, the Data Controller shall delete personal data relating to the data subject without undue delay where one of the following grounds applies:

- the Controller no longer needs the personal data for the purposes for which they were collected or otherwise processed;
- where processing is based on consent, the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing or objects to processing for direct marketing purposes;
- the personal data are unlawfully processed by the Controller;
- the personal data must be erased in order to comply with a legal obligation under Union or Member State law applicable to the Data Controller;
- personal data are collected in connection with the provision of information society services.

There may be important reasons or interests which may allow the processing of the data subject's data even if he or she has objected to it (for example, the exercise of the right to freedom of expression and information, or if it is necessary for the establishment, exercise or defence of legal claims).

4.6. Right to restriction of processing

The data subject shall have the right to obtain, at his or her request, the restriction of processing by the Controller if one of the following conditions is met:

- contests the accuracy of the personal data; in this case, the restriction applies for the period of time that allows the Controller to verify the accuracy of the personal data;
- the data processing is unlawful and you oppose the erasure of the data and instead request the restriction of their use;
- the controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- the data subject has objected to the processing; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the Controller prevail over the legitimate grounds of the data subject.

Where the data are subject to restriction, such personal data may be processed, except for storage, only with the consent of the data subject or for the establishment, exercise or defence of legal claims or the protection of the rights of another natural or legal person or of an important public interest of the Union or of a Member State. The Controller shall inform the data subject in advance of the lifting of the restriction on processing.

4.7. Right to object

Where the processing of personal data is based on the legitimate interests of the controller [Article 6(1)(f) of the Regulation] or is necessary for the performance of a task carried out in the exercise of official authority vested in the controller [Article 6(1)(e) of the Regulation], the data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to processing of his or her personal data, including profiling based on those provisions.

Where the data subject's personal data are processed by the Data Controller for direct marketing purposes (e.g. sending information letters), the data subject has the right to object at any time to the processing of personal data concerning him or her for such purposes,

including profiling, where it is related to direct marketing. If the data subject objects to the processing of his or her personal data for direct marketing purposes, the personal data may no longer be processed for those purposes.

4.8. Interest screening test

Where the legal basis for the processing of personal data is the legitimate interest of the controller or a third party within the meaning of Article 6(1)(f) of the Regulation and, consequently, a written "balancing of interests test" has been carried out pursuant to preamble paragraph 47 and Article 5(2), the data subject may request it by sending an e-mail to gdpr@sportugynokseg.hu.

4.9. 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 the Controller in a structured, commonly used, machine-readable format and the right to have those data transmitted by the Controller to another controller if:

- a) processing is based on the data subject's consent or on a contract within the meaning of Article 6(1)(b) of the Regulation; and
- b) the processing is carried out by automated means.

V. THE PROCEDURES FOR ENFORCING THE RIGHTS OF THE DATA SUBJECT

The data subject can exercise the above rights by sending an e-mail to gdpr@sportugynokseg.hu, by post to the Data Controller's head office or by visiting the Data Controller's head office in person. The Controller shall investigate and act on the data subject's request without undue delay after receipt of the request. The Data Controller shall inform the data subject of the action taken on the basis of the request within 30 (thirty) days of its receipt. Where the Controller is unable to comply with the request, it shall inform the data subject of the reasons for the refusal and of his or her rights of appeal within 30 (thirty) days.

Within 5 (five) years of the death of the data subject, the rights of the deceased as set out in this Notice, which the data subject enjoyed during his or her lifetime, may be exercised by a person authorised by the data subject by means of an administrative order or a declaration in a public or private document of full probative value made to the Controller or, if the data subject made several declarations to a controller, by a declaration made at a later date. If the data subject has not made a corresponding declaration, his or her close relative within the meaning of Act V of 2013 on the Civil Code may, even in the absence of such a declaration, exercise the rights under Articles 16 (right of rectification) and 21 (right of access to data) of the Regulation. (right to object) and, if the processing was already unlawful during the lifetime of the data subject or if the purpose of the processing ceased to exist upon the death of the data subject, to exercise the rights of the deceased during his or her lifetime as provided for in Articles 17 (right of erasure) and 18 (right to restriction of processing) of the Regulation within 5 (five) years of the death of the data subject. The right to enforce the rights of the data subject under this paragraph shall lie with the next of kin who first exercises that right.

VI. THE RIGHT TO A JUDICIAL REMEDY IN RELATION TO DATA PROCESSING

In order to enforce his or her right to judicial remedy, the data subject may take legal action against the Controller if he or she considers that the Controller or a processor acting on his or her behalf or under his or her instructions is processing his or her personal data in breach of the provisions of the law on the processing of personal data or of binding legal acts of the

European Union. The court shall decide the case out of turn. The Tribunal shall have jurisdiction to hear the case. The lawsuit may be brought, at the choice of the data subject, before the court of the place of residence or domicile of the data subject or before the court of the seat of the Data Controller (Budapest District Court).

You can find the court in your place of residence or domicile at <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.

Anyone may file a complaint with the National Authority for Data Protection and Freedom of Information (NAIH) against the Data Controller, alleging that the processing of personal data has resulted in a violation of rights or an imminent threat thereof, or that the Data Controller is restricting the exercise of rights related to the processing of personal data or is refusing to exercise such rights. The notification can be made using one of the following contact details:

National Authority for Data Protection and Freedom of Information (NAIH)

Postal address: 1363 Budapest, Pf. 9.

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

E-mail: ugyfelszolgalat@naih.hu

URL: <http://naih.hu>

The Data Controller is committed to implementing the principles of lawful, transparent and fair processing, and will take prompt action to clarify the issues raised and remedy the identified harm in situations it considers to be prejudicial. Consequently, we recommend that you contact the Data Controller via the contact details provided in this Notice before taking legal action before the National Authority for Data Protection and Freedom of Information or before a court. You will be informed of the findings and the measures taken, and, if you have any questions regarding the processing, you will be informed within the time limits set by the applicable legislation.

The Sport Marketing Agency Ltd., as the Data Controller, is not liable for the consequences of the inaccurate provision of data.

Budapest, 12 May 2023.

Annex 1:

Concepts relating to the processing of personal data

- **controller:** the legal person who determines the purposes and means of the processing of personal data;
- **Processing:** any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **transfer:** making data available to a specified third party;
- **erasure:** making data unrecognisable so that it is no longer possible to recover it;
- **data marking:** the marking of data with an identification mark to distinguish it;
- **restriction of processing:** marking of stored personal data for the purpose of restricting their future processing;
- **data destruction:** the complete physical destruction of the data medium containing the data;
- **data processor:** a legal person who processes personal data on behalf of the controller;

- **recipient:** the natural or legal person, public authority, agency or any other body, whether or not a third party, to whom or with whom the personal data are disclosed;
- **data subject:** an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **third party:** a natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or the persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- **data subject's consent:** a voluntary, specific, informed and unambiguous indication of the data subject's wishes by which he or she signifies his or her agreement to the processing of personal data concerning him or her by means of a statement or an unambiguous act of affirmation;
- **personal data:** any information relating to the data subject;
- **objection:** a statement by the data subject objecting to the processing of his or her personal data and requesting the cessation of the processing or the erasure of the processed data.