Information Notice on Data Processing
in connection with the bookvibeZ Festival
organized by Libri-Bookline Zrt.

Effective: from the announcement of the Festival until the expiry of the longest data retention period specified in this notice

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Libri-Bookline Zrt. (hereinafter: "Bookline") organizes an offline book festival under the name bookvibeZ Festival (hereinafter: "Festival").
In the document below, we summarize the types of data processing involved in participation in the Festival.
This notice, together with our General Privacy Notice (available at: https://bookline.hu/adatvedelmi), provides comprehensive information about data processing related to the Festival. This supplementary notice aims to inform participants about the specific characteristics of the data processing activities in addition to those described in the General Privacy Notice.
The General Privacy Notice includes: Bookline's identification data and the contact details of its Data Protection Officer. Definitions of terms used in this supplementary notice. Explanations of the legal bases for data processing. Data security measures implemented to protect personal data. Information about transfers of data to third countries outside the European Union and the safeguards applied. Information about the rights of participants in relation to data processing

Ticket Sales

What data processing do we carry out?	Tickets can be purchased online on the Festival website (bookvibez.hu). The Festival website and ticketing system are operated on our behalf by Event & More Kft.. Purchased tickets, invoices, and the QR code required for entry are sent to the purchaser by email by Event & More Kft. For workshops with limited capacity, registration is possible after ticket purchase by providing the email address used during the ticket purchase. Invoices for purchased tickets are issued by Event & More Kft. in compliance with legal requirements. Bookline does not normally have access to purchasers' data; however, during settlement with Event & More Kft., it may review any documents generated during performance, including invoices issued to purchasers. Such review serves to verify the number of tickets sold and the value of purchases, not to identify individual purchasers.
For what purposes do we use the data?	*operation of the festival website, ticket purchase:* Data provided during ticket purchase are processed to receive and fulfill orders via the Festival website. *workshop registration:* The contact data are required to verify that only holders of valid tickets may participate. Verification is carried out by checking the identity of the email address provided at ticket purchase and at workshop registration. *issuing and retaining invoices:* Billing data are required to issue accounting documents as prescribed by law. *reviewing ticket content during settlement with Event & More Kft.:* Bookline may review invoices to verify the accuracy of settlement (number of tickets sold and total purchase value).
Do we use automated decision-making?	No we do not.
Legal basis for processing	*Ticket sales:* We process the data provided at the time of ticket purchase in order to perform the contract concluded

	with the purchaser for the organization of the Festival (if the purchaser transfers the ticket to another person, then with the actual participant) [Article 6(1)(b) of the GDPR]. *workshopokra jelentkezés:* By verifying the identity of the email address provided at the time of registration and purchase, we check whether the applicant for the workshop has complied with the registration condition that only persons who have already purchased a ticket may apply for the workshop [Article 6(1)(b) of the GDPR]. *Issuing and retaining invoices for the purchased tickets:* the issuance and retention of accounting documents are required by Act C of 2000 on Accounting; therefore, the data processing is necessary in order to comply with these legal obligations [Article 6(1)(c) of the GDPR]. *Access to the content of the purchased tickets in the course of settlement with Event & More Kft.*: the legal basis for the subsequent access to the invoices is Bookline's legitimate interest, namely that in order to ensure a full and accurate settlement with its contractor, it requires access to all transactions carried out by the contractor in Bookline's name in connection with the Festival [Article 6(1)(f) of the GDPR].
If the data processing is necessary for compliance with a legal obligation, which piece of legislation prescribes this obligation?	Only data processing related to the issuance and retention of accounting documents is prescribed by law, specifically Act C of 2000 on Accounting.

Which data do we process?	*Operation of the Festival's website; ticket purchase:*
	• *Data required for purchasing tickets: full name, email address*
	• *Data required for payment by bank card:*
	  ○ *bank card number*
	  ○ *cardholder's name*
	  ○ *bank card expiration date*
	  ○ *validation code (so-called CVC2 code)*

	Workshop registration: the email address provided at the time of ticket purchase. *Issuing and retaining invoices for purchased tickets:* • For private individuals: purchaser's name, address • For sole proprietor purchasers: name, registered office, tax number *Access to the content of the purchased tickets in the course of settlement with Event & More Kft.:* • For private individuals: purchaser's name, address • For sole proprietor purchasers: name, registered office, tax number
How long do we retain the data?	*Operation of the Festival website; ticket purchase:* until the end of the Festival *Workshop registration:* until the start of the workshops *Issuing and retaining invoices for purchased tickets: accounting documents are retained* • in accordance with Act C of 2000 on Accounting, until the acceptance of the financial statement following the eighth year after the issuance of the document, or • in accordance with Act CL of 2017 on the order of taxation and Act CXXVII of 2007 on value added tax, until the expiration of the right to determine the tax [for five years from the last day of the calendar year in which the tax return, data report, or notification should have been submitted, or, in the absence of such return, report, or notification, when the tax should have been paid]. The longer of the two retention periods applies. *Access to the content of the purchased tickets in the course of settlement with Event & More Kft.:* the purchasers' invoices may be reviewed retroactively only within the 5-year limitation period following the completion of the settlement with Event & More Kft.
If we do not collect the data directly from you, from which sources do we obtain	All data are provided by the ticket purchaser.

them?	
If we transfer the data, who are the recipients?	The Festival's website is operated by Event & More Kft. (registered office: 1112 Budapest, Sasadi út 134; company registration number: 01-09-698048) on behalf of Bookline. The website's IT operations are managed by COMPOFFICE-R Kft. (registered office: 1141 Budapest, Öv utca 29; company registration number: 01-09-434750). Event & More Kft. forwards the data recorded during ticket purchase to KBOSS.hu Kft. (registered office: 1031 Budapest, Záhony utca 7; company registration number: 01-09-303201), which operates the szamlazz.hu website, for the purpose of issuing and storing invoices. The personal data transferred in this way are processed by KBOSS.hu Kft. in accordance with its own privacy policy (available at the following link: https://www.szamlazz.hu/adatvedelem/).
Do we process your data jointly with other data controllers? If yes, who are the other joint data controllers?	Only Bookline processes the data.
Do we transfer the data to a third country? If so, what guarantees that the transferred data will be properly handled in the third country? The range of possible guarantees is detailed in the "*In which cases can personal data be transferred to a third country?*" section of our general privacy policy.	We do not transfer the data to any third country.
Whose data do we process?	*Operation of the Festival website; ticket purchase:* the ticket purchaser, and the invoice recipient (if different from the ticket purchaser). *Workshop registration:* the ticket purchaser. *Issuing and retaining invoices for purchased tickets:* the invoice recipient *Access to the content of the purchased tickets in the course of settlement with Event & More Kft.*: the invoice recipient

Is the provision of personal data based on a legal or contractual obligation, or is it a prerequisite for concluding a contract?	*Operation of the Festival website; ticket purchase:* without providing the data required for ticket purchase and bank card payment, we cannot fulfill our contractual obligations or issue your ticket (QR code). *Workshop registration:* if you do not provide the email address used for ticket purchase when registering for a workshop, we cannot register you as a workshop participant. *Issuing and retaining invoices for purchased tickets:* the data required for issuing invoices is necessary due to the obligation to issue accounting documents prescribed by Act C of 2000 on Accounting. *Access to the content of the purchased tickets in the course of settlement with Event & More Kft.:* not applicable.
What possible consequences may arise from failing to provide the data?	*Operation of the Festival website; ticket purchase:* without providing the data required for ticket purchase and bank card payment, you will not be able to enter the Festival. *Workshop registration:* if you do not provide the email address used for ticket purchase, you will not be able to attend the workshop you selected. *Issuing invoices for purchased tickets*: without the data required for invoicing, we cannot issue your invoice, and you

	will not be able to enter the Festival. *Access to the content of the purchased tickets in the course of settlement with Event & More Kft.:* not applicable.

On-site registration and entry.

Purchased tickets are not issued in a specific name and can be transferred to anyone; therefore, the following applies to the person who intends to enter the Festival on any day using the ticket (the QR code sent to the purchaser's email address).

What types of data processing do we carry out?	On the day of arrival at the Festival, the ticket (QR code) is checked for validity upon first entry. After the ticket's validity is verified, the participant receives a wristband, which confirms their right to access the areas and events permitted by their ticket. Since children under 14 may only attend the Festival under parental supervision, and those aged 14–16 require a parental consent form, the first entry of the day may include an age verification check if there is any doubt. If a person reasonably appears to be under 14 and is unaccompanied by an adult, or under 16 without a parental consent form, and cannot prove that they have reached the required age, they will not receive a wristband, even if they hold a valid ticket.
For what purposes do we use the data?	*QR code validity check:* the data is used to ensure that only individuals who obtained the ticket directly from Bookline (or any of our authorized representatives) or from a person who purchased it from Bookline (or any of our authorized representatives) are allowed to enter the Festival. *Age verification of intended entrants:* to ensure compliance with the age restrictions for participants specified in the contract concluded upon ticket purchase.
Do we use an automated (human intervention-free) decision-making mechanism? If yes, what is the decision-making logic, and what are the consequences of the automated decision?	We do not use automated decision-making.
What is the legal basis for the data processing?	*QR code validity check:* Bookline's legitimate interest in preventing misuse of tickets [Article 6(1)(f) of the GDPR]. Age verification of intended entrants: Bookline's legitimate interest in ensuring that participants comply with the age restrictions applicable to them under the service contract [Article 6(1)(f) of the GDPR].

If the data processing is necessary for compliance with a legal obligation, which legislation prescribes this obligation?	The data processing is not necessary for compliance with any legal obligation.
Which data do we process?	*QR code validity check:* during the verification of the QR code, it is checked whether there is a valid purchase associated with the code; this may involve verifying the data of the purchaser and the invoice recipient (if different), but not the data of the actual entrant, since the ticket is not issued in a specific name. *Age verification of intended entrants:* based on the photograph and date of birth on the entrant's identification document, and only if the staff responsible for entry reasonably doubts whether the entrant has reached the age of 14 or 16.
How long do we retain the data?	The processed data are used until on-site registration and entry have been completed.
If we do not collect the data directly from you, from which sources do we obtain them?	*QR code validity check:* the data are provided directly by the person entering the Festival, except when they did not purchase the ticket themselves; in that case, the data were provided by the ticket purchaser (invoice recipient) at the time of purchase. *Age verification of intended entrants:* the data are provided directly by the person entering the Festival.
If we transfer the data, who are the recipients?	*QR code validation and wristband issuance to participants:* the data are verified by Event & More Kft., acting on behalf of Bookline, or by its subcontractor appointed to manage on-site registration. *Age verification of intended entrants*: the data are verified by Event & More Kft., acting on behalf of Bookline, or by its subcontractor appointed to manage on-site registration.
Do we process your data jointly with other data controllers? If yes, who are the other joint data controllers?	Only Bookline processes the data.
Do we transfer the data to a third country? If so, what guarantees that the transferred data will be properly handled in the third country? The range of possible guarantees is	We do not transfer the data to any third country.

detailed in the “In which cases can personal data be transferred to a third country?” section of our general privacy policy.	
Whose data do we process?	*QR code validity check:* we process the data of the ticket purchaser (invoice recipient). *Age verification of intended entrants:* we process the data of the person entering the Festival.
Is the provision of personal data based on a legal or contractual obligation, or is it a prerequisite for concluding a contract?	*QR code validity check:* the provision of data is not required by law, by contract, and is not a prerequisite for concluding a contract. *Age verification of intended entrants:* the provision of data is not required by law, by contract, and is not a prerequisite for concluding a contract.
What possible consequences may arise from failing to provide the data?	*QR code validity check:* without verifying the QR code, entry to the Festival is not permitted. *Age verification of intended entrants:* if the data required for age verification are not provided, the wristband may be withheld, and entry to the Festival may be denied.

Photography, audio, and video recording at the Festival venue.

What types of data processing do we carry out?	Photographs, audio, and video recordings may be made of participants at any Festival venue. These recordings depict participants as part of a crowd rather than individually, although it cannot be completely excluded that someone may be identifiable by individual features (e.g., face, tattoo).
For what purposes do we use the data?	The recordings are used in media and communication materials as crowd images to promote the event, either during the current Festival or for the preparation and organization of future Festivals.
Do we use an automated (human intervention-free) decision-making mechanism? If yes, what is the decision-making logic, and what are the consequences of the automated decision?	We do not use automated decision-making.
What is the legal basis for the data processing?	Although our photographers focus on capturing the atmosphere of the event rather than individual participants, it is possible that a participant may appear recognizably in a recording. Please clearly indicate to the photographer on-site if you wish to appear in a recording, or conversely, if you do not want to be included. The legal basis for taking such images is therefore your consent [Article 6(1)(a) of the GDPR]. If you later change your mind, you can contact **dpo@libribookline.com**, specifying the particular recording (e.g., link), and we will remove you from the recording or replace the recording on any platforms where it was published.
If the data processing is necessary for compliance with a legal obligation, which legislation prescribes this obligation?	The data processing is not necessary for compliance with any legal obligation.
Which data do we process?	The participant's face and other externally identifiable features (e.g., tattoos).
How long do we retain the data?	The recordings are retained for a maximum of 5 years from the end of the Festival and may be used during this period to promote future Festivals.
From what source do we obtain the data?	The recordings are made of the participants, so they are the source of the data.
If we transfer the data, who are the recipients?	We do not transfer the data.

Do we process your data jointly with other data controllers? If yes, who are the other joint data controllers?	Only Bookline processes the data.
Do we transfer the data to a third country? If so, what guarantees that the transferred data will be properly handled in the third country? The range of possible guarantees is detailed in the "*In which cases can personal data be transferred to a third country?*" section of our general privacy policy.	The recordings are stored on cloud storage within Microsoft's cloud-based application. The cloud application operates on cloud infrastructure provided by Microsoft's Irish subsidiary – Microsoft Ireland Operations Limited (registered office: One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland; company registration number: 256796; VAT number: IE 8256796 U). Due to the operational characteristics of the cloud infrastructure – for example, the cloud provider ensures the flexible use of the service by continuously transferring data between data centers located in different countries across various continents and time zones – it cannot be completely excluded that, in certain cases, the recordings may leave the European Economic Area (EEA). This may occur, for instance, when our colleagues access (read, modify, etc.) the files on the storage while located outside the EEA. Additionally, the parent company of Microsoft Ireland Operations Limited is based in the United States, which is required to comply with U.S. laws. U.S. law allows law enforcement authorities and courts in the United States to request information from U.S.-based service providers – including Microsoft Ireland Operations Limited or its subsidiaries – regarding their customers and any data stored by customers on Microsoft infrastructure. Microsoft regularly publishes so-called transparency reports on the official or court requests it receives within the limits of applicable law. These reports can be accessed at the following link: https://www.microsoft.com/en-us/corporate-responsibility/reports/government-requests/customer-data?activetab=pivot_1%3aprimaryr2&culture=en-us&country=us. By decision of 10 July 2023, the European Commission determined that transfers of data to U.S. companies certified under the so-called EU–U.S. Data Transfer Framework provide the same level of protection for the data subjects as required under the GDPR. Microsoft, which is used to process the data, is included in the list of companies certified as compliant with the Data Transfer Framework.
Whose data do we process?	We process the data of participants attending the Festival.
Is the provision of personal data based on a legal or contractual obligation, or is it a prerequisite for concluding a contract?	The participant is free to decide whether they want to appear recognizably in recordings made at the Festival; neither law nor contract requires this.

What possible consequences may arise from failing to provide the data?	If the participant does not wish to appear recognizably in the recordings, this has no consequences for their participation in the current or any future Festivals.

Newsletter sending

What types of data processing do we carry out?	If a ticket purchaser subscribes to the Bookline newsletter at the end of the purchase process on the Festival website, their email address will be used in accordance with the provisions described in the "Newsletter subscription and sending, sending of automatic system messages" section of our general privacy policy.
For what purposes do we use the data?	See the "Newsletter subscription and sending, sending of automatic system messages" section of our general privacy policy.
Do we use an automated (human intervention-free) decision-making mechanism? If yes, what is the decision-making logic, and what are the consequences of the automated decision?	We do not use automated decision-making.
What is the legal basis for the data processing?	The legal basis for the data processing is Article 6(1)(a) of the GDPR (consent provided by the subscriber).
If the data processing is necessary for compliance with a legal obligation, which legislation prescribes this obligation?	The data processing is not necessary for compliance with any legal obligation.
Which data do we process?	See the "Newsletter subscription and sending, sending of automatic system messages" section of our general privacy policy.
How long do we retain the data?	See the "Newsletter subscription and sending, sending of automatic system messages" section of our general privacy policy.
If we do not collect the data directly from the subscriber, from what source do we obtain them?	The data are provided to us directly by the subscriber.
If we transfer the data, who are the recipients	Our newsletter sending applications are operated by Maileon Digital Kft. (1113 Budapest, Bocskai út 77-79.) and SFDC Ireland Limited (60 R801 Dublin, Salesforce Tower, North Dock, Ireland).
Do we process your data jointly with other data controllers? If yes, who are the other joint data controllers?	Only Bookline processes the data.
Do we transfer the data to a third country? If so, what guarantees that the transferred data will be properly handled in the third country? The range of possible guarantees	See the "Newsletter subscription and sending, sending of automatic system messages" section of our general privacy policy.

is detailed in the “In which cases can personal data be transferred to a third country?” section of our general privacy policy.	
Whose data do we process?	We process the data of individuals who subscribe to the Bookline newsletter after purchasing a Festival ticket.
Is the provision of personal data based on a legal or contractual obligation, or is it a prerequisite for concluding a contract?	Subscription is not required by law or contract, and tickets can be purchased without subscribing.
What possible consequences may arise from failing to provide the data?	Subscription is voluntary; if a person does not subscribe, they simply will not receive newsletter communications from Bookline.