

General Data Protection Regulation
CINE-MIS Nonprofit Kft.

In accordance with the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council, Article 13 and 14 the organization wishes to inform you as follows:

1. Identity and contact details of the data controller: **CINE-MIS Nonprofit Kft.**(premise: 3525 Miskolc, Kossuth Lajos str 11., company registration number: 05-09-016617, taxation number: 21006984-2-05, phone: 46/325 000, e-mail:cinemis@t-online.hu) (hereby referred to as: „**CINE-MIS**” or **controller**)
2. Contact details of the data protection officer: jokay@adatvedelem.eu, +36-1-796-7777.
3. Controller manages personal data solely for the purpose detailed in the given document to the extent necessary to fulfill controllers purpose. Personal data is made accessible for controller’s employees who has an explicit need for such data. Controller does not make decisions on automated data collections and does not draw profiles from personal data.
4. Information on data management:

A) THE JAMESON CINEFEST MISKOLC INTERNATIONAL FILM FESTIVAL’S DATA MANAGEMENT PROCEDURES REGARDING ENTRIES IN SHORT FEATURE AND FEATURE COMPETITION PROGRAM

DATA SUBJECTS	Competitors (directors), contact persons and/or right owners of films entered to the film festival organized by controller. Entries to the festival are accepted via controller’s website www.cinefest.hu or via international sites (i.e. www.reelport.com ; www.festhome.com), in which case the international partner provides us the data of entries. By indicating the Jameson CineFest Miskolc International Film Festival as the festival of choice, the person or legal entity making the entry agrees to have all personal data forwarded to us.
PURPOSE OF DATA MANAGEMENT	<ul style="list-style-type: none"> ▪ handling the entries of the Jameson CineFest Miskolc International Film Festival ▪ Identification of the entry, communication with its director, contact person, right owner ▪ organization of the Festival, handing out prizes ▪ Festival marketing and published materials ▪ screening of the entry in front of an audience during the Festival
CATEGORIES OF PERSONAL DATA CONCERNED	Name, date and place of birth, citizenship, phone number, e-mail, link and password to the entry, data regarding the film entered
LEGAL BASIS FOR DATA PROCESSING	consent of data subject
PERIOD FOR WHICH THE PERSONAL DATA IS STORED	1 year
TRANSFER OF PERSONAL DATA	Personal data may be transferred to the members of the pre-jury (third party film professionals in a contractual relationship with controller)
DATA PROVISION	Data provision is not mandatory for entering the Festival, but in order to participate in the program you are obliged to provide personal data necessary for our purposes.

B) THE JAMESON CINEFEST MISKOLC INTERNATIONAL FILM FESTIVAL'S DATA MANAGEMENT PROCEDURES REGARDING GUESTS AND MEDIA REPRESENTATIVES, FILLING OUT THE ACCREDITATION FORM AT CONTORLLER'S WEBSITE WWW.CINEFEST.HU

DATA SUBJECTS	Members of the juries, film professionals, representatives of production companies, representatives of sponsors, representatives of the media, accredited guest of the Jameson CineFest Miskolc International Film Festival
PURPOSE OF DATA MANAGEMENT	<ul style="list-style-type: none"> ▪ carrying out guest accreditation procedures at the Jameson CineFest Miskolc International Film Festival ▪ successful organization of the Festival, identification of guests, providing entry to the Festival for the accredited guests ▪ reservation in hotels ▪ data storage for the purpose of inviting representatives of the media for the Festival of the following year
CATEGORIES OF PERSONAL DATA CONCERNED	Name, e-mail, phone number, profession (in order to supervise rights for accreditation), represented organization The www.cinefest.hu does not use cookies.
LEGAL BASIS FOR DATA PROCESSING	consent of data subject
PERIOD OF DATA MANAGEMENT	1 year
DATA PROVISION	Data provision is not mandatory. Please note though, that accreditation depends on you providing personal data.
TRANSFER OF PERSONAL DATA	In case of reservations in hotels controller transfers personal data to the company providing accommodation.
DATA MANAGEMENT OFFICER	László Batta, host of the (www.cinefest.hu)

C) ONLINE TICKET RESERVATION AT WWW.CINEMIS.HU

DATA SUBJECTS	Persons reserving tickets at www.cinemis.hu
PURPOSE OF DATA MANAGEMENT	Online ticket reservation, proof of reservation e-mails
CATEGORIES OF PERSONAL DATA CONCERNED	E-mail The www.cinefest.hu does not use cookies.
LEGAL BASIS FOR DAT PROCESSING	consent of data subject
PERIOD OF DATA MANAGEMENT	Data are deleted at the start of the show
DATA PROVISION	Data provision is not mandatory. Please note though, that you cannot reserve tickets online if you fail to provide the necessary data.
DATA MANAGEMENT OFFICER	Ankiri Bt. (web hosting services), Webhu Kft. (ticket reservation program)

D) CONTRACTUAL PARTNERS (NATURAL PERSONS) EXCLUDING EMPLOYEES

DATA SUBJECTS	Natural persons (excluding controller's employees who receive special information related to their specific tasks) who enter into a contractual relationship with controller.
PURPOSE OF DATA MANAGEMENT	<ul style="list-style-type: none"> ▪ Fulfillment of the contract between controller and interested party ▪ Fulfillment of tax and legal obligations regarding the storage of data

	<ul style="list-style-type: none"> ▪ Proof of contractual terms and conditions in the case of legal dispute ▪ Recommendation of services similar to services provided for the interested party (direct marketing) if the party is not against such recommendation
CATEGORIES OF PERSONAL DATA CONCERNED	Personal data provided in the contract and necessary for the fulfillment of the contract (typically: name, address, mother's name, place and date of birth, taxation identification number, tax number, contact)
LEGAL BASIS FOR DATA PROCESSING	<ul style="list-style-type: none"> ▪ In regard of the registration of personal data of contractual party the legal basis for data processing is the fulfillment of the contract ▪ In regard of issuance and storage of financial documents the legal basis of data processing are the legal obligations ▪ In regard of direct marketing the legal basis of data processing is the rightful interest of controller. Rightful interest: direct marketing (in accordance with GDPR (47) preamble and in regard of processing data on name and address in accordance with Act CXIX. of 1995, Article 3.). The right to restriction of transferring data is ensured by controller. If the party declares that it does not wish to receive direct marketing information from controller, controller erases the data and will not use it for such purpose.
PERIOD OF DATA MANAGEMENT	<ul style="list-style-type: none"> ▪ Records of data provided by contractual partner, offers, other written and electronic communication: 5 years from the expiration of the contract ▪ Contract, orders and invoices: 8 years after the expiration of the contract in accordance with the obligations regarding financial documents ▪ In relation to direct marketing data management is continuous until the parties express differently
DATA PROVISION	The provision of personal data necessary for identification and data necessary for taxation are mandatory prerequisites of entering into a contractual relationship. In accordance with the current legal regulations we must handle such data. If you fail to provide such data we cannot enter into a contractual relation.

E) THE PROVISION OF DATA REGARDING THE CONTACT PERSONS OF CONTRACTUAL PARTNERS OF THE CONTROLLER

DATA SUBJECTS	Employees or representatives of any third party in a contractual relationship with controller who are specified in the contract as contact persons.
PURPOSE OF DATA MANAGEMENT	<ul style="list-style-type: none"> ▪ Controller needs to know the personal data of the contact person(s) in order to communicate effectively in their contractual relationship ▪ Direct marketing toward the third party if it does not wish to receive such communication
CATEGORIES OF PERSONAL DATA CONCERNED	Name, e-mail, phone number, job, related company
SOURCE OF DATA	data subject or contractual partner
LEGAL BASIS FOR DATA PROCESSING	The legal basis for data processing is the rightful interest of controller. Rightful interest (i) providing an effective means of communication with contracted third party, and (ii) direct marketing (toward legal entities) (GDPR 47 preamble). The right to restriction of transferring data is ensured

	by controller. If the party declares that it does not wish to receive direct marketing information from controller, controller erases the data and will not use it for such purpose.
PERIOD OF DATA MANAGEMENT	<ul style="list-style-type: none"> ▪ Records of data provided by contractual partner, offers, other written and electronic communication: 5 years from the expiration of the contract ▪ Contract, orders and invoices: 8 years after the expiration of the contract in accordance with the obligations regarding financial documents ▪ In relation to direct marketing data management is continuous until the parties expresses differently
DATA PROVISION	It is not mandatory to provide us your personal data. If you are a contact person and do not provide us your personal data the contract might be endangered and also terminated.

F) PICTURES, VIDEOS AND VOICE RECORDINGS AT EVENTS AND THE MANAGEMENT OF SUCH

DATA SUBJECTS	Persons participating at controller's events and being the subjects of photographs and video recordings made by the controller
PURPOSE OF DATA MANAGEMENT	<ul style="list-style-type: none"> ▪ marketing of controller's events ▪ Informing the public on past events
CATEGORIES OF PERSONAL DATA CONCERNED	Picture, voice, other personal particulars appearing in the recordings. In the case of written consent: name, address, signature.
LEGAL BASIS FOR DATA PROCESSING	<ul style="list-style-type: none"> ▪ Consent of the data subject given by implied conduct (implied conduct is if the subject knows that recording is or might take place in the room or at the event subject is entering into or participates at) or written consent. ▪ participation at public gatherings and performances at public life events do not require subject's consent to recording
PERIOD OF DATA MANAGEMENT	Data is managed until the subjects request of erasing/deleting such data.
DATA PROVISION	It is not mandatory to consent to recordings. If you fail to do so it is possible that you are restricted to enter certain events. You have the right to ask for the non-disclosure of recordings or ask the controller to delete such recordings.

5. Information on data transfer

The controller does not intend to transfer personal data to a recipient in a third country (non-EEA member). The controller may transfer the personal data of the data subject to co-operating parties in order to fulfill the contract between the data subject or its company and controller or in order to realize the Festival (i.e. the data of entries are transferred to the members of the pre-jury). Furthermore, if it becomes an utmost necessity due to legal dispute or due to the necessity of understanding the financial circumstances of a related economic procedure, controller might transfer the provided data on an ad hoc basis to service providers representing controller's interest (i.e. legal representatives, auditors, financial consultants who have a non-disclosure agreement with controller).

6. Rights of the data subject

Right to information: The data subject has **right to get information** regarding data management concerning his or her personal data at any time. The data subject has right to ask for rectification of inaccurate personal data, or for the erasure of such personal data. The data subject has right to object to processing of personal data.

Right of access by the data subject: The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been or will be disclosed, the envisaged period for which the personal data will be stored, any available information as to their source.

The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

Right to rectification: The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to the withdrawal of consent: The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Right to erasure: The data subject has the right to **ask controller to erase all personal data** if:

- 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 consent on which the processing is based, and where there is no other legal ground for the processing;
- c) data management has no legal basis;
- d) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject,
- e) data subject is under the age of 16.

Controller **erases the data upon the request of the data subject, unless** data processing is necessary:

- a) for compliance with a legal obligation which requires processing,
- b) for the establishment, exercise or defence of legal claims.

Right to restriction of processing: The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data,
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead,
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims,
- d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted under the cases above, such personal data shall, with the exception of storage, only be processed with the data subject's consent 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 reasons of important public interest of the Union or of a Member State. A data subject who has obtained restriction of processing shall be informed by the controller before the restriction of processing is lifted.

The controller shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

If the personal data has been made public controller is obliged to inform the controllers which are processing such personal data to erase any links to, or copies or replications of those personal data. In doing so, that controller should take reasonable steps, taking into account available technology and the means available to the controller, including technical measures, to inform the controllers which are processing the personal data of the data subject's request

Right to objection: Data subject has the right to object data processing

- a) if it is in his or her legitimate interest. Nevertheless, where personal data might lawfully be processed because 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, or on grounds of the legitimate interests of a controller or a third party, data processing shall be continued. It should be for the controller to demonstrate that its compelling legitimate interest overrides the interests or the fundamental rights and freedoms of the data subject.
- b) where personal data are processed for the purposes of direct marketing

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 a controller, in a structured, commonly used and machine-readable format and have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Right to lodge a complaint: The data subject shall have the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data relating to him or her infringes the regulations. Complaints shall be lodged to controller or to the data protection officer via the contacts written above.

The data subject has the right to lodge a complaint with a supervisory authority as well:

Hungarian National Authority for Data Protection and Freedom of Information

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, P.O.Box: 5.

Phone: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

If the data subject considers that the processing of personal data relating to him or her infringes the regulations he or she can also lodge a complaint to the court. Such complaint shall be handed in to the court of his or her habitual residence (see the courts at the following link: <http://birosag.hu/torvenyszekek>).

7. Remedy

The controller should **inform** the data subject of the **progress and the outcome** of the complaint within a reasonable period, but within one month at the most. Depending on the circumstances of the case the deadline may be prolonged by an additional two months. If the case requires further investigation the data subject shall be informed by the controller on the new deadline. If the complaint have been handed in in an electronic form, the information shall also be sent in an electronic form – if it is possible or if it is not specifically requested by the data subject otherwise. If the controller believes that the complaint does not require investigation, it shall inform the data subject on its decision within one month upon receiving the complaint. Controller informs data subject on the reasons for dismissing or rejecting the complaint and on the rights to lodge a complaint at the supervisory authority or court.

Procedures regarding the investigation of a complaint are free of charge. In case of an unlawful complaint or complaints that are – especially due to their repetitive nature – exaggerated controller is entitled to have its administrative costs reimbursed at a reasonable fee or is entitled to reject the request for investigation.

If the identity of the person lodging a complaint cannot be determined controller has the right to ask for additional information regarding the identity of the subject.

8. Protection of data

Controller ensures that personal data are protected. In order to do so controller implies the necessary technological and organizational measures to protect digital and paper-based data. Controller ensures that all the data processing regulations are met and observed. Controller protects the data by appropriate measures against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed which may in particular lead to physical, material or non-material damage and against inaccessibility due to technical changes.

In order to implement the necessary data protection measures controller ensures the information and training of its employees.

In defining and implementing the necessary measures of protection of data controller takes the available technological measures and development into account. From the available data processing methods controller chooses the one that ensures the maximum safety of data protection considering reasonability.

Controller ensures the IT protection of data especially in terms of:

- protection against unauthorized access including the protection of software and hardware and their physical protection (unauthorized access, network protection);
- applies measures to recover data, makes backup copies on a regular basis and stores such copies separately and safely (backup);
- ensures protection against malwares;
- ensures the protection of databases and storage devices against physical damage, including but not limited to fire-, water-, lightning damages and ensures that in the case of such damage the database can be restored and recovered (archives, fire protection).

In order to protect paper-based data controller takes all necessary measures to ensure their physical safety and their protection against fire. Employees and other parties acting on behalf of the controller shall ensure that, regardless of the means of data processing, data storage devices used by them or being in their care are safely guarded against destruction, loss, alteration, unauthorized disclosure of, or access to, transmission, or storage which may in particular lead to physical, material or non-material damage.

In effect: 06. December, 2018.

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