

DATA PROTECTION AND DATA MANAGEMENT INFORMATION

(HUNGARORING FAN CLUB NEWSLETTER)

I. THE DATA CONTROLLER

HUNGARORING Sport Zrt. (hereinafter referred to as **the "Data Controller"** or the **"Company"**) gives great importance to respecting the right of information self-determination of its employees, partners, customers, visitors and persons subscribing to the HUNGARORING FAN CLUB newsletter (hereinafter referred to as the **"Newsletter"**). The Data Controller shall process personal data confidentially, in accordance with the applicable European Union and national legislation and relevant data protection (authority) practices, and shall take all security and organizational measures to ensure the security, confidentiality, integrity and availability of the data.

With respect to provisions of 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 Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: **"Info Act"**), the Data Controller publishes the following information (hereinafter: **"Information"**) in order to protect the personal data of the persons subscribing to the Newsletter.

The Information is effective from **24 March 2023** until its revocation, in connection with the processing of personal data of those involved in the **procedure carried out by the Data Controller**.

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

Data Controller's data:	
company name:	HUNGARORING Sport Zártkörűen Működő Részvénytársaság (short name: HUNGARORING Sport Zrt.)
company registration number:	13-10-040464
seat:	2146 Mogyoród, Hungaroring út 10.
post address:	2146 Mogyoród, Pf. 10.
email address:	office@hungaroring.hu
website:	https://hungaroring.hu/
representative:	Zsolt István Gyulay, President and CEO
name of the data protection officer:	dr. István Fekete
contact details of the data protection officer:	gdpr@hungaroring.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 on Freedom of Information (hereinafter referred to as "**Info Act**");
- 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 (general data protection regulation, hereinafter referred to as "**Regulation**" or "**GDPR**")

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

Terms

The terminology used in the present information is identical to the definitions set out in Article 4 of the Regulation and, at certain points, to the interpretative provisions of Article 3 of the Infotv. The definitions relevant for the interpretation of this information are set out in Annex 1.

When the present information refers to data or processing, it shall mean personal data or the processing thereof.

II. DATA PROCESSING PURPOSES

PROTECTION OF DATA PROVIDED BY PERSONS SUBSCRIBING TO THE NEWSLETTER OF THE DATA CONTROLLER

The Company, as the owner of the website www.hungaroring.hu (hereinafter referred to as the "**Website**"), acts as data controller with respect to the personal data related to the Website. When you visit the website and contact the Company by using the "Newsletter" menu item and providing the data indicated therein, you are registering for the Newsletter service, which will result in the processing of your personal data. In this context, the Data Controller will process the personal data of the data subject as described below:

2.1. Purpose of data processing

To keep you informed about the Hungarian Grand Prix, the programs of the Hungaroring Circuit operated by the Company, our products, as well as to send you informative articles and materials.

The purpose of the data processing is to ensure that the Newsletter is sent to the e-mail address you have provided. The Data Controller uses the data provided by you for the sole purpose of sending the Newsletter.

2.2. Legal basis of the data processing

The data processing is based solely on the data subject's voluntary consent pursuant to Article 6(1)(a) of the Regulation. The consent is given by providing the data when subscribing to the Newsletter on the aforementioned website, and by voluntarily ticking the box for consent.

2.3. Processed personal data

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

- a) e-mail address.

Please note that on the aforementioned website, you can subscribe to the Newsletter service provided by the Company by entering your own personal data. The Data Controller cannot verify the correctness of the personal data (i.e. the identity) provided during the subscription. Consequently, we would like to draw your attention that if you use the personal data of another person, you may be subject to civil or criminal liability!

In order to avoid unintended subscriptions, after sending the subscription to the Newsletter, the Data Controller sends an e-mail message containing a so-called "*confirmation link*" to the e-mail address provided. The subscription to the Newsletter can be finalized by clicking on the confirmation link. If the subscriber does not finalize his/her subscription to the Newsletter within 5 (five) days after the subscription has been sent, the Data Controller will delete the previously provided data.

2.4. Categories of data subjects

The Newsletter can only be received by those persons who clearly indicate their intention to subscribe to the Newsletter service when subscribing to the Newsletter on the aforementioned website, by voluntarily providing the data specified in point 2.3. and by voluntarily ticking the consent box. By ticking to consent box, the subscribing persons declare that they have read and accepted the contents of this Information.

2.5. Source of the processed personal data

The source of personal data is the person subscribing to the Newsletter service, the data subject. The Data Controller receives the above personal data from the data subject.

2.6. Recipients of personal data made available

The Data Controller has primary access to the personal data processed. The personal data of the data subject may only be processed by the Data Controller's employees who are authorized to collect the data of point 2.3.

Data Processor(s):

The Data Processor, acting on behalf of and under the instructions of the Data Controller, may process the personal data of the data subject only for the purposes specified by the Data Controller and contractually agreed upon, in accordance with the instructions of the Data

Controller. The Data Processor shall not have the right to make its own decisions with regard to the data processing. The Data Processor shall be bound by confidentiality obligations and contractual guarantees regarding the protection of personal data obtained during the performance of its tasks.

The Data Controller uses the services of the following data processors in connection with the applications for the Newsletter:

The Data Controller provides the possibility to subscribe to the Newsletter on its website, which is operated by an external service provider. The personal data provided during the application process on the website will be sent via the website to the external service provider of the Newsletter service, thus these data will also be stored on the servers of the external service provider operating the website.

Data processor details:	
Name of the Data Processor:	CSAO Gazdasági Szolgáltató Kft.
Seat:	3346 BÉlapátfalva, Marx K. u. 20.
Tax number:	11171627-2-10
Company registration number:	10-09-022239
Represented by:	Kristóf Csajtai
E-mail:	csajtai.kristof@gmail.com
Activity:	operating a website and newsletter service and managing and updating the related database

The Data Controller uses the newsletter sending and database management service of SENDINBLUE to send its newsletters. The data of the subscribers are also stored on the servers of the external service provider as a data processor, in order to send the newsletter. Data of the external service provider:

Data processor details:	
Name of data processor:	SENDINBLUE
Seat:	7 rue de Madrid, 75008 Paris, France
Commercial register number:	498 019 298
Community tax number:	FR80498019298
Contact:	https://www.sendinblue.com/contact/
Activity:	providing newsletter and database management services
Information on data management:	https://www.sendinblue.com/legal/privacypolicy/

2.7. Transferring personal data

The Data Controller shall not disclose the personal data specified and processed in point 2.3 to any persons other than the Data Processors specified in point 2.6, however, the Data

Controller shall be entitled or obliged to disclose these data to the competent authorities or to the organization authorized to act in order to enforce a legal claim. In other words, the personal data specified in point 2.3 of this Information will be sent to SENDINBLUE (Data Processor, seat: 7 rue de Madrid, 75008 Paris, France) and CSAO Gazdasági Szolgáltató Kft., (Data Processor, seat: 3346 Bélapátfalva, Marx K. u. 20). The indicated data will not be forwarded to other third countries or international organizations

2.8. Duration of processing of personal data

The Data Controller processes the personal data of the data subjects until the voluntary consent of the subscription to the Newsletter service is withdrawn. The data subject has the right to withdraw the consent at any time by a statement addressed to the Data Controller, which can be done as follows:

- the easiest way is to click on *the "unsubscribe" link* at the bottom of the newsletter sent by the Data Controller;
- in person at the address of the Data Controller: 2146 Mogyoród, Pf. 10;
- by e-mail to the following e-mail address: sales@hungaroring.hu

Following the withdrawal, the Data Controller shall delete all data of the data subject without delay. The withdrawal of consent shall not affect the legality of the previous data processing based on consent.

If, after subscribing to the Newsletter, the applicant does not confirm/finalize his/her subscription to the Newsletter by clicking on the link in the e-mail message sent by the Data Controller within 5 (five) days from the date of sending, the Data Controller shall delete the applicant's previously provided data.

Exceptions to this are the legal or claim enforcement procedures of any court, prosecutor's office, investigative authority, infringement authority, administrative authority, the National Authority for Data Protection and Freedom of Information, or other organizations authorized by law.

2.9. 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 create a profile of the data subject on the basis of the available personal data.

2.10. Technique of data process

The Data Controller processes the personal data of the data subject electronically.

2.11. Provision of personal data

The provision of personal data is necessary for the Newsletter service, which is entirely voluntary. Giving these data is a condition of joining.

III. DATA SECURITY

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 communication through different registration platforms.

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

On the basis of the records of data processing activities, the Data Controller shall carry out a risk analysis to assess the conditions of the processing operation 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 Data Controller's activities.

The Data Controller shall implement appropriate technical and organizational 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 data processing and the varying 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 and availability to personal data in a timely manner;
- a procedure to test, assess and evaluate regularly the effectiveness of the technical and organizational measures taken to ensure the security of processing.

In determining the appropriate level of security, the following data processing risks must be taken into account: risks arising from accidental or unlawful destruction, loss, modification, unauthorized disclosure of or access to personal data transmitted, stored or otherwise processed.

The Data Controller shall implement appropriate technical and organizational measures to ensure that, by default, only personal data that are necessary for the specific purpose of the processing are processed. This obligation shall be applied 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, it should be attempted to replace the damaged data, to the extent 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 multi-level firewall protection. At the entry points of the used public networks, a hardware firewall (border protection device) is installed at all times. The data is stored redundantly, i.e. in multiple locations, by the Data Controller to protect it from unlawful destruction, loss, damage or destruction due to IT equipment failure.

The Data Controller protects its internal networks from external attacks with multi-level, 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 the data 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 data processing.

4.1. Right to information

The data subject has the right to be informed about the processing of his or her personal data. The Data Controller fulfill its obligation to inform by the present document.

4.2. Consent-based data processing

Where the legal basis for a data processing is the data subject's consent, he or she has the right to withdraw the 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 Data Controller will permanently and irretrievably delete the personal data following the withdrawal. 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 law, 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 of the processing;
- the categories of personal data concerned;

- the recipients or categories of recipients to whom the Data Controller has disclosed or will disclose the personal data, including in particular recipients in third countries or international organizations;
- the intended period of storage of the personal data or, if this is not possible, the aspects of determining such period;
- the data subject shall also be informed of his or her right to require 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 file 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, all available information on the source of the data;
- where automated decision-making is carried out, the fact of such procedure, including profile creating, and, at least in those cases, the logic used, i.e. the significance of such procedure and the possible consequences for the data subject.

4.4. Right to rectification of personal data

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

In the case of a request for rectification (amendment) of data, the data subject must certify the accuracy of the data requested to be amended and must also certify that the entitled person requests the modification of the data. 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. After confirming the authenticity of the request, the Data Controller shall, without undue delay, correct the inaccurate personal data or supplement the data. The Data Controller shall notify the data subject of the correction or marking.

The Data Controller further draws the attention of the data subject to report any change in his/her personal data as soon as possible, thus facilitating lawful data 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 reasons arise:

- the Data Controller no longer needs the personal data for the purposes for which they were collected or otherwise processed;
- where the data processing is based on consent, the data subject withdraws the consent and there is no other legal basis for the data processing;

- the data subject objects to the processing and there are no overriding legitimate grounds for the data processing or the data subject objects to data processing for direct marketing purposes;
- the personal data are unlawfully processed by the Data Controller;
- the personal data must be erased in order to comply with a legal obligation applicable to the Data Controller under EU or Member State law;
- 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 data processing

The data subject shall have the right to require the restriction of data processing by the Data Controller if one of the following conditions arise:

- disputes the accuracy of the personal data; in this case, the restriction shall be applied for the time period that allows the Data Controller to verify the accuracy of the personal data;
- the data processing is unlawful and the data subject opposes the erasure of the data and instead requests the restriction of their use;
- the Data Controller no longer needs the personal data for the purpose 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 data processing; in this case, the restriction shall be applied for the time period until it is examined whether the legitimate grounds of the Data Controller prevail the legitimate grounds of the data subject.

Where the data is restricted, it may only be processed 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 EU or a Member State, not including storage. The Data Controller shall inform the data subject in advance of the unlocking of the restriction.

4.7. Right to object

Where the processing of personal data is based on the legitimate interests of the Data Controller [Article 6(1)(f) of the Regulation] or the processing is necessary for the performance of a task carried out by the Data Controller in the public interest [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 profile creating based on the above regulations.

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, including profile creating, 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. Balancing test

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

4.9. Right to data portability

The data subject shall have the right to receive the personal data concerning him or her and was provided to the Data Controller in a structured, commonly used, computer-readable format and the right to have those data transferred by the Data Controller to another controller if:

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

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@hungaroring.hu, or by post to the Data Controller's seat, or by visiting the Data Controller's seat in person. The Data Controller shall investigate and perform the data subject's request without undue delay. 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 Data Controller is unable to comply with the request, it shall inform the data subject of the reasons of the refusal and the rights of appeal within 30 (thirty) days.

Within 5 (five) years after the death of the data subject, the rights of the deceased as set out in this Information, may be exercised by a person authorized by the data subject by an administrative order or a declaration in a public or private document providing full evidence and made to the Data Controller. If the data subject made several declarations to a data controller, the declaration made at a later date shall be applied. If the data subject has not made a declaration, his or her close relative, according to Act V of 2013 on the Civil Code, may exercise the rights under Article 16 (right to rectification) and Article 21 (right to object) of the Regulation; and in case the data processing was already unlawful during the lifetime of the data subject or if the purpose of the processing ceased by the death of the data subject, the rights under Article 17 (right of erasure) and Article 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 close relative 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 Data Controller if he or she considers that the Data Controller or the data processor instructed by the Data Controller is processing his or her personal data in a way which results a breach of the provisions of the law on the processing of personal data or of binding legal acts of the European Union. The issue shall be decided upon by the court as a matter of priority. The action shall fall within the material jurisdiction of that regional court. The action may also be brought, at the choice of the data subject, before the court of the domicile or place of residence of the data subject, or before the court of the seat of the Data Controller (Budapest District Court).

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

Anyone may file a notification (complaint) with the National Authority for Data Protection and Freedom of Information (NAIH) against the Data Controller, referring to the fact that the processing of personal data has resulted in a violation of rights or a direct 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.
Phone: +36 (1) 391 1400
E-mail: ugyfelszolgalat@naih.hu
URL: <http://naih.hu>

The Data Controller is committed to comply with the principles of lawful, transparent and fair data processing, consequently it will take prompt action to clarify the issues raised and remedy the identified harm. Accordingly, we recommend that you contact the Data Protection Officer of the Data Controller via the contact details provided in this Information before taking your case to the National Authority for Data Protection and Freedom of Information or to the courts. You will be informed of the findings and the measures taken, and the questions regarding the data processing within the time limits set by the applicable legislation.

The Data Controller, **HUNGARORING Sport Zrt.** shall not be liable for any consequences arising from the inaccurate provision of data.

Mogyoród, 24 March 2023.

Annex 1:

Definitions relating to the processing of personal data

- **data controller:** the legal person who determines the purposes and means of the processing of personal data;
- **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, organization, structuring, storage, adaptation or alteration, query, inspection, use, disclosure, transmission, distribution or otherwise making available, coordination or connection, restriction, erasure or destruction;
- **data transfer:** making data available to a specified third party;
- **data erasure:** making data unrecognizable so that it is no longer possible to recover it;
- **data marking:** the marking of data with an identification mark in order to distinguish it;
- **restriction of data 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 data 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 data controller, the data processor or the persons who, under the direct authority of the data controller or data processor, are authorized to process personal data;
- **data subject's consent:** a voluntary, specific, well-informed and clear declaration of the data subject's will by which he or she declares his or her agreement to the processing of personal data;
- **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 termination of the data processing or the erasure of the processed data.