

The processing of the personal data of BUD:Runway Run 2024 participants

Budapest Airport Zrt. (registered offices: 1185 Budapest, BUD International Airport; company registration number: 01-10-044665; tax number: 12724163-4-44;) informs the persons registering for and participating in the event (hereinafter: “Data Subject”) about the processing of their personal data in accordance with the “GDPR”.

1. Data controller

Name of the data controller	Budapest Airport Zrt. (hereinafter: “BUD”/”Data Controller”)
Head offices	1185 Budapest, BUD International Airport
Postal address	1675 Budapest, Pf. 53.
Telephone number	+36 (1) 296-9696
Website	bud.hu
Data protection officer	dr. Attila Molnár
Data protection officer’s contact	dpo@bud.hu

2. The scope of personal data processed, legal basis, purpose and duration of processing

2.1. In connection with the processing of data related to the registration for entry to the airport:

The scope of personal data processed	The legal basis for processing	The purpose of processing	The duration of data processing
<p>If the participant has an airport pass, the following details of the participant</p> <ul style="list-style-type: none"> ▪ Name, sex, place of birth, date of birth ▪ Airport pass number ▪ Employer 	<p>Compliance with a legal obligation, based on article 6 (1) c) of the GDPR</p> <ul style="list-style-type: none"> ▪ Commission implementing regulation (EU) 2015/1998 (5 November 2015) laying down detailed measures for the implementation of the common basic standards on aviation security: sections 1.2.5 and 11.1 of the annex ▪ Subsections (11)-(19) of section 67 of act XCVII of 1995 on aviation, ▪ Sections 13-16A and subsections k) and l) of section 17 of government decree no. 169/2010 (V. 11.) on the rules of the security of civil aviation and the powers, tasks and the operation of the Aviation Security Committee 	<p>Organizing the event, providing access to the event venue</p> <p>(Provided with a website interface to simplify registration)</p>	<p>Data relating to entry will be stored on the controller’s own servers for 5 years, based on the written consent of the authorities.</p>
<p>If the participant does not have an airport pass, the following details of the participant</p> <ul style="list-style-type: none"> ▪ Name, sex, mother’s name, place of birth, date of birth ▪ Number of the identity card or passport valid at 	<p>Compliance with a legal obligation, based on article 6 (1) c) of the GDPR</p> <ul style="list-style-type: none"> ▪ Commission implementing regulation (EU) 2015/1998 (5 November 2015) laying down detailed measures for the implementation of the common basic standards on aviation security: sections 1.2.5 and 11.1 of the annex ▪ Subsections (11)-(19) of section 67 of act XCVII of 1995 on aviation, ▪ Sections 13-16A and subsections k) and l) of section 17 of government decree no. 169/2010 (V. 11.) on the 	<p>Organizing the event and providing access to the event venue: enabling entry to the airport for event participants</p> <p>(Provided with a website interface to simplify registration)</p>	<p>Data relating to entry will be stored on the controller’s own servers for 5 years, based on the written consent of the authorities.</p>

<p>the time of registration</p> <ul style="list-style-type: none"> ▪ Employer 	<p>rules of the security of civil aviation and the powers, tasks and the operation of the Aviation Security Committee</p>		
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2.2. In connection with the processing related to the registration of additional data required for participation in the event:

The scope of personal data processed	The legal basis for processing	The purpose of processing	The duration of data processing
<p>Contact data:</p> <ul style="list-style-type: none"> ▪ E-mail address ▪ Telephone number 	<p>The consent of the participant, pursuant to article 6 (1) (a) of the GDPR</p>	<p>Contacting the participants, sharing information about the event</p>	<p>The data will be deleted within 30 days of the event</p>
<p>Data provided during payment:</p> <ul style="list-style-type: none"> ▪ The name and address of the payer <p>(The controller does not store bank card data)</p>	<p>The consent of the participant, pursuant to article 6 (1) (a) of the GDPR</p>	<p>The possibility to pay the entry fee.</p> <ul style="list-style-type: none"> - Payment is made through the K&H platform or by bank transfer 	<p>The data processor stores the data until the end of the event, after which it deletes all data from its servers on the day after the end of the event.</p>
<p>Crowd recordings</p> <ul style="list-style-type: none"> ▪ Photos and videos of the participants during the race, <p>(The data processor will take the pictures and videos with his own equipment, store the data on his own equipment and delete them after the event, after the data has been handed over to the data controller.)</p>	<p>The consent of the event participant, pursuant to article 6 (1) (a) GDPR</p>	<p>Use for marketing and communication purposes and, by making the recordings, to:</p> <ul style="list-style-type: none"> ▪ Document the event, ▪ Provide a memento for participants, ▪ Support BUD's marketing and PR activities ▪ Possibly publish the recordings on social media 	<p>Data is stored by BUD on its own servers until the data subject's consent is withdrawn, up to a maximum of 10 years from the date of recording</p>
<p>Further data:</p> <ul style="list-style-type: none"> ▪ T-shirt size ▪ Race times 	<p>The consent of the event participant, pursuant to article 6 (1) (a) GDPR</p>	<ul style="list-style-type: none"> ▪ Providing a set of equipment in the right number and size for the number of participants; ▪ Announcement of results 	<p>The data processor stores the data until the end of the event, after which it deletes all data from its servers on the day after the end of the event.</p>

Participation in the event is voluntary, based on your choice and free will. You have the right to withdraw your consent to data processing at any time, in the case of processing based on consent, which does not affect the lawfulness of the processing carried out on the basis of your consent until such withdrawal.

In connection with this event, organized for employees of the BUD group and their relatives, including children, and friends, the data controller will request personal data from the data subjects wishing to participate in the event for registration purposes at the time of the event announcement, in order to ensure participation in the event. The data subjects are employees of the BUD group companies and their relatives (children) or friends invited by them, and accordingly, the controller also processes the personal data of children, in each case, with the consent (registration) of the legal representative.

Please note that, for individual images, crowd and video recordings:

- Via the contact person before the event, or
- At the venue, to the event organizers

you can exercise your right to object to you (or your child) being included in the recordings. However, due to the large number of people attending the event and the group nature of the program, it may not be possible to grant this request, despite your explicit request.

You may request that your photograph not be used for the purposes detailed above at any time in the future. You will not suffer any disadvantage in connection with your objection. You can send your objection to dpo@bud.hu or send your signed statement to runwayrun@bud.hu.

In the request for deletion, we ask you for the same identification data as when you registered to give your consent. The data collected will be stored for a maximum of 30 days until the voluntary consent is withdrawn (cancellation). After this period, we will no longer store either your withdrawn personal data or your request for cancellation.

Please note that the processing of personal data provided by the Organizer in press releases after sharing on social networking sites is governed by the rules of social networking sites.

3. Data processors

The following act as data processors in relation to your personal data:

- Balatonman Triatlon Kft. (1036 Budapest Pacsirtamező utca 3-5.) - event organization
- Gergely György Zákány, self-employed (1174 Budapest, Bocskai István utca 63/1) - photographer and videographer
- Zero Time Services Kft. (2013 Pomáz, Mikszáth Kálmán utca 36/4.) - web hosting service
- FULLCON IT Development Kft. (1205 Budapest, Mártírok útja 100.) - web hosting service operator

4. Recipients of the personal data and the categories of recipients

4.1. The Data Processors referred to in section 3 and the employees of BUD whose access to, knowledge and processing of the data is indispensable for the performance of their duties.

4.2. Due to BUD's legal obligation to the data controller, BUD will transmit the data necessary for entry to the Airport Police Directorate (RRI), the Counter-Terrorism Center (TEK), the National Tax and Customs Administration (NAV) and the Constitution Protection Office (AH) for the purpose of carrying out background checks, in order to authorize entry. The authorities do not store the data, but have access to the systems to the extent strictly necessary for their work, as provided for by law.

4.3. In the current calendar year and thereafter, BUD may use the images of the participants of its events in its business communications, for the purpose of creating promotional materials related to the subject matter, forward them to third parties for the purpose of promoting and presenting its services and publish them on its website and social media channels. With respect to public appearances, the footage may be used by BUD as illustrations to promote the event, for marketing purposes in publications, at events and for activities

and through BUD’s online and offline channels (e.g. campaign review press release and/or internal communication magazine, and the following social media platforms), in particular:

<p>Online portals</p>	<ul style="list-style-type: none"> • BUD intranet • BUD career page - career.bud.hu • BUD social media channels <ul style="list-style-type: none"> ▪ Facebook (Meta Platforms Ireland Ltd., registered offices: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland) <ul style="list-style-type: none"> ▪ www.facebook.com/budapestairport ▪ www.facebook.com/groups/munkatarsak.bud ▪ Instagram (Meta Platforms Ireland Ltd., registered offices: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland) <ul style="list-style-type: none"> ▪ https://www.instagram.com/budapestairport/?hl=hu ▪ https://www.instagram.com/bud_vip/?hl=hu ▪ LinkedIn (LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2, Ireland) <ul style="list-style-type: none"> ▪ https://hu.linkedin.com/company/budapest-airport • BUD website (https://www.bud.hu/) • Job search, recruitment sites: e.g.: Profession.hu, Aide, LinkedIn, Exact Solutions • The social media platforms of contracted partners
<p>Offline portals</p>	<ul style="list-style-type: none"> • Corporate publications (brochures, books, magazines) • Other promotional material (e.g. posters, leaflets, other advertising surfaces) • Educational materials • Printed press releases
<p>Events</p>	<ul style="list-style-type: none"> • Job fairs • BUD’s own events • BUD’s appearance at external events

5. Transfer of personal data

No data is transferred to third countries or international organizations.

6. Storage of personal data, data security

The data provided during registration on the website is stored on servers provided by the data processor (the hosting room of Zero Time Services Kft., Drávanet data center, 1132 Budapest, Victor Hugo u. 18-22., 1138 Budapest, Váci út 188., operated by FULLCON IT Development Kft.).

The data required for entry, as well as photo and video recordings are stored on the data controller’s own servers (Budapest Airport Zrt., 1185 Budapest BUD International Airport).

BUD, as Data Controller, must ensure the security and the lawful use of the data, by taking appropriate technical and organizational measures. BUD stores the data provided by participants and processed by BUD on its own on-site servers, in secure databases, access to which is limited to persons whose access to, knowledge and processing of the data is indispensable for the performance of their duties.

BUD takes reasonable steps to ensure that personal data stored by it is not accessible to unauthorized persons. It will only disclose data to another organization if required to do so by law or on the basis of an official request, if the legal conditions for doing so are met.

If the Data Controller is required by a court or authority to provide personal data in the course of legal proceedings, the Data Controller is obliged to provide the requested data to the court or authority in question, in compliance with its legal obligation. The Data Controller only discloses to public authorities, if the public authority has indicated the precise purpose and scope of the data, the personal data that is strictly required for the purpose of the request and only to the extent strictly necessary for the purpose of the request.

7. The source of personal data, refusal to provide data and consequences

The person directly registering and participating in the event is the source of the personal data.

The provision and processing of data required for entry to the airport is governed by the legislation referred to in section 2.1. Refusal of data processing makes entry impossible; the person refusing data processing thus cannot enter the restricted area of the airport and cannot participate in the event.

8. Automated decision-making (including profiling)

Automated decision-making, including profiling, does not take place during processing.

9. Data subjects' rights in relation to data processing:

- **Right to information:**

You may request information from the data controller about the processing at any time during processing. The purpose of this notice is also to provide clear, concise, transparent and understandable information about the data processing activities of BUD.

- **Access to personal data**

You have the right to receive feedback from the controller on whether the processing of your personal data is in progress, and if so, the data subject is entitled to receive access to the personal data and the information specified in the GDPR. BUD will provide you with a copy of the personal data processed. BUD may charge a reasonable fee for any additional copies you request, based on administrative costs. If you have submitted your request electronically, we will provide the information to you in a commonly used electronic format, unless requested otherwise.

- **Right to the rectification of personal data:**

You have the right to have inaccurate personal data concerning you corrected by BUD without undue delay upon your request.

- **Right to the erasure of personal data, the right to be forgotten:**

You have the right to have your personal data erased without undue delay at your request, based on a submitted request, if one of the following grounds applies:

- The personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- You withdraw your previous consent and there is no other legal basis for processing;
- You object to processing and there are no overriding legitimate grounds for processing;
- The personal data have been unlawfully processed;
- The data must be erased, in order to comply with a legal obligation under EU or member state law, which the controller is subject to;
- Personal data are collected in connection with the provision of information society services (conditions for children's consent);

- **Right to the restriction of processing**

You have the right to request that we restrict processing if one of the following conditions is met:

- You contest the accuracy of the personal data, in which case the restriction applies for the period of time that allows BUD to verify the accuracy of the personal data;
- The processing is unlawful, you object to the erasure of the data and instead request the restriction of their use;
- BUD no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defense of legal claims; or
- You have objected to processing; in this case, the restriction applies for the period until it is established whether BUD's legitimate grounds override your legitimate grounds.

If processing is restricted based on the above, such personal data, with the exception of storage, may only be processed with your consent, or for the establishment, exercise or defense of legal claims, or for the protection of the rights of another natural or legal person, or for important public interests of the EU or

of a member state. BUD will inform you in advance of the lifting of the restriction on the processing restricted at your request.

- **Right to object**

You may object to processing if you consider that BUD may not be processing your personal data appropriately, in relation to the purposes stated in this document. In this case, BUD must demonstrate that the processing of the personal data is justified by compelling legitimate grounds which override your interests, rights and freedoms or are related to the establishment, exercise or defense of legal claims.

10. The exercising of data subjects' rights in relation to data processing and the related deadline

In order to exercise the rights of the data subject by electronic means, the enquiry containing the data subject's request must be sent to dpo@bud.hu.

BUD will comply with your request to exercise your rights within a maximum of one month of receipt. The day of receipt of the request does not count towards the deadline.

If necessary, BUD may, taking into account the complexity of the request and the number of requests, extend this deadline by a further two months. BUD will inform you of the extension, stating the reasons for the delay, within one month of the receipt of the request.

11. The right to effective judicial remedy

If you have any comments or questions about data processing,

- Please contact BUD's data protection officer at dpo@bud.hu

If you believe that BUD's processing of your personal data does not comply with legal requirements or has violated your rights,

- You may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa u. 9-11; postal address: 1363 Budapest, Pf. 9., telephone: +36-1-391-1400; e-mail: ugyfelszolgalat@naih.hu, website: www.naih.hu) or
- You have the choice of bringing an action for the protection of your data before the competent court in the place where BUD is established or where you reside (for a list of courts and their contact details, please see the following link: <http://birosag.hu/torvenyszekek>)

12. Amendments of the data processing notice:

BUD reserves the right to unilaterally amend this data processing document without prior notice.

Budapest, 23.05.2024