



PRIVACY POLICY

Tourism Management System
Effective: 30 October 2025

Veszprém-Balaton 2023 Joint Stock Company (“VEB”) contributed to the implementation of the programme series organised within the framework of **“Veszprém-Balaton 2023 European Capital of Culture”**. The objectives of these programmes included the expansion of the scale, diversity, and European dimension of the cultural offering, in particular through fostering cross-border cooperation, broadening access to culture, and encouraging participation therein.

In order to achieve and maintain the above objectives, VEB operates a **“Tourism Management System” (“TMS”)**. The TMS constitutes a unified framework designed to stimulate the visitor economy by promoting and supporting cultural events, including but not limited to the publication of events, ticket sales, the provision of incentives through discount cards, and the management of programme calendars.

The TMS incorporates the HelloVEB Portal System (**“HelloVEB Portal System”**), through which users may access various services, including but not limited to: (i) registering a user account; (ii) purchasing tickets for events and programmes (**“Events”**) announced by VEB and its partners (**“Organisers”**); (iii) registering for Events which are made available free of charge; (iv) saving Events of interest as favourites; and (v) subscribing to newsletters issued by VEB or the Organisers. In addition, users may also purchase a Veszprém-Balaton Pass tourism card (**“Veszprém-Balaton Pass”**) or a Veszprém Card (**“Veszprém Card”**) via the HelloVEB Portal System.

The purpose of this Privacy Policy is to inform you of the processing of personal data which takes place through the HelloVEB Portal System, user accounts, and individual purchases, including the purposes for which your personal data are processed, the legal bases for such processing, the duration of processing, and the remedies available to you in relation to such processing.

Information regarding VEB’s data processing activities is continuously available in the footer of the HelloVEB Portal System’s homepage.

VEB reserves the right to unilaterally amend this Privacy Policy. In the event of any amendment, you will be notified via publication on the HelloVEB Portal System and, where you hold a registered user account, also by e-mail. By continuing to use the services following the entry into force of such amendments, you are deemed to have accepted the amended Privacy Policy.

Persons lacking legal capacity and minors under the age of 16 with limited legal capacity may not use services via the VEB system.



It is at your discretion whether or not to provide personal data and which data to provide – the provision of such data is not mandatory. However, the provision of personal data is indispensable to the effective delivery of our services, and in the case of ticket or card sales, it is a prerequisite for the conclusion and performance of the contract, as set out in detail below.

I. Definitions

Controller: the legal entity which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Name and contact details of the Controller:

Veszprém-Balaton 2023 Joint Stock Company

Registered seat: Cserhát lakótelep 8., H-8200 Veszprém, Hungary;

Company Registration No.: 19-10-500277;

Tax No.: 23701142-2-19;

Represented by: Ms Aliz Markovits, Chief Executive Officer)

Website: <https://helloveb.hu/>

Data Protection Officer: Dr Réka Benedek

E-mail: adatvedelem@veszprembalaton2023.hu

Processing: any operation or set of operations performed, whether or not by automated means, on personal data or sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

Processor: the legal entity which processes personal data on behalf of the Controller.

User Account: a personal account created by the User within the HelloVEB Portal System, through which the User is entitled to perform the activities defined in the General Terms and Conditions accessible at <https://helloveb.hu/en/general-terms-and-conditions>.

Profiling: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's work performance, economic situation, health, personal preferences, interests, reliability, behaviour, location, or movements.

Personal Data: any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification 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.



II. Specific Data Processing Activities

1. Registration on the HelloVEB Portal System, creation of a User Account

Within the HelloVEB Portal System, it is possible to create a User Account. During registration, the following data are required:

SCOPE OF DATA PROCESSED	PURPOSE OF PROCESSING	LEGAL BASIS OF PROCESSING	RETENTION PERIOD
Your name, e-mail address, password provided during registration. In the case of registration with a Google account: your e-mail address.	Creation of a personal User Account enabling the use of convenience services provided by VEB (e.g. one-time provision of billing address, storage of tickets and cards, saving Events as favourites, modifying newsletter subscriptions, etc.).	Your consent pursuant to Article 6(1)(a) GDPR.	The data provided shall be processed by VEB until you delete your User Account.

Persons authorised to access the data: employees of the Controller engaged in the operation of the TMS.

Processor: Measureland Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság (registered seat: 1125 Budapest, Béla király út 13., Building A, Staircase B, Ground Floor 2., Hungary; Company Registration No.: 01-09-349947; Tax No.: 27110281-2-43; hereinafter: “**Measureland Kft.**”), involved in the development and operation of the TMS.

2. Data provided in the course of using the User Account

Through the use of the User Account, you may register for Events organised by VEB or its partners, save them as favourites, purchase tickets sold by VEB or its partner institutions, as well as purchase a Veszprém Card or a Veszprém-Balaton Pass. In doing so, you are able to view and download your tickets, cards, and invoices. Within your User Account, you may also amend your newsletter subscriptions. The following data processing activities take place when using the User Account:

SCOPE OF DATA PROCESSED	PURPOSE OF PROCESSING	LEGAL BASIS OF PROCESSING	RETENTION PERIOD
Details of the Events you have registered for, as well as tickets, cards purchased, and vouchers.	To provide an overview of the Events you have registered for and to facilitate entry to Events.	Your consent pursuant to Article 6(1)(a) GDPR.	The data provided shall be processed by VEB until you delete your User Account.
Details of Events you have marked as favourites and/or added to your calendar.	To send notifications and reminders concerning the relevant Event in the form of push messages.	Your consent pursuant to Article 6(1)(a) GDPR.	The data provided shall be processed by VEB until you delete your User Account or unsubscribe from push messages.



Persons authorised to access the data: employees of the Controller engaged in the operation of the TMS.

Processor: Measureland Kft., involved in the development and operation of the TMS.

3. Newsletter

Through the HelloVEB Portal System and within your User Account, you may subscribe to newsletters issued by VEB and its partners. If you subscribe, VEB and/or its partners may send you newsletters at such frequency as they determine.

SCOPE OF PROCESSED DATA	PURPOSE OF DATA PROCESSING	LEGAL BASIS OF PROCESSING	RETENTION PERIOD
Your e-mail address, name	Sending e-mail newsletters to interested parties.	The processing is based on your consent, pursuant to Article 6(1)(a) GDPR.	Until you withdraw your consent to the receipt of newsletters. You may unsubscribe from the newsletter either within your User Account or by clicking on the unsubscribe link provided in the newsletter.

Persons authorised to access the data: employees of the Controller engaged in the operation of the TMS and marketing.

Processors:

- Measureland Kft., involved in the development and operation of the TMS.
- MailerLite Limited (registered office: 88 Harcourt Street, Dublin 2, D02 DK18, Ireland), providing the newsletter delivery service and the related system for VEB.

Further controllers with access to the personal data processed under this section: the partners of VEB whose newsletters you have subscribed to. Please note that the newsletter communications of VEB's partners are subject to the privacy notice of the relevant partner, which is displayed upon subscription in the HelloVEB Portal System. VEB assumes no responsibility whatsoever for the processing activities carried out by its partners.

4. Ticket Sales Service

Through the HelloVEB Portal System and the User Account, it is possible to purchase tickets for Events organised by VEB or its partner institutions. Ticket sales are performed by VEB.

The ticket sales service may also be used as a guest user, i.e. without creating a User Account.



SCOPE OF PROCESSED DATA	PURPOSE OF DATA PROCESSING	LEGAL BASIS OF DATA PROCESSING	RETENTION PERIOD
Purchases made with a User Account			
Your name, e-mail address, password, username, transaction number, customer code, transaction date	Provision of ticket sales service, fulfilment of the order, processing of purchase and payment through the use of a payment service provider, documentation of payment, and sending of notifications relating to the ordered service (e.g. changes to performance or time).	Performance of a contract, pursuant to Article 6(1)(b) GDPR, and VEB's legitimate interest in enforcing contractual claims, pursuant to Article 6(1)(f) GDPR.	Data will be retained until you delete your User Account.
Your e-mail address, transaction ID	Sending a push notification regarding tickets placed in the Cart but not paid for.	VEB's legitimate interest in the preparation of a contract, pursuant to Article 6(1)(f) GDPR.	Until the push notification has been sent.
Surname, forename, billing address provided for invoice issuance, transaction number, date and time, invoice content, tax number (if provided), e-mail address	Issuance of accounting records relating to purchase transactions and retention thereof within the statutory retention periods.	Compliance with VEB's legal obligations, pursuant to Article 6(1)(c) GDPR (Accounting Act).	8 years following the purchase, or for such period as required under the applicable tax and accounting legislation.
Fact of admission to Events – Upon admission to Events, tickets are scanned and your QR code is validated by the system, with this fact recorded on the backend server.	Verification of ticket usage, serving as a basis for settlement between VEB and its partners.	VEB's legitimate interest, pursuant to Article 6(1)(f) GDPR, to enable settlement with its partners and the enforcement of potential related claims.	5 years following settlement with partners.
Purchases made as a guest User			
Your e-mail address, transaction number, customer code, transaction date	Provision of ticketing service, fulfilment of the order, processing of purchase and payment through the use of a payment service provider, documentation of payment, and sending of notifications relating to the ordered	Performance of a contract, pursuant to Article 6(1)(b) GDPR, and VEB's legitimate interest in enforcing contractual claims,	5 years from the conclusion of the contract.



	service (e.g. changes to performance or time).	pursuant to Article 6(1)(f) GDPR.	
Surname, forename, billing address provided for invoice issuance, transaction number, date and time, invoice content, tax number (if provided), e-mail address	Issuance of accounting records relating to purchase transactions and retention thereof within the statutory retention periods.	Compliance with VEB's legal obligations, pursuant to Article 6(1)(c) GDPR (Accounting Act).	8 years following the purchase, or for such period as required under the applicable tax and accounting legislation.
Fact of admission to Events – Upon admission to Events, tickets are scanned and your QR code is validated by the system, with this fact recorded on the backend server.	Verification of ticket usage, serving as a basis for settlement between VEB and its partners.	VEB's legitimate interest, pursuant to Article 6(1)(f) GDPR, to enable settlement with its partners and the enforcement of potential related claims.	5 years following settlement with partners.

Persons authorised to access the data: employees of the Controller engaged in the operation of the TMS and invoicing.

Processors:

- Qilaq Solutions Kft. (registered seat: 8623 Balatonföldvár, Móricz Zsigmond utca 26. B. ép., Hungary; Company Registration No.: 14-09-304941; Tax No.: 12819771-2-14), operating the ticketing module of the TMS.
- KBOSS.hu Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság (registered seat: 1031 Budapest, Záhony utca 7., Hungary; Company Registration No.: 01-09-30320; Tax No.: 13421739-2-41), providing the technical invoicing infrastructure (/szamlazz.hu/).

Sub-processors:

1. OTP Mobil Szolgáltató Korlátolt Felelősségű Társaság (registered seat: 1143 Budapest, Hungária körút 17–19., Hungary; Company Registration No.: 01-09-174466; Tax No.: 24386106-2-42).
 2. PayPal (Europe) S.à r.l. et Cie, S.C.A. (registered seat: 22–24 Boulevard Royal, L-2449 Luxembourg).
- 5. Data processing in connection with the Veszprém Card application**



Through the Veszprém Card website, which forms part of the HelloVEB Portal System, as well as within your User Account, you may apply for and purchase a Veszprém Card, the seller of which is VEB (“**Online Card Application**”).

Additionally, the Veszprém Card may be applied for in person at Veszprém Card Authorised Sales Partners (“**In-Person Card Application**”).

SCOPE OF PROCESSED DATA	PURPOSE OF DATA PROCESSING	LEGAL BASIS OF PROCESSING	RETENTION PERIOD
Your surname, forename, date of birth, address, card number the address card	To enable the application and purchase of the Veszprém Card and fulfil the order.	Performance of a contract, pursuant to Article 6(1)(b) GDPR, and VEB’s legitimate interest in enforcing contractual claims, pursuant to Article 6(1)(f) GDPR.	Data will be retained until you delete your User Account.
Proof of eligibility provided during application, i.e., a copy of the address page of your address card	Verification of eligibility conditions necessary for Veszprém Card application.	Performance of a contract, pursuant to Article 6(1)(b) GDPR, and VEB’s legitimate interest in enforcing contractual claims, pursuant to Article 6(1)(f) GDPR.	Data will be deleted following confirmation of approval of the Veszprém Card application.
Surname, forename, billing address provided for invoice issuance, transaction number, date and time, invoice content, tax number (if provided), e-mail address	Issuance of accounting records relating to the purchase transaction and retention thereof within the statutory retention period.	Compliance with VEB’s legal obligations, pursuant to Article 6(1)(c) GDPR (Accounting Act).	8 years from the date of purchase, or for such period as required under applicable tax and accounting legislation.
Details of services redeemed using the Veszprém Card at participating venues, including the name of the venue, date, and service name, based on QR code scanning	Verification of entitlement to services available through the Veszprém Card	Performance of a contract, pursuant to Article 6(1)(b) GDPR, and VEB’s legitimate interest in enforcing contractual claims, pursuant to Article 6(1)(f) GDPR.	Data will be retained until you delete your User Account.



Persons authorised to access the data: employees of the Controller engaged in TMS operation, approval of card applications, card sales, and invoicing.

Processors:

- Measureland Kft., involved in the development and operation of the TMS.
- Veszprém Card Authorised Sales Partner participating in the sale: Veszprémi Turisztikai Nonprofit Kft. – Tourinform Office (registered seat: 8200 Veszprém, Óváros tér 2., Hungary; Company Registration No.: 19-09-511185; Tax No.: 14636950-2-19). Further information regarding processors is available on the Veszprém Card website: www.veszpremkartya.hu
- KBOSS.hu Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság (registered seat: 1031 Budapest, Záhony utca 7., Hungary; Company Registration No.: 01-09-30320; Tax No.: 13421739-2-41), providing the technical invoicing infrastructure (/szamlazz.hu/).

Sub-processor:

OTP Mobil Szolgáltató Korlátolt Felelősségű Társaság (registered office: 1143 Budapest, Hungária körút 17–19., Hungary; Company Registration No.: 01-09-174466; Tax No.: 24386106-2-42).

6. Data Processing in Connection with the Purchase of the Veszprém-Balaton Pass

Through the Veszprém-Balaton Pass website, which forms part of the HelloVEB Portal System, as well as within your User Account, you may purchase a Veszprém-Balaton Pass, the seller of which is VEB (“**Online Card Purchase**”).

Additionally, the Veszprém-Balaton Pass may be purchased in person at Veszprém-Balaton Pass Authorised Sales Partners (“**In-Person Card Purchase**”).

SCOPE OF PROCESSED DATA	PURPOSE OF DATA PROCESSING	LEGAL BASIS OF PROCESSING	RETENTION PERIOD
Your name, e-mail address, password, username, transaction number, customer code, transaction date, Veszprém-Balaton Pass number, validity period, activation date	Provision of the Veszprém-Balaton Pass purchase service, fulfilment of the order, execution of payment using a payment service provider, documentation of payment, and sending notifications related to the purchased service.	Performance of a contract, pursuant to Article 6(1)(b) GDPR, and VEB’s legitimate interest in enforcing contractual claims, pursuant to Article 6(1)(f) GDPR	Data will be retained until you delete your User Account.
Name of the Veszprém-Balaton Pass holder	Verification of eligibility to use the Veszprém-Balaton Pass	Performance of a contract, pursuant to Article 6(1)(b) GDPR, and VEB’s legitimate interest in enforcing	5 years following the expiry of the card’s validity period



		contractual claims, pursuant to Article 6(1)(f) GDPR	
Veszprém-Balaton Pass number, validity period, activation date, list of services used with the Veszprém-Balaton Pass.	Settlement of the Veszprém-Balaton Pass usage between VEB and the Veszprém-Balaton Pass acceptance partner.	VEB's legitimate interest in ensuring proper financial settlement with acceptance partners.	5 years following the expiry of the Veszprém-Balaton Pass' validity period.
Surname and forename, billing address provided for invoice issuance, transaction number, date and time, invoice content, tax number (if provided), e-mail address	Issuance and retention of accounting records related to the purchase transaction within statutory retention periods.	Compliance with VEB's legal obligations, pursuant to Article 6(1)(c) GDPR (Accounting Act)	8 years from the date of purchase, or for such period as required under applicable tax and accounting legislation.

Persons authorised to access the data: employees of the Controller engaged in TMS operation, Veszprém-Balaton Pass sales, and invoicing.

Processors:

- Measureland Kft., involved in the development and operation of the TMS.
- Veszprém-Balaton Pass Authorised Sales Partners involved in the sale.
- Veszprém-Balaton Pass Acceptance Partners involved in the acceptance of the Veszprém-Balaton pass. Further information regarding processors is available on the Veszprém-Balaton Pass website: <https://veszprembalatonpass.hu/>
- KBOSS.hu Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság (registered seat: 1031 Budapest, Záhony utca 7., Hungary; Company Registration No.: 01-09-30320; Tax No.: 13421739-2-41), providing the technical invoicing infrastructure (/szamlazz.hu/).

Sub-processor:

OTP Mobil Szolgáltató Korlátolt Felelősségű Társaság (registered office: 1143 Budapest, Hungária körút 17–19., Hungary; Company Registration No.: 01-09-174466; Tax No.: 24386106-2-42).

7. Recordings

VEB hereby informs that, in connection with participation in certain Events organised by VEB, image and/or audio recordings of Data Subjects may be made for the data processing purposes set out below. In such cases, the following processing shall apply:



SCOPE OF PROCESSED DATA	PURPOSE OF DATA PROCESSING	LEGAL BASIS OF DATA PROCESSING	RETENTION PERIOD
Image and/or audio recordings of Data Subjects (“Recordings”)	Promotion of the Event and of events created as part of the legacy of the programme series of “Veszprém – European Capital of Culture 2023”, in particular, but not exclusively, through highlights or promotional and informational videos using the Recordings, publication on VEB’s YouTube channel, Facebook page, LinkedIn page, event-specific websites, and VEB’s own website, for the general public, as well as for applications, campaigns, and other forums suitable for promotion, and for transmission to VEB’s media partners for public dissemination	Freely given, explicit consent of the Data Subject, pursuant to Article 6(1)(a) GDPR	3 (three) years from the date of the Event, or until the withdrawal of consent, if earlier

Persons authorised to access the data: employees of VEB responsible for Event organisation and marketing may access the Recordings prior to publication.

Data Processor:

VEB may engage third parties as data processors to achieve the purpose of using the Recordings. Such third parties only perform tasks necessary for the data processing purpose related to visual material; they do not themselves process or record personal data, but only use it under VEB’s instructions (e.g., video creation, editing, cutting). Promotional materials made from the Recordings may be published on VEB’s YouTube channel, Facebook page, LinkedIn page, VEB’s website, and other forums used for promotion of the Events.

Please note that if the Event for which you purchased a ticket or card is not organised by VEB, the respective Event organiser may also make recordings. In such cases, the data processing policy of the relevant Event organiser shall apply. VEB assumes no liability for any damages arising in connection with such recordings, and therefore you are advised to familiarise yourself with the data processing policies published by the relevant Event organiser before attending the Event.

III. Other Information

For any data processing activities not covered by this Privacy Notice, you will be informed at the time your data is collected.

You are hereby informed that VEB may be contacted by courts, the public prosecutor, investigative authorities, administrative authorities, the National Authority for Data Protection and Freedom of Information (“NAIH”), or other bodies authorised by law for the purpose of providing information, disclosing, transferring data, or making documents available. VEB will only disclose personal data to the



extent and in the scope necessary to achieve the purpose of the request, provided that such disclosure is legally required.

VEB does not verify the accuracy of the personal data you provide; you are responsible for ensuring their correctness. Please ensure that your User Account login credentials are securely maintained and used exclusively by you. Accordingly, any liability arising from use of the registered email address shall rest solely with the user who registered that email address. If you provide personal data of another person, it is your responsibility to obtain the relevant individual's consent.

Persons authorised to access personal data include VEB employees or contractors, as well as the Data Processors identified for specific processing activities.

IV. Data Subject Rights in Relation to This Data Processing

1.1. Right of Access

Under Article 15 GDPR, you have the right to request at any time confirmation as to whether your personal data is being processed by the Data Controllers and, if so, to obtain information regarding: the purposes of processing, the recipients or categories of recipients to whom the personal data has been or will be disclosed, the source of the data (if not collected from you), retention periods, any rights related to data processing, and, where applicable, safeguards for transfer to a third country or international organisation.

When exercising your right of access, you are also entitled to request a copy of your data subject to the following:

- The right to obtain a copy shall not adversely affect the rights and freedoms of others.
- If a Recording has been made, and other data subjects are identifiable, VEB may take technical measures (e.g., image editing, blurring, or distortion) to protect the rights of third parties.
- If your request is manifestly excessive or unfounded, VEB may charge a reasonable fee or refuse to act on the request pursuant to Article 12(5)(a) and (b) GDPR.

1.2. Right to Rectification

Pursuant to Article 16 GDPR, the Data Controller shall rectify or complete your personal data upon your request.

1.3. Right to Erasure (“Right to be Forgotten”)

Under Article 17 GDPR, you may request the deletion of your personal data, which shall be erased without undue delay if:

- The data is no longer necessary for the purposes for which it was collected or processed, or the processing is unlawful;
- You withdraw consent and there is no other legal basis for processing;
- In relation to Recordings, if you exercise your right to object and there is no overriding legitimate reason for the processing.



Data shall not be deleted where processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation under Union or Member State law applicable to the Data Controller;
- c) for the establishment, exercise, or defence of legal claims.

1.4. Right to Restrict Processing

Under Article 18 GDPR, you may request restriction of processing where:

- The processing is unlawful, and you oppose deletion, requesting restriction instead;
- The Data Controller no longer needs the personal data for the processing purpose, but you require it for the establishment, exercise, or defence of legal claims.

1.5. Right to Data Portability

Under Article 20 GDPR, you have the right to receive your personal data provided to the Data Controller and to have that data transmitted directly to another Data Controller, where the processing is based on your consent.

1.6. Right to Object

Under Article 21 GDPR, where processing is based on the Data Controller's or a third party's legitimate interests (Article 6(1)(f) GDPR), you have the right to object. The Data Controller is not obliged to comply if it demonstrates compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or if the processing is necessary for the establishment, exercise, or defence of legal claims.

1.7. Right to Lodge a Complaint / Judicial Remedies

If you consider that the processing of your personal data by the Data Controller infringes applicable data protection laws, including the GDPR, you have the right to lodge a complaint with the competent supervisory authority. In Hungary, this is the National Authority for Data Protection and Freedom of Information ("NAIH"). Contact details:

- Website: <http://naih.hu>
- Postal Address: 1363 Budapest, Pf.: 9
- Address: 1055 Budapest, Falk Miksa utca 9-11
- Telephone: +36 (1) 391-1400
- Email: ugyfelszolgalat@naih.hu

In addition, you may seek remedies through the courts pursuant to the GDPR and the Act on the Right of Informational Self-Determination and Freedom of Information ("Info Act"), in particular Chapters III and VIII of the GDPR and Section 23 of the Info Act.



1.8. Response to Data Subject Requests

Should you wish to exercise any of your rights, or have questions or comments, please contact VEB using the contact details set out in Section I. of this Notice. VEB will ensure that any requests related to data processing are responded to without undue delay, and in any event within 30 days. VEB will take the necessary measures to ensure the proper exercise of your rights with other Data Controllers where processing is carried out jointly.