

Annex 4:

PRIVACY NOTICE

This Privacy Notice (hereinafter: the '**Notice**') relates to the data processing activities of the HFDA Hungarian Fashion & Design Agency Nonprofit Private Limited Company (hereinafter: the '**Company**' or the '**Sponsor**' or the '**Data Controller**') and contains all relevant information concerning the processing of personal data. Its purpose is to ensure that the data subject (hereinafter: the 'Data Subject') is fully informed about the purpose and conditions of data processing, the related risks and safeguards, as well as the rights to which the Data Subject is entitled, prior to providing any personal data.

360 Design Budapest is an innovative event in the domestic and regional design scene, showcasing the contemporary object culture of Hungary. As part of the 360 Design Budapest programme series, the Company provides domestic and regional product designers and applied and fine artists with the opportunity to exhibit their works, as well as gain visibility through the Company's digital channels. The provision of personal data in the course of submitting the application (hereinafter the '**Application**') is necessary for the performance of a contract to which the Data Subject is a party, or in order to take steps at the request of the Data Subject prior to entering into such contract.

Submitting an application requires providing the necessary personal data to the Data Controller. When submitting the application, the Data Subject has the option to subscribe to our newsletter. In this case, we kindly ask for their explicit consent to process the subscription. By providing their personal data and subscribing, the Data Subject declares that they have read and expressly accepted the version of this Privacy Notice in force at the time the data or information was provided, and they consent to the processing of their data.

Our Company stores the personal data provided by the Data Subject on servers operated by the Data Controller or the Data Processor.

By providing this privacy notice, our Company aims to comply with the 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 referred to as: the Regulation), as well as the provisions of Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter referred to as: Info Act). Our Company aims to ensure that all information relating to the processing of personal data is provided to the Data Subject in a concise, transparent, intelligible, and easily accessible form, using clear and plain language, and to facilitate the exercise of the Data Subject's rights. The terms used in this Notice correspond to the definitions and interpretations set forth in the Info Act and the GDPR.

1. DATA CONTROLLER AND CONTACT DETAILS

- 1.1. **Name of the data controller:** HFDA HUNGARIAN FASHION & DESIGN AGENCY NONPROFIT PRIVATE LIMITED COMPANY
- 1.2. **Company registration number:** 01-10-049808
- 1.3. **Tax number:** 26338972-2-43
- 1.4. **Registered office:** 1126 Budapest, Istenehyi út 18.
- 1.5. **Represented by:** Zsófia Jakab, CEO

1.6. **Central email address:** info@hfda.hu

1.7. **Central phone number:** +36 20 272 2351

2. **NAME AND CONTACT INFORMATION OF THE DATA PROTECTION OFFICER:**

2.1. **Name of the data protection officer:** Takács, Kiss és Társai Law Firm

2.2. **Registered office:** 1054 Budapest, Szabadság tér 7, Bank Center Office Building, Citi Tower, 6th Floor

2.3. **Email address:** dpo@tkpartners.hu

3. **INFORMATION RELATED TO DATA PROCESSING**

3.1. **Scope of personal data processed:**

For the purpose outlined above, the Data Controller processes the following personal data provided during the completion of the application form for the 360 Design Budapest exhibition call for product designers and applied and fine artists, which will be held between 9–19 October 2025 (hereinafter referred to as the '**Call**')

- The Data Subject's (the applicant, or the authorised representative of the selected applicant if they are a sole proprietor or a business entity) name, registered office, place of business, branch office, and postal address;
- The Data Subject's phone number, email address, and website address;
- The Data Subject's date of establishment, registry number or company registration number, tax number;
- The name, position, phone number, and email address of the person authorised to represent the Data Subject;
- The name, phone number, and email address of the Data Subject's contact person;
- The name and category of the creation produced by the Data Subject.

3.2. **Purpose of data processing:**

The Data Controller processes certain personal data of the Data Subjects for the purpose of successfully managing the application and selection process, general communication related to this, as well as for the purpose of entering into a cooperation agreement with the selected applicants. The necessary data is transferred to the participating organisations and other third parties for the purposes of cooperation. The Data Controller keeps the Data Subject's data for the purpose of providing the opportunity for newsletter subscription, based on explicit consent, in the case of subscribing to the newsletter.

3.3. **Legal basis for data processing:**

If the given Data Subject registers for the event on their own behalf, the legal basis for data processing is the preparation for the conclusion of the agreement (hereinafter: '**Agreement**') aimed at ensuring participation in the 360 Design Budapest exhibition, as well as the performance of the Agreement [GDPR Article 6(1)(b)].

The personal data provided by the Data Subject to the Data Controller by completing the application form will be processed by the Data Controller as necessary for the preparation and performance of the Agreement.

Given that without the provision of the above personal data, the Data Controller cannot prepare, conclude, or perform the Agreement, the Data Subject is obligated to provide the personal data necessary for achieving the above purposes to the Data Controller. In the case of failure to provide the data, the Data Controller is entitled to refuse to conclude the agreement with the Data Subject or to refuse to perform the Agreement.

The legal basis for the above data processing is the preparation for the conclusion of the Agreement and the performance of the Agreement.

3.4. Duration of data processing:

The duration of the above data processing is the same as the period until the announcement of the results specified in the Call, followed by the duration of the preparation and conclusion of the Agreement, and the duration specified in the Agreement.

In the case of Applicants who were not selected during the call or in the event of the termination of the Agreement, the Data Controller will retain the personal data mentioned in this point for the purpose, legal basis, and duration specified in point 3.3.

The personal data of the selected applicants will be retained by the Data Controller for 10 years following the expiration of the agreement with them, in order to ensure the proof of all legally significant circumstances by the Data Controller. The Data Controller will retain the data of applicants who were not selected for 1 year following the completion of the selection process. The Data Controller will handle personal data used in connection with newsletter subscription until the withdrawal of consent.

4. RECIPIENTS OF PERSONAL DATA OR CATEGORIES OF RECIPIENTS:

The personal data provided by the Data Subject may be accessed by employees directly under the control of the Data Controller and Data Processor for the purpose of fulfilling their job duties. These employees will handle the data confidentially and in accordance with applicable legal requirements, as well as internal rules and procedures, both at the Data Controller and Data Processor.

By transferring the personal data to the recipients mentioned above, or by making it accessible to them, the Data Controller does not transfer the Data Subject's personal data to any third country outside the European Economic Area.

The Data Controller does not transfer the personal data to any recipient other than the one mentioned above, unless the data transfer is required by law, an authority, or a court order.

5. RIGHTS OF THE DATA SUBJECT

The rights of the Data Subject in relation to data processing are as follows:

5.1. Right to transparent information:

The Data Subject has the right to receive information about the facts and details of data processing before the processing begins. We have created this Privacy Notice to ensure this right.

5.2. Right of access by the data subject:

The Data Subject has the right to obtain confirmation from the Data Controller as to whether or not personal data concerning them is being processed, and, where that is the case, access to the following information:

- the personal data being processed and the categories of personal data;
- the purposes of the processing;

- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- information regarding the Data Subject's right to request the Data Controller to correct, delete, or restrict the processing of their personal data, and to object to the processing of such personal data;
- the right to lodge a complaint with the Data Protection Authority, in accordance with section 5.11 of the Privacy Notice;

Upon the Data Subject's request, the Data Controller shall provide a copy of the personal data subject to processing.

In the event that the Data Subject requests multiple copies of the above-mentioned information or the previous copy, the Data Controller is entitled to charge a fee that is proportionate and reasonable, based on the administrative costs of producing the additional copies.

If the Data Subject's right of access under this section adversely affects the rights and freedoms of others, particularly the business secrets or intellectual property of others, the Data Controller is entitled to refuse to fulfil the Data Subject's request to the extent necessary and proportionate.

Before fulfilling the request, the Data Controller may ask the Data Subject to clarify the content of the request and to specify the requested information or data processing activities.

5.3. Right to rectification:

Upon the Data Subject's request, the Data Controller shall promptly correct or supplement any inaccurate or incomplete personal data relating to the Data Subject. Before rectifying any incorrect data, the Data Controller may verify the accuracy and truthfulness of the data provided.

After fulfilling the Data Subject's request to exercise their right to rectification, the Data Controller shall promptly inform those individuals with whom the Data Subject's personal data has been shared, provided that this is not impossible or does not require disproportionate effort on the part of the Data Controller.

5.4. Right to withdraw consent:

Where processing is based on the Data Subject's consent, they have the right to withdraw that consent at any time. Such withdrawal shall not affect the lawfulness of processing based on consent before its withdrawal.

The Data Subject may withdraw their consent to data processing at any time by notifying the Data Controller in an informal manner or by using the unsubscribe link provided in the newsletter.

5.5. The right to erasure ('right to be forgotten'):

The Data Subject is entitled to request the deletion of their personal data without undue delay in the following cases:

- The personal data is no longer necessary for the purposes for which it was collected or otherwise processed by the Data Controller;
- The Data Subject withdraws their consent, provided that there is no other legal basis for the data processing carried out by the Data Controller;
- The Data Subject objects to the data processing under section 5.8 of the Privacy Notice, and there is no overriding legitimate reason for the processing;

- The Data Controller has unlawfully processed the Data Subject's personal data; or
- The personal data must be deleted by the Data Controller in order to comply with a legal obligation imposed by Hungarian or European Union law.

After fulfilling the Data Subject's request to exercise their right to deletion, the Data Controller shall promptly inform those individuals with whom the Data Subject's personal data has been shared, provided that this is not impossible or does not require disproportionate effort on the part of the Data Controller.

The Data Controller is not required to delete personal data if the processing is necessary for the establishment, exercise, or defence of legal claims.

In the case of data processing based on a legal obligation, the Data Subject is not entitled to this right.

5.6. Right to restriction of processing (right to blocking):

The Data Subject has the right to request that the Data Controller restrict the processing of their personal data in the following cases:

- If the Data Subject contests the accuracy of the personal data, processing shall be restricted for a period enabling the Data Controller to verify the accuracy of the data;
- If the processing is unlawful and the Data Subject opposes the erasure of the data and instead requests the restriction of its use;
- If the Data Controller no longer needs the personal data for the purposes of processing, but the Data Subject requires it for the establishment, exercise, or defence of legal claims;
- If the Data Subject has objected to the processing, in which case processing shall be restricted pending the verification of whether the Data Controller's legitimate grounds override those of the Data Subject.

5.7. Right to data portability:

The Data Subject has the right to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used and machine-readable format. Furthermore, the Data Subject has the right to transmit this data to another data controller without hindrance from the Data Controller to which the personal data was originally provided. This right shall apply where:

- the processing is based on the Data Subject's consent, or on the consent given for the processing of special categories of personal data for one or more specific purposes, or on a contract pursuant to Article 6(1)(b) of the GDPR;
- the processing is carried out by automated means.

If technically feasible, the Data Controller will, upon the Data Subject's request, transfer the personal data directly to another data controller specified by the Data Subject in their request. The right to data portability under this section does not create an obligation for data controllers to implement or maintain technically compatible data management systems with each other.

If the Data Subject's right to data portability adversely affects the rights and freedoms of others, particularly the business secrets or intellectual property of others, the Data Controller is entitled to refuse to fulfil the Data Subject's request to the extent necessary.

5.8. Right to object:

The Data Subject has the right to object at any time to the processing of their personal data for reasons related to their particular situation, if the 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 Data Controller, or if the

processing is necessary for the legitimate interests pursued by the Data Controller or a third party, including profiling.

In such a case, the Data Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the Data Subject or for the establishment, exercise, or defence of legal claims.

If the Data Controller cannot demonstrate that the data processing is justified by compelling legitimate grounds, the Data Controller must cease processing the personal data and is required to delete it.

5.9. Automated decision-making in individual cases, including profiling:

The Data Subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them. The Data Controllers do not use automated decision-making.

5.10. Notification of the data subject in case of a data breach:

If a data protection incident is likely to result in a high risk to the Data Subject's data, rights, and freedoms, the data controllers will inform the Data Subject of the incident without undue delay.

5.11. Right to lodge a complaint with a supervisory authority:

If the Data Subject has a grievance regarding the processing of their personal data, it is advisable to contact the Data Controller prior to submitting a formal complaint, in order to facilitate a quicker and more efficient resolution of the matter.

The Data Subject has the right to lodge a complaint with a supervisory authority if they believe that the processing of their personal data infringes data protection laws.

Supervisory authority:

Name: National Authority for Data Protection and Freedom of Information (hereinafter: '**NAIH**')

Registered office: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, PO Box 9

Phone: +36 (30) 683-5969, +36 (30) 549-6838, +36 (1) 391-1400

Fax: +36 (1) 391-1410

Official electronic portal: Short name: NAIH, KR ID: 429616918

E-mail: ugyfelszolgalat@naih.hu

5.12. Right to an effective judicial remedy against a supervisory authority:

The Data Subject shall have the right to seek judicial remedy against a final decision issued by NAIH.

5.13. Right to an effective judicial remedy against the data controller or data processor:

The Data Subject shall have the right to an effective judicial remedy by initiating civil proceedings, without prejudice to the right to lodge a complaint, if they consider that their rights have been infringed as a result of the improper processing of their personal data.

The lawsuit may be initiated at the choice of the Data Subject, before the court of their place of residence or habitual residence (the contact details of the courts can be found at the following link: <http://birosag.hu/torvenyszekek>).

6. DATA SECURITY MEASURES

The Company undertakes to ensure the security of personal data and implements the necessary technical and organisational measures, as well as establishes the procedural rules required to protect the recorded, stored, and processed data. These measures are aimed at preventing the destruction, unauthorised use, and unauthorised alteration of personal data.

The Data Controller ensures that unauthorised persons do not have access to, cannot disclose, transmit, modify, or delete the processed data. The Data Controller takes all reasonable measures to prevent the accidental damage or destruction of the data. This obligation extends to all employees involved in data processing and to the Data Processor acting on behalf of the Data Controller.

The Company ensures appropriate data backups for IT data and the technical environment of its website. These backups are operated in accordance with the parameters determined by the respective data retention periods, guaranteeing availability during the retention period and ensuring that data are permanently deleted upon expiry.

The integrity and operability of the IT systems and data storage environment are monitored using advanced techniques, and the necessary capacities are continually maintained.

Events occurring in the IT environment are logged using comprehensive logging functionalities, thereby enabling the subsequent investigation of potential incidents and providing legally valid proof if necessary.

The Company operates a continuously high-bandwidth, redundant network environment to support its websites, which securely distributes the load across available resources.

The Company ensures the disaster resilience of its systems through planned measures and provides for business continuity and, thereby, continuous user service at a high level using both organisational and technical tools.

It places high priority on the controlled installation of security patches and manufacturer updates that ensure the integrity of its IT systems, thus preventing, avoiding, and addressing attempts to exploit vulnerabilities for unauthorised access or damage.

The IT environment is regularly subjected to security testing. Any identified errors or vulnerabilities are corrected, and the continual strengthening of IT security is treated as an ongoing responsibility.

Strict security expectations, including confidentiality obligations, are established for employees, and their compliance is supported through regular training. In its internal operations, the Company strives to maintain planned and controlled processes.

Any incidents affecting personal data, whether detected internally or reported to the Company, are investigated transparently, responsibly, and rigorously within 72 hours. All such incidents are appropriately managed and recorded.

In the development of its services and IT solutions, the Company ensures compliance with the principle of data protection by design, treating data protection as a key requirement from the planning stage onwards.

7. HANDLING AND REPORTING OF DATA PROTECTION INCIDENTS

A data protection incident shall be deemed to mean any event concerning personal data processed, transferred, stored or otherwise handled by the Data Controller which results in the unlawful processing of such personal data. This includes, in particular, unauthorised or accidental access, alteration, disclosure, deletion, loss or destruction, as well as accidental destruction or damage. The persons responsible for data protection shall immediately investigate any reported or detected data protection incident. Within 72 hours of becoming aware of the incident, they shall propose measures for its elimination and for managing its consequences.

The Data Controller guarantees that all data processing is carried out in full compliance with the applicable legal provisions.

Should the conditions of data processing change, the Company shall inform the Data Subjects of such changes.

This Notice is effective as of April 11, 2025.