

BSI Sport Kft.'s privacy policy

Introduction

BSI Sport Kft. informs the participants of its races and the people creating an account on its registration system about its data processing practices and the legal remedies of users. BSI Sport Kft. as data controller complying with the requirements laid down in Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: Privacy Act) commits itself to provide data processing services which are in line with the legal requirements mentioned above and other requirements laid down in the legislation in force.

Data of data controller:

Name: BSI Sport Kft.

Registered office: 1138 Budapest, Váci út 152-156.

Postal address: 1554 Budapest, Pf. 7.

Company registration number: 01-09-729245

Tax number: 13320360-2-41

Email address: nevezes@futanet.hu, info@futanet.hu

Telephone: (1) 220-8211, (20) 965-1966

Fax: (1) 273-0936

Website: www.futanet.hu, nevezes.futanet.hu

Data controller registration number: 01389-0001

Legal basis of data processing

According to Section 5 (1) of the Privacy Act, the legal basis for processing personal data is the consent of the data subject. When you register for our events, subscribe to newsletters, training programmes, 'Spuri' running magazine or you create an account through our online registration system, you give your consent that the data detailed below may be processed.

Apart from asking for your consent to data processing in general, we ask you to give your special consent to receive emails and text messages for marketing purposes. This consent can be withdrawn any time, regardless of other data. We have no grounds to refuse your participation in the events due to the withdrawal of such data.

Registering another competitor

Our experience shows that our customers require the opportunity to register their friends, family members or colleagues for our events. This simplified registration makes the life of runners and BSI Sport Kft easier as well. When registering a team, the team leader has to register the team members

as well, as team members can only register together and we cannot expect the physical presence of all the members of the team.

Thus BSI Sport Kft. provides the opportunity for its customers to register others for its events as well. In this case we assume and expect that our customer who is registering the others would have the consent of the people concerned about processing their data in connection with registration. It is usually not required to have a written consent to process personal data, consequently we do not want to overburden our customers with bureaucratic procedures, either.

Purposes and duration of data processing

General purposes of data processing of BSI Sport Kft.

- to identify and keep records of our customers and record registrations
- to organize our events
- to inform our customers and do our promotional activities
- to carry out financial accounting
- to compile statistics and analyses
- to identify those people who are entitled to special registration offers and match these special offers and customers
- to contact a family member given by the customer in case of medical problems in our events
- to improve the quality of our services and prepare new events

Customers in our database can register for our events any time in the future, so we should be able to identify them for an unlimited period of time. We might also need to be able to get access to the data for an unlimited period of time to provide special registration offers (eg. the person has already entered an event organized by BSI), to keep records of race series (eg. Club of Jubilee Runners) and for promotional purposes (to find those people who have entered a race the most times) Taking into the account the purpose limitation principle, we will store personal data of our customers in our database until the withdrawal of consent of our customers, that is to say we will only delete them on special request.

Details about our marketing activities

Within the framework of marketing activities, BSI Sport Kft.

- carries out statistical analyses in order to improve its services and identify the offers that might appeal to its customers
- forms target groups from its customers, who might be interested in certain services or offers, or who it should target with its offers
- sends newsletters and advertisements via emails
- sends advertisements via text messages (we hardly ever use it, sending emails is our most important tool of direct marketing)
- can use the photographs and videos made about the participants of its events (each time you register for an event, you have to give your special consent to it, and you cannot register for an event without it, as we might not be able to identify the people in the pictures in all cases.

Data transfer to other countries

BSI Sport Kft does not transfer any personal data to other countries.

Scope of data processed

The scope of the data we process and the purposes of data processing will be specified below. It is important to highlight that BSI Sport Kft. does not keep records of any special data about its customers. We only keep records of data given by our customers, and of values calculated from them (membership of the Club of Jubilee Runners, eligibility for the Spuri Golden Card) We also keep records of race results (eg. net time, place, distance covered) and other data in connection with organizing races (race bib pick-up, confirmation of registration).

We keep records of data of financial transactions (date, amount of money, currency, amount of money paid, transaction ID in case of online registration). In our online registration system paying by payment cards is through the safe, 3-partner online payment system of OTP, where our customers give the data directly to the bank, so BSI Sport Kft is not in possession of any data about payment cards, and we do not process such data.

There is a special group of our customers, who have subscribed to our newsletters or online training plans, but they have not created an account on our registration system and they do not register for events. We only store their names and email addresses which they provided when creating an account.

Data processing partners

Developer and operator of our online registration system: VNM Zrt.

Its address: 2040 Budaörs, Gyár u. 2.

Its website:: www.voipnetwork.hu

Contact details:: <http://www.voipnetwork.hu/kapcsolat/elerhetosegek>

VNM Zrt provides normal server hosting, that is to say it ensures the operation and security of the online registration server, but it does not process the data stored in our system further (eg. for its own purposes). The supplier logs the usual data for security reasons (the title of the visited page, the date of visit, the IP address of the visitor)

Most of our events are chip timed. Our timing partners are given the personal and registration data of the participants of the given event. They will either add the race times measured and the places calculated from them and give them back to us, or upload the lists of results to www.futanet.hu themselves. Our timing partners process the data only for purposes determined by BSI.

You can find the timing partner of each event in the event information on our website: www.futanet.hu: Our partners most of the times are:

- AGNI-TECH Informatikai Kereskedelmi és Szolgáltató Kft. (www.agni-timing.hu, [sportido\[kukac\]agni.hu](mailto:sportido[kukac]agni.hu), (1) 236-3011)
- Evochip Hungary Sportszolgáltató Kft. (3232, Gyöngyös-Mátrafüred, Hegyalja u. 24/a, <http://www.evochip.hu/>, info@evochip.hu, (20) 335-2880)
- We might contract with other timing companies for some events.

In some of our events there is a possibility to have your medal engraved, which is done by an external partner. Engravers are given some data from the list of results made public (name, bib number, chip time) to make engraving faster and smooth.

Postage is done by Benyó Kft. (2040 Budaörs, Ady Endre u. 51., (23) 422-610) to subscribers of Spuri Running Magazine.

We do not give the personal data of our customers to any other company which is not listed above.

Start lists and lists of results

In most of our events we publish a start list and a list of results about the participants to enhance the purity and transparency of sports events just as it is done in other races in the world. The start list includes the following data about the competitor: name, date of birth, residence (only the name of the municipality), citizenship, gender, sports club, and age group in the given event. On this basis, everyone will see who they will compete with. The list of results might also include – apart from the data of the start list – chip and gun times, split times, distances covered, place (overall and category), as well as whether the participant was disqualified, did not finish or was given a time penalty.

By registering for the events, our customers give their consent to the publication of their data in the start lists and the lists of results.

Neither start lists, nor lists of results are made in our fitness events.

Sending emails and text messages

We send an email to all of our customers

- when they have created an account on the online registration system successfully
- when they have registered for an event successfully (confirmation letter) – except when they have registered in person
- when they have asked to have their password modified
- to send them information about our events
- after timed events (a letter informing you about the results)
- for the purpose of administration and data validation

We send a text message

- when you have won the Spuri Golden Card (virtual golden card)
- to inform you about your time after you have passed the finish line in some of our events
- in case of exceptional occurrences, if competitors cannot be informed about them in any other way (eg. an event has to be cancelled because of a heavy storm at the last minute)

The messages mentioned above form part of our services, we send them regardless of your consent to receiving letters for promotional purposes.

We only send you emails and text messages for promotional purposes if you have given your consent to receiving them. This consent can be withdrawn any time, for example you can unsubscribe by clicking on the button at the bottom of our newsletters, or in a separate email.

People who are authorized to have access to data

Personal data given by our customers can be accessed only by those employees who do tasks in connection with registration, as well as those ones who analyze, aggregate, assess data and those people who are responsible for informing our customers before and after the events. The people mentioned above include the following:

- people who register entrants and record data
- system operator, operator of our database
- financial workers
- people who do the marketing

The location of our data processing servers

The location of data processing of BSI Sport Kft is the office of BSI. (1138 Bp. Váci út 152-156.) This is where our main database server is located.

Our websites are hosted by a server of T-Systems located in II. Adatpark (1087 Budapest, Asztalos Sándor u. 13.)

Our online registration server is located in the server room of BIX. (1132 Budapest, Victor Hugo u. 18-22.).

Data generated when visiting websites

Just as all other web servers on the internet, our web servers automatically store certain data when our websites are visited, which can be considered personal data. When visiting www.futanet.hu, nevezes.futanet.hu, runinbudapest.com, entry.budapestmarathon.com and others of our websites, servers usually store the normal data to repair breakdowns, improve services and find out about break-in attempts

- date of visit
- URL address of the webpage visited
- referring site (where the visitor arrived from)
- IP address of the visitor
- The user agent of the visitor, which includes the type and version of your operating system and your browser.

Data stored about competitors/customers

We use the data listed below to identify competitors (eg. to differentiate between two competitors with similar names), to keep in touch, to provide services (eg. to send information about races), to organize races (eg. giving out bib numbers, placing competitors in corrals, forming categories, determining results in categories, checking registration, solving problems), for financial aggregations and for marketing purposes listed above. Data which are not necessary when creating an account or registering for an event, are marked 'not mandatory'.

On the one hand, we need the size of your T-shirt to be able to order the appropriate T-shirts for a certain event. On the other hand, if we can provide a T-shirt in the same event in the future, we will be able to estimate how many of each size we would need. That is to say, if we ask you to give the size of your T-shirt for a registration for a certain event, it does not necessarily mean that we can

give you a T-shirt in that event – only if the event information says that the registration fee includes a T-shirt as well.

Basic data:

- your registration number in the database (runner registration number), which is the same as the number of your Spuri Golden Card (it used to be called loyalty runner registration number – generated automatically)
- full name, title
- date of birth
- permanent address/postal address
- citizenship
- phone number
- email address
- qualifications (not mandatory, we use it for statistical and marketing purposes)
- occupation (not mandatory, we use it for statistical and marketing purposes)
- running shoes and sports watches brands (not mandatory, we use it for statistical and marketing purposes)
- sports club (if there is one – not mandatory – it appears on the start list and the list of results)
- number of your own timing chip (if there is one – not mandatory)
- whether you would like to receive newsletters, emails about our next events, opportunities
- data about your subscription to Spuri Running Magazine (issues, subscription fee, method and date of payment)
- last used billing address and name (generated automatically if you ask for an invoice through our online registration system – for the convenience of our customers – you do not have to type it in every time you log in)
- in case of non-Hungarian citizens: whether they would like to receive newsletters in Hungarian instead of English (for the convenience of Hungarians living abroad)
- whether you are a member of a target group which is eligible for a discount on registration (eg. owners of Spuri Golden Card)
- your results, bib numbers, eligibility for awards in race series (Club of Jubilee Runners, Half Marathon Mania,) – these are calculated from the data given by the participant, and the results measured in events

additional data recorded about people registering through our online registration system:

- online ID
- user name
- encrypted password
- the last date of modifying your password (it is necessary for the operation of the program and troubleshooting)
- transaction ID in case of paying online with a payment card, which is necessary for financial control and problem solving

data connected to the events:

- your goal and chip time in the event (or the distance covered if it is a timed race, category, place and split times in some cases)
- registration fee paid, type of discount, payment method, date
- bib number pick-up, registration confirmation, date of deferral
- size of T-shirt
- name of company (if a company finances the registration of the participant or if he/she enters a corporate running event)
- whether the entrant is a student (for statistical purposes, or to check someone's eligibility)

- name to be written on the bib (not mandatory, only if the runner requests it and only in certain races)
- whether they are entering the race for the first time (not mandatory, for statistical and marketing purposes as well as to provide a special bib for participants entering the race for the first time)
- whether you have entered the National Championships – based on the start list given to us by the Hungarian Athletics Association (to compile the list of results of the National Championships)
- name and address of a relative to be contacted in the case of an accident (not mandatory – in the interest of the competitor and their family)
- other remarks about administration (eg. deferring your registration, clarifying a problematic payment, transferring registration to someone else etc.)

Deleting your data

Our customers can ask us any time to delete their personal data from our database under the law. If you have already registered for an event, you have to retrieve from the competition at the same time. You have to unsubscribe to 'Spuri' as well, since we do not know who we should send the magazine to.

Even if the data subject has withdrawn his consent, under Section 6 (5) of the Privacy Act we will be able to store the data where this is necessary for compliance with a legal obligation pertaining to the controller or for the purposes of legitimate interests pursued by the controller or by a third party.

Our legal obligations include complying with audits, for which we need the payment data stored in the database. Our legitimate interest is to save the integrity of the database. That is why for technical reasons (due to the structure of databases) we cannot delete data which is closely linked to other data (eg. external key) It is our legal obligation, and at the same time it is our legitimate interest and obligation to third parties to save the backups so as to be able to restore the database if it has been damaged. Data from the backups cannot be deleted, only from the production server. Only the system administrator can have access to the backups, and we only use them in case of malfunctioning to restore the system. It is our legitimate interest to be able to get statistical data from our database so that the number and statistical composition of entrants will remain the same. It is the legitimate interest of third parties that we should be able to track who registered them for the event concerned. (If you have registered someone, then that person might have problems if we cannot clarify the details of registration). If a team member asks us to have his/her data deleted, we do not want to delete the registration and results of the whole team.

Consequently, we can only delete the data of those customers who have never registered for any of our events, have not subscribed for Spuri Running Magazine, have not bought any products and services from us, that is to say they have only created an account. The data of those people who registered in person, or transferred the registration fee, that is to say there is no important data about them in our online registration system, can be deleted from the online registration system – however, the necessary data will remain in our main database. Apart from that, we delete their name, their address, the name of their club, the name of the person who 'should be contacted in case of an accident', the name of their company if it is given, their last used billing name and address, or any other data recorded which is not necessary to save the integrity of our database.

If you have already had your data deleted, you can register for our events again in the future, but we cannot take into consideration your previous registrations. As a result, you can lose the benefits of

paying a reduced registration fee if 'you have already entered an event organized by BSI', or you will not be entitled to a membership of the Club of Jubilee Runners, or your previous results will not be taken into consideration in Half Marathon Mania, corporate running events, Spuri Golden Card and you will not be eligible for further fee reductions. If your company participated in any of our corporate running events in the given year, it can be disadvantaged when their results are calculated.

Legal remedies

If you think your rights to the protection of your personal data have been violated by BSI Sport Kft. or any of its employees, please contact BSI Sport Kft. using any of our contact details so that we can solve the problem as soon as possible.

Our contact details can be found at the beginning of this document.

If you assume that BSI Sport Kft has not taken the necessary steps to solve your problem, you can go to court, or you can contact the Hungarian National Authority for Data Protection and Freedom of Information

Hungarian National Authority for Data Protection and Freedom of Information

Postal address: 1534 Budapest Pf.:834

Address: 1125 Budapest Szilágyi Erzsébet fasor 22/C.

Telephone: 06-1/391-1400

Fax: 36-1/391-1410

Email address: ugyfelszolgalat@naih.hu

Website: www.naih.hu

President: Dr. Péterfalvi Attila

Clause of BSI Sport Kft.

The data controller reserves the right to modify its privacy policy when it is necessary. It will be done if the scope of our services is increasing, the technical system is changing, or it is required by law. However, it will not mean using your personal data for other purposes other than the intended initial purpose.