

PRIVACY NOTICE

Lumiere Hall Kft. / Vincent Hall

Effective from 31 August 2026

1. Data Controller and Scope

The controller of personal data processed in connection with Vincent Hall and its websites is Lumiere Hall Kft. (tax number: 32382877-2-41; hereinafter: the “Controller”). The Controller operates Vincent Hall and the related ticketing and visitor services.

Controller details	Information
Legal name	Lumiere Hall Kft.
Registered / postal address	1052 Budapest, Piarista köz 1., Hungary
E-mail	budapest@vincenthall.nl
Additional contact e-mail	go@vincenthall.nl
Telephone	+36 70 703 1373

This Privacy Notice applies to personal data processed through Vincent Hall websites, online and on-site ticket sales, visitor communications, complaints, gift vouchers, newsletters, social media pages, embedded website services and related business operations.

Personal data are processed in accordance with Regulation (EU) 2016/679 (the “GDPR”), Act CXII of 2011 on Informational Self-Determination and Freedom of Information (“Infotv.”), and other applicable Hungarian and EU legislation.

2. Processing Operations

2.1. Ticket purchase, payment, invoicing and admission

The Controller processes personal data as necessary to sell and deliver tickets, process payments, issue invoices, communicate purchase confirmations, administer ticket changes where offered, verify eligibility for ticket categories or discounts, and ensure admission to the Exhibition.

Purpose	Data categories	Legal basis	Retention
Ticket purchase and delivery	Name where required; e-mail address; ticket type, quantity, price, date; order and transaction identifiers; related correspondence	GDPR Art. 6(1)(b) – performance of a contract	Generally 5 years after performance of the contract where required for the establishment, exercise or defence of legal claims, unless a shorter or longer mandatory period applies.
Payment processing	Payment status, amount, transaction identifier and limited payment metadata. Full payment-card credentials are processed by the external payment service provider and are not stored by the Controller unless expressly stated otherwise.	GDPR Art. 6(1)(b) – performance of a contract	For the period necessary to complete and document the transaction and thereafter as required for accounting or legal claims.
Invoicing and accounting	Customer name and billing address; invoice data; for business customers, company name and tax number where required	GDPR Art. 6(1)(c) – legal obligation, including applicable Hungarian VAT and accounting rules	Accounting records and supporting documents are retained for at least 8 years as required by Hungarian accounting law.

Purchase confirmation and mandatory electronic-commerce communications	E-mail address; order details	GDPR Art. 6(1)(c) and, where applicable, Art. 6(1)(b)	For the period required by applicable law and/or for contractual claims.
Discount / eligibility administration	Ticket category and fact of eligibility (for example student or pensioner status), promo code, guided-tour information where applicable	GDPR Art. 6(1)(b) – performance of a contract	Only as long as necessary for the purchase/admission and related claims, unless retention is required by law.
Ticket change or customer service related to an order	Ticket details, e-mail address, correspondence and any data voluntarily supplied in the request	GDPR Art. 6(1)(b) and/or Art. 6(1)(f) – contract performance and legitimate interest in customer service and business continuity	Generally up to 5 years from the last relevant interaction where needed for legal claims.

The source of the above data is normally the Ticket Buyer or the person contacting us. Where information is mandatory for the conclusion or performance of a contract, failure to provide it may prevent us from completing the purchase, issuing the ticket or invoice, or providing the requested service.

2.2. Gift vouchers

Gift vouchers are generally not personalised and are delivered electronically to the e-mail address provided by the purchaser. To the extent personal data are processed in connection with a voucher purchase, the ticketing and payment rules described above apply accordingly.

2.3. Contact, enquiries, complaints and data-subject requests

When you contact us by e-mail, telephone, post, social media or another available communication channel, we process the information needed to communicate with you and handle your enquiry, complaint or request. This may include your name, contact details, social-media identifier, order or ticket information and any other personal data you voluntarily provide.

The legal basis is GDPR Art. 6(1)(f) (our legitimate interest in handling communications, customer service and business continuity), GDPR Art. 6(1)(b) where the communication concerns a contract, or GDPR Art. 6(1)(c) where processing is necessary to comply with a legal obligation, including handling data-subject requests or statutory complaints.

Correspondence is retained only for as long as necessary for the relevant purpose and, where it may be relevant to legal claims, generally for up to 5 years from the last substantive contact, unless a different statutory retention period applies.

2.4. Newsletters and direct marketing

If you subscribe to a newsletter or other electronic marketing communication, we process the contact information provided for the purpose of sending Vincent Hall news, offers and information. Depending on the subscription form, this may include your name, e-mail address, subscription timestamp and technical evidence of consent such as the IP address used at subscription.

The legal basis is your consent under GDPR Art. 6(1)(a). Electronic direct marketing to natural persons is also subject to the prior, clear and explicit consent requirements of Section 6 of Act XLVIII of 2008 on Business Advertising Activity.

You may withdraw your consent at any time, free of charge and without giving reasons, using the unsubscribe link in the message or by contacting us. Withdrawal does not affect the lawfulness of processing carried out before withdrawal. We may retain limited evidence of the consent and withdrawal where necessary to demonstrate legal compliance.

2.5. Website use, cookies and similar technologies

When you use our websites, certain technical data may be processed automatically, such as IP address, device and browser information, timestamps, page requests, security logs and cookie identifiers. Strictly necessary technologies may be used where required for website operation, security, session management, ticket checkout or remembering privacy choices.

Non-essential cookies or similar technologies used for analytics, advertising, social-media integration or personalisation are used only where the applicable legal requirements are met, including obtaining consent where consent is required. Users must be able to refuse non-essential cookies as easily as they can accept them and to change or withdraw their choices later.

The specific cookies and similar technologies in use, their providers, purposes and storage periods should be presented in the website's cookie settings or cookie notice and kept up to date as the website configuration changes.

2.6. Social media pages

Vincent Hall maintains profiles on social-media platforms including Facebook, Instagram, TikTok and YouTube. When you visit or interact with these pages, the platform provider processes personal data under its own privacy terms. Depending on the platform and feature, Lumiere Hall Kft. may act as an independent controller or, for certain analytics functions, as a joint controller with the platform provider.

For Facebook and Instagram Page Insights, Meta Platforms Ireland Limited and the Controller may act as joint controllers for the collection and transmission of data used to generate aggregated insights. Meta's applicable controller addendum and privacy information govern the allocation of responsibilities between the parties.

The Controller processes visible interactions (such as comments, messages, reactions and shares) and aggregated statistics for communication, moderation, audience understanding and management of its social-media presence. The legal basis is GDPR Art. 6(1)(f), namely the Controller's legitimate interest in operating and promoting its services, subject to the rights and interests of users.

Platform privacy information is available from the respective providers, including Meta (Facebook/Instagram), TikTok and Google/YouTube. Users may also exercise rights directly with the relevant platform for processing carried out by that platform.

2.7. Embedded services, including Google Maps

The website may embed or link to third-party services such as Google Maps. Use of such services may result in the transfer of technical information such as IP address, device information and, where enabled by the user, location or account-related information to the relevant provider. Where an embedded service is non-essential and requires consent under applicable cookie or communications rules, it should not be activated before the required consent is obtained.

Google services are provided in the EEA primarily by Google Ireland Limited. Google may process data under its own privacy policy and may transfer data internationally subject to the safeguards described in its privacy documentation.

3. Recipients, Processors and Internal Access

Personal data are accessible only to employees and contractors who need access for their assigned tasks and are subject to confidentiality obligations. The Controller applies role-based access and the principle of data minimisation.

The Controller may use service providers acting as processors or independent controllers, depending on their role. Relevant categories may include:

- website hosting and IT infrastructure providers;
- web development and technical support providers;
- e-mail and business communication providers;
- ticketing, payment and fraud-prevention providers;
- invoicing and accounting providers;
- newsletter and customer-communication providers;
- analytics, consent-management and website-security providers where used;
- social-media and embedded-content providers; and
- professional advisers and public authorities where disclosure is required by law.

Where a service provider acts as a processor, the Controller uses contractual arrangements meeting the requirements of GDPR Article 28. Where a recipient acts as an independent controller, that recipient is responsible for its own processing under applicable data-protection law.

4. International Transfers

Some service providers may process personal data outside the European Economic Area. International transfers are not based merely on a general reference to consent or legitimate interests. A transfer must have a lawful transfer mechanism under Chapter V GDPR.

Where personal data are transferred to a third country, the Controller relies, as applicable, on an adequacy decision of the European Commission (including the EU-U.S. Data Privacy Framework where the relevant U.S. recipient is certified), Standard Contractual Clauses adopted by the European Commission, Binding Corporate Rules, or another lawful safeguard or derogation permitted by the GDPR. Where required, the Controller assesses whether supplementary measures are necessary to ensure an essentially equivalent level of protection.

Information on the applicable transfer mechanism and, where relevant, how to obtain a copy of the safeguards may be requested from the Controller using the contact details above.

5. Data Security

The Controller implements appropriate technical and organisational measures proportionate to the risks of the processing, including access controls, confidentiality obligations, secure systems and communications, data minimisation, backup and recovery measures where appropriate, and procedures for handling security incidents. No method of electronic transmission or storage can be guaranteed to be completely risk-free.

6. Rights of Data Subjects

Subject to the conditions and limitations set out in the GDPR, you may exercise the following rights in relation to your personal data:

- right of access (GDPR Article 15);
- right to rectification (Article 16);
- right to erasure / “right to be forgotten” (Article 17);
- right to restriction of processing (Article 18);
- right to be informed of certain rectification, erasure or restriction actions communicated to recipients (Article 19);
- right to data portability where the legal requirements are met (Article 20);
- right to object to processing based on legitimate interests (Article 21);
- rights concerning automated individual decision-making, including profiling (Article 22); and
- right to withdraw consent at any time where processing is based on consent.

6.1. Access and rectification

You may ask whether we process personal data concerning you and, where we do, request access to the data and the information required by GDPR Article 15. You may also request correction of inaccurate personal data and completion of incomplete data.

6.2. Erasure and restriction

You may request erasure where one of the grounds in GDPR Article 17 applies. Erasure is not absolute; we may retain data where processing is necessary, for example, to comply with a legal obligation or for the establishment, exercise or defence of legal claims. You may request restriction of processing in the circumstances specified in GDPR Article 18.

6.3. Data portability

Where processing is based on consent or contract and is carried out by automated means, you may request the personal data you provided to us in a structured, commonly used and machine-readable format and, where technically feasible and legally applicable, request transmission to another controller.

6.4. Right to object

Where processing is based on GDPR Art. 6(1)(f), you may object at any time on grounds relating to your particular situation. We will stop the processing unless we demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims. If personal data are processed for direct marketing, you may object at any time and the data will no longer be processed for that purpose.

6.5. Automated decision-making

The Controller does not currently make decisions based solely on automated processing, including profiling, that produce legal effects concerning you or similarly significantly affect you. If this changes, the Privacy Notice will be updated and the information required by GDPR Articles 13 and 22 will be provided.

6.6. Exercising your rights and response time

Requests may be sent using the Controller’s contact details above. We may request additional information only where we have reasonable doubts about the identity of the requester and only to the extent necessary to confirm identity.

We respond without undue delay and in any event within one month of receiving a request. Where necessary due to the complexity or number of requests, this period may be extended by up to two further months; in that case, we will inform you within one month of receipt and explain the reasons for the delay.

Exercising data-subject rights is generally free of charge. Where a request is manifestly unfounded or excessive, in particular because of its repetitive character, the Controller may charge a reasonable fee reflecting administrative costs or may refuse to act, as permitted by GDPR Article 12(5).

6.7. Rights after the death of a data subject under Hungarian law

To the extent provided by the Hungarian Infotv., certain rights relating to the personal data of a deceased person may be exercised within five years of death by a person authorised by the data subject in a declaration made to the Controller. In the absence of such a declaration, a close relative may exercise the rights expressly provided by the Infotv., subject to appropriate proof of death, identity and status.

7. Complaints, Supervisory Authority and Judicial Remedies

If you have a question, complaint or request concerning the processing of your personal data, we encourage you to contact us first at budapest@vincenthall.nl or go@vincenthall.nl, by telephone at +36 70 703 1373, or by post at 1052 Budapest, Piarista köz 1., Hungary.

You also have the right to lodge a complaint with the competent supervisory authority. In Hungary, the supervisory authority is:

Supervisory Authority	Contact details
The National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság – NAIH)	Address: 1055 Budapest, Falk Miksa utca 9-11, Hungary Mailing address: 1363 Budapest, Pf. 9., Hungary E-mail: ugyfelszolgalat@naih.hu Telephone: +36 (1) 391 1400 Website: https://www.naih.hu/

You may also lodge a complaint with another competent supervisory authority in the European Union where the GDPR permits, and you may seek judicial remedies before the competent courts. These remedies are without prejudice to any other administrative or judicial remedy available under applicable law.

8. Changes to this Privacy Notice

The Controller may update this Privacy Notice to reflect changes in its processing activities, service providers, technologies or applicable law. The current version will be made available on the relevant Website. Where a change materially affects the way personal data are processed, the Controller will provide additional notice where required by law.