

DATA PROCESSING POLICY

I. Purpose of the Policy

The purpose of this Policy is to set out the data protection and processing principles used by StormBell Pictures Kft./Banner Productions Hungary Kft./VoiceCreek Entertainment Kft. (hereinafter referred to as: Data Controller) as the operator of the website at bannercasting.hu, and the data protection and processing policy of the Data Controller, which is recognized by the Data Controller as binding on it.

When developing these rules, the Data Controller took into consideration especially the provisions of national laws, in particular Act No. CXII of 2011 on the Right of Informational Self-Determination and the Freedom of Information ("Info Act"), and Regulation (EU) 2016/679 of the EUROPEAN PARLIAMENT AND OF THE COUNCIL (GDPR).

This data processing policy can be downloaded here.

The purpose of data processing: the provision of a casting service, distinguishing clients from each other, the performance, execution of the contract concluded by and between the data controller and the client, the provision of the service undertaken in the contract, the certification of obligations and rights arising from the contract, the enforcement, collection of any claims arising from the contract, statistical analysis, the construction of analytical models, maintaining contact, monitoring the use of services.

II. Details of the Data Controller

Name: StormBell Pictures Kft., registered office: 1026 Budapest, Endrődi Sándor utca 15/a, Telephone: +3617924620, e-mail: banner@bannercasting.hu, company reg. No./court: Company Registry Court of the Budapest-Capital Regional Court: 01-09-965121, tax No.: 23426319-2-41.

Name: Banner Productions Hungary Kft., registered office: 1026 Budapest, Endrődi Sándor utca 15/a, Telephone: +3617924620, e-mail: banner@bannercasting.hu, company reg. No./court: Company Registry Court of the Budapest-Capital Regional Court: 01-09-194131, tax No.: 25003677-2-41.

Name: VoiceCreek Entertainment Kft., registered office: 1026 Budapest, Endrődi Sándor utca 15/a, Telephone: +3617924620, e-mail: banner@bannercasting.hu, company reg. No./court: Company Registry Court of the Budapest-Capital Regional Court: 01-09-347966, tax No.: 27073968-2-41.

The Data Controller shall delete all e-mails received by it, together with the name, e-mail address of the sender, the date and time data and other personal data included in the message, within five years from the receipt of the data.

The Data Controller reserves the right to change this policy at any time. Any change shall become effective upon publication on the website. After the amendment of the Data Processing Policy, all Data Subjects shall be informed in an appropriate manner (in the online application form and/or by e-mail).

III. Definition of terms

1. "personal data": means 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;

2. "data processing": means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, 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;
3. "restriction of data processing": means the marking of stored personal data with the aim of limiting their processing in the future;
4. "Data Controller": means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the Data Controller or the specific criteria for its nomination may be provided for by Union or Member State law;
5. "data processor": means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Data Controller;
6. "consent of the Data Subject": means any freely given, specific, informed and unambiguous indication of the wishes of the Data Subject by which he/she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him/her;

IV. Legal basis for data processing

The legal basis for data processing is on the one hand the freely given consent of the Data Subject (hereinafter referred to as: Data Subject) (subpar. a) of par. (1) of Article 6 of the GDPR), given by the Data Subject during registration or subscription to the newsletter by making a free statement on accepting this Policy based on appropriate information, and on the other hand the contract concluded by and between the Data Controller and the Data Subject (subpar. b. of par. (1) of Article 6 of the GDPR).

V. The scope of processed personal data

1. The Data Controller uses so called cookies on its website. These are text files allowing the Data Controller to provide maximum comfort to users visiting the website of the Data Controller. These cookies are stored temporarily on the computer of the Data Subject and are forwarded to the server of the Data Controller only when the website is visited. The Data Subject can view and delete the cookies stored on his/her computer, and can keep their use under control through the settings of his/her browser. Further information on this is available under the Help menu of individual browsers. For the proper operation of the website the Data Subject needs to allow the use of cookies in his/her browser.

The purpose of data processing: the identification of the Data Subjects, distinguishing them from each other, the provision of a casting service.

The legal basis for data processing: the consent of the Data Subject (subpar. a) of par. (1) of Article 6 of the GDPR)

The scope of processed data: as listed in section V/2.

The possible consequences of failure to provide data: inability to fully use the services of the website, inaccuracy of analytical measurements.

2. For registration, for subscription to the newsletter, and for being included in the database, the Data Subject needs to provide the following data:

The scope of processed data:

- a) identifier (Banner ID)
- b) Name: surname, given name(s)
- c) Birth name
- d) e-mail address
- e) Telephone number
- f) place of birth (country, town)
- g) date of birth
- h) permanent address
- i) actual address
- j) mother's name
- k) tax number
- l) Social Security number
- m) appearance
 - height
 - weight
 - breast
 - waist
 - hip
 - dress
 - shoe
 - shirt neck
 - hat size
 - eye colour
 - hair colour
 - use of eyeglasses
- n) languages spoken
- o) instrumental skills
- p) sports
- r) dancing skills
- s) works he/she is interested in
 - film
 - advertisement
 - walk-on parts
 - swimsuit scene
 - semi-nude
 - nude
- t) other information:
 - name of Agent
 - tattoo
 - piercing
 - scar/surgical scar
 - identical twin
 - other provided information
- u) photos of the Data Subject

The purpose of data processing: allowing the provision of the service of the Data Controller, the sending of newsletters (requires a separate consent)

The Company uses the data listed in Section V. /2 for the followings:

- a. registration on the website
- b. performance of the contract concluded by and between the Data Controller and the Data Subject
- c. sending newsletters, data reconciliation letters
- d. casting for roles, walk-on parts, casting activity

The duration of the data processing: 5 years from receiving the personal data, or until the deletion thereof is requested by the Data Subject

The processing of these data is technically essential for the provision of the service of the Data Controller, or for sending the newsletters. With a separate explicit consent of the Data Subject to this effect, the Data Controller uses the personal data for the purpose of sending direct mail, offers (newsletters) to the Data Subject as well, in accordance with the provisions of Act No. XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities. The Data Subject may request to be deleted from the newsletter database at any time by using the link included in the newsletter, or by sending a message to the office@bannercasting.hu e-mail address of the Data Controller. The Data Subject may request the deletion of his/her registration, personal data, or to unsubscribe from the newsletter exclusively in writing, in the manner described above.

The Data Subject provides his/her personal data during registration or subscription to the newsletter, and the Data Controller processes them from that time until the deletion of the registration, or until he/she unsubscribes from the newsletters. The deletion of data, or unsubscription may be requested by the Data Subject at any time in accordance with this Policy.

3. The Data Controller shall not be entitled to use the personal data for a purpose other than those described herein. Personal data shall not be transferred to any third party or authority - unless required otherwise by this Policy or by law - without the prior explicit consent of the Data Subject.

4. The Data Controller does not verify the personal data provided to it. The person providing the data shall be solely responsible for the correctness thereof. When providing an e-mail address, the Data Subject also assumes responsibility for ensuring that from that e-mail address only he/she will use the service. In view of this assumption of responsibility, all responsibilities associated with login with the provided e-mail address shall be borne exclusively by the Data Subject who registered the e-mail address.

VI. Data transfer

1. By accepting this data protection policy, the Data Subject gives his/her explicit consent to the transfer of his/her data listed in Section VI. /2 by the Data Controller to third parties in connection with its casting activity.

2. In addition to the above, the Data Controller shall have the right and obligation to transfer to the competent authorities all such personal data available to it and stored by it lawfully, the

transfer of which is required by law or a final authority order. The Data Controller shall not be held responsible for such data transfer, or for the consequences thereof.

3. The Data Controller, for the purpose of certifying the lawfulness of data transfer and informing the Data Subject, shall maintain a data transfer log showing the date and time of the transfer of personal data processed by it, the legal basis for and the recipient of the data transfer, the description of the scope of the transferred personal data, as well as other information prescribed by the relevant legislation on data processing.

The Data Controller may transfer the data for the registration of the Data Subject; for sending newsletters, and for the purpose according to Section V./1 to the following data processors:

Data Processors:

a.) Web hosting activity:

The servers serving the website of the Data Controller have been relocated to the server centre of RendszerNET Kft. (registered office: 7030 Paks, Vadász utca 39., company reg. No.: 17-09-007852. tax No.: 22638232-2-17, server centre: 1132 Budapest, Victor Hugo utca 11-15.).

The Data Processors shall perform data processing in accordance with the instructions of the Data Controller, they shall not make a substantive decision on data processing, they may process the personal data made available to them only as directed by the Data Controller, they shall not perform data processing for their own purposes, furthermore they shall be obliged to store and retain personal data as directed by the Data Controller. During data processing, data may be accessed by the internal staff of the data processor.

The legal basis for data transfer: the freely given consent of the Data Subject (subpar. a) of par. (1) of Article 6 of the GDPR)

The possible consequences of failure to transfer data: failure by the Data Controller to provide the service

b.) Data transfer associated with the casting activity of the Data Controller:

The legal basis for data transfer: the freely given consent of the Data Subject (subpar. a) of par. (1) of Article 6 of the GDPR), the contract concluded by and between the Data Controller and the Data Subject (subpar. b. of par. (1) of Article 6 of the GDPR)

The possible consequences of failure to transfer data: failure by the Data Controller to provide the service, failure by the Data Subject to make appearances and conclude contracts.

VII. The rights of the Data Subject and their enforcement

The Data Subject may request information on the processing of his/her personal data, and may request the rectification or erasure of his/her personal data - except for data processing required by law -, may withdraw his/her consent, may exercise his/her right to data portability and right to object in the manner indicated when the data is recorded, or at the contact details provided by the Data Controller in Section II.

Right to information

The Data Controller shall take appropriate measures to provide any information referred to in

Articles 13 and 14 of the GDPR and any communication under Articles 15 to 22 and 34 of the GDPR relating to data processing to the Data Subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language, in particular for any information addressed specifically to a child. The information shall be provided in writing, or by other means - including, where appropriate, by electronic means. When requested by the Data Subject, the information may be provided orally, provided that the identity of the Data Subject is proven by other means.

Right of access by the Data Subject

The Data Subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him/her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the data processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the Data Controller rectification or erasure of personal data, or restriction of processing of personal data concerning the Data Subject, or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the Data Subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in paragraphs (1) and (4) of Article 22 of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the Data Subject.

The Data Controller shall provide a copy of the personal data undergoing processing to the Data Subject. For any further copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs. Where the Data Subject makes the request by electronic means, and unless otherwise requested by the Data Subject, the information shall be provided in a commonly used electronic form. The Data Controller shall provide the information in any event within one month of receipt of the request.

Right to rectification

The Data Subject shall have the right to obtain from the Data Controller without undue delay the rectification of inaccurate personal data concerning him/her. Taking into account the purposes of the processing, the Data Subject shall have the right to have incomplete personal data completed - including by means of providing a supplementary statement.

Right to erasure ("right to be forgotten")

(1) The Data Subject shall have the right to obtain from the Data Controller the erasure of personal data concerning him/her without undue delay and the Data Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purpose for which they were

collected or otherwise processed;

b) the Data Subject withdraws consent on which the processing is based, and there is no other legal ground for the processing;

c) the Data Subject objects to the processing, and there are no overriding legitimate grounds for the processing, or the Data Subject objects to the processing;

d) the personal data have been unlawfully processed;

e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Data Controller is subject;

f) the personal data have been collected in relation to the offer of information society services.

(2) Where the Data Controller has made the personal data public and is obliged to erase the personal data, the Data Controller taking account of the available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform Data Controllers which are processing the personal data that the Data Subject has requested the erasure by such Data Controllers of any links to, or copy or replication of, those personal data

(3) Paragraphs (1) and (2) shall not apply to the extent that processing is necessary:

a) for exercising the right of freedom of expression and information;

b) for compliance with a legal obligation which requires processing by Union or Member State law to which the Data Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;

c) for reasons of public interest in the area of public health;

d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to in paragraph (1) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or

e) for the establishment, exercise or defence of legal claims.

Right to restriction of data processing

(1) The Data Subject shall have the right to obtain from the Data Controller restriction of data processing where one of the following applies:

a) the accuracy of the personal data is contested by the Data Subject, for a period enabling the Data Controller to verify the accuracy of the personal data;

b) the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;

c) the Data Controller no longer needs the personal data for the purposes of the data processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims; or

d) the Data Subject has objected to data processing, pending the verification whether the legitimate grounds of the Data Controller override those of the Data Subject.

(2) Where processing has been restricted under paragraph (1), such personal data shall, with the exception of storage, only be processed with the consent of the Data Subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.

Right to data portability

The Data Subject shall have the right to receive the personal data concerning him/her, which he/she has provided to the Data Controller, in a structured, commonly used and machine-readable format, and shall have the right to transmit those data to another Data Controller.

Right to object:

The Data Subject shall have the right to object, on grounds relating to his/her particular situation, at any time to the processing of personal data concerning him/her which 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 for the purposes of the legitimate interests pursued by the Data Controller or by a third party, including profiling based on those provisions. The Data Controller shall no longer process the personal data unless the Data

Controller 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.

Where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to the processing of personal data concerning him/her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where the Data Subject objects to data processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Automated individual decision-making, including profiling:

The Data Subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/her.

The above right shall not apply if the data processing:

- is necessary for the conclusion, or performance, of a contract between the Data Subject and a Data Controller;
- is authorised by Union or Member State law to which the Data Controller is subject and which also lays down suitable measures to safeguard the rights and freedoms and legitimate interests of the Data Subject; or
- is based on the explicit consent of the Data Subject.

Right to withdraw consent:

The Data Subject shall have the right to withdraw his/her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Rules of procedure:

The Data Controller shall provide information on action taken on a request under Articles 15 to 22 to the Data Subject without undue delay and in any event within one month of receipt of

the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Data Controller shall inform the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the Data Subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the Data Subject.

If the Data Controller does not take action on the request of the Data Subject, the Data Controller shall inform the Data Subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The Data Controller shall inform the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the Data Subject makes the request by electronic form means, the information will be provided by electronic means, unless otherwise requested by the Data Subject.

The Data Controller shall provide the requested information and any communication free of charge. Where requests from a Data Subject are manifestly unfounded or excessive - in particular because of their repetitive character -, the Data Controller may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested, or refuse to act on the request.

The Data Controller shall communicate any rectification or erasure of personal data or restriction of data processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Data Controller shall inform the Data Subject about those recipients if the Data Subject requests it.

The Data Controller shall provide a copy of the personal data undergoing processing to the Data Subject. For any further copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs. Where the Data Subject makes the request by electronic means, and unless otherwise requested by the Data Subject, the information will be provided in a commonly used electronic form.

Compensation and restitution:

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the Data Controller or data processor for the damage suffered. A data processor shall be liable for the damage caused by data processing only where it has not complied with obligations of this Regulation specifically directed to data processors or where it has acted outside or contrary to lawful instructions of the Data Controller.

Where more than one Data Controller or data processor, or both a Data Controller and a data processor, are involved in the same data processing and where they are responsible for any damage caused by data processing, each Data Controller or data processor shall be held liable for the entire damage.

A Data Controller or data processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

The Data Subject may request information on data concerning him/her, or request the

rectification, erasure/restriction of processing thereof at the contact details provided by the Data Controller in Section II.

VIII. Data protection principles applied by the Data Controller

1. The Data Controller only processes personal data essential for the use of the services of the Data Controller, on the basis of the consent of the Data Subject, and subject to purpose limitation.

2. The Data Controller undertakes to process the received information in compliance with the provisions of the national and Union law in force, and the data protection principles set forth in this Policy, and not to transfer them to any third party.

An exception to the provision of this paragraph is the data processing specified in Section IV.

3. In certain cases, on official court or police request, in the event of a legal procedure for the infringement of copyright, property or other rights, or the reasonable suspicion thereof, the violation of the interests of the Data Controller, endangering the provision of its services, the Data Controller may disclose the data available on the Data Subject to third parties.

4. The system of the Data Controller may collect data on the activity of the Data Subject, which should not be combined with other data given during registration, or data generated during the use of other websites or services.

5. The Data Controller undertakes the obligation to provide clear, awareness-raising and unambiguous communication to the Data Subjects before collecting, recording and processing any of their data, informing them about the method, purpose and principles of data collection. In addition, in all cases when data collection, processing and recording is not required by law, the Data Controller shall call attention to the fact that consent should be freely given. In the case of mandatory data processing, the law requiring the data processing shall be indicated. The Data Subject shall be informed of the purpose of data processing, and of the Data Controller, and data processor. Information on data processing is also provided by the fact that the law provides for data collection from existing data processing by transfer or combination.

6. In all cases where the Data Controller wishes to use the provided data for a purpose other than for which the data was originally collected, it shall inform the Data Subject thereof, and shall obtain his/her prior explicit consent, and shall provide him/her the opportunity to prohibit the use thereof.

7. During the collection, recording and processing of data, the Data Controller shall comply with the restrictions specified by law in all cases, it shall inform the Data Subject of its activity by electronic mail, as required. The Data Controller undertakes the obligation not to enforce any sanction against a Data Subject who refuses to provide data for non-mandatory processing.

8. The Data Controller undertakes the obligation to implement adequate safeguards and appropriate technical and organizational measures to protect personal data, as well as adequate procedural rules to ensure the protection of collected, stored and processed data, and to prevent them from destruction, unauthorized use and unauthorized alteration. It also undertakes the obligation to call the attention of any third party to whom the data may be transferred to the performance of these obligations.

IX. Control over personal data

1. A request for the alteration of personal data or the erasure of personal data shall be made by an explicit written statement sent in the internal mail system of the service.
2. In addition, certain personal data may be modified by modifying the page containing the personal profile.
3. After the fulfilment of a request for the erasure or alteration of personal data, the former (erased) data can no longer be recovered.

X. Available remedies

Right to judicial remedy:

In the event of any infringement of his/her rights, the Data Subject may turn to court against the Data Controller. The court shall hear such cases in priority proceedings, free of charge.

Proceedings of the authority:

In the event of a complaint about data processing or the infringement of any of his/her rights, the Data Subject may turn to the National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet fasor 22/C).