

PRIVACY NOTICE
on the transfer of personal data to and the making available of personal data
to the
Ministry Responsible for Social Relations and Culture

1. Data controller

Name: Hungarian State Opera

Registered office: 1061 Budapest, Andrássy út 22, Hungary

Postal address: 1373 Budapest, P.O. Box 503, Hungary

Email: info@opera.hu

Website: www.opera.hu

Contact details of the Data Protection Officer:

Email: dpo@opera.hu

Telephone: +36 30 681 0061

2. Background and purpose of the processing

Acting in the exercise of the management powers vested in the governing body, the Minister Responsible for Social Relations and Culture ordered an audit of the Hungarian State Opera (hereinafter: **OPERA**) to assess the lawfulness, professional standards and efficiency of its operations (hereinafter: the **audit**). The Ministry Responsible for Social Relations and Culture (hereinafter: the **Ministry**) is OPERA's governing body. According to the ministerial measure, the purpose of the audit is to enable the governing body to obtain a comprehensive and factual overview of OPERA's financial management and internal operating arrangements.

The audit runs from 30 July 2026 to 31 August 2026 and may be extended once by a further 30 days. Under a separate request for the provision of information issued by the Ministry, OPERA is required to provide the Ministry with employment, contractual, procurement, public procurement, financial, accounting, decision-making and legal documents, statements, deliverables and related correspondence concerning the period from 2022 to 2026.

OPERA is the controller of the personal data covered by this Notice. Under the ministerial measure, OPERA is required to transfer personal data and to provide access to documents and systems. The purpose of the data transfer and the making available of personal data is to enable the Ministry to conduct the audit. To the extent necessary for the audit, the persons carrying it out may inspect OPERA's paper and electronic records and its financial management and administrative systems, and may request copies, further information and explanations.

The purposes of the processing, the data transfer and the making available of personal data are:

- a) to obtain a comprehensive and factual overview of OPERA's financial management and internal operating arrangements and to examine the lawfulness, professional standards and efficiency of its operations;
- b) to examine OPERA's financial management, asset management, existing portfolio of contracts and commitments, financial position and production planning;
- c) to examine employment and other contractual relationships, decisions made by OPERA as an employer and other management decisions, as well as personnel expenditure, benefits, payments and representation expenses;
- d) to examine ongoing and completed procurement, public procurement and IT procurement procedures, as well as consultancy, mandate, expert, intellectual creation and legal or attorney services contracts, performance and deliverables;

- e) to evaluate the operation of internal policies and the internal control system; to review ongoing legal disputes and administrative proceedings related to financial management, as well as previous regulatory and governing-body audits and related measures; and to prepare the audit report and determine any measures that may be necessary.

3. Legal basis for the data transfer and the making available of personal data

The legal basis for transferring and making personal data available is Article 6(1)(c) of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), namely compliance with a legal obligation to which OPERA is subject.

That legal obligation is based on points (e), (h) and (j) of Section 9 of Act CXCV of 2011 on Public Finances (the **Public Finances Act**), points III.3 and IV.1 of Ministerial Measure No. II/33/2026/KÁTIT, and point 5 of Ministerial Instruction No. II/33-1/2026/KÁTIT. As part of the governing body's management powers, the cited provisions of the Public Finances Act provide for:

- a) the examination of the lawfulness, professional standards and efficiency of the activities of a budgetary institution;
- b) the issue of individual instructions to perform a task or remedy an omission;
- c) the processing of data of public interest and data public on grounds of public interest held by the budgetary institution, as well as personal data specified by law that are necessary for the exercise of management powers.

The data subject's consent is not required for the data transfer or for making the data available. Accordingly, consent cannot be withdrawn and there is no right to object to the processing.

4. Recipient of the data transfer and access

Name: Ministry Responsible for Social Relations and Culture

Address: 1055 Budapest, Szemere utca 6, Hungary

Email: info@tkkm.gov.hu

The Ministry processes the personal data transferred or made available to it as an independent data controller when performing its management and audit functions.

The data are transferred electronically to the official contact person designated by the Ministry. The Ministry engages Balázs Ivacs (telephone: +36 30 708 1674) as its data processor to conduct the audit. To the extent necessary for the audit, Balázs Ivacs may inspect OPERA's paper and electronic records and its financial management and administrative systems.

5. Categories of data subjects

This Notice is addressed to OPERA's former employees affected during the period from 2022 to 2026, and to its current and former contractual partners. Where the contractual partner is a legal person or another organisation, this Notice also applies to the natural persons concerned who act as representatives, contact persons, persons certifying performance or contributors.

A separate Privacy Notice on the transfer and making available of personal data is provided internally to OPERA's current employees.

The persons covered by this Notice include in particular:

- a) OPERA's former employees and other persons formerly engaged by OPERA;
- b) natural persons who currently have or previously had a contractual relationship with OPERA;
- c) persons contracting as sole traders;
- d) representatives, contact persons, persons certifying performance and contributors of contractual partners that are legal persons or other organisations;
- e) other natural persons named in records, contracts, invoices, certificates of performance or correspondence covered by the audit.

6. Categories of personal data transferred or made available

Depending on the relationship the person had with OPERA and the audit documents in which the person appears, OPERA may transfer or make available, in particular, the following personal data:

In the case of former employees and other persons formerly engaged by OPERA

- a) name, job title and organisational unit;
- b) the commencement date, end date and duration of the relationship;
- c) data contained in appointment documents, employment contracts, job descriptions and other employment documents;

- d) regular and non-regular salary, wages, supplements, expense reimbursements, bonuses and other benefits;
- e) payments made under the Collective Agreement;
- f) payments relating to specific performances, productions or tasks;
- g) authority to enter into commitments, authorise payments, countersign or certify performance;
- h) signature, position and official contact details appearing on documents;
- i) representation expenses attributable to the person and the grounds for those expenses, as well as data contained in employer or other management decisions, legal disputes, regulatory or governing-body audit records, registers and correspondence relating to the subject matter of the audit.

In the case of contractual partners

- a) the name and contact details of a contractual partner who is a natural person or sole trader, and any other personal data contained in the contract and related documents;
- b) where a contractual partner is a legal person or another organisation, the name, contact details and position of its representative and contact person, and any other personal data contained in the documents;
- c) the subject matter, duration, consideration and other terms of the contract;
- d) data concerning the method and grounds of the procurement or public procurement procedure;
- e) data concerning performance, certification of performance, invoicing and payment;
- f) tax, financial and bank account data;
- g) personal data contained in the deliverables, complete documentation and related correspondence concerning consultancy, mandate, expert, intellectual creation and legal or attorney services contracts;
- h) personal data relating to the data subject that are contained in documents concerning ongoing legal disputes and administrative proceedings connected with financial management;
- i) signature, position, authority to represent and organisational contact details.

The list above sets out possible categories of data. It does not mean that OPERA transfers or makes available every category of data listed in respect of every data subject.

OPERA transfers the documents requested by the Ministry for the audit and the personal data contained in those documents. Within the scope specified in the ministerial measure, OPERA also makes personal data available by permitting access to documents and systems.

7. Sources of personal data

The sources of personal data are:

- a) OPERA's employment and personnel records;
- b) contract and commitment registers;
- c) financial, accounting, payroll and payment records;
- d) procurement, public procurement and IT procurement documentation;
- e) asset management records, internal policies and documents concerning the operation of the internal control system;
- f) contracts, invoices, certificates of performance, deliverables, season and production planning documents, and cost and revenue statements;
- g) documents stored in OPERA's records management system and official correspondence, including documents and related correspondence concerning employer and other management decisions, ongoing legal disputes and administrative proceedings, audits, and legal or attorney services;
- h) data originating from the data subject, the contractual partner or its representative or contact person.

OPERA does not ask the data subject to provide any new data in connection with the transfer or making available of personal data.

8. Retention of data by OPERA

The transfer and making available of personal data do not automatically extend the retention period of the source documents processed by OPERA. OPERA retains the documents until the expiry of the statutory, records-management and data-retention periods applicable to the relevant relationship, processing purpose, document type and accounting obligation.

Under point IV.1 of Ministerial Measure No. II/33/2026/KÁTIT, all relevant documents and electronic data must be preserved intact throughout the audit. During this period, no document or data may be

disposed of or destroyed, or altered in breach of applicable law or internal policies.

OPERA retains documentation of the fact, date and recipient of the data transfer and making available of personal data, as well as the categories of data concerned, for the period specified in its records management policy and retention schedule.

9. Automated decision-making and international data transfers

OPERA does not carry out automated decision-making or profiling in connection with the transfer or making available of personal data.

In the course of this processing, OPERA does not transfer personal data to a third country or an international organisation.

10. Rights of data subjects

The data subject has the right to:

- a) request information about and access to the personal data processed, transferred or made available concerning them;
- b) request the rectification of inaccurate personal data;
- c) request restriction of processing in the cases specified in Article 18 of the GDPR;
- d) request the erasure of data where there is no lawful purpose for the processing or the processing of the data is no longer necessary.

A request for erasure cannot be granted where processing is necessary for compliance with a legal obligation to which OPERA is subject or for the performance of a task carried out in the public interest.

In view of the legal basis for the processing, the data subject does not have the right to data portability or the right to object under Article 21 of the GDPR.

Requests by data subjects may be submitted to OPERA's Data Protection Officer at dpo@opera.hu.

11. Legal remedies

The data subject may lodge a complaint concerning the processing with the Hungarian National Authority for Data Protection and Freedom of Information:

Name: Hungarian National Authority for Data Protection and Freedom of Information

Address: 1055 Budapest, Falk Miksa utca 9-11, Hungary

Postal address: 1363 Budapest, P.O. Box 9, Hungary

Email: ugyfelszolgalat@naih.hu

Website: www.naih.hu

The data subject may also bring proceedings before a court to seek review of the lawfulness of the processing.

Dated: Budapest, [as indicated by the timestamp]

Hungarian State Opera