

Pixel Run — Privacy Policy

Adatvédelmi Tájékoztató

2026-05-08

PIXEL RUN — PRIVACY POLICY

Version: 2.0

Effective: 2026-05-08

Previous version: 2024 v1 (withdrawn 2026-05-08)

Language / binding version: This Privacy Policy is published in Hungarian and English. **The Hungarian version is the only legally binding version.** The English version is provided for information only. In case of any discrepancy, the Hungarian version prevails.

Data Controller

Pixel Run Kft. (hereinafter: “Pixel Run”, the “Controller”, “we”)

Registered office: 1085 Budapest, Salétrom u. 7. IV/2, Hungary

Company registration number: 01-09-421596

Tax number: 32390324-2-42

Registry court: Metropolitan Court of Budapest as Registry Court

E-mail: hello@pixelrun.hu

Phone: +36-30-831-5049

Web: pixelrun.hu

Privacy contact: József Apagyi — hello@pixelrun.hu

Pixel Run is **not required** to designate a Data Protection Officer (DPO) under Article 37 GDPR, as its activities do not involve regular and systematic large-scale monitoring or large-scale processing of special categories of data.

Scope

This Privacy Policy explains how Pixel Run processes your personal data when you contact us, make a reservation, purchase a Pass, gift card or other service, take part in a Pixel Run experience, or visit our websites.

The Policy is drafted in accordance with **Regulation (EU) 2016/679** (GDPR) and the Hungarian **Act CXII of 2011 on Informational Self-Determination and Freedom of Information** (Infotv.).

Related documents

This Policy is to be read together with:

- **General Terms and Conditions (ÁSZF)**;
- **Pass Policy (Bérlet Szabályzat)**;
- **Event Policy (Rendezvény Szabályzat)**;
- **House Rules (Házirend)**;
- **Liability Waiver (Felelősségvállalási Nyilatkozat)**.

All listed documents are available on the Controller's website.

1. Principles

In line with Article 5 GDPR, Pixel Run processes personal data following the principles of:

- **lawfulness, fairness, and transparency**;
 - **purpose limitation** — collected for specified, explicit, legitimate purposes only;
 - **data minimisation** — limited to what is necessary;
 - **accuracy** — kept up-to-date;
 - **storage limitation** — retained only as long as needed;
 - **integrity and confidentiality** — protected by appropriate technical and organisational measures;
 - **accountability** — demonstrably documented.
-

2. Purposes, legal bases, data, retention

2.1. Inquiries and contact

Purpose: Responding to inquiries, quote requests, and other communications; pre-contractual steps.

Legal basis: Art. 6(1)(b) GDPR (steps prior to entering into a contract at the data subject's request) for quote-related inquiries; Art. 6(1)(f) GDPR (legitimate interest in responding) for other inquiries. The legitimate-interest balancing test is available on request.

Data: name, e-mail address, phone number, content of the inquiry.

Retention: **2 years** from the inquiry, unless a contract is concluded — see 2.2 and 2.7.

2.2. LED Reservation (gameplay booking)

Purpose: Performing the booking; sending confirmations, reminders, modification and cancellation notices; on-site identification.

Legal basis: Art. 6(1)(b) GDPR — performance of contract.

Data: first and last name, e-mail address, phone number, booking ID, time, headcount, ticket type, language, any redeemed coupon / gift card / Pass code.

Retention: 5 years from the booking date (general civil-law limitation period under §6:22 of the Hungarian Civil Code), then deleted or anonymised. Invoice-bound data are retained for the period stated in 2.7.

2.3. Pass purchase and redemption

Purpose: Issuing, delivering and redeeming the Pass; tracking the Entries balance; sending low-balance and expiry notices; fraud prevention. See the Pass Policy.

Legal basis: Art. 6(1)(b) GDPR (contract); Art. 6(1)(f) GDPR (legitimate interest in fraud prevention and audit logging).

Data: Holder name, Holder e-mail address, Pass code, Pass-product ID, Entries balance, redemption history, payment ID.

Retention: 5 years from the Pass expiry date; invoice-bound data per 2.7.

2.4. Gift cards and Coupons

Purpose: Issuing and redeeming Pixel Run gift cards / Coupons; for partner-issued Coupons (e.g. Meglepkék), validating the code with the partner system.

Legal basis: Art. 6(1)(b) GDPR (contract); Art. 6(1)(f) GDPR (legitimate interest in fraud prevention and partner reconciliation).

Data: code, e-mail (where relevant), redemption history; for partner Coupons: partner ID and validation result.

Retention: 5 years from expiry of the Coupon / gift card.

2.5. Third-party (Meglepkék) coupon validation

Purpose: Verifying the validity of voucher codes issued via the Meglepkék partner portal before they are redeemed at Pixel Run. Pixel Run runs an automated sidecar service (`pixel.validator`) which logs into the Meglepkék partner portal and queries the code's status.

Legal basis: Art. 6(1)(f) GDPR — legitimate interest (preventing fraudulent redemption). Balancing test on request.

Data: the Meglepkék code, the partner system's response (status, partner ID, expiry), request timestamp.

Retention: 2 years from validation (audit and dispute resolution).

2.6. Events (birthday room, team-building)

Purpose: Event organisation, contracting, quote handling, deposit management, on-site delivery. See the Event Policy.

Legal basis: Art. 6(1)(b) GDPR (contract); Art. 6(1)(f) GDPR (legitimate interest) where the booking is made by an organisation and we process the contact's data.

Data: contact name, e-mail, phone number, customer (organisation/individual) data, headcount, food/beverage preferences (catering is via separate partner contract), special requirements.

Retention: 5 years from the event date.

2.7. Invoicing and accounting

Purpose: Compliance with **Act CXXVII of 2007** (VAT), **Act C of 2000** (Accounting), and **Act CL of 2017** (Rules of Taxation).

Legal basis: Art. 6(1)(c) GDPR — legal obligation.

Data: customer name, billing address, tax number (corporate), payment method and amount, invoice number and issue date.

Retention: 8 years under §169 of the Accounting Act.

2.8. Online card payment

Purpose: Accepting payment for online purchases.

Legal basis: Art. 6(1)(b) GDPR — performance of contract.

Data: Payment is processed via **myPOS Limited**. Pixel Run does **not** access card numbers, expiry dates, or CVC codes — these are processed exclusively by the payment provider under its own privacy notice. We retain the payment ID, amount, status, and timestamp.

Retention: as 2.7.

2.9. Newsletter and marketing communication

Purpose: Sending news, promotions, and event information.

Legal basis: Art. 6(1)(a) GDPR — consent, also under §6 of **Act XLVIII of 2008** (Hungarian Advertising Act, Grtv.).

Data: name, e-mail address, subscription date, open/click metrics.

Retention: until consent is withdrawn (unsubscribe). An unsubscribe link is included in every newsletter; alternatively, you may e-mail hello@pixelrun.hu. Withdrawal does not affect the lawfulness of prior processing.

2.10. Website visits, cookies, analytics

Purpose: Operating pixelrun.hu and shop.pixelrun.hu, measuring user experience, statistical analysis, marketing.

Legal basis:

- **Strictly necessary cookies:** Art. 6(1)(f) GDPR — legitimate interest in basic site operation;
- **Analytics and marketing cookies (Google Analytics, Google Tag Manager, ad pixels):** Art. 6(1)(a) GDPR — consent, given via the cookie banner and revocable at any time.

Data: IP address, browser/device identifiers, visit time, page views, referrer, cookie unique ID.

Retention: depends on the cookie’s technical lifetime (typically 1 day to 13 months).

2.11. CCTV on the Pixel Run premises

Purpose: Guest and staff safety, asset protection, gameplay documentation (where game mechanics require, e.g. result capture). Detailed rules are in the House Rules and a separate CCTV notice.

Legal basis: Art. 6(1)(f) GDPR — legitimate interest. Balancing test on request.

Data: camera images.

Retention: 8 days from recording, except where a recording is needed for legal claims or official proceedings — in which case retention extends until conclusion.

2.12. Marketing photos and video

Purpose: Producing visual content for marketing on pixelrun.hu, social media, and ads.

Legal basis:

- For images that **identify** an individual: Art. 6(1)(a) GDPR — consent, obtained before recording (separate statement or clear notice on entry);
- For non-identifying footage (crowd shots, silhouettes, back views): Art. 6(1)(f) GDPR — legitimate interest. The data subject may object.

Data: image, audio.

Retention: until consent is withdrawn or objection is upheld. Content already published on third-party platforms (social media caches) cannot be guaranteed to be fully removable, but we will remove it from our own surfaces (`pixelrun.hu`, official social accounts) without delay.

2.13. Fraud prevention, audit, dispute handling

Purpose: Safe operation of the service; identification of abuse and fraud; chargeback handling; auditability; legal claims defence.

Legal basis: Art. 6(1)(f) GDPR — legitimate interest; in some cases Art. 6(1)(c) GDPR — legal obligation (AML, consumer protection).

Data: system logs, payment-fraud signals, redemption anomalies, related contact data.

Retention: 5 years (aligned with civil-law limitation periods).

3. Source of data

Pixel Run collects personal data **directly from the data subject** (booking form, quote request, on-site collection, e-mail or phone contact), except:

- **Third-party Coupon validation** — the Coupon’s status is read from the Meglepkék partner portal (see 2.5);
- **Online payments** — payment status and transaction ID arrive from myPOS;
- **Corporate event bookings** — the booking organisation provides the contact person’s data.

4. Processors and recipients

4.1. Processors (acting on Pixel Run’s instructions)

Processor	Activity	Location / EU transfer
Amazon Web Services EMEA SARL (38 Avenue John F. Kennedy, L-1855 Luxembourg)	Cloud infrastructure (application servers, database, backups, S3 document storage)	EU (Frankfurt, eu-central-1)
Netlify, Inc. (44 Montgomery Street, Suite 300, San Francisco, CA 94104, USA)	Hosting of the <code>pixelrun.hu</code> marketing site	USA (EU–US Data Privacy Framework certified)

Processor	Activity	Location / EU transfer
Billingo Technologies Zrt. (1133 Budapest, Árbóc utca 6., Hungary)	Electronic invoicing	Hungary
myPOS Limited (12 St. Stephen's Green, Dublin D02 WK11, Ireland)	Online and on-site card payment processing	EU (Ireland)
SendGrid Inc. / Twilio Ireland Limited (3 Dublin Landings, North Wall Quay, Dublin 1, Ireland)	Transactional e-mails (booking confirmations, invoice delivery, newsletters)	EU (Ireland) / USA (SCCs + EU-US DPF)
Slack Technologies Limited (4th Floor, One Park Place, Hatch Street Upper, Dublin 2, Ireland)	Internal alerts (payment and operations notices). Customer personal data is not transmitted to Slack in identifiable form.	EU (Ireland)
Google Ireland Ltd. (Gordon House, Barrow Street, Dublin 4, Ireland)	Google Analytics, Google Tag Manager, Google Ads remarketing — only with cookie consent	EU (Ireland) / USA (SCCs + EU-US DPF)

4.2. Independent controller partner

Recipient	Activity
Meglepkék (the partner operator)	Pixel Run validates Meglepkék-issued coupons via the partner's online portal (see 2.5). The processed data is the coupon code and the partner's response; Pixel Run does not transmit the data subject's personal data to Meglepkék.

4.3. Authorities and legal counsel

Pixel Run may share data — based on legal obligation or to enforce legitimate claims — with:

- the **Hungarian Tax and Customs Authority (NAV)**;
- courts, authorities, and legal counsel in case of disputes.

4.4. International transfers

Pixel Run does **not transfer** personal data outside the European Economic Area (EEA), except via processors (Netlify, SendGrid, Google) whose parent company is in the United States. With these processors **Standard Contractual Clauses (SCCs)** are in place, and the providers are certified under the **EU–US Data Privacy Framework (2023)**. Pixel Run no longer relies on the EU–US Privacy Shield, which was invalidated by the Court of Justice of the European Union in *Schrems II* (Case C-311/18) on 16 July 2020.

5. Data security

In line with Article 32 GDPR, Pixel Run applies technical and organisational measures proportionate to the risk, including:

- **Encryption** — HTTPS/TLS on all websites and APIs; standard processor-side encryption (TLS, disk encryption);
- **Access control** — role-based authorisation, two-factor authentication on critical admin surfaces;
- **Logging and monitoring** — system and audit logs, anomaly monitoring;
- **Backup and recovery** — regular AWS-side backups, recovery drills;
- **Incident response** — internal procedure per section 6.

Card data is processed exclusively by a PCI-DSS-compliant payment provider (myPOS).

6. Data breach

If Pixel Run becomes aware of a personal-data breach, it will notify the Hungarian supervisory authority (NAIH) without undue delay and at the latest **within 72 hours** of becoming aware, unless the breach is unlikely to result in a risk to the rights and freedoms of data subjects (Art. 33 GDPR).

If the breach is likely to result in a high risk, Pixel Run will also notify the affected data subjects without undue delay (Art. 34 GDPR).

Pixel Run keeps an internal incident register.

7. Automated decision-making and profiling

Pixel Run does **not** carry out solely automated decision-making — including profiling — that produces legal or similarly significant effects on the data subject (Art. 22 GDPR).

Any on-site content suggestions or newsletter segmentation — if used — do not reach the threshold of automated individual decisions.

8. Children’s data

Pixel Run’s services are aimed at adults and minors accompanied by an adult. **For children under 16**, processing of personal data requires the consent of a parent or legal guardian (Art. 8 GDPR; §25/M Infotv.). The adult who places the booking acts on behalf of the legal guardian and represents that consent has been obtained.

Pixel Run knowingly does **not** accept newsletter sign-ups from children under 16.

9. Your rights

9.1. Right of access (Art. 15 GDPR)

You may at any time request confirmation of whether we process your data and, if so, request information on purposes, categories of data, recipients, retention, and your rights.

9.2. Right to rectification (Art. 16 GDPR)

You may have inaccurate data corrected and incomplete data completed.

9.3. Right to erasure (“right to be forgotten” — Art. 17 GDPR)

You may request erasure where:

- the data is no longer necessary for the purpose;
- you have withdrawn consent and there is no other legal basis;
- you object and there are no overriding legitimate grounds;
- the processing is unlawful;
- erasure is required by law.

This right may be limited by statutory retention obligations (notably the 8-year accounting retention).

9.4. Right to restriction (Art. 18 GDPR)

You may request restriction where:

- you contest the accuracy of the data (for the time needed to verify);
- the processing is unlawful and you oppose erasure;
- we no longer need the data but you require it for legal claims;

- you have objected and the balancing assessment is pending.

9.5. Right to data portability (Art. 20 GDPR)

Where processing is based on consent or contract performance and is automated, you may receive the data you provided in a structured, commonly used, machine-readable format (typically JSON or CSV), or request transmission to another controller where technically feasible.

9.6. Right to object (Art. 21 GDPR)

You may at any time object to processing based on legitimate interest. Pixel Run will cease processing unless we demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing relates to legal claims.

You may object to direct marketing at any time, without justification, and we will stop direct-marketing processing immediately.

9.7. Right to withdraw consent (Art. 7 GDPR)

Where processing is based on consent, you may withdraw it at any time without justification. Withdrawal does not affect the lawfulness of prior processing.

9.8. Right to lodge a complaint with the supervisory authority

You may lodge a complaint with the Hungarian supervisory authority:

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

Address: 1055 Budapest, Falk Miksa utca 9–11., Hungary

Postal address: 1363 Budapest, Pf. 9, Hungary

E-mail: ugyfelszolgalat@naih.hu

Phone: +36-1-391-1400

Web: <https://naih.hu>

You also have the right to a judicial remedy. Under §23 Infotv., you may bring proceedings before the regional court of your place of residence.

9.9. Exercising your rights

You may submit your request to:

- **E-mail:** hello@pixelrun.hu
- **Postal address:** 1085 Budapest, Salétrom u. 7. IV/2, Hungary

We respond on the merits within **1 month** of receipt. The deadline may be extended by up to 2 further months for complex or numerous requests, with prior notice.

Requests are handled **free of charge**. Where requests are manifestly unfounded or excessive (in particular repetitive), Pixel Run may charge a reasonable fee based on the administrative cost, or refuse to act (Art. 12(5) GDPR). The fee is set on a per-request basis.

We may ask for additional information to confirm your identity in case of reasonable doubt.

10. Changes to the Policy

Pixel Run may amend this Policy from time to time. The current version is always available on the Pixel Run website. For **material changes**, we publish a notice on the website at least 15 days before the effective date, and where reasonably practicable inform newsletter subscribers and active Pass holders by e-mail.

Amendments apply prospectively only.

11. Contact

Pixel Run Kft.

Registered office: 1085 Budapest, Salétrom u. 7. IV/2, Hungary

Company registration number: 01-09-421596

Tax number: 32390324-2-42

Registry court: Metropolitan Court of Budapest as Registry Court

E-mail: hello@pixelrun.hu

Phone: +36-30-831-5049

Web: pixelrun.hu

Supervisory authority:

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

1055 Budapest, Falk Miksa utca 9–11., Hungary

ugyfelszolgalat@naih.hu | <https://naih.hu>