

NOTICE ON THE PROCESSING OF PERSONAL DATA

in relation to the use of NetBriefing

(last updated on 17 April 2025)

We inform you, as the data subject, that HungaroControl Pte. Ltd. Co. (registered office: 1185 Budapest, Igló u. 33-35., e-mail: info@hungarocontrol.hu, hereinafter as: Controller or HungaroControl) processes the data related to the use of its NetBriefing system as follows:

1. DETAILED DESCRIPTION OF THE DATA PROCESSING

Scope of processed data	Source of data	Purpose of data processing	Legal basis of data processing	Retention period
A. The data provided during registration: a) name b) password, c) address, d) e-mail, e) phone number, f) service license number	Data subject	Operation of the NetBriefing system	Article 6(1)(a) of the GDPR - consent (by registering in the NetBriefing system)	Until consent to data processing is withdrawn, but for no longer than one year and 62 days from the last log-in to the Netbriefing system by the data subject
B. Personal data provided in the submitted flight plan	Data subject	To manage flight plans submitted by the Data Subject and to provide air traffic control or flight information services to aircraft that have submitted a flight plan, and to provide an alerting service based on the flight plan data.	Article 6(1)(c) of the GDPR - to fulfil the legal obligation provided for in SERA.8015(b) and SERA.10001 (a) to (b) of the SERA Regulation ¹	For at least 62 days or until the withdrawal of the consent to data processing but for no longer than one year and 62 days from the last log-in to the Netbriefing system by the data subject

Consent to the processing may be withdrawn as described above without giving reasons by sending an e-mail to the Data Protection Officer at the e-mail address indicated below. The withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.

2. WHAT IS THE PROCESS AND METHOD OF DATA PROCESSING?

- a) the collection and use of data
- b) the storage of data electronically on the servers of HungaroControl Pte. Ltd. Co.;
- c) the transmission of data
 - ca) to the transport safety organisation, in the event of an occurrence of an incident, for the purpose of the investigation of the incident, pursuant to Article 4(8) of Regulation (EU) No 376/2014 of the European Parliament and of the Council on the reporting, analysis and follow-up of occurrences in civil aviation, amending Regulation (EU) No 996/2010 of the European Parliament and of the Council and repealing Directive 2003/42/EC of the European Parliament and of the Council and Commission Regulations (EC) No 1321/2007 and (EC) No 1330/2007,

¹ Commission Implementing Regulation (EU) No 923/2012 laying down the common rules of the air and operational provisions regarding services and procedures in air navigation and amending Implementing Regulation (EU) No 1035/2011 and Regulations (EC) No 1265/2007, (EC) No 1794/2006, (EC) No 730/2006, (EC) No 1033/2006 and (EU) No 255/2010

- cb) to the state transport safety authority, pursuant to Sections 9(1)(c) and 12(1) of Act CLXXXIV of 2005 on the technical investigation of air, rail and waterborne accidents and other transport incidents,
- cc) to the aircraft operator, if the data recorded contains information related to a specific flight of the aircraft operator and the request is made solely for the purpose of performing a safety analysis or an operator accident investigation.
- d) erasure of data after the expiry of the data retention time.

3. RECIPIENTS, DATA PROCESSORS

Please be informed that the personal data shall be handled confidentially by HungaroControl, and shall not be transferred by HungaroControl to third parties without providing prior notice thereof to you, except for the statutory disclosure of data to authorities and other bodies based on law.

Please also note that HungaroControl uses the services of a data processor to store your personal data. In the processing of personal data, it applies risk-proportionate organisational and technical protection measures in accordance with the applicable legal requirements, which prevent unauthorised access to personal data, prevent unauthorised modification, transfer, disclosure and erasure of data and ensure verifiability for both manual and automated processing operations. HungaroControl also ensures that the data stored in the different records shall not be matched in a direct manner or identified with the individual data subjects.

The processor employed by HungaroControl:

The data processing company in charge of maintaining and troubleshooting the system (R-SYS s.r.o. (Address: Rybárska, 7389 911 01 TRENČÍN SLOVAK REPUBLIC, website: <https://r-sys.eu/>, E-mail: info@r-sys.sk)

4. WHAT ENTITLEMENTS DO YOU HAVE?

a) The right to receive transparent information – with this notice, the Controller provides information on the circumstances of the processing, including who processes your personal data, for what purposes, on what basis and for how long, as well as your rights in relation to the processing and to whom you can address any questions or complaints regarding the processing;

b) The right to withdraw consent – consent may be withdrawn at any time without giving reasons by sending an e-mail to the Data Protection Officer at the e-mail address indicated below. However, the withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal;

c) The right of access to your personal data – you may at any time ask the Controller whether your personal data are being processed, request full information about the processing and request a copy of your personal data. Requesting of copies shall be free of charge on the first occasion, whereas HungaroControl may charge a fee for every further copy based on administrative costs;

d) The right to rectification of your personal data – you may request the Controller to correct your inaccurate personal data or, if they are incomplete, to complete your personal data;

e) The right to erasure of your personal data – you may request the erasure of your personal data by the Controller, and HungaroControl or its data processor shall erase the processed personal data at your request, if:

- its processing is unlawful;
- the purpose of processing has been terminated or no further processing of data is required for attainment of the purpose;
- the statutory data retention period has expired;
- the erasure of data was ordered by law, authority or court;

f) The right to restriction of processing – you may request that the Controller only store your personal data and not otherwise process it (e.g. for the establishment, exercise or defence of legal claims);

g) Information on the identity of the recipients informed of the rectification, erasure or restriction of processing – upon request, the Controller will inform you of these recipients;

h) The right to data portability – you may request the Controller to provide to you the personal data provided by you in a structured, commonly used, machine-readable format or to have it transmitted by the Controller to another controller. This right only applies to data processed based on consent or contract, provided that the data processing is carried out by automated means;

i) The right to lodge a complaint – you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your place of habitual residence, place of work or the place of the alleged infringement, if you consider that the processing of your personal data infringes the applicable data protection laws.

j) Damages, aggravated damages – please be informed that you may claim damages or aggravated damages (compensation for injury to feelings) for the damages incurred as a result of unlawful processing or for personality right related damages;

k) Notification – HungaroControl shall assess the request submitted by the data subject for enforcement of their rights, as soon as possible, but within one month at the latest, and shall inform the data subject about its decision in writing or – if the data subject submitted their request electronically – in an electronic way.

l) Costs – if you submit a repeated request in the same year for the same set of data, for a reason other than the need to rectify, erase or restrict the data due to HungaroControl's failure, HungaroControl may ask for reimbursement of its costs incurred in relation to the fulfilment of the request.

5. WHERE CAN YOU TURN IF YOU HAVE QUESTIONS ABOUT EXERCISING YOUR RIGHTS OR IF YOU WANT TO SEEK LEGAL REMEDY?

a) If you have any questions, please contact the data protection officer of HungaroControl:

Dr. Anikó Fazekas

Phone number: +36-30-851-2515

E-mail: dpo@hungarocontrol.hu

b) Legal Remedies:

Hungarian National Authority for Data Protection and Freedom of Information (NAIH) Mailing address: 1363 Budapest, Pf.: 9.

Website: www.naih.hu

Phone number: +36-1-391-1400

Court:

The regional court having competence according to the registered office of the Controller shall be the competent court to conduct the legal action in Hungary, but the data subject may also choose to bring the action before the regional court having competence according to his or her domicile or habitual residence.

Please be informed that the information on data processing related to the use of the HungaroControl GA VFR mobile application is provided in a separate document, which is available on the GA VFR mobile application and on the website (https://www.netbriefing.hu/vfrapp/privacypolicy_HU.html).