

## **Notice on the processing of personal data in the course of NetBriefing usage**

1. Please be informed that an online registration is required for the usage of the NetBriefing system. You can complete the registration by providing your personal data specified under paragraph (a). The data provided during registration will be handled by HungaroControl Zrt (hereinafter as: HungaroControl) under the following terms and conditions:
  - a) **Processed data:** name, password, address, e-mail address, phone number, license number, drone registration number;
  - b) **Source of processed data:** the NetBriefing registration interface
  - c) **Data controller:** HungaroControl (registered office: 1185 Budapest, Igló u. 33-35., website: [www.hungarocontrol.hu](http://www.hungarocontrol.hu), e-mail: [aro@hungarocontrol.hu](mailto:aro@hungarocontrol.hu));
  - d) **Purpose of data processing:** management of flight plans;
  - e) **Legal basis of data processing:** the Applicant's voluntary consent;
  - f) **Method of data processing:**
    - electronic data storage,
    - transfer of data to the aviation authority for purpose of investigation of flight incidents,
    - data deletion;
  - g) **Data retention time:** until withdrawal of the consent, but for the maximum of 20 years following registration;
  - h) **Data Processor:** HungaroControl Pte. Ltd. Co. does not employ data processors for the processing.

## **2. Data security measures**

- 2.1. Please be informed that the personal data are processed confidentially by HungaroControl Pte. Ltd. Co. and these personal data shall not be transferred by the data controller and to third parties without your consent and without providing prior notice thereof to you, except for the statutory data provision to authorities and other bodies based on legislation.
- 2.2. Please be informed that HungaroControl shall store your personal data electronically, on the servers located in its registered seat (1185 Budapest, Igló utca 33-35). The Company shall not use the services of other companies for storing the personal data, except the processor. In the course of processing of personal data – in line with the applicable legislation – it takes such risk proportionate administrative and technical measures that prevent unauthorized and unlawful access to and modification of the personal data and also ensure verifiability throughout the data processing actions, both in terms of the manual and the automated data processing procedures. The Company 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.

### 3. Rights and legal remedies concerning data management, contact

3.1. Please be informed that you have the right to object to the processing of your personal data, if:

- a) processing of the personal data is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority or processing is necessary for the enforcement of the legitimate interests of the data controllers or any third parties.
- b) processing of the personal data is carried out for direct marketing purposes or profiling with a direct marketing purpose;
- c) processing of the personal data is carried out for scientific or historical research purposes or statistical purposes, which are necessary for execution of a task not in the public interest.

HungaroControl shall examine the objection as soon as possible, but within 15 days from submission of the request at the latest, and shall decide whether such objection is well-founded or not and shall inform the complainant about its decision in writing. If the data controller finds that the objection is well-founded, it shall terminate the processing, including further data collection and data transfer, and block the data, and shall inform about the objection and the measures taken based on the objection all the entities to whom it previously transferred the personal data subjected by the objection, and these entities, in turn, shall be obliged to take the necessary measures to enforce the right to objection.

3.2. Please be informed that you have the right to ask the data controller **to provide** your personal data and the information related to processing thereof **to you**. You may ask for copies of the personal data as long as requesting such copies does not adversely affect the rights and freedoms of others. Requesting of copies shall be free of charge on the first occasion, whereas the data controller may charge a fee based on administrative costs for every further copy.

3.3. Please be informed that you have the right to request the **clarification, correction or supplementation** of your personal data by sending a declaration, as long as the data are inaccurate, incorrect or incomplete.

3.4. Please be informed that the data controller shall **restrict** processing upon your request, if you contest the accuracy of data, if processing is unlawful, but instead of deletion, you request the restriction of processing, if the purpose of processing has been terminated, but you claim the data for the establishment, exercise or defence of legal claims, and if you filed an objection against the processing and the assessment of such objection is currently in progress. In the event the data controllers lift the restriction of processing, they shall provide information thereof in advance.

3.5. Please be informed that the data controller or the processor shall **erase** the processed personal data upon your request, if:

- a) processing is unlawful;
- b) the purpose of processing has been terminated or no further processing of data is required for attainment of the purpose;
- c) you withdraw your consent and there is no other legal basis for the processing;
- d) the statutory data retention period has expired;
- e) the erasure of data was ordered by law, authority or court.

3.6. Please be informed that upon your request, the data controller will **transfer** your personal data to you in a structured, commonly used and machine-readable format, or – if it is technically feasible – will **transmit** these data to another data controller or ensure to you the option of transmission. Please be informed that the transfer or transmission of data cannot be ensured if the data needs to be deleted or if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority.

3.7. If you do not give your consent to the processing or withdraw your consent, you are not allowed to participate in the selection process.

3.8. If you do not give your consent to the processing or withdraw your consent, you are not allowed to participate in the selection process.

3.9. 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.

3.10. HungaroControl shall assess the request submitted by you for enforcement of your rights, as soon as possible, but within 1 month the latest, and shall inform you about its decision in writing or – if you submitted your request electronically – in an electronic way.

HungaroControl may delay the provision of information on the enforcement of rights for reasons specified under law, proportionately to the goal wished to be achieved, and may restrict the contents of the information and may also refrain from providing the information.

If a repeated request is submitted in the same year for the same scope of data, and the underlying reason is not that the data are required to be corrected, deleted or restricted due to the omission or failure of the data controller, then the data controller may ask for reimbursement of its costs incurred in relation to the fulfilment of the request.

3.11. If you are of the opinion that your rights have been violated in connection with the processing of your personal data, **you may initiate an investigation** at the Hungarian National Authority for Data Protection and Freedom of Information (1024 Budapest, Szilágyi Erzsébet fasor 22/C., [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), +36-1-3911400, [www.naih.hu](http://www.naih.hu)), or **you may turn to the court** of competent jurisdiction. The regional court having competence according to the registered office of the data controller shall conduct the legal action, with the provision that at your discretion, the legal action can also be started at the regional court having competence according to your domicile or habitual residence as well.

4. For data processing related issues not included in this Notice, the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC and Act CXII of 2011 on Informational Self-determination and Freedom of Information shall be applied.

5. Please be informed that the following person acts as the Data Protection Officer of HungaroControl: dr. Anikó Fazekas (+36-30-851-2515, [dpo@hungarocontrol.hu](mailto:dpo@hungarocontrol.hu)).