

INFORMATION ON THE PROCESSING OF PERSONAL DATA

Regarding the assessment of ad hoc segregated airspace use requests by the air traffic service provider

Please be advised that HungaroControl Pte. Ltd. Co. (hereinafter: **Controller or HungaroControl**) processes personal data in connection with the air traffic service provider's opinion issued pursuant to *Government Decree 4/1998. (I. 16.) on the use of the Hungarian airspace* (hereinafter: Government Decree) in connection with the air traffic service provider's opinion issued on the basis of the Government Decree as follows:

1. DETAILED PRESENTATION OF DATA PROCESSING

Processed data	Purpose of data processing	Legal basis for data processing	Retention period
<p><i>A. Natural person requester</i></p> <p>a) name, b) address, c) phone number, d) e-mail address, e) mail address (regarding requests submitted before February 2021¹ f) tax identification number or tax number);</p>	<p>In cases specified in the Government Decree, conducting an air traffic assessment and preparing a service provider opinion based on well-founded, verified data, as well as subsequently proving the validity of the opinion, in the event of an ad hoc segregated airspace request;</p>	<p>I. Issuing air traffic service provider opinions based on well-founded, verified data relating to ad hoc segregated airspace use requests, as a task of public interest performed by HungaroControl, pursuant to Article 6(1)(e) of the GDPR;</p>	<p>With regard to data stored in paper form, contained in air traffic service provider's opinions and other documents related to airspace use requests: for 15 years, in accordance with the Company's Document Management Regulation, Appendix 1, Archiving Plan;</p>
<p><i>B. Person responsible for air traffic organisation in the airspace</i></p> <p>a) name, b) contact information;</p>	<p>Maintaining the database necessary for monitoring procedures and deadlines relating to air traffic service provider opinions and for compiling statistics on air traffic service provider opinions</p>	<p>II. HungaroControl's legitimate interest in monitoring procedures and deadlines related to air navigation service provider opinions and maintaining the database necessary for compiling statistics on air navigation service provider opinions, pursuant to Article 6(1)(f) of the GDPR</p>	<p>With regard to electronically stored data relating to airspace use requests: 15 years (in order to ensure consistency with the data provided in air traffic service provider's opinions, a uniform retention period must be applied to both paper-based and electronically stored data)</p>
<p><i>C. Person responsible for the airspace use request</i></p> <p>a) name, b) contact information</p>			

¹ The version prior to February 2021 of the electronic form specified in the Government Decree, standardized by the military aviation authority and published on its website, contained the requester's tax identification number and tax number as well.

2. ADDRESSEES, DATA PROCESSORS

Please be informed that the Controller treats personal data confidentially and does not disclose it to third parties without your prior consent, except for the mandatory disclosure of data to authorities and other bodies based on legal regulations. When processing personal data, in accordance with the relevant legal requirements, it shall apply risk-proportionate organizational and technical protection measures to prevent unauthorized access to personal data and unauthorized modification, transfer, disclosure or erasure of personal data, and ensure controllability in both manual and automated data processing. The Controller also ensures that the data contained in the various records cannot be directly linked and assigned to the data subject.

Please note that HungaroControl does not use a data processor for data processing.

3. RIGHTS OF THE DATA SUBJECT

RIGHT	DETAILED INFORMATION
Right to transparent information	With this notice, the Controller provides information about the circumstances of data processing, i.e., among other things, who processes your personal data, for what purpose, on what basis, and for how long, as well as about the rights you have in connection with data processing and who you can contact with questions or complaints regarding data processing.
Right to access your personal data	You may ask the Controller at any time whether your personal data is being processed, request full information about the processing, and request a copy of your personal data. The first request for copies is free of charge; HungaroControl may charge a fee based on administrative costs for each additional copy.
Right to rectification of your personal data	You may request that the Controller correct your inaccurate personal data or, if incomplete, supplement it.
Right to objection	You have the right to object to the processing of your personal data at any time for reasons related to your particular situation. In the event of your objection, the Controller may no longer process your personal data, unless it is able to demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or which are related to the establishment, exercise, or defence of legal claims.
Right to erasure of personal data	Under certain conditions, you have the right to request the erasure of your personal data. This means that you can ask us to delete personal data that we may have processed unlawfully or that is no longer needed for a specific purpose. Please note that we may not be able to comply with your request for certain legal reasons, in which case we will notify you.
Right to restriction of processing	You may request (e.g. for the purpose of submitting, enforcing or defending legal claims) that the Data Controller only store your personal data and not process it in any other way.

RIGHT	DETAILED INFORMATION
Right to data portability	You may request that the Controller provide you with the personal data you have made available in a structured, commonly used, machine-readable format or that the Controller transfer it to another controller. This right only applies to data processed on the basis of consent or a contract, provided that the data processing is carried out by automated means.
Notification	HungaroControl shall assess the request submitted by the data subject to exercise his or her rights within the shortest possible time from the date of submission, but no later than one month, and shall notify the data subject of its decision in writing or, if the data subject submitted the request electronically, by electronic means. HungaroControl, for reasons specified by law and in proportion to the objective pursued, may delay the provision of information relating to the exercise of rights, and may restrict the content of the information or refrain from providing it.
Costs	If you submit a repeated request for the same data set in a given year, and the reason for this is not that the data needs to be corrected, erased or restricted due to an omission on the part of HungaroControl, HungaroControl may request reimbursement of the costs associated with fulfilling the request.
Legal remedy	<p>Without prejudice to any other administrative or judicial remedies available to you (such as the right to claim compensation for damages suffered as a result of a breach of the GDPR), you have the right to lodge a complaint with the data protection supervisory authority in the Member State of your habitual residence, place of work, or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.</p> <p>Contact details for the data protection authority:</p> <p>Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH) (National Authority for Data Protection and Freedom of Information) Mail address: 1363 Budapest, Pf.: 9. Webpage: www.naih.hu Phone: +36-1-391-1400</p> <p>Court:</p> <p>In Hungary, the court with jurisdiction over the Controller's registered office shall have jurisdiction over the lawsuit, but the data subject may also bring the lawsuit before the court of their domicile or place of residence, at their discretion.</p>