

INFORMATION

on data processing related to the recording of telephone calls

(last updated: 13 February 2026)

- I. We inform you that calls (both incoming and outgoing) made on the telephone numbers listed below will be recorded.
- II. Please note that HungaroControl Pte. Ltd. Co. (registered office: 1185 Budapest, Igló u. 33-35., Website: www.hungarocontrol.hu, hereinafter referred to as: HungaroControl, Data Controller) processes your personal data in relation to telephone calls as follows:

1. DETAILED DESCRIPTION OF DATA PROCESSING

Related data	Sources of data	Purpose of data processing	Legal basis for data processing	Retention period
<p>A. Sound recording of conversations initiated from and received on the following phone numbers:</p> <p>+36-1-293-4182 +36-1-293-4102 +36-1-293-4466 +36-1-293-4561 +36-1-293-4562 +36-1-293-4563 +36-1-293-4564 +36-1-293-4565 +36-1-293-4956 +36-1-293-4957 +36-1-293-4958 +36-1-296-9182 +36-1-296-9105 +36-1-296-9102 +36-1-296-9117 +36-1-296-9122 +36-1-296-9183 +36-1-291-1085</p>	<p>The Data Subjects are</p> <p>a) the professional staff of HungaroControl's ATS units that initiate and receive calls,</p> <p>b) personnel of service providers and legal entities having access rights referred to in points ATS.OR.435 a)-b) and ATS.OR.440 a) of Annex IV to Commission Implementing Regulation 2017/373 (hereinafter referred to as: the Regulation)¹</p>	<p>To fulfil a legal obligation related to the recording and storage of data,</p> <p>To use the data for the purposes permitted by the Regulation and Act XCVII of 1995 on Air Transport (hereinafter referred to as: Aviation Act) as well as to carry out the alerting and reporting tasks set forth in the relevant laws.</p>	<p>With respect to the recording of data, to fulfil the legal obligation prescribed in points ATS.OR.435 c) paragraph (3) and ATS.OR.440 c) paragraph (3) of Annex IV to the Regulation [GDPR, Article 6(1)(c)].</p> <p>With respect to the retention of data, to fulfil the legal obligation prescribed in points ATS.OR.455 a) paragraphs (2)–(3) and ATS.OR.455 b) of Annex IV to the Regulation; and Section 56(3)² of Decree No. 57/2016 (XII. 22.) NFM. [GDPR, Article 6(1)(c)]</p> <p>With respect to the use of data,</p> <ul style="list-style-type: none"> • for general communication purposes: to fulfil the legal obligation set out in points ATS.OR.435 a)-b), ATS.OR.440 a) and ATS.OR.455 b) of Annex IV to the Regulation, • for the purpose of alerting or notification related to an accident or event: <ul style="list-style-type: none"> – Article 9(1) of Regulation (EC) No 	<p>62 days from making the sound recording.</p>

¹Commission Implementing Regulation (EU) 2017/373 of 1 March 2017 laying down common requirements for providers of air traffic management/air navigation services and other air traffic management network functions and their oversight, repealing Regulation (EC) No 482/2008, Implementing Regulations (EU) No 1034/2011, (EU) No 1035/2011 and (EU) 2016/1377 and amending Regulation (EU) No 677/2011

²Decree No. 57/2016 (XII. 22.) NFM on the Rules and Procedures of the Air Traffic Control Services

Related data	Sources of data	Purpose of data processing	Legal basis for data processing	Retention period
			996/2010 of the European Parliament ³ , – SERA.1105(c) of the Annex to Regulation (EU) No 923/2012 ⁴ , – Section 10(19) of Act CLXXXIV of 2005 ⁵ – Section 10(1) of Government Decree 169/2010 (V. 11.) ⁶ , – Section 8(1) of Government Decree 267/2011 (XII. 13.) ⁷ , – Sections 2–3 of Decree No. 59/2005 (VII. 18.) GKM ⁸ , – Section 44(1) and (3), Section 175(1) and (3), Section 379(2f) and Section 381(4) of Decree No. 57/2016 (XII. 22.) NFM, • for other purpose: to fulfil the legal obligation stipulated in Section 61/A(10) of the Aviation Act, [GDPR, Article 6(1)(c)]	
B. Sound recording of conversations initiated from and received on the following phone numbers: +36-1-293-4207 +36-1-293-4208 +36-1-293-4213 +36-1-293-4482 +36-1-293-4619 +36-1-293-4207 +36-1-293-4208	The Data Subjects are a) employees of the Finance and Accounting Department who initiate and receive calls, b) Employees of the bank concerned	Follow-up investigation of financial transactions	HungaroControl's legitimate interest in the proper processing and documentation of financial transactions concluded orally over the telephone, which qualify as individual contracts [GDPR, Article 6(1)(f)]	1) 62 days from the recording of data with respect to the original sound recording, 2) For CD/DVD copies, two years from the date of recording the data, or in the case of an internal audit, until the conclusion of the internal audit

³Regulation (EU) No 996/2010 of the European Parliament and of the Council of 20 October 2010 on the investigation and prevention of accidents and incidents in civil aviation and repealing Directive 94/56/EC

⁴Commission Implementing Regulation (EU) No 923/2012 of 26 September 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

⁵Act CLXXXIV of 2005 on the Investigation of Aviation, Railway and Water Transport Accidents and Other Traffic Incidents

⁶Government Decree 169/2010 (V. 11.) on the Rules for the Protection of Civil Aviation and on the Rights and Responsibilities and the Operating Procedures of the Aviation Security Committee

⁷Government Decree 267/2011. (XII.13.) on the organisational structure of the air search and rescue service providing assistance to aircraft in distress, and conducting activities related to protection against disasters and rescue, and the order of bearing the costs related to its operations, maintenance and alerting, and on the rules related to the authorisation of such activities,

⁸Decree No. 59/2005 (VII. 18.) GKM on the establishment and operation of the central reporting system of economy and transport and on certain reporting requirements,

Related data	Sources of data	Purpose of data processing	Legal basis for data processing	Retention period
<p>C. Sound recording of conversations initiated from and received on the following phone numbers:</p> <p>+36-1-293-4499 +36-1-293-4699</p>	<p>The Data Subjects are</p> <p>a) employees of the IT Service Desk Unit who initiate and receive calls</p> <p>b) persons using the IT Service Desk Unit at the above telephone numbers</p>	<p>Resolving IT incidents reported by employees using the one-stop IT Service Desk Unit via an external telephone line, handling complaints related to the reports, and quality assurance of IT operational activities</p>	<p>Consent by the data subject [GDPR, Article 6(1)(a)]</p>	<p>62 days from making the sound recording.</p>
<p>D. Sound recording of conversations initiated from and received on the following phone numbers:</p> <p>+36-1-293-4545 +36-1-293-4346</p>	<p>The Data Subjects are</p> <p>a) employees of the Data Controller who initiate and receive calls related to reports and consultations regarding the use of facilities and vehicles</p> <p>b) persons making telephone reports regarding the use of facilities and vehicles, as well as persons participating in telephone consultations</p>	<p>Ensuring that appropriate action is taken in response to reports and consultations regarding the use of facilities and vehicles</p>	<p>Consent by the data subject [GDPR, Article 6(1)(a)]</p>	<p>62 days from making the sound recording.</p>
<p>E. Sound recording of conversations initiated from and received on the following phone numbers:</p> <p>+36-1-293-4354 +36-1-293-4471</p>	<p>The Data Subjects are</p> <p>a) employees of the Data Controller's aeronautical information service who initiate and receive calls</p> <p>b) persons requesting aeronautical information on the above telephone numbers</p>	<p>Retrievability of data when NOTAM is issued by telephone</p>	<p>To fulfil the legal obligation prescribed by Section ATM/ANS.OR.A.085 of the Regulation [GDPR Article 6(1)(c)],</p>	<p>62 days from making the sound recording.</p>
<p>F. Network data stream generated during an IP-based telephone conversation made</p>	<p>The Data Subjects are</p> <p>Persons having an IP-based telephone conversation via</p>	<p>a) Troubleshooting arising during network performance</p>	<p>a) Legitimate interest of HungaroControl Pte. Ltd. Co. in troubleshooting arising during network</p>	<p>a) For 5 days after the telephone conversation</p>

Related data	Sources of data	Purpose of data processing	Legal basis for data processing	Retention period
through HungaroControl's telephone exchange (which also includes the sound recording of the conversation)	HungaroControl's telephone exchange	analysis and operation; b) Identification, prevention, investigation and response to cyber, IT and information security incidents	performance analysis and operations [GDPR, Article 6(1)(f)] b) HungaroControl's legitimate interest in identifying, preventing, investigating and resolving cyber, IT and information security incidents [GDPR, Article 6(1)(f)]	b) For five years after the telephone conversation, or until the investigation is completed in the event of a security incident

Please note that if you do not wish to give consent to the data processing operations based on consent listed in the table above, you can contact the relevant divisions of HungaroControl at the following contact details:

- with respect to data processing specified in point C: servicedesk@hungarocontrol.hu,
- with respect to data processing specified in point D: diszpecser@hungarocontrol.hu.

Consent may be withdrawn at any time and without reason by way of notice sent to the Data Protection Officer's e-mail address indicated below. However, the withdrawal of consent shall not affect the lawfulness of data processing based on consent before its withdrawal.

2. THE PROCESS AND THE MEANS OF PROCESSING

I. Data processing related to conversations conducted via the telephone lines used by HungaroControl Pte. Ltd. Co. ATS units for communication with adjacent ATS units and other organisations required by law

- Data recording:* calls made to/from the above phone numbers will be automatically recorded,
- Listening to and use of recordings:* for the purposes permitted by the law indicated in line A of Table 1 at the legal basis, and for the purpose of checking the technical operation of the equipment;
- Data storage:* on the Frequentis DIVOS system located at the seat of HungaroControl (1185 Budapest, Igló utca 33-35.),
- Erasure and destruction of data* following expiry of the data processing period.
- Data transfer:* to authorities, courts, the aircraft operator and the following organisations conducting the operator's inspection:
 - the investigating authority (police) within its powers and responsibilities delegated under Act XC of 2017 on the Code of Criminal Procedure,
 - the misdemeanour authority (police) within its responsibilities delegated under Section 38(1) of Act II of 2012 on Misdemeanour Offences, Misdemeanour Proceedings and the Misdemeanour Register,
 - the Public Prosecutor's Office within its powers and responsibilities delegated under Act XC of 2017 on the Code of Criminal Procedure,
 - court.
 - Act II of 2012 on Misdemeanour Offences, Misdemeanour Proceedings and the Misdemeanour Register,
 - Act CXXX of 2016 on the Code of Civil Procedure,
 - Act I of 2017 on the Code of Administrative Procedure and
 - within its powers and responsibilities delegated under Act XC of 2017 on the Code of Criminal Procedure,
 - the tax authority within its powers and responsibilities delegated under Section 22 of Act CLI of 2017 on the Code of Tax Administration Procedure,
 - the aviation authority within its responsibilities delegated under Section 9(4) and Point 12 of Government Decree 382/2016 (XII. 2.) on the Designation of Bodies for Regulatory and Administrative Functions Relevant to Transportation,

- g) the military aviation authority within its responsibilities delegated under paragraph k) of Section 3 of Government Decree 392/2016 (XII. 5.) on the Designation of the Military Aviation Authority,
- h) the transportation safety bureau within its responsibilities delegated under Section 3(1) of Act CLXXXIV of 2005 on the Investigation of Aviation, Railway and Water Transport Accidents and Other Traffic Incidents,
- i) the public transportation safety bureau within its responsibilities delegated under Section 5/A(1) of Act CLXXXIV of 2005 on the Investigation of Aviation, Railway and Water Transport Accidents and Other Traffic Incidents,
- j) the aircraft operator, if the recorded data contains information related to one of its specific flights and the request is made solely for the purpose of conducting an analysis for flight safety purposes,
- k) the organisation performing the operator's investigation ordered by the transportation safety bureau pursuant to Section 20(1) of Act CLXXXIV of 2005 on the Investigation of Aviation, Railway and Water Transport Accidents and Other Traffic Incidents,

II. Data processing related to the investigation of financial transactions

- a. *Data recording*: calls made to/from the above phone numbers will be automatically recorded,
- b. *Copying of data*,
- c. *Use of / listening to recordings*: in a documented manner, in the presence of at least two persons authorised to process data, for the purpose of follow-up checking of financial transactions by the CEO, the Deputy CEO, the Chief Financial Officer, the Legal Director, designated persons working under their supervision, and, if the matter is subject to an internal audit, the internal auditor designated to conduct the audit, as well as the designated employee of the investment partner concerned,
- d. *Storage of data*:
 - for the original audio recording, on the Frequentis DIVOS system located at the seat of HungaroControl,
 - for the CD/DVD copy, at the seat of HungaroControl, in the office of the financial department, in a lockable cabinet,
 - for the CD/DVD copy, in the case of an internal audit, from the start of the audit until its conclusion at the seat of HungaroControl, in the office of the internal auditor, in a safe,
- e. *Erasure and destruction of data* following expiry of the data processing period.

III. Data processing related to the use of the IT Service Desk Unit:

- a. *Data recording*: calls made to/from the above phone numbers will be automatically recorded,
- b. *Use of / listening to the data*;
- c. *Storage of data*: on the CISCO system at HungaroControl's seat (1185 Budapest, Igló utca 33-35.),
- d. *Erasure and destruction of data* following expiry of the data processing period.

IV. Data processing related to reports and consultations regarding the use of facilities and vehicles

- a. *Data recording*: calls made to/from the above phone numbers will be automatically recorded,
- b. *Use of / listening to the data*: by the head of the division responsible for the operation of the facilities and his or her designated colleague,
- c. *Storage of data*: on the CISCO system at HungaroControl's seat,
- d. *Erasure and destruction of data* following expiry of the data processing period.

V. Data processing relating to aeronautical information

- a. *Data recording*: calls made to/from the above phone numbers will be automatically recorded,
- b. *Listening to the data stored*;
- c. *Data transfer*: to authorities, courts, the aircraft operator and the following organisations conducting the operator's inspection:
 - a) the investigating authority (police) within its powers and responsibilities delegated under Act XC of 2017 on the Code of Criminal Procedure,
 - b) the misdemeanour authority (police) within its responsibilities delegated under Section 38(1) of Act II of 2012 on Misdemeanour Offences, Misdemeanour Proceedings and the Misdemeanour Register,
 - c) the public prosecutor's office within its powers and responsibilities delegated under Act XC of 2017 on the Code of Criminal Procedure,
 - d) court,

- da) Act II of 2012 on Misdemeanour Offences, Misdemeanour Proceedings and the Misdemeanour Register,
- db) Act CXXX of 2016 on the Code of Civil Procedure,
- dc) Act I of 2017 on the Code of Administrative Procedure and
- dd) within its powers and responsibilities delegated under Act XC of 2017 on the Code of Criminal Procedure,
- e) the tax authority within its powers and responsibilities delegated under Section 22 of Act CLI of 2017 on the Code of Tax Administration Procedure,
- f) the aviation authority within its responsibilities delegated under Section 9(4) and Point 12 of Government Decree 382/2016 (XII. 2.) on the Designation of Bodies for Regulatory and Administrative Functions Relevant to Transportation,
- g) the military aviation authority within its responsibilities delegated under paragraph k) of Section 3 of Government Decree 392/2016 (XII. 5.) on the Designation of the Military Aviation Authority,
- h) the transportation safety bureau within its responsibilities delegated under Section 3(1) of Act CLXXXIV of 2005 on the Investigation of Aviation, Railway and Water Transport Accidents and Other Traffic Incidents,
- i) the public transportation safety bureau within its responsibilities delegated under Section 5/A(1) of Act CLXXXIV of 2005 on the Investigation of Aviation, Railway and Water Transport Accidents and Other Traffic Incidents,
- j) the aircraft operator, if the recorded data contains information related to one of its specific flights and the request is made solely for the purpose of conducting an analysis for flight safety purposes,
- k) the organisation performing the operator's investigation ordered by the transportation safety bureau pursuant to Section 20(1) of Act CLXXXIV of 2005 on the Investigation of Aviation, Railway and Water Transport Accidents and Other Traffic Incidents,
- d. *Transmission of data:* transmission of the recording to the aviation authority for the purpose of incident investigation,
- e. *Storage and erasure of data:* on the CISCO system at HungaroControl's seat,
- f. *Erasure and destruction of data* following expiry of the data processing period.

VI. Data processing related to troubleshooting arising during network performance analysis and operation, as well as the identification, prevention, investigation and remediation of cyber, IT and information security incidents

- a. *Recording of data,*
- b. *Listening to the data stored;*
- c. *Storage and erasure of data:* on the CISCO system at HungaroControl's seat,
Erasure and destruction of data following expiry of the data processing period.

III. RECIPIENTS, DATA PROCESSORS

Please note that HungaroControl keeps your personal data confidential and will not disclose such data to any third parties without notifying you in advance, except where mandatory data disclosure to the authorities and other organs is prescribed by law.

We would like to inform you that HungaroControl does not use a data processor.

IV. YOUR RIGHTS

a) Right to transparent information – With this notice the Data Controller provides information about the context of data processing, that is to say concerning the reasons and the legal basis for processing your personal data, who the data processor is and for how long your personal data will be processed, your rights in connection with such data processing and who to turn to if you have question or complaint;

b) Right to withdraw consent – Consent may be withdrawn at any time and without reason by way of notice sent to the data protection officer's e-mail address indicated below; However, the withdrawal of consent shall not affect the lawfulness of data processing based on consent before its withdrawal;

c) Right of access to your personal data – You have the right to obtain from the Data Controller confirmation as to whether or not your personal data concerning are being processed, and, where that is the case, to receive a copy of your personal data. Requesting such copy is free of charge for the first time, whereas HungaroControl may charge a reasonable fee based on administrative costs for each additional copy;

d) Right of rectification of your personal data – You have the right to obtain from the Data Controller the rectification of inaccurate personal data concerning you, or to have incomplete personal data completed;

e) Right to object – You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data; If you have lodged an objection, the Data Controllers shall not continue processing your personal data unless they can demonstrate compelling legitimate grounds for the processing which override your interests, rights, freedoms or which are connected with the establishment, exercise or defence of legal claims;

f) Right of erasure of your personal data – You have the right to obtain from the Data Controller the erasure of your personal data, and HungaroControl or its data processor shall have the obligation to erase your personal data at your request if:

- the personal data have been unlawfully processed;
- the purpose of processing no longer exists or the personal data are no longer necessary;
- you have withdrawn consent and where there is no other legal ground for the processing;
- the legal time limit for storage has expired;
- the erasure of data was ordered by law, by an authority or court;

g) Right to restriction of processing – You have the right to obtain from the Data Controller restriction of processing your personal data, with the exception of storage, for example, for the establishment, exercise or defence of legal claims;

h) Notification obligation regarding the recipients of notification of rectification or erasure of personal data or restriction of processing – At your request the Data Controller shall provide information about such recipients;

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

j) Compensation, claim for damages – You are hereby informed that you have the right to demand compensation or lodge a claim for damages for losses resulting from unlawful data processing or for any violation of rights relating to personality;

k) Notification – HungaroControl shall evaluate any request submitted by the data subject concerning the exercise of his or her rights within the shortest possible time, not exceeding one month, and shall notify the data subject of its decision in writing, or electronically, if the data subject made the request by electronic means.

l) Costs – If you submit another request in the same year with respect to the same type of data, for reasons other than any negligence on the part of HungaroControl prompting the rectification, erasure or restriction of data, HungaroControl shall be entitled to recover the costs of compliance with such request.

V. WHERE TO TURN TO IF YOU HAVE A QUESTION IN RELATION TO EXERCISING YOU RIGHTS, OR IF YOU WISH TO SEEK LEGAL REMEDY?

a) If you have any question, please contact the data protection officer of HungaroControl:
dpo@hungarocontrol.hu

b) Legal remedies:

Nemzeti Adatvédelmi és Információszabadság Hatóság

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

Mailing address: H-1363 Budapest, PO Box 9, Hungary

Website: www.naih.hu

Phone: +36-1-391-1400

Court:

In Hungary, the general court in whose jurisdiction the Data Controller's seat is located shall have jurisdiction to hear and determine any legal action, however, the data subject may choose to bring the action before the general court in whose jurisdiction the data subject's home address or habitual residence is located.