

Notice on the processing of personal data in connection with the recording of phone calls

- I. Please be informed that the calls (both incoming and outgoing calls) made via the below phone numbers are recorded.

- II. Please be informed that HungaroControl Pte. Ltd. Co. (seat: 1185 Budapest, Igló u. 33-35, Website: www.hungarocontrol.hu, E-mail: adatvedelem@hungarocontrol.hu) shall process the sound recording of the phone calls, qualifying as your personal data, as follows:

1. Data processing related to the auditing of financial transactions

1) The processed data are the sound recordings of the phone calls to/from the below phone numbers:

- +36-1-293-4207
- +36-1-293-4208
- +36-1-293-4213
- +36-1-293-4482
- +36-1-293-4619

2) Legal basis of data processing: the legitimate interest of HungaroControl Pte. Ltd. Co., acting as a state owned business association, in the appropriate implementation and documentation of the financial transactions executed orally, on the phone, qualifying as individual contracts.

3) Data subjects:

- a. the employees of the Financial and Accounting Department, Treasury Group, making and receiving the phone calls,
- b. employees of the concerned bank.

4) Purpose of data processing: subsequent auditing of the financial transactions.

5) Method of data processing:

- a. *Recording of the data:* the calls to and from the above phone numbers are automatically recorded.

- b. *Copying of the data:* the Technical Operations and Development Department shall make a copy of the sound recording of the call related to the inspected transaction onto a CS/DVD and shall send it to the Financial and Accounting Department.

- c. *Transfer of the data:* in the event of an internal audit affecting a financial transaction, the Treasury Group shall transfer the data carrier containing the duplicate copy to the Internal Audit Group, and when the audit is completed, the Internal Audit Group returns it to the Treasury Group.

- d. *Listening to the data:* The appointed associates subordinated to the Financial Directorate, the internal auditor duly mandated to carry out the internal audit, as well as the appointed associates of the affected bank shall be entitled to listen to the phone calls

for purpose of subsequent auditing/inspection of the concerned financial transaction, on an ongoing basis;

-
- in exceptional cases, on an ad hoc basis, the CEO, the CFO and the Senior Legal Adviser shall be entitled to listen to the calls.

e. *Storage and erasure of the data:*

- in terms of the original sound recording, storage and erasure are carried out in the Frequentis DIVOS system located at the registered seat of the Company (1185 Budapest, Igló utca 33-35),
- in terms of the CD/DVD copies storage and erasure are carried out at the registered seat of the Company, in the office premises of the Financial and Accounting Department, in lockable cabinets,
- in terms of the CD/DVD copies, in the event of an internal audit, storage and erasure are carried out in the office premises of the Internal Audit Group, in security cabinets, at the registered seat of the Company, right from commencement of the audit until its termination.

6) **Data retention time:**

- a. 60 days from the time of recording the data in terms of the original sound recording,
- b. two years from the time of recording the data in terms of the CD/DVD copies,
- c. in case of internal audits, until the concerned internal audit is closed.

2. **Data processing related to the use of the IT Customer Service**

1) **The processed data are the sound recordings of the phone calls to/from the below phone numbers:**

- +36-1-293-4499
- +36-1-293-4699

2) **Legal basis of data processing:** the data subject's consent.

3) **Data subjects:**

- a. the employees of the IT Customer Service making and receiving the phone calls,
- b. the persons using the IT Customer Service via the above phone numbers.

4) **Purpose of data processing:** solving IT incidents/events reported by employees using the one-stop IT Customer Service from an external phone line, complaint handling related to the notifications, and quality assurance of the IT operational activities.

5) **Method of data processing:**

- a. *Recording of the data:* the calls to and from the above phone numbers are automatically recorded.
- b. *Listening to the data:* the head of the Infocommunications Services Department and his/her appointed associate (e-mail: IT@hungarocontrol.hu).
- c. *Storage and erasure of the data:* in the CISCO system located at the registered seat of the Company (1185 Budapest, Igló utca 33-35).

6) **Data retention time:** 62 days.

3. Data processing related to the reports and consultations made regarding the use of the facilities and motor-vehicles

- 1) **The processed data are the sound recordings of the phone calls to/from the below phone numbers:**
 - +36-1-293-4545
 - +36-1-293-4346
- 2) **Legal basis of data processing:** the data subject's consent.
- 3) **Data subjects:**
 - a. the employees of the Project Engineering and Operational Department making and receiving the phone calls,
 - b. the persons receiving the reports on the phone related to the use of facilities and motor-vehicles, and the persons involved in the consultations made on the phone.
- 4) **Purpose of data processing:** ensuring the measures required according to the reports and consultations made regarding the use of the facilities and motor-vehicles.
- 5) **Method of data processing:**
 - a. *Recording of the data:* the calls to and from the above phone numbers are automatically recorded.
 - b. *Listening to the data:* The head of the Project Engineering and Operational Department and his/her appointed associate shall have the right to listen to the phone calls (e-mail: PRMO_OV@hungarocontrol.hu).
 - c. *Storage and erasure of the data:* in the CISCO system located at the registered seat of the Company (1185 Budapest, Igló utca 33-35).
- 6) **Data retention time:** 62 days.

4. Data processing related to aeronautical information

- 1) **The processed data are the sound recordings of the phone calls to/from the below phone numbers:**
 - +36-1-293-4354
 - +36-1-293-4471
- 2) **Legal basis of data processing:** legal obligation specified under Point (b) of Part "B" of Annex IV of Commission Regulation (EU) No 73/2010 laying down requirements on the quality of aeronautical data and aeronautical information for the single European sky.
- 3) **Data subjects:**
 - a. associates of the AIS Department making and receiving the phone calls,
 - b. the persons receiving aeronautical information via the above phone numbers.

- 4) **Purpose of data processing:** ensuring the retrievability of the data in the event the NOTAM is issued by phone.
- 5) **Method of data processing:**
 - a. *Recording of the data:* the calls to and from the above phone numbers are automatically recorded.
 - b. *Listening to the data:* The head of the AIS Department and his/her appointed associate shall have the right to listen to the phone calls (e-mail: ais@hungarocontrol.hu).
 - c. *Transfer of the data:* transfer of the recording to the aviation authority for purpose of investigation of the concerned incident.
 - d. *Storage and erasure of the data:* in the CISCO system located at the registered seat of the Company (1185 Budapest, Igló utca 33-35).
- 6) **Data retention time:** 62 days.

5. Data processing related to meteorological services

- 1) **The processed data are the sound recordings of the phone calls to/from the following phone number:** +36-1-293-4681
- 2) **Data subjects:**
 - a. associates of the Meteorology Office of HungaroControl making and receiving the phone calls,
 - b. the representatives of the organisations using the service or the persons using the service.
1. **The controller:** HungaroControl Pte. Ltd. Co. (seat: 1185 Budapest, Igló u. 33-35., Website: www.hungarocontrol.hu, e-mail: aeromet@hungarocontrol.hu).
2. **Purpose of data processing:** to determine and prove the time and content of the service provided via the phone in the event there is any subsequent dispute or investigation regarding the service.
3. **Legal basis of data processing:** the legitimate interest of HungaroControl and the persons using the service to prove (subsequent to the service) the appropriate professional content and time of the aeronautical meteorological service provided via the phone.
4. **Method of data processing:**
 - a) *Recording of the data:* the calls to and from the phone number at +36-1-293-4681 are automatically recorded in the CISCO system operated by the Technical Operations and Development Department;
 - b) *Listening to the data:* if there is an investigation regarding the appropriate professional content and time of the aeronautical meteorological service provided via the phone, the head of the Meteorology Group (Meteorology Office) has the right to listen to the data, by ensuring access to the system;
 - c) *Storage and erasure of the data:* in the CISCO telephone exchange system located at the registered seat of the Company (1185 Budapest, Igló utca 33-35).
5. **Data retention time:**
 - a) 60 days from the time of recording the data,
 - b) until the investigation is closed, in the event there is an investigation regarding the service, but maximum for 60 days from the time of recording the data.

HungaroControl Pte. Ltd. Co. does not employ data processors for the above data processing actions.

III. Data security measures

1. Please be informed that the provided personal data shall be handled confidentially by HungaroControl, and these personal data shall not be transferred 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. 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. 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.

IV. Rights and Legal Remedies

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.

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. 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.

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.
5. Please be informed that the controller 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.
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.
7. 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.
8. HungaroControl shall assess the request submitted by you for enforcement of your rights, as soon as possible, but within one month at 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.

9. 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, +36-1-3911400, 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.
- V. 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.

VI. Please be informed that the following person acts as the Data Protection Officer of HungaroControl: dr. Anikó Fazekas (+36-30-851-25-15, dpo@hungarocontrol.hu).