

NOTICE OF PERSONAL DATA PROCESSING
SESAR2020 Flight Centric ATC Open Day

- I. Please be informed that HungaroControl Pte. Ltd. Co. (website: www.hungarocontrol.hu, email: info@hungarocontrol.hu, hereinafter: HungaroControl or Company) processes your personal data related to *SESAR2020 Flight Centric ATC Open Day* on 16 January, 2019 at HungaroControl headquarters (33-35 Igló Street 1185 Budapest) as follows:

1) Data processing related to data provided during the registration:

- a) **Processed data:** name, company, e-mail address;
- b) **Legal basis of processing:** the consent of the participant;
- c) **Purposes of data processing:** events coordination (calculating the expected number of attendees, seating plan, contact and communication with the participants);
- d) **Method of data processing:** recording, storage and erasing of the data;
- e) **Data retention time:** 3 months.

If you do not consent to the processing of your data during the registration, you will not be able to take part in the event.

2) Data processing related to photograph and video taken in the Open Day:

- a) **Processed data:** photograph, video
- b) **Legal basis of processing:** the consent of the participant;
- c) **Purposes of data processing:** promoting and branding;
- d) **Method of data processing:**
 - taking, recording, storage photographs and videos
 - publishing photographs and videos in promotional materials (posters, publications) of HungaroControl, on social networking sites, on national and international events and conferences,
 - transferring photographs and videos to the Frequentis AG and Deutsches Zentrum für Luft- und Raumfahrt (DLR) for presenting validation results,
 - erasure photographs and videos after data retention time;
- e) **Data retention time:** 10 years;
- f) **Processors:**
 - *ProduCom Kft.* (1027 Budapest, Fő u 75. B II. em 2., www.producom.hu, info@producom.hu) - taking photographs;
 - *LinkedIn Ireland Unlimited Company* (Wilton Plaza Wilton Place, Dublin 2, Ireland, <https://www.linkedin.com/help/linkedin/ask/PPQ?lang=en>) - publishing photographs on the LinkedIn;
 - *Facebook Ireland Ltd.* (4 Grand Canal Square, Grand Canal Harbour, Dublin, Ireland, <https://www.facebook.com/help/contact/1461223320847982>) - publishing photographs and video on Facebook and Instagram;
 - *Google Inc.* (1600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America, <https://support.google.com/youtube/answer/142443>) - publishing photographs and video on YouTube;

3) Data processing related to the electronic entrance control system of the Company

- a) **Processed data:** data subject's name, personal ID card with photo number, issued by the authority, the name of the escort (if any), serial number of the entry card to be issued, time of issuance and withdrawal;
- b) **Data subjects:** The processing of the data of persons intending to enter occasionally or regularly into the building of the Company, who are not holding a permanent entry card;
- c) **Purpose of data processing:** Requesting a permission to enter and stay in the security area of the Company, checking the entrance and rights as well as securing compliance with the legislation regulating civil aviation security;
- d) **Legal basis of data processing:** The Company's compliance with the law in terms of civil aviation security and the protection of critical systems and facilities and also with the Company's Aviation Security Plan, approved by the aviation authority, and the establishment of the required and appropriate safety guarantees, as being the Company's legitimate interest;
- e) **Data source:** the online registration platform;
- f) **Method of data processing:**
 - fa) **Recording of the data:** by the employee requesting the entry, via the electronic requisition reporting interface or by the organizational unit or the co-workers of the Security Service via the electronic entrance control system;
 - fb) **Storage and viewing of the data:** by the co-workers of SD and the Security Service, on the Company's security server, independent from its internal IT network;
- g) **Duration of data processing:** for a maximum of two years in the entrance control system, or until the expiry of the requisition in the electronic requisition reporting interface;
- f) **Data processor:** The Company does not employ data processors for the processing.

- 4) Regarding all the data provided on the registration platform, BIG FISH Internet-technológiai Ltd. (1066 Budapest, Nyugati tér 1-2., e-mail: cafe@bigfish.hu) is the data processor (as facility manager for the servers of HungaroControl website).

II. Data security measures

1. Please be informed that the personal data is kept by Data Manager and Data Processors in confidence. Only those who are involved in the performance of these tasks can be recognized the data. The data shall not be transferred by HungaroControl to third parties without your consent and without providing prior information and consent of you, except for mandatory reporting to authorities with statutory and other bodies.
2. Please be informed that HungaroControl shall store your personal data electronically, on closed servers and on its data processing servers and computers located in the registered seat (1185 Budapest, Igló utca 33-35), paper-based documents in lockable cabinets in tis offices. For storage of data, HungaroControl uses the data processing service described in this notice. In the course of processing of personal data, HungaroControl – in accordance with the applicable legislation – takes such risk proportionate administrative and technical measures that prevents unauthorized and unlawful access to the personal data and modification of the personal data. Moreover, these measures ensure the transmission, disclosure and cancellation of personal data as well as ensuring the control over data processing. 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.

III. Rights of the data subjects, legal remedies, contact

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 HungaroControl 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 is not necessary for the purpose of carrying out tasks of general interest.

HungaroControl shall examine the objection as soon as possible, but within a maximum of 15 days of the submission of the request, and shall decide whether such objection is well-founded or not and shall inform the complainant about its decision in writing. If HungaroControl 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 are required to take action in order to enforce the right of protest.

2. Please be informed that you have the right to ask HungaroControl **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 Company 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 HungaroControl 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. If HungaroControl unblocks the restriction of data processing, you shall be informed in advance.
5. Please be informed that HungaroControl or its 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.
6. Please be informed that upon your request, HungaroControl 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 the data subject for enforcement of their rights, as soon as possible, but within 25 days 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.

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 you submit a repeated request 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 HungaroControl, the Company 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.
10. Please be informed that HungaroControl is operating a complex security system (security cameras, entrance control system) on its own area. The rules of data processing related to the operation of this system are specified under the In-House Rules of the HungaroControl, which is available at the Reception Service.
11. Please be informed that the following person acts as the **Data Protection Officer** of HungaroControl: dr. Márton Domokos (+36-20-203-2653, dpo@hungarocontrol.hu)