Notice on the processing of personal data

In relation to the internal audit activities of HungaroControl Pte. Ltd. Co.

I. Please be informed that HungaroControl Hungarian Air Navigation Services Private Limited Company (seat: 1185 Budapest, Igló u. 33-35, Website: www.hungarocontrol.hu, E-mail: info@hungarocontrol.hu, hereinafter as: HungaroControl, Company) shall process personal data in relation to its internal audit activities, as follows:

1. **Processed data:** personal data included in the documents used in the course of the internal audits (hence, in particular: name, signature, employee number, initials, data related to working time arrangement, data included in the main text or in the certificates attached in the annexes of the individual contracts [and the copies of these certificates form integral and inseparable parts of the contracts – mainly public procurement contracts], data included in CVs and correspondence related to the inspected activity).

2. **Data subjects:** employees of HungaroControl and external persons affected by the process or proceeding investigated through the internal audit.

3. **Purpose of data processing:**
   A. to conduct and document the internal audits, to keep track of the measures, to prove that the internal audit reports are substantiated and well-founded,
   B. to use the data for purpose of investigating the conducts – possibly qualifying as unlawful – identified as a result of the findings of the internal audits, and – if necessary – to use these data in labour law, civil law or criminal law proceedings (the internal audit itself shall not impose any sanctions and shall not make any proposals to that effect in its findings),
   C. in terms of storage of the data:
      - to perform the obligation of retention specified in the Archiving Plan attached as an annex to the Document Management Policy approved by the Hungarian National Archives, pursuant to Government Decree No. 335/2005. (XII. 29.) on the general requirements for the records management of bodies performing public functions
      - Government Decree No. 339/2019. (XII. 23.) on the internal control system of publicly owned companies, as well as the Directive on the internal control of companies under the Minister without portfolio in charge of National Assets 's ownership and for publicly owned companies to comply with the requirements of the Directive issued jointly by the Minister of Finance and the Minister without portfolio in charge of National Assets for the establishment and operation of the internal control system.

4. **Legal basis of data processing:**

A. in terms of the usage of the data:
   a) legitimate interest of HungaroControl to conduct and document the internal audits, to keep track of the measures related to the internal audits, and to prove that the internal audit reports are substantiated and well-founded pursuant to Article 6(1) f) 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 (hereinafter as: GDPR),

b) legitimate interest of HungaroControl to use the data for purpose of investigating the conducts – possibly qualifying as unlawful – identified as a result of the findings of the internal audits, and – if necessary – to use these data in labour law, civil law or criminal law proceedings, pursuant to Article 6(1) f) of the GDPR,

B. in terms of storage of the data: the performance of the legal obligation of HungaroControl approved pursuant to Article 6(1)c) of the GDPR.

5. Method of data processing:

A. *Recording of the data*: recording of the data in the memos, notes, worksheets used in the course of the internal audits and in the internal audit reports.

B. *Usage of the data:* the data shall be used to conduct the internal audits, keep track of the measures determined as a result of the audits, and also to prove that the findings made in the internal audit reports are substantiated and well-founded, and also to investigate the conducts possibly qualifying as unlawful, and to conduct the related labour law, civil law or criminal law proceedings.

C. Storage of the data:

a) the personal data included in internal audit documents created less than six years ago shall be stored in the office premises of the Internal Audit Team conducting the respective internal audit, located at the registered office of the Company (1185 Budapest, Igló utca 33-35.), in security cabinets (the highly confidential documents and the documents of ongoing cases) and in lockable cabinets (other documents) and on the servers located at the registered office of the Company,

b) the personal data included in the internal audit documents created more than six but less than ten years ago shall be stored in the central archive (lockable with a key and code) located at the registered office of the Company, accessible only to the document manager assistant and administrator of the Administration Group,

c) contracts created more than ten years ago and identified as a result of the internal audit – possibly qualifying as unlawful - and preserved as a documentation of a related labour law, civil law or criminal law proceedings shall be stored in lockable cabinets in the office premises of the Internal Audit Unit conducting the respective internal audit, located in the registered office of the Company (1185 Budapest, Igló Street 33-35.) or in the central archive (lockable with key and code) located at the registered office of the Company, accessible only to the document management assistant and administrator of the Administration Unit,

D. *Erasure of data*: by destruction of the hard copy documents and by deletion of the documents stored electronically, after the data retention time has expired.

6. Data retention time:

a) in terms of the records created prior to 1 January 2020: 10 years (according to the Archiving Plan of HungaroControl),

b) in terms of the records created after 1 January 2020: 6 years,

c) in the case of investigating the conducts – possibly qualifying as unlawful – identified as a result of the findings of the internal audits and the related labour law, civil law or criminal law proceedings, until the respective proceeding is closed, whereas this period exceeds the general period, otherwise, until the end of the retention period.

7. **Data processor:**
   HungaroControl does not employ data processors for the processing.

II. 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 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.

III. Rights and legal remedies concerning data processing, contact

1. Please be informed that you have the right **to object** to the processing of your personal data. If HungaroControl finds that the protest is justified, it will terminate the data processing, including further data collection and data transfer, and block the data; and shall notify the protest and the action taken on it to all persons to whom the personal data concerned by the protest have previously been transmitted and who are obliged to take action to enforce the right of protest.

2. Please be informed that you have the right to ask the Company ***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 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. In the event HungaroControl lift the restriction of processing, they shall provide information thereof in advance.

5. Please be informed that the Company 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) the statutory data retention period has expired;
   d) the erasure of data was ordered by law, authority or court.

6. 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.

7. Please send the requests to the ***Data Protection Officer*** at the following e-mail address: dpo@hungarocontrol.hu.

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. 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 (1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, Pf. 9., 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.