

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

1. Please be informed that the calls (both incoming and outgoing calls) made via the below phone numbers are recorded.
2. By making an incoming call or receiving an outgoing call, you grant your express consent to the processing of your personal data by HungaroControl Pte. Ltd. Co. (registered office: 1185 Budapest, Igló u. 33-35.), in a documented manner, as follows:
  - a) **Scope of processed data:** the audio recordings made of the phone calls to and from the following phone numbers:
    - +36-1-293-4207
    - +36-1-293-4208
    - +36-1-293-4213
    - +36-1-293-4482
    - +36-1-293-4619

**Legal basis of processing:** legitimate interest of HungaroControl Pte. Ltd. Co. to perform its financial transactions in the appropriate manner.

**Purpose of data processing:** subsequent inspection of the disputed financial transactions.

**Source of data:** the device recording the phone calls.

**Processing method:** recording, storage, erasure of the audio recordings, listening to these recordings.

**Controller:** in terms of recording, storage and erasure: the appointed associates of the Technical Operational and Development Department ([MÜFO@hungarocontrol.hu](mailto:MÜFO@hungarocontrol.hu)); in terms of listening to the recordings: CEO, CFO, and the appointed associates subordinated to the CFO ([GZDI@hungarocontrol.hu](mailto:GZDI@hungarocontrol.hu)), the Senior Legal Adviser ([JOGO@hungarocontrol.hu](mailto:JOGO@hungarocontrol.hu)), the internal auditor holding a mandate for the given inspection ([IACO\\_CSV\\_felett@hungarocontrol.hu](mailto:IACO_CSV_felett@hungarocontrol.hu)), and the appointed associate of the bank involved in inspection of the disputed transaction.

**Data retention time:** for 2 years following the recording of the respective data.

- b) **Scope of processed data:** the audio recordings made of the phone calls to and from the following phone number:
  - +36-1-293-4499

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

**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.

**Source of data:** the device recording the phone calls.

**Processing method:** recording, storage, erasure of the audio recordings, and listening to these recordings, received to the phone number ensured for using the one-stop IT Customer Service from an external phone line.

**Controller:** in terms of recording, storage and erasure: the appointed associates of the Technical Operational and Development Department ([MÜFO@hungarocontrol.hu](mailto:MÜFO@hungarocontrol.hu)); in terms of listening to the recordings: the head and appointed associate of the Infocommunications Services Department (phone number: +36-1-293-4450, e-mail: [IT@hungarocontrol.hu](mailto:IT@hungarocontrol.hu)).

**Data retention time:** until withdrawal of the consent, but for the maximum of 62 days.

- c) **Scope of processed data:** the audio recordings made of the phone calls to and from the following phone numbers:
- +36-1-293-4545
  - +36-1-293-4346

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

**Purpose of data processing:** ensuring the measures required according to the reports and consultations made regarding the use of the facilities and motor-vehicles.

**Source of data:** the device recording the phone calls.

**Processing method:** recording, storage, erasure of the phone calls, listening to these phone calls.

**Controller:** in terms of recording, storage and erasure: the appointed associates of the Technical Operational and Development Department ([MÜFO@hungarocontrol.hu](mailto:MÜFO@hungarocontrol.hu)); in terms of listening to the recordings: the head and appointed associate of the Project Engineering and Operational Department (phone number: +36-1-293-4136, e-mail: [PRMO\\_OV@hungarocontrol.hu](mailto:PRMO_OV@hungarocontrol.hu)).

**Data retention time:** until withdrawal of the consent, but for the maximum of 62 days.

- d) **Scope of processed data:** the audio recordings made of the phone calls to and from the following phone numbers:
- +36-1-293-4354
  - +36-1-293-4471

**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.

**Purpose of data processing:** ensuring the retrievability of the data in the event the NOTAM is issued by phone.

**Source of data:** the device recording the phone calls.

**Processing method:** recording, storage, erasure of the phone calls, listening to the phone calls, their transmission to the aviation authority for the purpose of investigation of the event.

**Controller:** in terms of recording, storage and erasure: the appointed associates of the Technical Operational and Development Department ([MÜFO@hungarocontrol.hu](mailto:MÜFO@hungarocontrol.hu)); in terms of listening to and transmission of the recordings: the head and appointed associate of the AISO Department ([ais@hungarocontrol.hu](mailto:ais@hungarocontrol.hu)).

**Data retention time:** for 62 days.

3. Please be informed that the provided personal data are kept confidential by HungaroControl Pte. Ltd. Co. and these personal data may be disclosed only to the persons listed above. Without your consent and without providing prior notice thereof to you, the data shall be transferred by HungaroControl Pte. Ltd. Co. to third parties only as detailed in this notice, except for the statutory data provision to authorities and other bodies based on legislation.
4. Please be informed that HungaroControl Pte. Ltd. Co. 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, HungaroControl Pte. Ltd. Co. – in line with the applicable legislation – 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.

5. 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 Pte. Ltd. Co. 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 Pte. Ltd. Co. 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 HungaroControl Pte. Ltd. Co. 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.
6. Please be informed that you have the right to ask HungaroControl Pte. Ltd. Co. **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.
7. 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.
8. Please be informed that HungaroControl Pte. Ltd. Co. 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 lifts the restriction of processing, you shall be informed thereof in advance.
9. Please be informed that HungaroControl Pte. Ltd. Co. 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 withdrew 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.
10. Please be informed that upon your request, HungaroControl Pte. Ltd. Co. 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.

11. 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.
12. HungaroControl Pte. Ltd. Co. 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 Pte. Ltd. Co. 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 Pte. Ltd. Co., the Company may ask for reimbursement of its costs incurred in relation to the fulfilment of the request.

13. 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](mailto:ugyfelszolgalat@naih.hu), +36-1-3911400, [www.naih.hu](http://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.
14. 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 shall be applied.
15. Please be informed that the following person acts as the **Data Protection Officer** of HungaroControl Pte. Ltd. Co.: dr. Márton Domokos (+36-20-203-2653, [dpo@hungarocontrol.hu](mailto:dpo@hungarocontrol.hu))