

## INFORMATION

### on processing in connection with the English and Hungarian language proficiency exams

(last updated: 2 June 2025)

We wish to inform you as a data subject (hereinafter referred to as **You** or **Data Subject**), that regarding the completion of the English and Hungarian language proficiency exams, pursuant to the provisions of *Commission Regulation (EU) 2015/340 laying down technical requirements and administrative procedures relating to air traffic controllers' licences and certificates pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council, amending Commission Implementing Regulation (EU) No 923/2012 and repealing Commission Regulation (EU) No 805/2011* (hereinafter referred to as Regulation), the provisions of *Government Decree No. 532/2017 (XII. 29.) on the Additional Procedural Rules of the Aviation Authority related to the issuing a licences and entering a language proficiency endorsement in a the licence* (hereinafter referred to as Government Decree), and the provisions of *GKM Decree No. 17/2008 (IV. 30.) on the service licence and training of air navigation and air traffic management services personnel* (hereinafter referred to as GKM Decree), **HungaroControl Pte. Ltd. Co.** (registered office: H-1185 Budapest, Igló u. 33-35., website: [www.hungarocontrol.hu](http://www.hungarocontrol.hu), email: [nyelvizsga@hungarocontrol.hu](mailto:nyelvizsga@hungarocontrol.hu), hereinafter referred to as **Data Controller** or **HungaroControl**) is processing your personal data as described below:

#### 1. DETAILED DESCRIPTION OF DATA PROCESSING

Related data	Sources of data	Purpose of data processing	Legal basis for data processing	Retention period
<p>A. Data provided during online application</p> <p>a) name,</p> <p>b) date of birth,</p> <p>c) telephone,</p> <p>d) e-mail address,</p> <p>e) postal address,</p> <p>f) indication of the applicant's status: HungaroControl employee or external applicant;</p> <p>B. Personal data on the assessment form;</p> <p>C. Personal data on the duplicate copy of the language exam certificate;</p> <p>D. For external applicants (non-HungaroControl employees):</p>	<p>The Data Subject</p> <p>(persons who have passed the English and Hungarian language proficiency exam organised by the Company)</p>	<p>A. Verifying the identity of applicants during language proficiency exams, contacting them, and issuing their language exam certificates;</p> <p>B. Result of the language proficiency exam;</p> <p>C. Certification of completion of the exam for the purpose of obtaining a licence, presentation during official inspections and audits, and proving language proficiency required for the performance of job duties of HungaroControl employees;</p> <p>D. Issuing invoices;</p>	<p>1. With regard to points A to B, C and E: Article 6(1) (c) of the GDPR</p> <ul style="list-style-type: none"> <li>• ATCO.B.030 of the Regulation and the legal obligations specified in the provisions of the Government Decree regarding the conditions of issuing licences and entering a language proficiency endorsement in the licence,</li> <li>• with regard to flight information service providers: compliance with the legal obligation set out in Annex 4 to the GKM Decree;</li> </ul> <p>2. With regard to point D: Article 6(1)(b) of the GDPR – the contract arising from the application;</p> <p>3. With regard to the</p>	<p>I. With regard to the data referred to in points A and D, until the language proficiency examination has been completed or the language exam certificate has been issued;</p> <p>II. With regard to the data referred to in points B and C, the duration set out in the Archive Plan annexed to the Records Management Policy of the Company developed in accordance with the guidelines of the National Archives and approved by the National</p>

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billing address;  E. Audio recording made during the oral part of the language proficiency exam (conversational dialogue)		E. Evaluation of the oral part of the language proficiency exam, and assessment of any appeals that may be submitted	retention of duplicate copies of employees' language exam certificates, Article 6(1) (f) of the GDPR – the legitimate interest of the Company to verify the qualifications and education required for the performance of the job duties of its employees	Archives;  III. With regard to the data referred to in point E, 3 years (pursuant to Point 3.2 of Annex 4 of the GKM Decree )

## 2. THE PROCESS AND THE MEANS OF PROCESSING

- a) Collecting, recording and using data;
- b) Storing data: electronically on HungaroControl's servers, as well as in the form of hard copies in a locked cabinet;
- c) Transmission of data: as regards the results of the exam English Language Proficiency for Aeronautical Communication (ELPAC), to EUROCONTROL (Aviation Learning Centre 12, rue Antoine de Saint-Exupéry LU-1432 Luxembourg) ;
- d) erasure and destruction of data following expiry of the data processing period.

## 3. RECIPIENTS, DATA PROCESSORS

We inform you that HungaroControl keeps all personal data confidential as they can be accessed only by staff members involved in the organisation and conducting of exams. HungaroControl will disclose such data to third parties without notifying you in advance exclusively in accordance with this notice, except where mandatory data disclosure to the authorities and other organs is prescribed by law.

## 4. 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 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;
- c) 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;
- d) Right to object** – Where data processing takes place on the basis of legitimate interest, 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 Controller shall no longer process your personal

data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims;

**e) 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;

**f) 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;

**g) 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;

**h) 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.

**i) 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;

**j) 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.

**k) 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.

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

**a) If you have any question, please contact the data protection officer of HungaroControl:**

Dr. Anikó Fazekas

Telephone: +36-30-851-2515

E-mail address: [dpo@hungarocontrol.hu](mailto: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](http://www.naih.hu)

Telephone: +36-1-391-1400

**Court:**

In Hungary, the general court that has jurisdiction where 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 that has jurisdiction according to the data subject's address or place of residence.