

## **Privacy Policy**

### **for the use of the “HungaroControl AIRbility” online game**

- I. Please note that HungaroControl Zrt. (registered seat: 1185 Budapest, Igló u. 33-35., email: [info@hungarocontrol.hu](mailto:info@hungarocontrol.hu)) processes your personal data as set out below in connection with the online game used to measure skills for the purposes of supporting air traffic control recruiting activities (hereinafter: “game”):
- 1) **Processed data:** name, e-mail address, date of birth, the results achieved in the name, username and password;
  - 2) **The purpose of data processing:**
    - a. organizing games, determining the best results achieved in the game, and making the results available to players,
    - b. contact in the course of the air traffic control recruiting activity,
    - c. the preparation of statistics on the basis of the results achieved in the game that provide assistance in the recruiting of workers.
  - 3) **The legal grounds for data processing:** the consent of the player participating in the game, which they give after familiarizing themselves with the contents of this Privacy Policy, separately for each of the purposes of data processing, by checking the appropriate check boxes.
  - 4) **Data Processor:** the programmer of the game, Lounge Design Szolgáltató Korlátolt Felelősségű Társaság (registered seat: 1025 Budapest, Felső Zöldmáli út 72, email: [info@lounge.hu](mailto:info@lounge.hu), website: <http://www.thelounge.hu>), which utilizes the services of TRENDENCY ONLINE Alkalmazásfejlesztő Zártkörűen Működő Részvénytársaság (registered seat: 1092 Budapest, Knézits utca 12. fszt. 3., company registration number: 01-10-047275, tax number: 23745269-2-43, phone number: +36 70 426 1423 email: [dev@trendency.hu](mailto:dev@trendency.hu), website: <https://trendency.hu/>), as additional data processor, for the purposes of operating the online surface used for the game. The Data Processor has access to the electronic database that contains the personal data.
  - 5) **The duration of data processing:**
    - until the withdrawal of consent, but for no more than 2 years from the time the data provided by the participant are saved/amended;
    - if the user account is deleted by the user, for 30 days from the time of deletion.
  - 6) **The method of data processing:** viewing the data, retaining those in electronic format, and using those for the purposes specified in point 2).

## **II. Data security measures**

The data controller and the data processor handle the provided personal data confidentially and will not disclose those to third parties without informing you beforehand and obtaining your consent, with the exception of the compulsory data disclosure to the authorities and other official bodies as required by law.

The data processor uses the following technical and organizational measures to ensure the security of processing:

- internal information security regulations,

- privacy policy,
- the data protection training of employees,
- the application and continuous monitoring of the information security technical measures that meet the conditions of Article 32 of the GDPR.

### III. Rights and possibilities for legal remedy

1. Please note that if you do not grant consent for the data processing applied for the purposes of organizing the game, you will not be able to participate in the game. Please note that you may **withdraw your consent** by unchecking the checkbox. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
2. Please note that you have the right to request that the data controller **make available** to you the personal data it processes and the information in connection with the processing thereof. You may request a copy of your personal data if such copy does not adversely affect the rights or freedoms of others. The request for a copy is free of charge on the first occasion; the data controller may charge a fee based on administrative costs for all other copies.
3. Please note that you may **correct** your personal data in the profile created in the application, if such data are incorrect.
4. Please note that if you so request, the data controller will **restrict** processing if you dispute the correctness of the data, if processing is unlawful but you request restriction instead of erasure, if the purpose of processing is no longer viable but you request processing for the submission, enforcement, or protection of legal claims, or if you have objected to processing and the objection is under consideration. If the data controllers lift the restriction on processing, they will notify you in advance.
5. Please note that upon request, the data controller will **erase** the processed personal data if:
  - a) it is processed unlawfully;
  - b) the purpose of data processing is no longer viable or the processing of the data is no longer necessary for achieving its purpose;
  - c) you withdraw consent and there are no other legal grounds for the processing;
  - d) the processing of the data is required by law, an authority, or a court.
 Please also note that you can erase your personal data in the profile you create in the application at any time; however, in this case you may no longer participate in the game..
6. Please note that at your request, the data controller will **provide** you with a copy of your personal data in a structured, commonly used and machine-readable format, or, if technically feasible, will **forward** those to another data controller or ensure those are forwarded.
7. Please note that you have the right to demand **compensation or restitution** for any damages or violations of your personality rights that you suffer as a result of unlawful processing.
8. HungaroControl will evaluate and pass a decision on your request pertaining to the enforcement of rights you are due, within the shortest possible time of its submission, but within no more than one month, and will inform you of such decision on writing, or if you submitted your request electronically, by electronic means.  
 In the case of a repeated request submitted in the same year regarding the same data, the data controller may request reimbursement for its costs incurred in connection with the fulfillment of the request if the request is not necessary because the data have to be rectified, erased, or restricted due to an omission on behalf of the controller.

9. If you feel a violation has occurred in connection with the processing of your personal data, you **may initiate an inspection** from the Hungarian National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11., mailing address: 1363 Budapest, Pf. 9., [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), +36-1-3911400, [www.naih.hu](http://www.naih.hu)) or **turn to the competent court**. The lawsuit may also be launched at the tribunal in whose jurisdiction your home address or, if requested, at your temporary residence is located.

IV. Please note that HungaroControl's **Data Protection Officer** is: Dr. Anikó Fazekas (+36-30-851-25-15., [dpo@hungarocontrol.hu](mailto:dpo@hungarocontrol.hu)).