

RIVAIR PILOT LTD. DATA MANAGEMENT INFORMATION

THE DATA CONTROLLER'S DATA

RIVAIR PILOT Kft

Cg: 01-09-739828

Headquarters: 1085 Budapest, Horánszky Street 10.

Branches:

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Contacts:

+36 70 523 7075

E -mail: office@riv-air.hu

Data Protection Officer: Dr. Simó Veronika

The theoretical and practical training of pilots is a major focus of RIVAIR PILOT Ltd. This activity entails specific data management obligations.

The purpose of this Privacy Notice is to inform all Data Subjects who come into contact with the company in a concise and clear manner about the company's data management principles and practices and to help them understand and exercise their rights and obligations in relation to the processing of their personal data.

The Data Controller will publish the Privacy Notice on its website (<https://riv-air.hu/>).

The Data Controller shall set out the detailed rules of the data management procedure in an Internal Data Management Policy.

Principles of data management

The Data Controller shall observe **the principles of data management with particular care.**

Personal data may only be processed for clearly specified, legitimate purposes, for the exercise of rights and the performance of obligations. At all stages of processing, the purpose of the processing must be fulfilled and the collection and processing of the data must be fair and lawful.

Only personal data that is necessary for the purpose of the processing and is adequate for the purpose of achieving that purpose may be processed.

Personal data may only be processed to the extent and for the duration necessary to achieve the purpose.

The appropriate technical or organisational measures, in particular those designed to protect against unauthorised or unlawful processing, accidental loss, destruction or damage, shall be implemented to ensure adequate and secure processing of personal data.

The processing must ensure that the data are accurate, complete and, where necessary for the purposes for which they are processed, kept up to date and that the Data Subject can be identified only for the time necessary for the purposes for which they are processed.

The Data Controller shall inform the Data Subject, before the processing starts, of the scope of the data processed, the purposes, legal basis and duration of the processing, of his or her rights and remedies and of the availability of this Privacy Notice.

Lawfulness of processing:

The Data Controller may lawfully process personal data only **on a specified legal basis**.

The possible legal bases for the activities of RIVER PILOT Ltd. in accordance with Article 6 of the Regulation are the following:

a.) processing is necessary for compliance with a legal obligation to which the Controller is subject, such as an obligation to fulfil an obligation to competent authorities, etc.; Article 6(1)(c) GDPR)

b.) processing is necessary for the performance of a contract to which the Data Subject is a party or for taking steps at the request of the Data Subject prior to entering into the contract; GDPR Article 6 (1) b.)

This includes, for example, any contractual relationship, the conclusion of contracts related to the activities of the Controller or, for example, an employment contract.

c.) the processing is necessary for the protection of the vital interests of the Data Subject or of another natural person, e.g. the protection of persons and property; GDPR Article 6 (1) d.)

d.) processing is necessary for the purposes of the legitimate interests pursued by the Controller or a third party; such processing is necessary for the operation of the Controller. Article 6(1)(f) GDPR) The Controller shall carry out a balancing of interests test to demonstrate a legitimate interest.

Scope of processed personal data

When contacting us for the first time on the website, it is essential to provide your name, telephone number and e-mail address (<https://riv-air.hu/flight-booking/>)

If the Data Subject wishes to enter into a contractual relationship with RIVAIR PILOT Kft. in any area of the Data Controller's activity, he/she is obliged to complete the data forms prepared by the Data Controller.

The scope of the data processed on the forms: (<https://riv-air.hu/exam-booking/>, name, name at birth, date and place of birth, mother's name, nationality, permanent and postal address, telephone number, e-mail address, photo ID number (copy)

It is the responsibility of the Data Controller to record all the necessary data in accordance with the legal requirements, but not to exceed this limit.

Duration of processing

The Data Controller shall retain and store personal data for the duration of the contractual or other legal relationship in question, and in the event of its termination for any reason, the Data Controller may not delete the data for a further period of 5 years in order to comply with its legal obligations.

In the area covered by financial and tax legislation, the retention period is 8 years.

Data transmission

The Data Controller will only transfer the personal data processed to third parties if required to do so by law.

Data security measures

It is the responsibility of the Data Controller to store the personal data provided to it in a secure manner and location, and to ensure that no unauthorised person has access to it. The Data Controller stores personal data in its own offices and on its own computers.

The Data Subject's rights and means of redress

The data subject has the right to exercise the following rights in relation to his or her personal data processed by the controller:

- a) to be informed of the facts relating to the processing before the processing starts (**right to prior information**),
- (b) to have access to his or her personal data and information relating to the processing of those data by the controller at his or her request (**right of access**),
- (c) to have his or her personal data rectified or completed by the controller at his or her request and in the further cases specified in this Chapter (**right of rectification**),
- (d) at his or her request and in the further cases specified in this Chapter, to restrict the processing of his or her personal data by the controller (**right to restriction of processing**),
- (e) at his request and in the further cases specified in this Chapter, to erase his personal data (**right to erasure**),
- (f) to initiate proceedings before the Authority (**right to official remedy**); and
- (g) initiate court proceedings (**right to judicial remedy**).

(h) The Data Subject also has the right to receive personal data concerning him or her which he or she has provided to a controller in a structured, commonly used, machine-readable format and the right to transmit such data to another controller (**Right to data portability**).

Data processor

The Data Controller does not use the assistance of a data processor.

Where should the Affected Person go?

The Data Subject may submit a question, request or complaint to the following contact details, and the Data Controller will provide written information on the action taken to comply with the request no later than 25 days after the request is submitted.

Name: Vilmos Rózsavölgyi
1085 Budapest, Horánszky u. 10.
Phone: +36 30-932 2197
E-mail address: info@riv-air.hu

Data Protection Officer

RIVAIR PILOT Ltd. appoints a Data Protection Officer to ensure compliance with the legal requirements for the processing of personal data and to facilitate the exercise of the rights of Data Subjects.

The Data Protection Officer is Dr. Veronika Simó
Contact details of the Data Protection Officer: adattiszt@gmail.com

Data protection incident

"**data breach**" means a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed"

The Data Controller shall carry out its processing activities in such a way that the integrity and confidentiality of personal data are not compromised in any way. The Data Controller shall endeavour and carry out its activities in such a way as to prevent a personal data breach from occurring.

The Data Controller shall operate a data breach handling process, which shall be set out in its internal operating rules.

Remedies against improper data processing

1- The Data Subject may submit a complaint to the Authority

The Data Subject may bring proceedings against the Data Controller before **the National Authority for Data Protection and Freedom of Information** in the event of a breach of the law or improper processing.

The NAIH contact details are:

Postal address: 1530 Budapest, Pf.: 5.
Address: 1055 Budapest, Falk Miksa utca 9-11.
Phone: +36 (1) 391-1400
Fax: +36 (1) 391-1410
E-mail: ugyfelszolgalat@naih.hu
URL: <http://www.naih.hu>

2. Data Protection Authority procedure

The procedure of the authority can only be initiated ex officio.

The content of the decision of the authority is determined by the nature, gravity, circumstances and impact of the infringement.

3. The Data Subject may claim damages and damages awards from the court

The Data Subject may also bring proceedings before a court in the courts for the place where he or she resides or is domiciled.

Any person who has suffered pecuniary or non-pecuniary damage as a result of a breach of the Regulation shall be entitled to compensation from the Data Controller for the damage suffered. The Data Controller shall be exempted from liability if it proves that it is not in any way responsible for the event giving rise to the damage, i.e. that it took all necessary and adequate measures to remedy the damage.

Before initiating proceedings, it is advisable for the parties to attempt to clarify and remedy the breach between themselves.

Main relevant legislation

Act CXII of 2011 - on the Right to Informational Self-Determination and Freedom of Information (hereinafter referred to as the "Infotv")

REGULATION (EU) No 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC, GDPR (General Data Protection Regulation), hereinafter referred to as the Regulation.

Act XCVII of 1995 on Air Transport