

Dear Candidate!

Before you honor us with your trust and send us your job application or CV, please read our privacy notice.

1 Data of the controller

The name of the data controller is TrustAir Aviation Korlátolt Felelősségű Társaság (hereinafter referred to as the "**Data Controller**")

Registered seat: 9099 Pér, Petőfi utca 1.

Company registration number: 08-09-026981

Tax number: 25140433-2-08

E-mail: dpo@trustair.hu

Website: www. trustair.hu

2 Data Protection Officer details

Data Protection Officer: Dr. Rövid Law Office

Registered seat: 1055 Budapest, Honvéd utca 18.

Represented by: dr. Sallai Fruzsina

E-mail: dpo@trustair.hu

3 Purpose and legal basis for processing

The purpose of the data processing is the management and registration of job applications and CVs received in response to advertised vacancies or received to be registered in an electronic database for recruitment and selection purposes. The applicant's application and the personal data contained therein shall be provided to the Data Controller for the purpose of applying for the job, which shall be deemed to constitute the applicant's consent to the processing of their personal data by the Data Controller in accordance with the provisions of this Notice. The applicant shall have the right to withdraw their consent at any time, which shall also constitute a withdrawal of their application for the vacancy. The withdrawal of consent shall not affect the lawfulness of the processing prior to the withdrawal.

4 Legal background to data processing

The processing, storage, recording and transfer of the personal data detailed in this notice is based on and subject to Regulation (EU) 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 Directive 95/46/EC (the "**GDPR**").

Submitted job applications and CVs will be construed as voluntary consent to the processing of data as per this notice in accordance with Article 6 Section (1) paragraph (a) of the GDPR. This consent may be withdrawn at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal.

5 Scope of data processed and duration of data processing

The Data Controller shall process, record and store the data contained in the job applications, CVs, cover letters and other documents sent as personal data (applicant's name, telephone number, e-mail address, previous work experience, data concerning their education, qualifications, data recorded in professional references) in accordance with this notice until the end of the recruitment and selection process. After this period, the processed data will be automatically destroyed and deleted. In the event of the conclusion of a contract of employment, the Data Controller shall process these data in accordance with the Employer's Data Processing Guide and for the period specified therein.

The data processed will only be used for the recruitment and selection process.

6 Access to data, transfer of personal data, recipients of personal data and categories of recipients

The job applications and CVs sent will be handled only by authorized staff of the Data Controller.

The Data Controller uses the following data processor in connection with data processing:

- **Róbert Tibor Tofán**; data processing activity: IT specialist; e-mail: trustair.admin@trustair.hu.

The Data Controller shall not disclose the job applications and CVs received to third parties for statistical or other purposes, except in cases provided for by law, nor shall it disclose the data received to the public, and shall provide information on the assessment of the job applications and CVs submitted only at the request of and to the Data Subject.

7 Automated decision-making (including profiling)

No automated decision making, including profiling, takes place during the processing.

8 Data security

The Data Controller shall take special care to ensure the safe storage and processing of the job applications and CVs received.

9 Rights of the Data Subject in relation to data processing

9.1 The Data Subject may request the Controller to:

- (a) provide them access to their personal data,
- (b) rectify their personal data; and
- (c) erase or restrict of the processing of their personal data, except for mandatory processing.

9.2 Right of access:

The Data Subject has the right to receive feedback from the Data Controller as to whether or not their personal data is being processed and, if such processing is ongoing, has the right to access the personal data. The Data Controller shall provide the Data Subject with a copy of their personal data which is the subject of the processing. For additional copies requested by the Data Subject, the Controller may charge a reasonable fee based on administrative costs. If the Data Subject has made the request by electronic means, the information shall be provided in a commonly used electronic format, unless the Data Subject requests otherwise.

9.3 Right to rectification:

The Data Subject shall have the right to obtain from the Data Controller, upon their request, the rectification of inaccurate personal data relating to them without undue delay.

9.4 Right to erasure:

The Data Subject shall have the right to obtain from the Data Controller, upon their request, the erasure of personal data relating to them without undue delay, and the Data Controller shall be obliged to erase personal data relating to the Data Subject without undue delay if any of the following applies:

- a) the personal data is no longer necessary for the purposes for which they were collected or otherwise processed;
- b) the Data Subject withdraws their consent pursuant to Article 6 Section (1) paragraph (a) or Article 9 Section (2) paragraph (a) of the General Data Protection Regulation and there is no other legal basis for the processing;
- c) the Data Subject objects to the processing on the basis of Article 21 Section (1) of the GDPR and there are no overriding legitimate grounds for the processing, or the Data Subject objects to the processing on the basis of Article 21 Section (2) of the GDPR;
- d) the personal data has been unlawfully processed;
- e) the personal data must be erased in order to comply with a legal obligation under European Union or Member State law to which the Data Controller is subject;
- f) the personal data was collected in connection with the provision of information society services referred to in Article 8 Section (1) of the GDPR (conditions for the consent of children).

9.5 Right to restriction of processing:

The Data Subject shall have the right to obtain from the Controller, at their request, the restriction of processing if one of the following conditions are met:

- a) the Data Subject contests the accuracy of the personal data, in which case the restriction applies for the period of time that allows the Data Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the Data Subject opposes the erasure of the data and requests instead the restriction of its use;
- c) the Data Controller no longer needs the personal data for the purposes of the processing, but the data subject requires the information for the establishment, exercise or defense of legal claims; or
- d) the Data Subject has objected to the processing pursuant to Article 21 Section (1) of the GDPR; in this case, the restriction shall apply for the period until it is determined whether the legitimate grounds of the Controller prevail over the legitimate grounds of the Data Subject.

If the processing is restricted, such personal data, except for storage, may only be processed with the consent of the Data Subject or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the Union or of a Member State.

9.6 Right to data portability:

The Data Subject is also entitled to receive the personal data concerning him or her which he or she has provided to the Controller in a structured, commonly used, machine-readable format and to transmit such data to another controller without hindrance from the controller to which he or she has provided the personal data, if: (i) the processing is in accordance with Article 6. (i) the processing is based on consent within the meaning of Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation or on a contract within the meaning of Article 6(1)(b) of the General Data Protection Regulation; and (ii) the processing is carried out by automated means.

9.7 Right to object:

The Data Subject shall have the right to object at any time, on grounds relating to their particular situation, to the processing of their personal data based on Article 6 Section (1) paragraph (e) or (f), including profiling based on those provisions. In such a case, the Controller may no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

Where personal data is processed for direct marketing purposes, the Data Subject has the right to object at any time to the processing of their personal data concerning for such purposes, including profiling when related to direct marketing. If the Data Subject objects to the processing of personal data for direct marketing purposes, the personal data may no longer be processed for those purposes.

9.8 General rules on the exercise of the right of Access:

The Data Controller shall inform the Data Subject of the action taken in response to their request without undue delay, but no later than one month from the date of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. The Data Controller shall inform the Data Subject of the extension of the time limit within one month of receipt of the request, stating the reasons for the delay. Where the Data Subject has submitted the request by electronic means, the information shall be provided by electronic means where possible, unless the Data Subject requests otherwise.

The Data Controller shall provide the Data Subject with information and action free of charge. Where the Data Subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the Controller shall, taking into account the administrative costs of providing the information or information or the action requested:

- a) charge a reasonable fee, or
- b) refuse to act on the request.

The burden of proving that the request is manifestly unfounded or excessive lies with the Data Controller.

If the Data Controller has reasonable doubts about the identity of the natural person making the request, it may request additional information necessary to confirm the identity of the Data Subject.

9.9 Enforcement options:

The Data Subject may take the Data Controller to court in the event of a breach of their rights. The court shall rule on the case out of turn. The Data Controller shall prove that the processing complies with the law. The court of law, in the capital city the Metropolitan Court, has jurisdiction to decide the case. The action may also be brought before the court of the place of residence or domicile of the Data Subject.

The Data Controller shall compensate for any damages caused by the unlawful processing of the Data Subject's data or by breaching the requirements of data security. The Controller shall be exempted from liability if it proves that the damage was caused by an unavoidable cause outside the scope of the processing. No compensation shall be due if the damage was the result of the intentional or grossly negligent conduct of the victim.

The Data Subject may also contact the National Authority for Data Protection and Freedom of Information in the event of a complaint regarding the processing of their personal data (Dr. Attila Péterfalvi, President of the National Authority for Data Protection and Freedom of Information, postal address: 1363 Budapest, PO Box 9, address: 9-11 Falk Miksa Street, Budapest1055; telephone: +36 (1) 391-1400; fax: +36 (1) 391-14