



Data processing information in connection with trainings at Budapest Airport

Introduction

Budapest Airport Budapest Liszt Ferenc Nemzetközi Repülőtér Üzemeltető Zártkörűen Működő Részvénytársaság (registered offices: 1185 Budapest, BUD International Airport; corporate registration number: 01-10-044665; tax number: 12724163-4-44; hereinafter: "BUD") organizes trainings necessary to fulfill the conditions of entry to and work at Budapest Ferenc Liszt International Airport. The prior booking of training services, the checking of participation in trainings, the identification of the person in question and the certification of result achieved in the subsequent examination require the processing of the some of the data subject's data.

BUD's adult education registration number: B/2020/008762

Protecting the personal data provided by persons using training services and, within that, electronic training services and ensuring their right of informational self-determination are of key importance for BUD. BUD commits itself to handling the personal data of persons participating in trainings and registering in the electronic training system and participating in trainings in a manner which contributes to the secure use of the electronic application operated by BUD, by ensuring full compliance with applicable legal provisions, the data protection principles contained therein and itemized regulations.

BUD processes the personal data of the persons applying for and participating in trainings confidentially, in compliance with effective legal provisions, provides for their security, takes the technical and organizational measures and creates the procedural rules necessary to enforce applicable regulations and other recommendations.

BUD reserves the right to amend this declaration.

If you feel that you have additional questions besides the contents of this declaration, or a problem, or would like to make observations that are not or not entirely clear based on this declaration or require further explanation, please contact our colleague responsible for ensuring the protection of personal data, via this e-mail address training@bud.hu.

1. The controller and the data protection officer

Name of controller	Budapest Airport Zrt. (hereinafter: "BUD" / "Controller")
Registered offices	1185 Budapest, BUD International Airport
Mailing address	1675 Budapest Pf. 53.
Telephone number	+36 (1) 296-9696
Website	bud.hu
E-mail address	training@bud.hu
Representative	François Berisot, CEO
Data protection officer	Dr. Linh Sipos
Data protection officer's contact	dpo@bud.hu

2. The main parameters of data processing

Budapest Airport Zrt.

H-1185, BUD Nemzetközi Repülőtér/BUD International Airport

<p>Scope of personal data processed</p>	<p>Data to be reported to the Adult Education Data System (the vocational education and training module of the Public Education Registration and Learning Core System):</p> <ul style="list-style-type: none"> ▪ Participant details: Name, name at birth, mother’s name at birth, e-mail address, place and date of birth, highest level of education, education ID number. ▪ Data on education: The date of entry to and completion of the training and the date of participation, the payment obligation for the training. ▪ Other data recorded: The participant’s educational qualification, vocational training, professional qualifications, foreign language skills, assessment and qualification during training.
<p>The purpose of data processing</p>	<p>Conducting BUD’s trainings, as described in the Introduction.</p>
<p>The legal basis for processing</p>	<p>Fulfilling a legal obligation of the controller pursuant to article 6(1)(c) of the GDPR, based on act LXXVII of 2013 on adult education, in particular, chapter VI of the act.</p> <p>If the training is not covered by the adult education act, the legal basis is the performance of a contract, in accordance with article 6(1)(b) of the GDPR.</p>
<p>The duration of data processing</p>	<p>The controller processes the data until the last day of the eighth year following the conclusion of the adult education contract.</p>
<p>Data storage, data security</p>	<p>Budapest Airport Zrt. stores personal data on its own servers, in protected databases, and in the case of some specific training courses, data are not stored in its electronic training system, but on paper.</p> <p>Access to these personal data is limited by BUD to persons whose access to and processing of the data is indispensable for the performance of their duties, i.e. Budapest Airport’s instructors, staff involved in the organisation and delivery of trainings and finance staff.</p>
<p>Recipient categories</p>	<p>The controller forwards the data to the adult education state administration body through the adult education data system (the vocational training and adult education module of the Public Education Registration and Learning Core System).</p> <p>The data is also accessible to the employees of the software development company that provides support for the TOTARA electronic training program, as processor (Veloxnet Kft; registered offices: 2364 Ócsa, Damjanich utca 81.; corporate registration number: 13 09 096787).</p>
<p>The transfer of personal data</p>	<p>No data are transferred to third countries or international organisations.</p> <p>If the Controller is required by a court or authority to provide personal data in the course of legal proceedings, the Controller is obliged to provide the requested data to the court or authority in question, in compliance with its legal obligation. The Controller shall disclose to the authorities - if the authority has indicated the precise purpose and scope of the data - personal data only to the extent strictly necessary for the purpose of the request.</p>
<p>Refusal to provide data and its consequences</p>	<p>The provision of personal data is based on law, if the training is not covered by the adult education act, it is based on a contractual obligation; the data subject is thus obliged to provide the personal data in this case as well. Failure to provide the data will result in the data subject not being able to complete the training.</p>

Automated decision-making (profiling)	Data processing based on automated decision-making and profiling does not take place in the course of processing.
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3. The rights of data subjects:

The right to information	You may at any time during processing request information from the controller about the processing. This notice also aims to provide clear, concise, transparent and understandable information about BUD's processing activities.
The right of access to personal data	You have the right to receive feedback from the controller as to whether or not your personal data are being processed and, if such processing is taking place, you have the right to access your personal data and the information set out in the GDPR. BUD will provide you with a copy of the personal data that are subject to processing. If you have submitted your request electronically, we will provide the information to you in a commonly used electronic format, unless you request otherwise.
Right to the rectification of personal data	You have the right to have inaccurate personal data concerning you corrected by BUD without undue delay, upon your request.
The right to erasure or the blocking of personal data	You have the right to have your personal data erased without undue delay, at your request, if one of the following grounds applies: <ul style="list-style-type: none"> ▪ The personal data are no longer necessary for the purposes for which they were collected or otherwise processed; ▪ You object to the processing and there are no overriding legitimate grounds for processing; ▪ The personal data have been processed unlawfully; ▪ The data must be erased in order to comply with a legal obligation under EU or member state law to which the controller is subject;
Right to the restriction of processing	You have the right to request that we restrict processing if one of the following conditions is met: <ul style="list-style-type: none"> ▪ You contest the accuracy of the personal data, in which case the restriction applies to the period of time that allows BUD to verify the accuracy of the personal data; ▪ Processing is unlawful and you object to the erasure of the data and instead request the restriction of their use; ▪ BUD no longer needs the personal data for the purposes of processing, but you require it for the establishment, exercise or defence of legal claims; or ▪ You have objected to processing; in this case, the restriction applies for the period until it is established whether BUD's legitimate grounds prevail over your legitimate grounds. <p>If processing is subject to restriction based on the above, such personal data, with the exception of storage, may only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for the important public interests of the EU or of a member state.</p> <p>Upon request, BUD will inform you in advance of the lifting of the restriction on processing.</p>

4. The exercise of data subjects' rights in relation to data processing and the related time limits

You can exercise your data subject rights electronically by sending a request for a data subject request to dpo@bud.hu.

BUD will comply with your request to exercise your rights within a maximum of one month of receipt. The date of receipt of the request shall not count towards the time limit.

If necessary, BUD may, taking into account the complexity of the request and the number of requests, extend this deadline by a further two months. BUD will inform you of the extension, stating the reasons for the delay, within one month of receipt of the request.

5. Legal remedy

If you have any observations or questions about the processing of your data, please contact BUD's data protection officer at dpo@bud.hu.

If you believe that BUD's processing of your data does not comply with legal requirements or infringes your rights,

- You may lodge a complaint about the processing of your personal data with the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa u. 9-11; mailing address: 1363 Budapest, Pf.: 9., telephone: +36-1-391-1400; e-mail: ugyfelszolgalat@naih.hu, website: www.naih.hu) or
- You may turn to the court competent according to BUD's registered address or your place of residence/stay for the protection of your data (for a list of courts and their contact details, please visit birosag.hu/torvenyszekek).

The competent court according to BUD's registered address is the Budapest-Capital Regional Court (registered offices: 1055 Budapest, Markó utca 27.; mailing address: 1363 Bp. Pf. 16.; telephone number: +36 1 354 6000).

6. The possibility to amend this data processing notice:

BUD reserves the right to unilaterally modify this data processing notice without prior notice to you.

Budapest, 24.02.2025.