



Privacy Policy

01-04-2016

1. Introduction

The Premi Air Consulting Ltd. considers the personal data protection of great importance in the course of its operations. We handle the data made available by our customers in compliance with the rules of law in force without exception; we see after the data security and provide the technical and procedural conditions required for the observance of the related law to the greatest possible extent.

The following policy contains the guiding principles of the Premi Air Consulting Ltd. in relation to the data which are accepted by the employees involved in the data management and the company as binding for themselves.

The policy has been elaborated in accordance with the following effective legislation:

- Act CXIX of 1996 on the use of name and address information serving the purposes of research and direct marketing
- Act VI of 1998 on the protection of individuals with regard to the automatic processing of personal data
- Act CVIII of 2001 on certain issues of electronic commerce activities and information society services
- Act XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activities
- Act CXII of 2011 on information self-determination and freedom of information

2. Definitions

- *Data subject* shall mean any particular natural person identified or identifiable by personal data;
- *Personal data* shall mean any data relating to data subject - in particular the name, identification code and any information specific to his physical, physiological, mental, economic, cultural or social identity - as well the conclusion which might be reached through the data in relation to the data subject;
- *Data subject's consent* shall mean voluntary and definite indication of his wish which is based on appropriate information and expression of his unambiguous approval on the control of personal data relating to him without limitation or with regard to specific operations;
- *Data subject's objection* shall mean a statement made by the data subject to object to the control of his data and to the request that the data relating to him be terminated and the data controlled be deleted;
- *Data controller* shall mean a natural or legal person or unincorporated organization that determines the purpose of the processing of data, makes decisions regarding the

data control (including the means to be used) and implements such decisions itself or engages a processor to implement them;

- *Data control* shall mean any operation or a set of operations carried out on data irrespective of the procedure adopted, in particular, collection, recording, organization, storage, adaptation or alteration, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, deletion or destruction, and blocking them from further use, taking photographs, sound and video recording, and the recording of physical attributes for identification purposes (for instance fingerprints and palm prints, DNA samples and retinal images);
- *Data transmission* shall mean making data available to a particular third party;
- *Public disclosure* shall mean making data available to the general public;
- *Data deletion* shall mean making data unidentifiable in a manner that they may not be retrieved any longer;
- *Data marking* shall mean assignment of an identification code to the data for its distinction;
- *Data blocking* shall mean assignment of an identification code to the data in order to restrict its later processing finally or for a particular period;
- *Data destruction* shall mean complete physical destroy of a data medium containing the data;
- *Data processing* shall mean the technical operations involved in data control, irrespective of the method and tools applied for such operations and the venue of the application, provided that technical operations are carried out on the data;
- *Data processor* shall mean any natural or legal person or any unincorporated organization that carries out data processing under the contract concluded with the processor – including entering into a contract by virtue of legal regulation;
- *Data file* shall mean a set of data handled in a particular filing system;
- *Third party* shall mean any natural or legal person or unincorporated organization other than the data subject, the controller or the processor;
- *EEA member state* shall mean any Member State of the European Union and any State which is party to the Agreement on the European Economic Area, as well as any State the nationals of which enjoy the same legal status as nationals of States which are parties to the Agreement on the European Economic Area, based on an international treaty concluded between the European Union and its Member States on the one hand and the State which is not party to the Agreement on the European Economic Area on the other hand;
- *Third country* shall mean any country other than a member of the European Economic Area.

3. Principles of the data management

3.1. Personal data may exclusively be controlled for a specific purpose to exercise rights and fulfil obligations. Data control must at every stage comply with the objective of the data control; data must be recorded and controlled in a fair and legal manner.

3.2. No other than personal data essentially needed to satisfy the aim of the control, appropriate for achieving the goal may be controlled. Personal data may only be controlled to the extent and for the time required to achieve the goal.

3.3. Throughout the data control process, personal data shall be classified as such until its connection with the data subject can be restored. The connection with the data subject can be restored if the data controller has the technical conditions required for restoration at his or her disposal.

3.4. In the course of the data control it has to be ensured that the data are accurate, complete and – if required for the data control – updated, and that the data subject is only identifiable for the time required for the data control.

4. Legal ground of the data management

According to section 5 (1) a) of act CXII 2011 personal data may only be controlled if the data subject agrees to it. In the course of the operation of the A Premi Air Consulting Ltd. personal data control is exclusively based on the voluntary contribution of the data subjects.

If personal data has been recorded with the consent of the data subject, the controller may, control the data recorded if it is not regulated otherwise

a) in order to fulfil his relevant legal obligations, or

b) to enforce the rightful interests of the controller or third party if the enforcement of such interests is proportionate to restrictions pertaining to the protection of personal data without any further special consent as well as after the data subject withdraws his consent.

The consent or subsequent approval of a legal guardian is not required in case of legal declarations containing the consent of minors aged over 16.

5. Range of the personal data, purpose and duration of the data control

5.1. Data of the home page visitors

5.1.1. Neither IP address nor any other personal data of the users are recorded by the Premi Air Consulting Ltd. while its home page is being visited.

5.1.2. While the user is browsing, the service provider might place so called cookie on the computer. The user may delete such cookies from his own computer or he may forbid their application in his browser.

5.1.3. The html code of the web site operated by the Premi Air Consulting Ltd. may contain links independent for web analytic measurements which arrive from external server and point to external server. The web analytic service provider controls other than personal data which are related only to browsing and unsuitable for identification of individual users.

5.2. Newsletter

5.2.1. The Premi Air Consulting Ltd. delivers online newsletters containing novelties, news and special offers as well as electronic direct marketing messages for the users signing up for the newsletters of the home page operated by the Ltd.

5.2.2. The name and e-mail address are mandatory for signing up for the newsletter, since these data are essential for the delivery of the messages.

5.2.3. We will control the data until the data subject requests for their deletion.

5.2.4. There is a link in every news letter to offer the option to unsubscribe from the newsletter.

5.2.5. Users should take responsibility for the authenticity of the data provided by them.

5.2.6. The National Authority for Data Protection and Freedom of Information has been notified of the data control relating to the newsletter. **NAIH-90992/2015.**

5.3. Club membership

5.3.1. The Premi Air Consulting Ltd. provides the service users with the opportunity to apply for club membership. Our customers are offered discounts for flying through the club membership, and the members get access to the contents not available for the general public. Club membership also means signing up for the newsletter.

5.3.2. The name, e-mail address and user password are mandatory for club membership, since these data are essential for the access to the contents of restricted accessibility and for the delivery of messages.

5.3.3. We will control the data until the data subject requests for their deletion.

5.3.4. Data subjects may initiate the termination of their club membership as well as the removal of their data out of our register from their registered e-mail address.

5.3.5. Users should take responsibility for the authenticity of the data provided by them.

5.3.6. The data control has been notified of to the National Authority for Data Protection and Freedom of Information. **NAIH-90994/2015.**

6. Security of data control

6.1. The web site of the Premi Air Consulting Ltd. can be found on the server of the GYŐR.NET Internetszolgáltató Ltd. (9024 Győr, Közép u. 16.).

6.2. The newsletters are sent through the server of the GYŐR.NET Internetszolgáltató Ltd. (9024 Győr, Közép u. 16.).

6.3. The Premi Air Consulting Ltd. protects data particularly from unauthorised access, modification, transfer, disclosure, deletion or destruction, accidental destruction and damage as well as inaccessibility resulting from the changes in the technology applied.

6.4. The Premi Air Consulting Ltd. in cooperation with the server operators provides for the the data security with technical, administrative and organizational measures which guarantee the protection at a level adequate to the risks occurring in relation to the data control.

7. Rights of data subjects and their enforcement

7.1. The data subject may request for the following from the controller:

- a) information on the control of personal data,
- b) correction of personal data and
- c) deletion or blocking of personal data, with the exception of the mandatory control.

7.2. Upon the request of the data subject, the controller will provide information on the subject's data they control as well as the data processed by the data processor hired by them, the sources of the data, the objective of the control, its legal grounds and duration, the controller's name, address and activity related to the data control, in addition, the legal grounds and addressees of the data transfer.

7.3. The Premi Air Consulting Ltd. shall provide clear information in writing within the shortest possible time following the submission of the request; however, no later than within 30 days.

7.4. Information specified in paragraph 6.3 shall be provided free of charge if the individual requesting for the information has not yet submitted a request for information to the controller in connection with the same scope of data in the same year. In any other cases repayment for expenses may be established. The rate of repayment for expenses may also be specified in the contract concluded by the parties. The costs which have already been paid shall be reimbursed if the data has been controlled unlawfully or the request for information has resulted in correction.

7.5. The Premi Air Consulting Ltd. shall correct the personal data if the personal data is not authentic and the controller has access to the authentic personal data.

7.6. The Premi Air Consulting Ltd. shall delete personal data if

- a) its control is contrary to the law;
- b) it is requested by the data subject;
- c) it is incomplete or incorrect – and it may not be remedied according to the law – provided that deletion is precluded by the law;
- d) the objective of the control has ceased to exist, or the period defined in the relevant legislation for storing data has expired;
- e) it has been ordered by the court or the Authority.

7.7. The Premi Air Consulting Ltd. shall block the personal data instead of deletion if it is requested by the data subject, or if deletion would presumably violate the rightful interests of the data subject on the basis of the information available. Personal data blocked in such a manner may exclusively be controlled as long as the control objective which has excluded the deletion of the personal data is in existence.

7.8. The data subject and any one as well as everyone to whom the data was transferred for control purposes, shall be notified of any correction, blocking and deletion. Notification shall be of no importance if it does not violate the rightful interest of the data subject.

7.9. The data subject may object to the control of his personal data,

- a) if the control or transfer of personal data is required for the fulfilment of the legal obligations of the controller or for the assertion of the rightful interest of the controller, recipient or any third party;
- b) if personal data is used or transferred directly for business benefits, public opinion surveys or scientific research purposes; as well as
- c) in other cases defined in relevant legislation.

7.10. The Premi Air Consulting Ltd. shall assess the objection lodged within the shortest possible time following the receipt of the request; however, he shall assess the document within a maximum period of 15 days and make a decision on the grounds of the objection and notify the applicant in writing. In case the objection of the data subject is well-grounded, the Premi Air Consulting Ltd. shall suspend the control process – including data entry and data transfer – block the data and

notify the persons to whom the personal data constituting the object of objection has been transferred of the objection lodged as well as the measures taken accordingly and who are obliged to take measures to enforce the right to object.

7.11. If the data subject disagrees with the decision made by the Premi Air Consulting Ltd., or if the Premi Air Consulting Ltd. fails to observe the time limit specified in paragraph 6.10, the data subject may seek remedy at the court of law within 30 days of the notification on the decision or of the last day of the deadline period. The court shall proceed without delay.

7.12. Appeal or complaint related to data control may be submitted to the National Authority for Data Protection and Freedom of Information by using the following contact details:

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

e-mail: ugyfelszolgalat@naih.hu

8. Data and contact details of the controller

Name:	Premi Air Consulting Ltd.
Registered office:	Incső str. 12/B Nyúl 9082 Hungary
Telephone number:	+36 34 568 101
Fax:	+36 34 568 102
E-mail:	info@repulogepszimulator.hu
Web site:	www.repulogepszimulator.hu
Corporate registration number:	08-09-014575
Tax number:	13806916-2-08
Represented by:	Peter Tagai, Managing director