

# PRIVACY POLICY

## 1. Name of Data Controller

Company Name:	Çelebi Ground Handling Hungary Ground Services Limited Liability
Company Short name:	Çelebi Ground Handling Hungary Kft.
Headquarters:	1185 Budapest, Ferenc Liszt International Airport

## 2. Rules of data management

Celebi Ground Handling Hungary Kft. (Hereinafter: the Company) manages personal data in connection with this interface in accordance with its Privacy and Data Security Regulations. The material scope of the Code covers all processes at all organizational units of the Company in which personal data processing as defined in Article 4 of the GDPR is implemented.

Personal data may only be processed for the purpose of exercising a right or fulfilling an obligation. The use of personal data managed by the Company for private purposes is prohibited. Data management must always comply with the principle of purpose limitation.

The Company manages personal data only for a specific purpose, for the purpose of exercising the right and fulfilling the obligation to the minimum and for the time necessary to achieve the purpose. The data management must meet the goal at every stage - and if the purpose of the data management is terminated or the data is otherwise unlawful, the data will be deleted.

The Company manages personal data only on the basis of the written consent of the concerned person - in case of special personal data - or by law or law.

In all cases, the Company communicates the purpose of data management and the legal basis for data management to the data subject prior to the inclusion of the data.

Employees of the Company's organizational units who manage data and employees of the Company in the data management on behalf of the Company are obliged to keep the personal data known as business secrets. Persons handling and accessing personal data must make a Privacy Statement.

If a person subject to the Rules becomes aware that personal data handled by the Company is incorrect, incomplete, or inaccurate, he or she must correct or correct it at the person responsible for recording the data.

Data protection obligations for natural or legal persons or organizations without legal personality on behalf of the Data Controller shall be enforced in the order contract with the data processor.

The Company's executive officer, taking into account the specificities of the Company, determines the organization of data protection, the tasks and powers of data protection and related activities and appoints the person who supervises the data management.

During their work, the Company's employees shall ensure that unauthorized persons are not allowed to access personal data and that the storage and placement of personal data is designed in such a way that it cannot be accessed, unaware, altered or destroyed by an unauthorized person.

The Chief Executive shall supervise the Company's data protection system through a data protection officer designated by him.

## 3. Enforce the rights of stakeholders

The data subject may request information on the management of his / her personal data and may request the rectification of his / her personal data or, with the exception of the data processing provided for by law, the restriction or restriction on the contact details provided by the Company.

The data subject is entitled to receive the personal data relating to him / her provided to the Data Controller in a distributed, widely used machine-readable form, and is entitled to forward such data to another data controller.

The Company shall send the received application or protest within three days of receipt to the head of the organizational unit competent for data management.

The head of the competent organizational unit shall respond in writing, in a comprehensible form, within 1 (one) month from the date of receipt of the request to the person concerned, and within 15 (fifteen) months of exercising the right of objection.

At the request of the data subject, the Data Controller shall provide information on the data processed by the data subject, or on the data processor processed by him or her, or on his / her behalf, the purpose of the data processing, the legal basis, duration, the name, address of the data processor and its activities related to data management, the circumstances of the data protection incident, its effects and the measures taken to prevent it, and, in the case of transmission of the personal data of the data subject, the legal basis and the addressee of the transfer.

Information is generally free of charge if the person requesting the information has not submitted a request for information to the Data Controller for the same data year in the current year. In other cases, a cost reimbursement can be established. The amount of the reimbursement may be fixed by contract between the parties. Repayment of costs already paid must be refunded if the data have been illegally treated or the request for information has led to a correction.

Inaccurate data is corrected by the head of the unit managing the data, if the necessary data and public documents proving them are available, by GDPR. For the reasons set out in Article 17, shall arrange for the deletion of the personal data handled.

Personal data should be deleted if --

- (a) personal data are no longer needed for the purpose for which they were collected or otherwise processed;
- (b) the data subject's consent is withdrawn by the data subject and there is no other legal basis for the processing;
- (c) the data subject objects to the processing of the data and there is no legal reason for the data to be given priority;
- (d) personal data have been unlawfully treated;
- (e) the personal data must be deleted in order to fulfill a legal obligation under Union or Member State law applicable to the controller;
- (f) the collection of personal data for children under the age of 16 was related to the provision of information society services;
- (g) if the controller has disclosed the personal data and the personal data are no longer needed for the purpose for which they were collected or otherwise handled, it shall take all reasonable steps, including technical measures, to take into account available technology and implementation costs; measures to inform data controllers that the data subject has requested them to delete the relevant personal data links or a copy or duplicate of such personal data.

The data subject may object to the processing of their personal data --

- if the processing or transfer of personal data is solely necessary for the performance of a legal obligation to the Data Controller or for the legitimate interests of the Data Controller, the Data Acquirer or a third party, except in the case of mandatory data management;
- the use or transmission of personal data for direct marketing, opinion polling or scientific research; as well as
- in other cases defined by law.

The Data Controller examines the objection as soon as possible after the submission of the request, but within a maximum of fifteen (15) days and decides on its validity and informs the applicant in writing of its decision.

If the Data Controller finds that the data subject's objection is well-founded, data management, including further data collection and data transfer, will be terminated, blocked, and notified of any protest and any action taken on the basis of the protest and for which it was previously transmitted. they must take action to enforce the right of protest.

If the data subject disagrees with the Data Controller's decision, or if the Data Controller fails to reply, the data subject may go to court within thirty (30) days from the date of notification of the decision or from the last day of the deadline.

If you do not receive the data necessary to enforce the data subject's right to protest, you may appeal to the Data Controller within 15 days of the notification. The Data Controller may also challenge the data subject.

If the Data Controller fails to notify, the Data Receiver may request information from the Data Controller on circumstances related to the failure of the data transfer, which the Data Controller shall provide within 8 days after the receipt of the request of the Data Receiver. Upon request for information, the data importer may apply to the Data Controller for information, but not later than within 15 days of the deadline. The Data Controller may also challenge the data subject.

The Data Controller may not delete the data of the data subject if the data management has been ordered by law. However, the data cannot be transmitted to the data receiver if the Data Controller has agreed to the protest or the court has established the legitimacy of the protest.

If the case is not clear when exercising the rights of the data subject, the head of the organization managing the data may, by sending the case file and the position on the case, request a statement from the person responsible for data protection who will do so within three days.

The Company shall also indemnify for any damage caused to the data subject by unlawful handling of the data of the data subject or breach of the data security requirements, as well as the personal injury violation caused by him or the data processor used by him. The Data Controller is exempted from liability for damages and the payment of damages if he proves that damage to the person or the privacy of the data subject has been caused by an unavoidable cause beyond the scope of data management. Likewise, it will not reimburse you for damage caused by the deliberate or grossly negligent conduct of the victim.

The person concerned may have legal remedy, complaint with the National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet fasor 22 / C.), Or with the court of the place of residence or place of stay.

## 4. Data management by the the Company's website

Location of data management: Budapest, Hungary

### 4.1. Website management

Anyone may freely access the Company website without disclosing their identity and providing personal information, and may obtain information freely and unrestrictedly on the website and on its linked pages. However, non-personal information is collected unrestrictedly and automatically by/from the website. However, no personal data can be obtained from these data, so it does not implement the data subject to the GDPR.

### 4.2. Data management related to contacting

The Company operates its own website with the involvement of an authorized third party, which allows visitors to contact. The Company operates its own servers and stores e-mails to the Company's addresses. By ensuring the protection of personal data, the Company treats personal data in email only for the purposes for which it is associated.

purpose of data processing: contacting the company, keeping in touch

the legal basis for data processing: the stakeholder contribution pursuant to Article 6 (1) (a) of the GDPR, and CVIII of 2001 on certain aspects of electronic commerce services and information society services; Act 13 / A. § (3)

scope of data processed: personal data provided by the data subject

deadline for deleting data: until the contact data is filed (until the purpose of contact is achieved)

method to store data: electronical

## 5. DPO contact details

Name: Boda Csaba

E-mail: [boda.csaba@ltender.hu](mailto:boda.csaba@ltender.hu)

Telephone: +3670 620-7280

## 6. Questions not specified in this document

Issues not specified in this document are governed by the GDPR Rules and the Company's Privacy and Data Security Policy.