

## PRIVACY POLICY

According 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 (General Data Protection Regulation) Data Controller hereby informs Users on the principles of data protection and controlling used during the management of <https://next.testair360.com> website (hereinafter: „Website”).

### Definitions:

**Controlling:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Data controllers or Controllers:** the persons who alone or jointly with others, jointly determine the purposes and means of the control of personal data.

**Personal data or data:** any data or information, based on which a natural person User can be identified, directly or indirectly.

**Processor:** the service provider who processes personal data on behalf of the Data controllers.

**User:** a natural person, who participates in an entrance Preparation Test or Pro Test held at the Website

**Policy:** the present privacy policy of the Data controller.

**Preparation Test:** a test that assists the preparation of the User for the Pro Test by familiarising them with the exam environment and the types of questions that can be expected in the Pro Test in general.

**Pro Test:** an ab-initio pilot aptitude test, used by airlines and pilot schools for their pilot cadet programmes.

### 1. Company name and contact details of data controller(s):

1.1. With regard to data processing for the Preparation Test, the Data Controller is:

**TestAir360 Kft.** (Headquarters: Kápolnás tanya 870/4 hrsz. 4502 Vasmegyer, Hungary, Tax number: 28762788-2-15, Company registration number: 15 09 087722, Email: [info@testair360.com](mailto:info@testair360.com))

1.2. With regard to data processing for the Pro Test, the Data Controller is -depending which Airline/Pilot school initiated and scheduled the Pro Test is:

**WIZZ Air Hungary Zrt.** (registered seat: 1103 Budapest, Kőér utca 2/A.B.ép. II-V, company registration number: 01 10 140174, tax number: 26648525-2-44)

**Egnatia Aviation** (registered seat: Tenedou 32 and Panagoudas, 65404, company registration number: 20836330000, tax number: 999196674)

**Tréner Kft.** (registered seat: 4400 Nyíregyháza, Repülőtér 1., company registration number: 15 09 061647, tax number: 11240695-2-15)

## 2. Company name and contact details of data processors:

2.1. In case of the Pro Test, the following data processors shall receive personal data:

**Proctorio GmbH** (registered seat: Bahnhofstraße 18, 85774 Unterföhring, Germany) for providing a proctored exam and ensuring academic integrity of Pro Test

further information on the collection of personal data by Proctorio GmbH available [under this link](#).

**TestAir360 Kft.** (registered office: Kápolnás tanya 870/4 hrsz. 4502 Vasmegyer, Hungary, Tax number: 28762788-2-15, Company registration number: 15 09 087722, Email: info@testair360.com) granting license for the Data Controller to use the TestAir360 software in order to select students for cadet programs.

2.2. Storing the data related to both the Pro Test and Preparation Test:

**Google LLC** (1600 Amphitheatre Parkway, Mountain View, California, 94043) Privacy Policy available under : <https://cloud.google.com/privacy/gdpr>

Personal data will only be forwarded to the above recipients.

## 3. The scope of personal data processed, the legal basis of processing, the purpose and peiod of processing,

Purpose of data processing	Legal base of data processing	Types of processed personal data	Retention period	Data Controller	Data Processor(s)
Registration to the Website and participation in the Preparation or Pro Test	Consent of the data subject, Article 6 (1) point a) of the General Data Protection Regulation  The consent of the data subject can be revoked at any time. The withdrawal of the data subject's consent does not affect the lawfulness of the data processing, before	Full name and email address of User	Storage until withdrawal. In case of withdrawal of consent, personal data will be deleted.	In case of the Preparation Test TestAir360 Kft. In case of the Pro Test the relevant Airline/Pilot school scheduling the Pro Test	in case of registration for the Pro Test: Testair360 Kft.  Google LLC

<p>assisting the preparation of the Users for the Pro Test by familiarising them with the structure and environment of the Pro Test in general.</p>	<p>the withdrawal of the data subject's consent.</p>	<p>Results of the Preparation Test</p>	<p>The results of the Preparation Test will be stored until withdrawal or deletion of registration, whichever is earlier.</p> <p>Results from already completed exams (Pro Test and Preparation Test) will still feed into TestAir360 database even after the deletion of a registration. However, these data cannot be used to identify the individual user and it will be used for statistical analysis.</p>	<p>TestAir360 Kft.</p>	<p>Google LLC</p>
<p>airlines and pilot schools use the Pro Test for their pilot cadet selection process.</p>		<p>Results of the Pro Test</p>	<p>one year from the completion of the Pro Test</p>	<p>the relevant Airline/Pilot school scheduling the Pro Test</p>	<p>Testair360 Kft. Google LLC</p>

ensuring the integrity of the Pro Test's examination process and verifying the test Data Subject's identity		recordings (content, video audio material) taken during the Pro Test, incl. Audio, Screen, Web Traffic  ID card (wich may include name, government ID number, and date of birth)	data will automatically be deleted 180 from the completion of the given Pro Test	the relevant Airline/Pilot school scheduling the Pro Test	Testair360 Kft.  Proctorio GmbH
Issuance of accounting documents and bookkeeping activities for the purchase of the Pro Test	Data processing is necessary to fulfill the legal obligation of the data controller (GDPR Article 6 (1) point c))	Full Name, Address, Email address	Data Controller will store data for 8 years	the relevant Airline/Pilot school scheduling the Pro Test	TestAir360 Kft.

#### 4. Automated decision-making (including profiling):

During data processing, automated decision-making, including profiling, does not take place.

#### 5. Security and disclosure of personal data

Controller ensures the security of the personal data, implement the necessary technical and organisational measures and develop the procedural rules that are necessary for the implementation of the relevant laws and rules of protection of data and confidentiality. Controller protects the data with adequate measures against unauthorised access, alteration, transfer, public disclosure, erasure or destruction, the accidental destruction and damage, and unavailability resulting from the change of the applied technology.

Controller among the tasks relating to information technology protection ensures in particular:

- The protection against unauthorized access, including the protection of software and hardware devices and the physical protection (access control, securing the network);

- Measures taken to enable the restoration of data files, including the regular backups and the separate and secure handling of the copies (mirroring, backups);
- The protection of the data files against viruses (anti-virus service)
- Physical protection of the data files and the storage devices including the protection against fire, water, lightning, and other natural disasters and the restoration of the data damaged in those disasters (archiving, fire protection).

## **6. Rights of data subject with regard to the data processing:**

Corresponding to applicable data protection laws, you – based on particular circumstances – shall have the:

- a) right to request access to your personal data;
- b) right to have your personal data rectified;
- c) right to have your personal data erased;
- d) right to restrict the processing of your personal data;
- e) withdraw the consent provided to the processing of personal data.
- f) d) the right to data portability, if the conditions specified in the legislation exist, and
- g) e) in the case of data processing based on legitimate interest, the right to protest.

### Right of access:

The data subject has the right to receive feedback from the data controller as to whether his personal data is being processed, and if such data processing is underway, he is entitled to receive access to the personal data. The Data Controller provides the Data Subject with a copy of the personal data that is the subject of data processing. For additional copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs. If the Data Subject submitted the request electronically, the information must be provided in a widely used electronic format, unless the Data Subject requests otherwise.

### Right to rectification:

The Data Subject has the right to have inaccurate personal data corrected without undue delay upon request by the Data Controller.

### Right to erasure:

The data subject has the right to have the data controller delete the personal data concerning him without undue delay at his request, and the data controller is obliged to delete the personal data concerning the data subject without undue delay if one of the following reasons exists:

- a) the personal data are no longer needed for the purpose for which they were collected or otherwise processed;

- b) the data subject withdraws the consent that forms the basis of the data management pursuant to point a) of Article 6 (1) or point a) of Article 9 (2) of the General Data Protection Regulation, and there is no other legal basis for the data management;
- c) the Data Subject objects to the data processing based on Article 21 (1) of the General Data Protection Regulation and there is no overriding legitimate reason for the data management, or the Data Subject objects to the data management based on Article 21 (2) of the General Data Protection Regulation;
- d) personal data were handled unlawfully;
- e) personal data must be deleted in order to fulfill the legal obligation prescribed by EU or Member State law applicable to the data controller;
- f) the collection of personal data took place in connection with the offer of information society-related services referred to in Article 8 (1) of the General Data Protection Regulation (conditions for the consent of children).

Right to restrict data processing:

The Data Subject is entitled to request that the Data Controller to restrict data processing if one of the following conditions is met:

- a) the data subject disputes the accuracy of the personal data, in which case the limitation applies to the period that allows the data controller to check the accuracy of the personal data;
- b) the data management is unlawful and the data subject opposes the deletion of the data and instead requests the restriction of their use;
- c) the data controller no longer needs the personal data for the purpose of data management, but the data subject requires them to submit, enforce or defend legal claims; or
- d) the data subject has objected to data processing in accordance with Article 21 (1) of the General Data Protection Regulation; in this case, the restriction applies to the period until it is determined whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the data subject.

If data processing is subject to restrictions, such personal data may only be processed with the consent of the Data Subject, except for storage, or to submit, enforce or defend legal claims, or to protect the rights of another natural or legal person, or in the important public interest of the European Union or a member state.

Right to data portability:

The Data Subject is also entitled to receive the personal data relating to him provided to the Data Controller in a segmented, widely used, machine-readable format, and is also entitled to transmit this data to another data controller without being hindered by the data controller, to which the personal data has been made available, if: (i) the data processing is based on consent according to point a) of Article 6 (1) of the General Data Protection Regulation or point a) of Article 9 (2) of the General Data

Protection Regulation, or on a contract according to Article 6 (1) point a) of the General Data Protection Regulation and (ii) data management is performed in an automated manner.

Right to protest:

The Data Subject has the right to object at any time to the processing of his personal data based on points e) or f) of Article 6 (1), including profiling based on the aforementioned provisions, at any time for reasons related to his own situation. In this case, the data controller may no longer process the personal data, unless the Data Controller proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the data subject, or that are necessary for the presentation, enforcement or defense of legal claims are connected.

If personal data is processed for direct business acquisition, the data subject has the right to object at any time to the processing of personal data concerning him for this purpose, including profiling, if it is related to direct business acquisition. If the data subject objects to the processing of personal data for the purpose of direct business acquisition, then the personal data may no longer be processed for this purpose.

General rules for the exercise of the rights of the data subjects:

The Data Controller shall inform the Data Subject without undue delay, but no later than one month from the receipt of the request, of the measures taken as a result of the request. If necessary, taking into account the complexity of the application and the number of applications, this deadline can be extended by another two months. The Data Controller shall inform the Data Subject of the extension of the deadline, indicating the reasons for the delay, within one month of receiving the request. If the Data Subject submitted the request electronically, the information must be provided electronically, if possible, unless the Data Subject requests otherwise.

The Data Controller provides the Data Subject with information and measures free of charge. If the Data Subject's request is clearly unfounded or - especially due to its repetitive nature - excessive, the Data Controller, taking into account the administrative costs associated with providing the requested information or information or taking the requested action:

- a) may charge a fee of a reasonable amount, or
- b) may refuse to take action based on the request.

It is the responsibility of the Data Controller to prove that the request is clearly unfounded or excessive.

If the Data Controller has reasonable doubts about the identity of the natural person who submitted the request, it may request the provision of additional information necessary to confirm the Data Subject's identity.

**7. Legal remedies:**

The Data Subject may at any time contact the Data Controller under the email address [info@testair360.com](mailto:info@testair360.com).

In the event of a violation of their rights, the Data Subject may apply to court against the Data Controller. The court acts out of sequence in the case. The Data Controller is obliged to prove that the data management complies with the provisions of the law. The adjudication of the lawsuit falls within the jurisdiction of the court, in the capital, the Metropolitan Court. The lawsuit can also be initiated before the court of residence or residence of the Data Subject.

The Data Controller is obliged to compensate the damage caused to others by the unlawful handling of the Data Subject's data or by violating the requirements of data security. The Data Controller is released from liability if it proves that the damage was caused by an unavoidable cause outside the scope of data management. There is no need to compensate the damage if it resulted from the intentional or grossly negligent behavior of the injured party.

In the event of a complaint regarding the handling of his personal data, the Data Subject may also contact the National Authority for Data Protection and Freedom of Information (dr. Attila Péterfalvi, President of the National Authority for Data Protection and Freedom of Information, postal address: 1530 Budapest, Pf.: 5., address: 1125 Budapest, Erzsébet Szilágyi fasor 22/c, Phone: +36 (1) 391-1400; Fax: +36 (1) 391-1410; E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu)).

## **8. Modification of the Privacy Policy**

Data controller reserves the right to modify the present Policy with a unilateral decision at any time.

Date: June 12, 2023, Budapest