Green Shield Kft.
H-1191 Budapest, Üllői út 200. VIII/808.
Mobilszám: +36 20 210 0611
E-mail: iroda@greenshield.hu
Web: www.greenshield.hu

The Green Shield Trading and Service Limited Liability Company
(company registration number: 01 09 343106, registered office: 1095 Budapest, Gát street 9-11. II/7.)

DATA MANAGEMENT INFORMATION CONCERNING THE PARTICIPANTS IN THE EDUCATION

The Green Shield Kft., as a data controller, issues this data management information sheet in compliance with the provisions of Articles 12 and 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR Regulation) and in accordance with it - in accordance with the provisions contained in the Preamble of the GDPR Regulation - prepared and made available to those concerned, i.e. to the participants in the courses organized by him (hereinafter: Students). The data controller - keeping in mind paragraph (78) of the Preamble and Article 24 of the GDPR regulation - takes appropriate technical and organizational measures to protect personal data, lawfully handle it and comply with the requirements of the law.

The Green Shield Kft. handles the personal data of the Students exclusively for the purpose, in connection with the educational activity, to the extent necessary and in relation to the essential data related to the education and the issuance of the certificate concluding it.

The personal data of the students is stored by Green Shield Kft., it can be seen by authorized persons (e.g. aviation security instructors, aviation security officers, colleagues carrying out education and related administrative activities, senior officials), and data may only be transferred to the extent necessary and in compliance with the appropriate rules (e.g. external with the conclusion of a data transfer agreement for the instructor).

During data management, Green Shield Kft. acts on the basis of the commission contract and data transfer agreement concluded with the partner who commissions it. In doing so, the partner entrusts him - for the partner's designated employees who carrying out security inspections, or should hold job-specific trainings and security awareness trainings - to carry out educational activities in one or more competences regulated in the 2015/1998 EU Implementing Regulation (such as 11.2.3.1., 11.2.3.2., 11.2.3.3 ., 11.2.3.5, 11.2.3.6, 11.2.3.7, 11.2.3.8, 11.2.3.9, 11.2.3.10, 11.2.6.2, and 11.2.7), and in relation to the individual taught competencies (such as 11.2.3.5., 11.2.3.6., 11.2.3.7., 11.2.3.8. 11.2.3.9., 11.2.3.10., 11.2.6.2 and 11.2.7.) related written exams and in the process issue a certificate to the Students.

The Green Shield Kft. only handles the personal data of Students who have a contractual relationship with their employer, or the Students apply for the training as an individual entrepreneur and only handles

the data of the Students listed in this information sheet for the purpose of fulfilling the contract (conducting training and exams, certifying completion) .

A) AVAILABILITY OF THE DATA MANAGER

Data controller name: Green Shield Kft.
Contact information of the data controller:
registered office: 1095 Budapest, Gát street 9-11. II/7.
phone number: +36 20 210 0611
email address: iroda@greenshield.hu

B) INFORMATION CONCERNING PROCESSED PERSONAL DATA

The data manager, as an authorized partner, necessarily manages the personal data of the Students in order to ensure that the Green Shield Kft. should comply with the obligations contained in the contract with the partner, 11.2.3.1., 11.2.3.2., 11.2.3.3., 11.2.3.4., 11.2.3.5., 11.2.3.6. of the 2015/1998 EU Implementation Regulation, 11.2.3.7., 11.2.3.8. 11.2.3.9., 11.2.3.10., 11.2.6.2, and 11.2.7. points, according to which, after completing the training, the Student must provide an account of his knowledge of all the subjects of the competencies listed in the legislation, which are a prerequisite for performing his duties or entering security restricted areas without escort.

Description of data management activity	**Categories of personal data**	**Purpose of data management**	**Legal basis for data management**	**Data transfer, if yes, to whom**	**Deadline for deletion**
Management of personal data of students participating in the training	Student's name, employer's name, job title, place and time of birth, mother's name, ID number, existence of a successful background check, signature	Organization of training	Article 6 of the GDPR regulation. (1) point b): legitimate interest of the data controller	No data transfer takes place.	5 years
Administration of students' attendance at education	Student's name, employer's name, job title, place and time of birth, mother's name, identity card number, signature, date of education, topic	Conducting training and verifying the attendance of participants	Article 6 of the GDPR regulation. Paragraph (1) point c): fulfillment of a legal obligation (169/2010. (V.11.) Govt.	Data is forwarded to the contractual partner in relation to the students delegated by him, and the attendance sheets may be presented during the inspection of	5 years

Description of data management activity	Categories of personal data	Purpose of data management	Legal basis for data management	Data transfer, if yes, to whom	Deadline for deletion
			order. 1. app. 2.1. m) par ., or 20.2. point)	the aviation authority, in addition, data is not forwarded by name, only the total number of employees (as statistical data) is forwarded to the accountant.	
Keeping the test form filled in by the students	Answers given by the student, score obtained, student's name, signature, pass/fail rating, aviation security instructor's signature related to the tasks aimed at mastering the knowledge acquired during the training	Documenting training	Article 6 of the GDPR regulation. Paragraph (1) point c): fulfillment of a legal obligation (169/2010. (V.11.) Government Order. 1. app. 2.1. m) para .)	As a general rule, no data is transmitted, however, the test sheets may be presented during an inspection by the aviation authority.	5 years
Keeping a personal record sheet	Student's name, place and time of birth, mother's name, name of taught category, instructor's name, license number, license validity date, training date, details of taught topic, number of hours spent, student's signature, instructor's signature	Keeping personal training records	Article 6 of the GDPR regulation. Paragraph (1) point c): fulfillment of a legal obligation (69/2014. (XII.18.) BM Decree § 5 (3) and Annex No. 2)	It will be presented to the examination board, or may be presented during the inspection of the aviation authority, no other data will be transmitted.	5 years
Certificate issued to students	Student's name, place and time of birth, mother's name, name of the course completed, exam result, certificate validity, date of issue	Proof of completion of training and passing the exam	Article 6 of the GDPR regulation. Paragraph (1) point c):	The certificate will be forwarded to the student concerned, as well as to the employer (data	5 years

Description of data management activity	Categories of personal data	Purpose of data management	Legal basis for data management	Data transfer, if yes, to whom	Deadline for deletion
			fulfillment of a legal obligation (169/2010. (V.11.) Government order. 1. app. 2.1. m) and 21.1. and 21.4. points)	processing partner) who enrolled him in the training, and may be presented during an inspection by the aviation authority, otherwise no data will be forwarded.	
Recording the data of individuals participating in the training and entering it into the Adult Education Data Reporting System (FAR).	Student's name, position, place and date of birth, mother's name, ID number, email address, and highest level of education.	Compliance with mandatory data reporting requirements as prescribed by law.	Article 6 of the GDPR regulation. Paragraph (1) point c): fulfillment of a legal obligation (Act LXXVII. of 2013 on Adult Education. 15. § (1).	The data controller transmits personal data to the government agency responsible for adult education through the adult education data reporting system.	The last day of the eighth year following the conclusion of the adult education contract.

C) APPLICATION OF DATA PROCESSORS

The Green Shield Kft. uses the following data processors and transmits the specified personal data of the students to them to the extent necessary for the performance of their activities:

a) IT service: **IT Részleg Korlátolt Felelősségű Társaság** (registered office: 2636 Tésa, Hősök square 10., company registration number: 13 09 222218, tax number: 22768982-2-13, e-mail address: info@it-reszleg.hu)
b) operation and development of a website: **ENERGO-LINE Bt.** (registered office: 2094 Nagykovácsi, Szent Lóránt street 35., company registration number: 13 06 063753, e-mail address: info@energo-line.hu)
c) provision of hosting services: **Websupport Magyarország Kft.** (registered office: 1119 Budapest, Fehérvári road 97-99., company registration number: 01 09 381419, e-mail address: support@websupport.hu)

d)

D) DATA TRANSFER TO A THIRD COUNTRY

The data manager does not forward the personal data specified above to third countries.

E) TECHNICAL AND ORGANIZATIONAL MEASURES

When handling the personal data, the data controller pays particular attention to guaranteeing their security, for which purpose it formulates special regulations for its employees, which they are obliged to comply with during their work.

The data controller sends paper-based documents containing personal data to 1191 Budapest, Üllői street 200. VIII/808. stored in his office at only authorized employees and company managers can access the documents. The room designated for document storage can be locked with a key.

The data manager stores the documents and data electronically on its own central NAS server. Access to the data stored on the server is only available to the data manager's designated employees, managers and partners providing IT services. The data controller tries to protect against data loss by supplying the operation of its server with an uninterruptible power supply.

F) RIGHTS AFFECTED

Pursuant to Article 15 of the GDPR regulation, the data subject may request from the data controller access to his/her personal data **(right of access)** . In doing so, the data subject is entitled to receive feedback from the data controller as to whether his personal data is being processed and, if so, he is entitled to receive access to the following information:

- purposes of data management,
- categories of personal data concerned,
- fact of data transfer and its recipients (also to third countries),
- planned duration of data storage,
- the data subject's right to request the correction, deletion or restriction of processing of the data, or to object to the processing of such personal data,
- the right to submit a complaint to the supervisory authority,
- information about the source of the data, if it was not collected from the data subject,
- the fact of automated decision-making.

The data controller provides a copy of the personal data that is the subject of data management to the data subject. If the data subject submits his request electronically by sending a letter to the email address specified in this information, then - in the absence of a request to the contrary - the data controller will

also fulfill his obligation to provide data electronically. During the enforcement of this right, the data controller must also pay attention to the rights of others.

Based on Article 16 of the GDPR regulation, the data subject may request the correction of his personal data (**right to correction**), which the data controller shall comply with without undue delay. The data subject is also entitled to request the addition of incomplete personal data.

Based on Article 17 of the GDPR regulation, the data subject may request the deletion of personal data managed by the data controller (**right to deletion, "right to be forgotten"**), which the data controller must comply with without undue delay if one of the following reasons exists:

- the personal data are no longer needed for the purpose for which they were collected and processed,
- the data subject objects to data processing,
- personal data were handled illegally,
- the personal data must be deleted in order to fulfill the legal obligation prescribed by EU or domestic law applicable to the data controller.

The data subject may request restriction of the processing of personal data based on Article 18 of the GDPR regulation (**right to restriction of data processing**). The data controller is obliged to do so if

- the data subject disputes the accuracy of the personal data, or
- the data management is illegal and the data subject opposes the deletion of the data, or
- the data controller no longer needs the personal data for data management purposes, but the data subject requests them, or
- the data subject objected to data processing.

Pursuant to Article 20 of the GDPR regulation, the data subject has the right to exercise the **right to data portability** , that is, he is entitled to receive his personal data in a segmented, widely used, machine-readable format from the data controller. Furthermore, you are also entitled to transfer this data to another data controller in the case of those specified in the GDPR regulation.

With regard to the data processing detailed above, the data subject has the **right to object only to those data processing** in which the data processing is based on point f) of Article 6 (1) of the GDPR regulation, i.e. *on the legitimate interest of the employer* . In this case, the data subject may object to the processing of his personal data at any time for reasons related to his own situation. In the event of a protest, the data controller may only continue to process the personal data if it proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedom of the data subject, or that are related to the presentation, enforcement and protection of legal claims. Upon the request of the data subject, the data controller shall provide the balancing test related to the data processing based on legitimate interest.

The data subject may submit a complaint regarding data management to the National Authority for Data Protection and Freedom of Information as an authority (registered office: 1055 Budapest, Falk Miksa str. 9-11., phone: +36 30 683 5969, email: ugyfelszolgalat@naih.hu). **(right to appeal to supervision)**

Information on the obligation to provide personal data

The data subject is not obliged to provide personal data, however, in the event of failure to provide such data, the data controller cannot fulfill its contractual obligations and the Students cannot participate in the training or take the exam.

Budapest, 2026.

Green Shield Kft.