DATA PROTECTION NOTICE

on the processing of personal data in connection with the registration in the PannonRIS system of vessels transiting through Paks

Effective from: 17 September 2026

1. Purpose of this Notice

This Data Protection Notice applies to the processing of personal data provided when using the electronic form entitled "Registration of Vessels Transiting through Paks", available in the PannonRIS system.

The primary purpose of the processing is to support the performance of tasks relating to **navigation safety, traffic management, regulatory supervision, waterway policing and water managemen**t in connection with the transit of vessels and other watercraft in the Paks area; to ensure that the competent authorities and cooperating organisations receive the necessary information in a timely and appropriate manner; and to facilitate the safe passage of waterway traffic.

The principal legislation applicable to the processing of personal data includes:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (the "GDPR");
- **Act CXII of 2011** on the Right of Informational Self-Determination and on Freedom of Information (the "Infotv.");
- **Act XLII of 2000** on Water Transport, in particular Section 48/B thereof;
- **Decree No. 45/2011 (VIII. 25.)** of the Minister for National Development on the professional and operational rules governing River Information Services.

2. Organisations Involved in Data Processing

The professional operation of data processing carried out within the framework of River Information Services is the responsibility of the navigation authority designated by law.

For the purpose of performing their respective statutory duties relating to regulatory supervision, navigation safety, transport safety, waterway policing and water management, the following organisations, in particular, may access the registration data to the extent necessary for the performance of their respective functions and powers:

- **Ministry of Transport and Investment (KBM)**
  Registered office: 18 Október huszonharmadika utca, Budapest 1117, Hungary
  E-mail: info@kbm.gov.hu
- **Government Office of the Capital City of Budapest (BFKH)**, acting through its competent navigation authority unit;
- **the competent waterway policing authority;**
- **General Directorate of Water Management (OVF)** and any water management organisation involved in achieving the purposes of the processing;
- **the PannonRIS/NAVINFO service**;

- authorised employees of the **National Association of Radio Distress-Signalling and Infocommunications (RSOE)** involved in carrying out the relevant tasks.

The personal data disclosed to these authorities and organisations will be processed by each recipient within the scope of its own statutory duties and powers and in accordance with the applicable data protection requirements.

3. Operator of the PannonRIS System

The technical operation of the PannonRIS system and the processing of data within the system are carried out by:

National Association of Radio Distress-Signalling and Infocommunications (RSOE)
Registered office: 1 Elnök utca, Budapest 1089, Hungary
Telephone: +36 1 303-0168
E-mail: navinfo@pannonris.hu

Within the PannonRIS system, RSOE is responsible for recording, storing, processing and transmitting registration data, ensuring the secure operation of the system, and making the data accessible to organisations authorised to receive it.

RSOE stores the information provided in the PannonRIS system and transmits it to the recipients necessary for achieving the purposes of the processing, currently primarily by **electronic mail (e-mail).**

4. Purposes and Legal Basis of Data Processing

The purposes of data processing include, in particular:

a) the advance identification of vessels and other watercraft transiting through Paks;

b) obtaining information on the anticipated time and location of transit, as well as technical, operational and cargo details relevant to waterway traffic;

c) preparations for transit from the perspectives of navigation safety and traffic management;

d) ensuring the necessary exchange of information between the navigation authority, waterway policing authorities, water management authorities and other organisations concerned;

e) ensuring the availability of information required for safe navigation and, where necessary, for taking appropriate action in the event of the carriage of dangerous goods;

f) maintaining the necessary contact with the vessel master, designated contact person, vessel operator or shipping agent.

The primary legal basis for processing is **Article 6(1)(e) of the GDPR**, under which the processing of personal data is lawful where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

This legal basis is further specified, in particular, by **Section 48/B(1) of Act XLII of 2000** on Water Transport and the provisions of **Decree No. 45/2011 (VIII. 25.)** of the Minister for National Development.

Under Act XLII of 2000, in the course of providing River Information Services, the navigation authority operating the River Information Services centre, or the organisation commissioned by that authority to provide the centre's technical operation, is authorised to process data recorded for the purposes of navigation safety and the facilitation of waterway traffic.

Pursuant to Section 6(1) of Decree No. 45/2011 (VIII. 25.) of the Minister for National Development, the navigation authority and the police, among others, may access RIS data for the purpose of performing their statutory duties.

Providing an e-mail address is mandatory, as the link required to amend the registration at a later date is made available through that address.

5. Categories of Personal Data Processed

The categories of data processed are determined by the information requested in the registration form completed in the PannonRIS system.

For **vessels and convoys**, the data may include, in particular:

- vessel name, vessel type, European Vessel Identification Number (ENI) and flag state;
- name of the designated contact person;
- vessel master's telephone number;
- telephone number of the vessel operator or shipping agent;
- planned transit period;
- current position and waiting location;
- information concerning the convoy and the vessel's technical characteristics;
- number of persons on board;
- cargo details and, where dangerous goods are carried, information concerning their nature, mass and UN number;
- declarations made by the vessel master concerning the proper functioning of the Automatic Identification System (AIS) and the operational condition of certain items of vessel equipment;
- e-mail address.

For **small craft and other watercraft**, the data may include, in particular:

- name and registration number of the vessel or watercraft;
- type and technical specifications of the watercraft;
- current location or place of departure;
- approximate planned time of transit;
- name of the designated contact person;
- mobile telephone number of the designated contact person;
- e-mail address.

Information relating to a vessel, cargo, technical parameters or geographical position does not necessarily constitute personal data in itself. This Notice applies where such information can be linked to an identified or identifiable natural person.

6. Disclosure of Data and Access to Data

RSOE makes data recorded in the PannonRIS system accessible exclusively to persons and organisations whose access is necessary to achieve the purposes of the processing.

Depending on their respective functions and powers, the data may be disclosed, in particular, to BFKH, KBM, the competent waterway policing authorities, OVF, the NAVINFO service and designated RSOE employees.

Data are currently transmitted electronically, primarily by **e-mail**.

Access to the data is subject to authorisation. In operating the IT system, RSOE imp

7. Data Retention Period

Pursuant to **Section 6(7) of Decree No. 45/2011 (VIII. 25.) of the Minister for National Development, the RIS operator is, as a general rule, required to retain RIS data for five years from the date on which they are generated.**

Where data relate to a water transport accident or an exceptional navigation incident, the retention requirements laid down in the specific legislation governing the professional investigation of such events shall apply.

Upon expiry of the applicable retention period, personal data must be erased or, where the relevant conditions are met, irreversibly anonymised, unless further retention is required by law.

8. Rights of Data Subjects

In accordance with the GDPR, data subjects have the right, in particular, to:

- request information about and access to the processing of their personal data;
- request the rectification of inaccurate personal data;
- request the erasure of their personal data or the restriction of processing where the conditions laid down by law are met;
- object, pursuant to Article 21 of the GDPR, to processing based on Article 6(1)(e) of the GDPR.

The right to erasure and the right to object do not entitle a data subject to require the erasure of data, or the cessation of their processing, where their retention or processing is necessary under mandatory statutory provisions applicable to the controller.

Requests made by data subjects are, as a general rule, free of charge. The controller will examine each request without undue delay and, in any event, within one month of receiving it, and will inform the data subject of the measures taken.

9. Remedies and Complaints

If a data subject considers that the processing of their personal data infringes the GDPR, the Infotv. or other applicable data protection legislation, they may lodge a complaint with:

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)
Address: 9–11 Falk Miksa utca, Budapest 1055, Hungary
Postal address: P.O. Box 9, Budapest 1363, Hungary
E-mail: ugyfelszolgalat@naih.hu
Telephone: +36 (1) 391-1400
Website: www.naih.hu

The data subject is also entitled to bring proceedings before a court in the event of unlawful processing of their personal data.

10. Miscellaneous Provisions

Submitting the form through the PannonRIS system **does not involve automated decision-making or profiling.**

Data processing may take place only to the extent necessary for carrying out the relevant navigation, navigation safety, regulatory and related operational tasks.

This Notice must be updated as appropriate in the event of any material change in the circumstances of data processing, the applicable legislation, the operation of the PannonRIS system or the categories of recipients.