

**DATA PROTECTION AND DATA PROCESSING**  
**INFORMATION**

**ÓBUDA UNIVERSITY**  
**(1034 BUDAPEST, BÉCSI ÚT 96/B.)**

**Budapest, 1 August 2021.**

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## **I. PRESENTATION OF THE CONTROLLER**

In order to ensure the legality of its internal data processing processes and data subjects' rights, **Óbuda University** (hereinafter: University, Controller, or "We") issues the following data protection information.

Controller's name:	<b>Óbuda University</b>
Institute ID:	<b>F112904</b>
Controller's registered seat:	<b>1034 Budapest, Bécsi út 96/B</b>
Controller's e-mail address:	<b><a href="mailto:jog@uni-obuda.hu">jog@uni-obuda.hu</a></b>
Controller's representative:	<b>Prof. Dr. Kovács Levente rector</b>
Data protection officer:	<b>Bovard Kft. (<a href="mailto:info@bovard.hu">info@bovard.hu</a>)</b>

As specified in Act CCIV of 2011 on national higher education (hereinafter: Nftv.), the Controller is an organization established for pursuing the core businesses of education, scientific research, and artistic activity – hereinafter jointly: higher education tasks –, which processes personal data required for performing this public task in the course of its operations by law. This compulsory data processing is indispensable for the legal operation of the University and for ensuring the achievement of the higher education objectives specified by law.

Students are hereby informed that the University processes personal data in compliance with applicable law, in particular the following:

- Act CXII of 2011 on informational self-determination and freedom of information (hereinafter: Infotv.);
- Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter: Regulation).

The University shall treat personal data confidentially, taking any and all IT and other technical and organizational measures to promote safe data processing as related to data storage and data processing.

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### **Definitions**

The conceptual structure of this information coincides with the interpretative definitions specified in Article 4 of the Regulation, supplemented at some points by the interpretative provisions of Infotv. Section 3.

When this information sets out provisions on data or data processing, they should be interpreted as personal data and the processing thereof.

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## **II. PURPOSES OF DATA PROCESSING**

## **1. Arrangements for admission procedures**

The admission procedure is conducted by the Bureau of Education jointly with higher education institutions in accordance with Government Decree 423/2012 (XII. 29.) on higher education admission procedures.

The rules related to the admission procedure are set out in the University's current Admission Regulations.

Classification decisions in the admission procedure made by the Bureau of Education in coordination with higher education institutions. Following such classification decision, the University shall admit the applicants classified to it as notified by the Bureau of Education. The University shall communicate its decision on admission to the applicant by way of a resolution.

### **Purpose of data processing**

The purpose of personal data processing is to conduct the admission procedure lawfully and to pass the decision on admission.

### **Personal data processed and the legal basis of their processing**

The following personal data shall be processed by the University in connection with the admission procedure<sup>1</sup>:

- a) the applicant's family and given name, gender, family and given name at birth, mother's family and given name, place and date of birth, nationality, place of residence, place of stay, address for service, telephone number and, in the case of non-Hungarian nationals, the legal title of stay in the territory of Hungary and the details of the document entitling to stay or, in the case of persons having the right of free movement and residence pursuant to a specific law, the details of the document certifying the right of residence – Hungarian certificate, Hungarian relative certificate, international insurance document,
- b) data on the secondary school leaving examination,
- c) secondary school data,
- d) data necessary for the assessment of the application for admission,
- e) the data of the admission procedure, the application identification number,
- f) the identification number of the declaration made under Nftv. Section 48/D(2).

In the course of the admission procedure the University may request the applicant to supply further data and certificates as required for assessing the application for admission.<sup>2</sup>

Data processing is required for carrying out the public task performed by the University, which, in this case, is to conduct the admission procedure to the higher education institution and to pass the decision on admission, so its legal basis is Article 6 (1) (e) of the Regulation.

### **Source of personal data**

As set out in Section 12 (3) of Government Decree 423/2012 (XII. 29.), the Bureau of Education shall forward the personal data of applicants to the University in the admission procedure.

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<sup>1</sup> Nftv. Annex 3, Section 1/B. 1. a)

<sup>2</sup> Government Decree 423/2012 (XII. 29.), Section 12 (6)

According to Section 18 (1) of Government Decree 423/2012 (XII. 29.), the source of personal data processed in connection with the aptitude tests and admission interviews organized by the University shall be the data subjects themselves.

In the event that the data subject is the source of personal data, information shall be provided directly on any changes in the scope of the data processed at the time of registration thereof.

### **Recipients of the personal data made available**

University staff shall be entitled to process the personal data of applicants for admission only on a need-to-know basis.

In accordance with Government Decree 423/2012 (XII. 29.), data in connection with the admission procedure shall be forwarded to the Bureau of Education<sup>3</sup>, through the designated online system of the Bureau of Education.

### **Transfer of personal data to third countries or international organizations**

Personal data shall not be transferred by the University to third countries and international organizations.

### **Duration of personal data processing**

If no student relationship has been established as a result of the procedure, the University shall process personal data processed in connection with the admission procedure for two years following the application deadline of the higher education admission procedure concerned.

### **Automated decision making and profiling**

None of them occurs in the course of data processing.

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## **2. Establishment of student relationship**

As provided in Nftv. Section 39 (3), a student relationship shall be established as of enrollment on the basis of the decision of admission or transfer.

The detailed rules of enrollment are regulated by Government Decree 87/2015. (IV. 9.) on the implementation of certain provisions of Act CCIV of 2011 on national higher education (hereinafter: Vhr.), and the current study regulations of the University.

Enrollment can be initiated through the University's electronic study registration system (NEPTUN system) by filling in and signing the enrollment sheet.

### **Purpose of data processing**

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<sup>3</sup> Government Decree 423/2012 (XII. 29.), Section 25 (3)

In respect of individuals admitted, the purpose of personal data processing shall be to establish the student relationship and to conduct the enrollment procedure.

### **Personal data processed and the legal basis of their processing**

As specified in Vhr. Sections 38 (3) and (4), the enrollment sheet shall contain the following data:

- a) the name and institutional identifier of the higher education institution,
- b) description of the current academic year and semester,
- c) the student's details and educational ID as specified in Nftv. Annex 3 Chapter I/B Section 1 b) ba),
- d) the name, level, schedule arrangement, language, form of financing, and training location of the specialty commenced,
- e) the type of the student relationship,
- f) the student's tax ID and social security ID,
- g) in case of applicants classified into a training course supported by (partial) Hungarian state stipend, the applicant's declaration as per Annex 9 that they have familiarized with and commit to the terms and conditions of such training course supported by (partial) Hungarian state stipend as stated in the Nftv.,
- h) the student's statement on familiarization with the information on the institution,
- i) further details related to student rights and obligations, as specified in the institutional regulations,
- j) the date of filling in and signing the enrollment sheet, as well as the signature of the student or of the representative thereof, and
- k) authentication as per Section 34 (4).

Annexes to the registration sheet:

- a) copies of the documents submitted as a condition for admission in the course of the admission procedure, to be authenticated by the higher education institution after collation with the original document,
- b) an original counterpart – signed by each party – of the training agreement between the higher education institution and a student subject to tuition fee payment,
- c) other declarations requested by the higher education institution, and
- d) in case of a student enrolled by way of a representative, the document entitling such person for representation.

Data processing is required for carrying out the public task performed by the University, which, in this case, is to establish a student relationship and to conduct the enrollment procedure to the higher education institution, so its legal basis is Article 6 (1) (e) of the Regulation.

### **Source of personal data**

The data subject. As the data subject is the source of personal data, information shall be provided directly on any changes in the scope of the data processed at the time of registration thereof.

### **Recipients of the personal data made available**

Only those members of the University staff shall process personal data whose job involves the processing of such personal data.

Enrollment shall be performed in the NEPTUN system, developed by SDA Informatika Zrt.

Following the establishment of a student relationship, the University shall be obligated to report the student's personal data and the details of the student relationship to the higher education information system (hereinafter: FIR).<sup>4</sup> The FIR electronic records are operated by the Bureau of Education as an independent controller.<sup>5</sup> Data disclosure to the FIR is performed through the NEPTUN system.

### **Transfer of personal data to third countries or international organizations**

Personal data shall not be transferred by the University to third countries and international organizations.

### **Duration of personal data processing**

The personal data of the data subject shall be processed for eighty years from the notification of the termination of student status as specified in Nftv. Annex 3 Chapter 1/B Section 3.

### **Automated decision making and profiling**

None of them occurs in the course of data processing.

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## **3. Performance of higher education tasks**

In accordance with Nftv. Section 18 (1), the University shall register personal and special data indispensable for the following in connection with performing higher education tasks in its education system:

- a) proper operation of the institution,
- b) exercise of the rights of applicants and students, and the performance of their obligations,
- c) arrangements for training and research,
- d) exercise of employer's rights, as well as the exercise of professors' researchers' and employees' rights, and the performance of their obligations,
- e) keeping records as specified by law,
- f) establishment, assessment and certification of the benefits provided by law and by the organizational and operational regulations of the higher education institution,
- g) career tracking of graduates as per Nftv. Sections 15 and 16.

### **Purpose of data processing**

The purpose of data processing is to perform the higher education tasks specified by law.

### **Personal data processed**

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<sup>4</sup> Vhr. Section 28 (1)

<sup>5</sup> Vhr. Section 25 (8)

Pursuant to Nftv. Annex 3 Chapter I/B Section 1 b), the University keeps records of the following personal data:

- a) data related to the student relationship:
  - the student's name, gender, name at birth, mother's name, place and date of birth, nationality, place of residence, place of stay, address for service, telephone number, email address and, in the case of non-Hungarian nationals, the purpose of stay in the territory of Hungary and the name and number of the document entitling to stay or, in the case of persons having the right of free movement and residence pursuant to a specific law, those of the document certifying the right of residence,
  - type of student (guest student) status, when and how student status was acquired and terminated, name of the training program pursued, any state funding received for such program, mode of study and expected date of completion thereof, assessment of student performance, data on examinations, semesters commenced, period of funding used, suspension of student status,
  - places and dates of courses taken at higher education institutions abroad,
  - credits earned and recognized, and validated studies in the course of the program,
  - data on student allowances, data necessary for the assessment of eligibility (social situation, data on parents, data on maintenance),
  - data on student employment,
  - data on disciplinary and damages cases involving the student,
  - data necessary for the assessment of eligibility for special treatment as a disabled student,
  - data on accidents involving the student,
  - serial number of student identity card, identification number of master data sheet,
  - the student's educational identification number, personal ID card number, photo, and social security number,
  - electronic copy of degree project (thesis) and diploma supplements, data on the completion of the internship practice period, the final certificate, the final examination (doctoral defense), the language examination, and the diploma and diploma supplement,
  - data necessary for the exercise of rights and fulfilment of obligations arising from student status;
- b) graduate tracking data;
- c) student tax identification number;
- d) data serving to identify the documents supporting the data;
- e) data on fees and costs paid by the student – any payment in instalments, deferment or exemption related to payment obligations;
- f) if the student is provided student or housing assistance being due by reason of receiving infant care allowance, childcare assistance, child raising allowance, childcare benefit, regular child protection allowance or being disabled, data on these;
- g) in the case of scholarships established by the Government by way of a decree pursuant to Article 85(1) and (2), data on the scholarship provided in support of the studies pursued by the student and disbursed on the basis of student status;
- h) data on student competence assessments and the results thereof;
- i) data on the existence and type of credit granted by the Student Loan Center, and in case of tied use loan, data on the amount of loan the student applied for, the number of loan agreement, the amount transferred to the higher education institution and the date of such transfer;
- j) date and reason for elimination from the record of personal data and addresses.

#### Data processing related to the operation of the electronic study registration system (NEPTUN)

In order to perform the registration tasks related to the student data processed as set out herein, the University operates an electronic study registration system (the NEPTUN system)<sup>6</sup>.

The University provides access for students on an on-going basis to the personal and study data recorded about them in the NEPTUN system<sup>7</sup>.

#### Data processing related to student performance assessment

In connection with student performance assessment, the University issues completion sheets, examination sheets and final examination records, and keeps registration course books – all with the data content specified by law –; furthermore, it issues credit certificates and master data sheet abstracts at the student's request.

The University keeps records in the NEPTUN system of study assessments and of study performance measured in credits.<sup>8</sup>

#### Data processing related to reclassification decisions

In cases specified in Nftv. Section 48 (2), the University shall be obligated each academic year to reclassify students enrolled in a training course supported by a Hungarian (partial) state stipend to a tuition fee payment course. Upon request, students pursuing studies subject to tuition fee payment at the same specialty of the higher education institution may replace such reclassified students. The University shall decide on such reclassification on the basis of the study achievements of students subject to tuition fee payment who request their reclassification to a training course supported by a (partial) state stipend.<sup>9</sup>

Such reclassification decision shall be adopted by the University based on the student data processed as specified herein, once per academic year, as provided in the Vhr.<sup>10</sup>.

#### Data processing related to the registration of degree projects / theses

The University keeps records in the NEPTUN system of the data on degree projects / theses produced by students (subject matter, title, description of training course, date of submission, supervisor's and referee's name and assessment, and if there is no defense as part of the final examination, the final evaluation of the degree project, the name and position of the assessor, and the date of assessment)<sup>11</sup>.

Degree projects / theses submitted by students in a paper-based and electronic format shall be preserved by the University for the period specified herein.

#### Data processing related to the completion of internship practice

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<sup>6</sup> Vhr. Section 34 (1)

<sup>7</sup> Vhr. Section 34 (2)

<sup>8</sup> Vhr. Section 60

<sup>9</sup> Nftv. Section 48 (3)

<sup>10</sup> Vhr. Section 61 (1)-(9)

<sup>11</sup> Vhr. Section 36 (1) 15

Students shall be obligated to submit to the University a certificate issued by the internship practice location in respect of the completion of internship practice, any competence assessment produced by the practice location, as well as any work log kept as mandatory in the course of performing such practice and a summary study, as applicable.

Data related to the completion of internship practice shall be recorded by the University in the NEPTUN system, broken down by training course (name, assessment, credit value, name of internship practice location, duration of practice, names of practice instructors, date of acceptance of completion, name and position of the accepting party)<sup>12</sup>.

#### Data processing related to the documents managed by the University

The University issues and stores the recorded data on students as authenticated documents<sup>13</sup>. Such documents – as well as the delivery and acceptance documents to certify the receipt thereof – shall be issued as provided in Vhr. Section 34.

#### *Issuance of deeds related to the completion of studies*

##### Issuance of final certificate

The University shall issue a final certificate with the data content set out in the Vhr. to students who have complied with the study and examination requirements prescribed by the curriculum as well as completed the required internship practice, except for passing a language examination and the completion of their degree project / thesis, and earned the required credits.<sup>14</sup>

##### Issuance of certificate

The University shall issue a certificate on the completion of higher education studies as provided in Nftv. Sections 51 to 52/A. Such certificate is a public deed, to be issued by the University with the data content set out in Nftv. Section 51 (5), in an official text format applicable to deeds to be used as mandatory pursuant to Annex 9 of the Vhr.

Such certificates are handed over personally, but in justified cases, such certificates issued may also be delivered to students who are foreign citizens by the diplomatic and consular courier service of the Ministry of Foreign Affairs and Trade. In this respect, the Ministry of Foreign Affairs and Trade shall act as provided in instructions No. 14/2016 (VII. 5.) of the Ministry of Foreign Affairs and Trade on the order of completing diplomatic and consular courier service assignments, and shall be considered as an independent controller in the course of fulfilling its duty.

The University keeps central records of the certificates issued.<sup>15</sup>

##### Issuance of master data sheet

A master data sheet serves for the registration of a student's personal and study data in relation to the student relationship specified in such master data sheet.<sup>16</sup> Such student master data sheet –

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<sup>12</sup> Vhr. Section 36 (1) 13

<sup>13</sup> Vhr. Section 34 (3)

<sup>14</sup> Nftv. Section 50. (1)

<sup>15</sup> Nftv. Section 50 (1)

<sup>16</sup> Vhr. Section 36 (1)

issued and authenticated in a paper-based or electronic format – contains the data specified in Vhr. Section 36 (2) from the data recorded in the NEPTUN system.

#### *Issuance of certificates related to student relationship and studies*

The University shall issue certificates of variable content to students ex officio or at request (certificates of legal relationship, certificates related to studies, in particular but not limited to certificates on the issuance of a final certificate, successful completion of a final examination, degree entitlement, and tutor's area of erudition, etc.), with the data content set out by law. As specified by law, certain certificates shall be issued by using an official text format as per Annex 9 of the Vhr. and shall be recorded in the NEPTUN system.

#### Data processing related to the special conditions of training courses supported by a Hungarian (partial) state stipend

The University is obligated by law to record – in the study administration register (the NEPTUN system) – the fact of the establishment of a student relationship related to a training course supported by a (partial) state stipend as well as the date of acquiring a certificate, and to forward such data to the Bureau of Education as the body responsible for the registration of compliance with the terms and conditions of the Hungarian state stipend.<sup>17</sup>

#### Data processing related to disciplinary procedures and to the establishment of liability for damages

The University shall conduct disciplinary procedures<sup>18</sup> and procedures for the establishment of liability for damages<sup>19</sup> against students as provided in its Organizational and Operational Regulations currently in effect if specific terms and conditions exist.

Records shall be drawn up of disciplinary hearings. The University shall process the personal data recorded in documents produced in the course of the disciplinary procedure in order to effectively conduct such procedure, on the basis whereof it shall adopt a disciplinary resolution at the end of the procedure.

In connection with students' compliance with their study obligations, the University shall draw up records of damages in case of damage caused illegally to the higher education institution / the organizer of practice training. The University shall process the personal data recorded in documents produced in the course of a procedure for the establishment of liability for damages in order to effectively conduct such procedure, on the basis whereof it shall adopt a resolution on damages at the end of the procedure.

Data related to disciplinary procedures and procedures for the establishment of liability for damages shall be recorded in the NEPTUN system.

#### Data processing related to student accidents

Pursuant to the Health and Safety Regulations of the University, accidents suffered by students in connection with their studies at practice classes shall be deemed as occupational accidents, required to be investigated and recorded in the same way as occupational accidents by the University.

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<sup>17</sup> Nftv. Sections 48/G b) and c)

<sup>18</sup> Nftv. Sections 55 (1)-(5)

<sup>19</sup> Nftv. Sections 56 (1)-(4)

The data for establishing the fact of and for investigating such accident are specified by law, which shall be primarily required for the identification of the data subject and for the investigation of all the circumstances and consequences of such accident.

#### Data processing related to students' legal redress

In case of any infringement of their rights, students may resort to legal redress as provided in Section 57 of the Nftv. Requests for legal redress may be submitted by students with the data content set out in the Study and Examination Regulations of the University currently in effect.

Any personal data recorded in the documents produced in the course of such procedure shall be processed by the University in order to adjudge such application for legal redress, on the basis whereof the University shall adopt a resolution under Section 57 (5) of the Nftv.

#### Data processing related to the issuance and validation of student ID cards

Students may initiate the issuance of a student ID card through the NEPTUN system, with the data content specified by law. Such application shall be forwarded to the Bureau of Education through the NEPTUN system.

Following issuance, student ID cards shall be validated by the University; pursuant to Government Decree 362/2011 (XII. 30.) on educational ID cards, the University shall be obligated to report the fact of such validation and the serial number of the validation sticker issued to the Bureau of Education<sup>20</sup>.

#### Data processing related to the promotion of students' equal opportunities

Upon request by a disabled student, the University shall be required to define criteria (partially) different from curriculum requirements, or to forbear from compliance therewith, as applicable, by providing at least one allowance – or more allowances as necessary – if allowances or exemptions can be granted to such students based on the findings of an expert opinion to certify disability.<sup>21</sup>

The type of disability of a disabled student (applicant) shall be evidenced by an expert opinion issued by the body specified in Section 63 (2) or (3) of the Vhr.<sup>22</sup> and a request for any partial or complete exemption from the completion of study obligations and / or examinations or for a permit to complete them in any other manner may be submitted on the basis thereof<sup>23</sup>.

Access to data required for the adjudgement of special treatment due for students with disabilities shall be provided by the higher education institution to coordinators to manage assistance to students with disabilities on behalf of the higher education institution and the faculty, respectively<sup>24</sup>

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<sup>20</sup> Government Decree 362/2011 (XII. 30.) Section 36 (6)

<sup>21</sup> Vhr. Section 62 (1)

<sup>22</sup> Vhr. Section 63 (1)

<sup>23</sup> Vhr. Section 64 (1)

<sup>24</sup> Vhr. Section 64 (5)

As regards any further data processing concerning the completion of certain higher education tasks, the University shall inform students concerned about the features of the given data processing as below, by making special data processing information available:

- data processing related to student work,
- data processing related to the support of students' studies (stipends),
- data processing related to partial studies of higher education abroad,
- data processing related to student hostel accommodation,
- data processing related to student loan programs,
- data processing related to career tracking,
- data processing related to doctoral training.

### **Legal basis of data processing**

Data processing is required to carry out the public task performed by the University, which in this case is the completion of higher education tasks as specified by law, so its legal basis is Article 6 (1) (e) of the Regulation.

Data processing carried out in respect of the investigation of student accidents, students' study support (welfare-based allowances), as well as special data processing for granting certain allowances in connection with the promotion of students' equal opportunities, as well as with the completion of other higher education tasks is based on the exemption set out in Article 9 (2) of the Regulation.

### **Source of personal data**

The data subject. As the data subject is the source of personal data, information shall be provided directly on any changes in the scope of the data processed at the time of registration thereof.

### **Recipients of personal data processed**

University staff shall process the personal data only on a need-to-know basis.

As described above, records shall be kept of students' personal data in the NEPTUN system, developed by SDA Informatika Zrt.

The University shall keep records stipulated by law in its education system, and shall be obliged to provide data from it by electronic means to the national statistical data collection programme, to the higher education information system as well as to any other system specified by law.<sup>25</sup>

In connection with carrying out higher education tasks, the following personal data shall be allowed to be forwarded by the University pursuant to the Nftv.<sup>26</sup>:

- a) to the maintainer, for the purpose of the performance of tasks related to maintainer control;
- b) to the court, the police, the public prosecutor's office, the bailiff or the public administrative body concerned, the data necessary for taking a decision on a specific matter;
- c) to the national security service, any and all data necessary for the performance of tasks defined in the Act on National Security;

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<sup>25</sup> Nftv. Section 2 (6)

<sup>26</sup> Nftv. Annex 3 Section 1/B 4

- d) all data to the body responsible for the operation of the higher education information system;
- e) to the body responsible for keeping records of compliance with the terms and conditions of Hungarian state scholarships, data on the program and on student status.

In the event that a diploma is issued to a student of foreign nationality by the diplomatic and consular courier service of the Ministry of Foreign Affairs and Trade, such diploma and the data required for the delivery of such diploma shall be forwarded by the University to the Ministry of Foreign Affairs and Trade.

### **Transfer of personal data to third countries or international organizations**

Students' personal data above shall not be transferred by the University to third countries and international organizations.

In the event of any data transfer to third countries by reason of partial studies abroad, scholarships, and / or scientific research activities, detailed information shall be provided thereon on a case-by-case basis to students concerned.

### **Duration of personal data processing**

The personal data of the data subject shall be processed for eighty years from the notification of the termination of student status as specified in Nftv. Annex 3 Chapter 1/B Section 3.

### **Automated decision making and profiling**

None of them occurs in the course of data processing.

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## **4. Production and use of photos and video recordings at programs organized by the University**

The University shall take photos and produce video recordings of programs organized by it (including in particular, but not limited to conferences, presentations, events of various subject matters, hereinafter jointly: programs), to be published subsequently at the interfaces specified above.

In the event that such program is organized by drawing on any proposal, support, or other central resource (hereinafter: "supported program"), the University may be obligated to documents by photos / videos that the resource made available was used lawfully as part of the documentation to substantiate the use of such support.

### **Purpose of data processing**

The purpose of producing and using photos and videos shall be to inform the public about programs organized by the University in order to ensure the transparency of the use of public funds, as well as to promote programs, university and scientific life and sphere, student community and student programs, and to illustrate programs by pictorial reports on the University's online interfaces, in its publications and reference materials.

The photos and videos to present programs may be published at the University's own online interfaces, in particular but not limited to the following:

- the University's website available at <http://uni-obuda.hu/>, as well as faculty websites,
- the University's Facebook and Instagram community sites and Youtube channel,
- and the Facebook page (event / group) expressly generated to promote the program concerned.

Photos and videos presenting such programs may also be used in the University's own publications and reference materials for the purposes specified in this section.

In case of a supported program, a further purpose of the production of photos and videos shall be to certify by our University that it uses support funds as provided by law, in the announcements of support, and in the relevant support contracts.

### **Personal data processed**

Photos and video recordings produced at such programs, which may randomly feature participants.

### **Legal basis of data processing**

Data processing is required to carry out the public task performed by the University, so its legal basis is Article 6 (1) (e) of the Regulation.

The University shall place clear information at the locations of the programs organized by it, as well as previously on their promotion materials, that photos and video recordings shall be produced at the program concerned, which shall be published on the online interfaces above.

### **Source of personal data**

Recordings are made by own employees or hired photo / video recorder partners.

Hired photographers / video cameramen shall deliver the recordings made to the University after the program concerned, and shall delete them finally and irretrievably from their own devices.

### **Recipients of the personal data made available**

The personal data of data subjects may only be known by employees – potentially by officials of the Students' Self-Government – assigned to conduct programs and / or participate in the production and publication of recordings, on a need-to-know basis.

The University hires the following data processor for photo publications at its own website:

Mitte Communications Kft. (1061 Budapest, Paulay Ede utca 55.) – assigned to perform graphic and design tasks related to the University's own website, in the course of which it may have access to such recordings.

The data processor may process data subjects' personal data only for the purpose specified by us and set out in a contract, in accordance with our instructions - they shall not have any independent rights of decision in respect of data processing. The data processor has undertaken a non-disclosure

obligation and contractual guarantees in respect of preserving the personal data revealed in the course of carrying out its duties.

In case of Facebook and Instagram community sites, the general data processing information by Facebook Ireland Ltd. shall be available at <https://hu-hu.facebook.com/privacy/explanation> and <https://help.instagram.com/519522125107875>, respectively. With regard to data protection issues, the data protection officer of Facebook Ireland Ltd. can be contacted at <https://www.facebook.com/help/contact/540977946302970>.

As regards the YouTube channel, the data processing information is available at [https://support.google.com/youtube/answer/7671399?p=privacy\\_guidelines&hl=hu&visit\\_id=636873724079445207-2532259155&rd=1](https://support.google.com/youtube/answer/7671399?p=privacy_guidelines&hl=hu&visit_id=636873724079445207-2532259155&rd=1). Data protection complaints may be lodged at <https://support.google.com/youtube/answer/142443>

Supported programs are monitored by the bodies authorized by law, considered as independent controllers in the course of pursuing such activities. Personal data by law (photos and videos) are transferred to such bodies, but they shall be entitled to process such data for monitoring purposes only.

### **Transfer of personal data to third countries or international organizations**

Personal data shall not be transferred by the University to third countries and international organizations, but due to the boundlessness of the internet, such data can be known by anybody after uploading. The University has no control over the use of recordings published on the internet by those who get to know them, so the University shall not be liable for that.

### **Duration of personal data processing**

Articles with information on programs which include photo and video recordings shall not be deleted by the University from the interfaces above, unless it is expressly requested or data processing is objected to by the data subject.

In case of a supported program, the University shall preserve personal data until the end of the maintenance period following such program, only for the purpose of justifying the use of the relevant support found.

### **Automated decision making and profiling**

None of them occurs in the course of data processing.

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## **III. DATA SUBJECT RIGHTS RELATED TO DATA PROCESSING**

### **Right of information**

Data subjects shall have the right to obtain information on data processing, provided by the Controller by making this information available.

### **Right of access**

At the data subject's request, the Controller shall provide information at any time whether the processing of the data subject's personal data is in progress, and if so, it will provide access to personal data and the following information:

- a) purposes of data processing;
- b) categories of personal data processed concerning the data subject;
- c) recipients or recipient categories to which the Controller has disclosed or will disclose such personal data, including in particular third country recipients and international organizations;
- d) planned duration of personal data storage, or of this is not possible, the criteria for specifying such duration;
- e) furthermore, data subjects will be informed about their right to request the Controller to rectify, erase or restrict the processing of their personal data, and to object to the processing of such personal data;
- f) the right to lodge a complaint with a supervisory authority and to initiate court proceedings;
- g) if the Controller has not collected such data directly from the data subject, any and all information available on the source of such data;
- h) in case of automated decision making, the fact thereof, including profiling, as well as at least the logic applied in these cases, meaning the significance and expected consequences of such data processing with regard to the data subject.

### **Right to the rectification of personal data**

Data subjects shall be entitled to the rectification, without undue delay, of inaccurate personal data by the Controller at their request at any time. Taking the purpose of data processing into account, data subjects shall also be entitled to request the supplementation of incomplete personal data – by way of a supplementary declaration, in addition to other things.

In the event of a request to rectify (modify) data, the data subject will need to substantiate the verity of the data requested to be modified; in addition, the data subject will also need to provide evidence that such data modification is actually requested by the party entitled. The Controller can only adjudge the correctness of such data only this way, and if so, whether it is allowed to modify the earlier data.

Furthermore, the Controller calls attention to the fact that data subjects should report any changes to their personal data as soon as possible, thus facilitating lawful data processing and the enforcement of their rights.

### **Right to erasure**

At the data subject's request, the Controller shall be obligated to erase personal data referring to the data subject without undue delay if any of the reasons below exist:

- a) the Controller no longer needs such personal data for the purpose of collection or processing otherwise;
- b) in case of data processing based on consent, the data subject withdraws the consent forming a basis of data processing, and there is no other legal basis for data processing;
- c) the data subject objects to data processing and there is no prioritized lawful reason for data processing, or the data subject objects to data processing for direct marketing purposes;
- d) the Controller processes personal data illegally;

- e) personal data are required to be deleted in order to comply with a legal obligation prescribed for the Controller by applicable EU or Member State law;
- f) personal data were collected in connection with offering services related to the information society.

### **Right to restriction of processing**

The data subject shall have the right to the restriction of data processing by the Controller at the data subject's request if one of the following applies:

- a) the data subject contests the accuracy of the personal data; in this case, such restriction shall apply for a period enabling the Controller to verify the accuracy of the personal data;
- b) the data processing is unlawful and the data subject opposes data erasure and requests the restriction of their use instead;
- c) the Controller no longer needs the personal data for data processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; or
- d) the data subject has objected to data processing, pending verification whether the Controller's legitimate grounds override those of the data subject.

### **Right to object**

If the legal grounds for the processing of personal data are constituted by the Controller's legitimate interest (Article 6 (1) (f) of the Regulation), or processing is necessary for the performance of a task carried out in the exercise of official authority vested in the Controller (Article 6 (1) (e) of the Regulation), data subjects shall have the right to object, on grounds relating to their particular situation, at any time to the processing of their personal data, including profiling based on those provisions.

Where the personal data of the data subject are processed for direct marketing purposes (such as for sending information letters) by the Controller, the data subject shall have the right to object at any time to the processing of their personal data for such purpose, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to the processing of their personal data for direct marketing purposes, the personal data shall no longer be processed for such purposes.

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## **RULES OF PROCEDURE TO ENFORCE DATA SUBJECTS' RIGHTS**

Data subjects may exercise their rights above by e-mail to [jog@uni-obuda.hu](mailto:jog@uni-obuda.hu), a letter sent by post to the Controller's registered seat, or personally at the Controller's registered seat. The Controller shall start to investigate and fulfil the data subject's request without undue delay following the receipt thereof. Measures taken by the Controller on the basis of such request shall be notified to the data subject within 30 days of receipt thereof. In the event that the Controller cannot fulfil such request, it will inform the data subject within 30 days about the reasons for rejection and their rights to legal redress.

Within five years of the data subject's death, the rights due for the deceased in their lifetime as specified herein may be enforced by a person authorized by the data subject via an order for dispatching affairs, or a declaration supplied to the Controller, issued in a public deed or in a private deed with full probative value; if the data subject supplied several declarations to the same

controller, by the declaration made at a later date. If the data subject failed to supply a corresponding declaration, even in the absence thereof, a close relative of the data subject as per the Civil Code will still be entitled to enforce the deceased's rights when alive, as provided in Article 16 of the Regulation (right to rectification) and Article 21 thereof (right to object); and if such data processing was unlawful even in the data subject's life, or if the purpose of data processing discontinued with the death of the data subject, the rights provided in Article 17 of the Regulation (right to erasure) and Article 18 thereof (right to the restriction of data processing) within five years of the data subject's death. The data subject's rights under this paragraph may be enforced by the close relative who is the first to exercise such rights.

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#### **IV. RIGHT TO LEGAL REDRESS RELATED TO DATA PROCESSING**

In order to enforce their right to legal redress at court, data subjects may take court action against the Controller if, in their opinion, the Controller or the data processor or joint controller acting as assigned or ordered process their personal data in violation of any provisions set out in any legal regulation on personal data processing, or of any requirements set out in a legally binding act by the European Union. The court shall act with special dispatch in the case. The adjudgement of such litigation shall fall within the sphere of authority of regional courts. As opted by the data subject, such litigation may also be instituted at the regional court competent according to the data subject's domicile or residence, or by the Controller's registered seat (Metropolitan Regional Court of Budapest).

Anyone can institute an investigation against the Controller by reporting to the National Authority for Data Protection and Freedom of Information (NAIH), with reference to the fact that rights related to the processing of personal data have been infringed or there is an imminent danger thereof, or that the enforcement of their rights related to processing are restricted by the Controller or their request to enforce such rights are rejected by the Controller. Such reporting can be made to one of the contacts below:

National Authority for Data Protection and Freedom of Information (NAIH)  
Mailing address: 1363 Budapest, Pf. 9.  
Address: 1055 Budapest, Falk Miksa utca 9-11.  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)  
URL: <http://naih.hu>