



File no.: NKE/22907-1/2025.

## **INFORMATION ON DATA PROCESSING regarding the international survey on training programmes for civil servants**

### **1. Name of Data Controller**

Ludovika University of Public Service  
Address: 1083 Budapest, Ludovika tér 2.  
Phone: +36 1 432 9000  
E-mail: [nke@uni-nke.hu](mailto:nke@uni-nke.hu)  
Website: <https://www.uni-nke.hu/>  
Represented by: Dr. Gergely Deli Rector

### **2. Name and contact details of the Data Protection Officer**

Data Protection Officer of the University:  
Adrienn Bernadett Kincses dr. iur.  
Direct contact: [adatvedelem@uni-nke.hu](mailto:adatvedelem@uni-nke.hu)  
Phone: +36 1 432 9000/ extension: 29833

### **3. Information about processing personal data regarding the questionnaire on systematic training programmes for civil servants in case personal data is collected directly from the data subjects**

<b>Categories of data subjects</b>	<b>Scope of processed data</b>	<b>Purpose of data processing</b>	<b>Legal basis</b>	<b>Consequences of failure to provide such data</b>
Employees of institutions filling the questionnaire for the survey.	Name, position, e-mail address, country of the responding institution, name of the responding institution, type of the responding institution and the personal data content of the answers in free text.	Creating a comparative survey of education programmes for civil servants and identification of good practices and fields of potential improvement.	Pursuant to Article 6 (1) e) of the GDPR <sup>1</sup> , data processing is necessary for the performance of a task carried out in the exercise of official authority of the University.	The questionnaire cannot be evaluated, making it more difficult to improve the system of training programmes.

<sup>1</sup> 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)

#### 4. Recipients of personal data, the persons entitled to access the data

Employees of the departments or research institutes who are required to access the concerned personal data based on their employment relationship, especially employees of

- Közigazgatási Továbbképzési Intézet (Institute For Public Administration Further Training, address: 1083 Budapest, Ludovika tér 1.; e-mail: [kti.igazgato@uni-nke.hu](mailto:kti.igazgato@uni-nke.hu); phone number: +36 1 432-9000; website: <https://kti.uni-nke.hu/>)

The planned questionnaire shall be managed by **EUSurvey** (European Commission – DG DIGIT; Rue de la Loi 107, B-1000 Brussels Belgium; phone number: +800 67891011; e-mail: [DIGIT-EUSURVEY-SUPPORT@ec.europa.eu](mailto:DIGIT-EUSURVEY-SUPPORT@ec.europa.eu)) software run by the European Commission. Data is stored on EU servers under the control of the European Commission.

#### 5. Duration of data processing

The University processes personal data until the purpose of data processing is achieved. Data is archived and stored after processing the questionnaires according to the University record keeping policies.

The University shall retain personal data contained in the questionnaires until December 31. 2031, in accordance with auditory regulations arising from the project's accounting.

#### 6. Implementation of the processing activity

The Ludovika University of Public Service implements a survey within the Project labelled RRF 2.1.2.-21-2022-00006.

During the survey a questionnaire is being sent to institutions in the 27 states of the European Union that aims to compare the training systems of civil servants in order to identify good practices and potential possibilities of improvement.

These questionnaires are sent to members of Directors of Institutes and Schools of Public Administration (hereinafter: DISPA) which is a network of directors of institutions of public administration education. The Data Controller's institute for public administration training programmes is a member of DISPA.

Data subjects shall provide the following data: name, position, e-mail address, name, home country and type of the responding institution. The questionnaire contains some free text answers to help describe any good practices.

The questionnaire is managed on EUSurvey.

The University shall process the data exclusively for the above-mentioned purpose and in accordance with the above conditions. Data processing activities are carried out in full compliance with the University's regulations on the protection and security of personal and public data, as well as its IT Security Regulations.

#### 7. Data protection

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the University shall implement appropriate technical and organisational measures to ensure a level of data security appropriate to the risk.

The University shall take all reasonable measures to ensure that the data processed by it do not become accessible to unauthorised parties. Access to data is limited, password protection is in place.

The University has a policy on protection and security of personal data and data of public interest and also an IT Security Policy.

## **8. Automated data processing (including profiling)**

The University does not use automated data processing for decision-making regarding personal data specified above.

## **9. Data transfers to third countries or international organisations**

There is no direct transfer of personal data to third countries regarding the processing detailed above.

## **10. Exercise of rights, legal remedies**

The data subject may exercise the rights provided for in the GDPR for the entire duration of the data processing, which he may do at any time at the contact details specified in Section 1 and 2.

The data subject may request

- *access to personal data* (the data subject has the right to obtain confirmation from the data controller as to whether or not personal data concerning him or her are being processed, and where that is the case, the right to access personal data and information specified in the GDPR) (Article 15 GDPR),
- *rectification of personal data* (the data subject has the right to obtain the rectification of inaccurate personal data concerning him or her, at his or her request, without undue delay. Taking into account the purpose of the data processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.) (Article 16 GDPR),
- *erasure of personal data* (the data subject has the right to obtain from the data controller the erasure of personal data concerning him or her, at his or her request, without undue delay and the data controller shall have the obligation to erase the personal data of the data subject without undue delay on the grounds specified in the GDPR; in case of data processing for compliance with a legal obligation the erasure request shall be declined ) (Article 17 GDPR),
- *restrictions on the processing of personal data* (the data subject has the right to obtain from the data controller restriction of processing if the conditions set out in the GDPR are met) (Article 18 GDPR),
- *exercise the right to personal data portability* (The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the data controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the data controller to which the personal data have been provided, as long as the conditions set out in the GDPR are met) (Article 20 GDPR),
- *may object to the processing of personal data* (shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6 (1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legiti-

mate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims; in case of data processing for compliance with a legal obligation the objection request shall be declined) (Article 21 GDPR).

The application must be submitted to the postal address of the data controller or to the following e-mail address: [adatvedelem@uni-nke.hu](mailto:adatvedelem@uni-nke.hu). The data controller shall provide written information as soon as possible, within a maximum of 1 month (within 15 days in the event of an objection) (this deadline may be extended by a further 2 months due to the complexity of the request). If any rights of the data subject have been violated, the data subject may apply to a court (the data subject may, at his or her choice, initiate a proceeding before the court competent according to his or her place of residence or stay) or may turn to the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11., phone: 06-1-391-1400, website URL: <http://naih.hu>, e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

**Budapest, 26th November 2025.**

