



Reg. number: NKE/02231/2025.

## **INFORMATION ON DATA PROCESSING at University of Public Service related to the Erasmus+ Program**

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

University of Public Service  
Address: 1083 Budapest, Ludovika tér 2.  
Telephone number: +36 1 432 9000  
E-mail address: [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**

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

### **3. Information on personal data processed for data subjects involved in the Blended Intensive Program of the Erasmus + Program (hereinafter: 'BIP'), if the data subject provides personal data**

#### **Information on processing personal data provided via NKE Survey**

<b>Categories of Data Subjects</b>	<b>Categories of processed personal data</b>	<b>Purpose of data processing</b>	<b>Legal basis</b>	<b>Consequences of not providing data</b>
Natural persons participating in Erasmus+ BIP programmes providing data through NKE Survey	Name, mother's maiden name, time and place of birth, nationality, gender, ID or passport number and expiry date, e-mail address, telephone number, permanent address, information on sending institution, previous degrees and education, language skills, date of arrival and departure, information on request of accommodation,	Application for BIP. Registration to the Neptun educational system.	The data subject's consent, based on GDPR Article 6 (1) a).	Applications for BIP cannot be accepted without personal data.

	personal data content of CV and letter of motivation.			
	Dietary requirements, food allergies.	To provide appropriate catering for the dietary requirements of the data subjects.	The data subject's consent, based on GDPR Article 6 (1) a). Special categories of personal data are processed based on GDPR Article 9 (2) a).	Catering cannot be provided according to the dietary requirements of the data subject.

#### 4. Data processing by processing the personal data of third parties in the application

Data Subject	Scope of processed data	Purpose of data processing	Legal basis	Source of personal data
<b>The person specified by the applicant, who can be notified by the Data Controller in case of emergency</b>	Data provided via NKE Survey: name, type of relation, e-mail address, telephone number.	<p>Organisation and structuring of data provided via NKE Survey in order to make administration faster and more accurate.</p> <p>Communication with a relative is necessary for the health and safety of the Student. The purpose of the communication is to ensure that the student receives all assistance as needed.</p>	Under Article 6 (1) (f) GDPR, processing is necessary for the legitimate interest of the controller.	Data is provided by the person filling the survey.

#### 5. Recipients of personal data and categories for recipients

- The following organizational units of the Data Controller: International Office, Legal Directorate, Economic Office, Human Resources Office.
- Other employees of the Data Controller who due to their employment relationship, are required to access the personal data.
- As well as the bodies defined by law that are empowered by law to inspect.
- Successful application package for the host university

#### 6. Duration of data processing

Personal data shall be processed until the data subject's withdrawal of consent. If the data subject does not withdraw his/her consent, personal data shall be processed for the duration below.

In case of a successful and efficient application, if the applicant establishes student status at the Data Controller: 80 years<sup>1</sup>.

The personal data of unsuccessful applicants shall be processed until the starting day of BIP.

## **7. The conceptual implementation of data management**

The Erasmus+ Blended Intensive Programme (BIP) combines physical and virtual learning activities to promote international collaboration and innovative teaching methods. It allows students and staff from participating institutions to work together on specific topics, blending online coursework with a short physical mobility experience abroad. BIPs enhance intercultural exchange, foster teamwork, and provide a flexible approach to Erasmus+ mobility.

Upon nomination, students can input their personal information required for the application form and upload the necessary attachments. Personal data obtained and transmitted to the University in connection with the application will be stored on the University's servers. The Data Controller will process personal data exclusively for the purposes and under the conditions specified above.

The data processing activities shall be carried out in full compliance with the University's regulations on the protection and security of personal data and the University's IT Security Policy.

## **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 security appropriate to the risk.

The University shall take all reasonable measures to ensure that the data it processes are not accessible to unauthorized persons. Access to data is limited, password protection is in place. Reading, writing and editing access on the central interfaces of the Data Controller varies from job to job, depending on the need for data processing.

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

The data processing for intra-EU mobility takes place on the NKE Survey maintained by the Data Controller. The portal has password protection based on limited access.

Reading, writing and editing access on the central interfaces of the Data Controller varies from job to job, depending on the need for data processing.

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

The University does not use automated data processing for decision-making.

## **9. Transfer of data to a third country or an international organization**

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

## **10. Exercise of rights, remedy**

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 points 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

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<sup>1</sup> As set out in the provisions of Act CCIV of 2011 on National Higher Education.

- 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),
- request the *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),
  - request the *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),
  - request *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),
  - *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 legitimate 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),
  - *withdraw their abovementioned consent* to processing of personal data at any time by sending an e-mail to [adatvedelem@uni-nke.hu](mailto:adatvedelem@uni-nke.hu), without affecting the lawfulness of the processing carried out on the basis of consent prior to its withdrawal.

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 notice 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). In addition, in the event of injury, 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) and 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, 28th January 2025**