



File no.: NKE/06837/2025.

**INFORMATION ON DATA PROCESSING**  
**regarding the application to the Student Erasmus+ Mobility Video Survey and**  
**the recording of promotional videos for student mobility programs of Ludovika**  
**University of Public Service**

**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 Student Erasmus+ Mobility Video Survey, 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>
Natural persons participating in Erasmus+ study exchange or traineeship at the University.	Name, gender, nationality, home institution, e-mail address, phone number, type of mobility preferred time to shoot video, personal data content of the questions of the survey regarding the data subject's mobility experience.	Application for the shooting of promotional videos for mobility exchange programs of the University via NKE Survey.	Pursuant to Article 6 (1) a) of the GDPR <sup>1</sup> , the consent of the data subject.

<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)

Natural persons appearing in the promotional videos for mobility exchange programs.	Image, voice and personal data content of the interview.  Other personal data may appear in the edited videos such as the data subject's name and home institution.	Shooting video interviews to promote the mobility programs of the University after posted on online platforms and social media.	Pursuant to Article 6 (1) a) of the GDPR, the consent of the data subject.
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**Consequences of failure to provide such data:** Natural persons participating in Erasmus+ study exchange or traineeship program of the University cannot apply for the videoshoots.

It is not possible to shoot the video interviews with the data subjects not appearing in them.

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

Employees of the departments who are required to access the concerned personal data based on their employment relationship,

- a) International Office,
- b) International Mobility Department,
- c) International Directorate

Promotional video recordings made with the persons participating at the Student Erasmus+ Mobility Video Survey may be published on the website and various social media sites of the University, and therefore the following entities, as processors, are entitled to access the data:

- **YouTube, LLC**, 901 Cherry Ave., San Bruno, CA 94066, USA; [legal@support.youtube.com](mailto:legal@support.youtube.com)
- **Meta Platforms Inc.**, 1 Hacker Way, Menlo Park, CA 94025, USA; Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Írország, <https://www.facebook.com/help/contact/540977946302970>
- **LinkedIn** Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland (LinkedIn Corporation, 1000 West Maude Avenue Sunnyvale, CA 94085 USA) <https://www.linkedin.com/help/linkedin>, <https://hu.linkedin.com/legal/privacy-policy>
- **X Corp.**, 1355 Market Street, Suite 900, San Francisco, CA 94103, USA, <https://help.twitter.com/en/contact-us>, Twitter International Unlimited Company One Cumberland Place, Fenian Street Dublin 2, D02 AX07 IRELAND

#### 5. Duration of data processing

Personal data controlled on the legal basis of the data subject's consent shall be processed until the withdrawal of such consent, but such withdrawal shall not affect the lawfulness of the processing carried out on the basis of the consent before its withdrawal. In the absence of withdrawal of consent, the data controller evaluates the necessity of processing data annually.

#### 6. Implementation of the processing activity

The Data Controller invites people participating in its Erasmus+ mobility programs to share their journeys by taking part in short video interviews with a maximum duration of 2

minutes. These videos will be featured on the Data Controller's social media platforms to showcase the participants' experiences, motivations, and perspectives on student mobility.

Data subjects can apply for these interviews via NKE Survey

The University shall process the data transmitted to it solely 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 data of public interest, as well as 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 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, although personal data posted on the website and social media accounts of the Data Controller may be accessible from third countries.

## **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 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),
- *withdrawal of the abovementioned consent to processing of personal data*, the data subject may withdraw his or her consent 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 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, 28 March 2025.**

