



A HAZA SZOLGÁLATÁBAN

File no.: NKE/ 13325-1/2023.

INFORMATION ON DATA PROCESSING regarding the participation at events of the University of Public Service

1. Name of Data Controller

University of Public Service

Address: 1083 Budapest, Ludovika tér 2.

Phone: +36 1 432 9000,

E-mail: 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:

Dr. Adrienn Bernadett Kincses

Direct contact: adatvedelem@uni-nke.hu

Phone: +36 1 432 9000/ extension: 29833

3. Information on data subjects regarding their participation at the events of the University of Public Service, when the personal data are collected directly from the data subjects (content under Article 13 of the GDPR¹).

3.1. Data processing related to the online registration for events

- **the categories of data subjects** include persons registering for the events of the University.

Scope of processed data	Purpose of data processing	Legal basis	Consequences of failure to provide such data
Name, contact data (e-mail, phone number), Neptun login name (in case of students).	The purpose of data processing is to maintain contact for provision of up-to-date information related to any specific event, and also to grant access to the event site and assess the expected number of participants in advance. To assess the academic/scientific interest of students and verify any	Pursuant to Article 6 (1) a) of the GDPR, the consent of the data subject. Processing data regarding food intolerance is also based on the consent of the data	None – however, on-site registration shall be required if no prior registration was made.
Name of the organisation represented by the data subject. Title/position/rank of the data subject.			

¹ 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)

	possible advantages relating to participation.	subject pursuant to Article 9 (2) a) of the GDPR.	
Model and license plate number of the car.	To ensure the use of the university parking lot.	The consent is granted by way of online or during on-site registration for the event.	The use of the university parking lot is not ensured.
Information on food intolerance.	To ensure special meals during the event to people with food intolerance.		The special meals are not ensured.

3.2. Data processing related to online registration and entry to events held at Zrínyi Miklós Barracks and University Campus (Budapest), and Lieutenant Ittebei Kiss József Helicopter Base (Szolnok)

- **the categories of data subjects** include persons registering for the events of the University held at Zrínyi Miklós Barracks and University Campus and Lieutenant Ittebei Kiss József Helicopter Base.

Scope of processed data	Purpose of data processing	Legal basis	Consequences of failure to provide such data
Identity card number; mother's name; place and date of birth.	To ensure entry to the area of the barracks and the helicopter base.	Pursuant to Article 6 (1) a) of the GDPR, the consent of the data subject. The consent is granted by way of online or on-site registration for the event.	No entry is granted to the area of the barracks and the helicopter base.

3.3. Data processing related to online events

- **the categories of data subjects** include persons participating at online events of the University.

Scope of processed data	Purpose of data processing	Legal basis	Consequences of failure to provide such data
Name, e-mail address.	To ensure participation at online events and to conduct online events.	Pursuant to Article 6 (1) a) of the GDPR, the consent of the data subject.	No participation is ensured at the online event.
Name, e-mail address, image, voice.	Conducting of online events and documentation of their implementation through Microsoft Teams run by the	The consent is granted by way of online	

	Data Controller or its contractual partner participating in implementing the online event.	registration for the event.	
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3.4. Information on the applicants having an active student status, studying in upper grades, participating in the dormitory admission procedure at the University

- **the categories of data subjects** include persons having an active student status, studying in upper grades, participating in the dormitory admission of the University.

Scope of processed data	Purpose of data processing	Legal basis	Consequences of failure to provide such data
Name; e-mail address; profession/faculty; NEPTUN login name; event name, date, fact of participation.	By attending the event, you will be eligible for extra score for the dormitory admission process as regulated in Annex 6, point 4, line 9 of the Regulations on Student Fees and Allowance.	Performance of a task of the University carried out in the public interest based on Article 6 (1) e) of the GDPR.	If the data subject fails to participate in the social life of the University in a verifiable manner, they shall not be eligible for extra points in the dormitory admission process.

3.5. Data processing related to recordings made of persons participating at events

- **the categories of data subjects** include persons participating at events of the University.

Scope of processed data	Purpose of data processing	Legal basis
Recordings made at mass gatherings ² .	The purpose of the recordings is to document	Data processing is based on Article 6 (1) e) of the GDPR,

² A multitude of people is visible on recordings made at mass gatherings, hence the persons included in the recording are not visible as individual persons, but as part of the crowd. When the people included in the image are not drawing attention to themselves as separate individuals, but as part of the crowd, then the concerned image qualifies as an image made at a mass gathering.

The recordings made of the speakers or participants of the event ³ .	and verify the occurrence of the events of the University. The recordings may be published on the website, journals, publications and social media sites of the University (e.g.: Facebook, YouTube, Instagram, Twitter) as well.	Article 2:48 (2) of the Civil Code, according to which the consent of the data subject shall not be required for the recording and use of his/her image or voice if the recording was made at a mass gathering or of a public appearance.
Recordings made of specific persons.		The legitimate interest of the University based on Article 6 (1) f) of the GDPR.

The consequence of failure to provide data in connection with the data management as defined in Section 3.5. is that documentation and verifying the occurrence of events of the University becomes more difficult.

3.6. Data processing related to attendance sheets

- **the categories of data subjects** include persons participating at the events of the University.

Scope of processed data	Purpose of data processing	Legal basis	Consequences of failure to provide such data
Name, signature	Verifying the implementation of the event, surveying the number of participants.	The legitimate interest of the University based on Article 6 (1) f) of the GDPR.	Surveying the number of participants is not possible.

4. Information on data subjects regarding their participation at the events of the University of Public Service, when personal data have not been obtained from the data subject (content under Article 14 of the GDPR).

4.1. Data processing related to the sending of invitations

- **the categories of data subjects** include persons invited to the events of the University.

Scope of processed data	Purpose of data processing	Legal basis	Source of data
Name, e-mail address.	Invitation to an event.	The University's legitimate interest based on Article 6(1)(f) of the GDPR.	Contact data available publicly, published on websites.

³ Public appearance shall mean any speech or activity that affect the life of the society, the developments in local or national relations. Public appearance is based on speaking or acting in the public interest. Typically the speaking and public participation at different cultural, social events and gatherings shall fall into this group. Anyone can be a public figure, hence this classification is not linked to any formal social or legal status.

4.2. Data processing related to entering the premises of the University

- **the categories of data subjects** include persons participating in events of the University's premises.

Scope of processed data	Purpose of data processing	Legal basis	Source of data
Data recorded by the electronic surveillance system.	An electronic surveillance system (CCTV system) is operated by the University in order to protect human life, physical safety and personal freedom, safeguard the storage of hazardous materials, protect the critical infrastructure used for building management and communication, and ensure property protection. The system makes and stores recordings.	The University's legitimate interest based on Article 6 (1) f) of the GDPR.	The legal person responsible for operating the surveillance system.

5. Recipients of personal data, the persons entitled to access the data

The University, in terms of the data processing as per Sections 3.1, 3.2 and 4.1 of the notice: those employees of the organisation who are required to access the concerned personal data based on their employment relationship.

The University, in terms of the data processing as per Section 3.3 of the notice: those employees of the organisation who are required to access the concerned personal data based on their employment relationship, furthermore employees of the contractual partner participating in the organisation and implementation of the events and Microsoft Corporation (registered office: One Microsoft Way, Redmond, WA 98052, United States, registration number: 600-413-485) as processor – acting as the operator of the Microsoft Teams platform used for conducting the online events - run by the Data Controller or its contractual partner - shall be entitled to access the personal data.

The University, in terms of the data processing as per Section 3.4 of the notice: those organisational units and university bodies that are entitled to pass decisions in the dormitory admission procedure or participate in conducting the admission procedure.

The University, in terms of the data processing as per Section 3.4 of the notice, uses the services of the following entities:

- SDA Informatika Zrt. (registered office: 1111 Budapest, Budafoki út 59., represented by: István Fehér, company registration number: 01-10-140314, tax number: 11684057-2-43, website: <https://www.sdadms.hu/>).

The recordings made of the persons participating at the University events may be published in the different 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
- Meta Platforms Inc., 1 Hacker Way, Menlo Park, CA 94025, USA; Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin, <https://www.facebook.com/help/contact/540977946302970>

- **X Corp.** 1355 Market Street, Suite 900, San Francisco, CA 94103, USA, <https://help.twitter.com/en/forms>

The University, in terms of the data processing as per Section 4.2 of the notice, employs – as processor – NKE Campus XXI. Szolgáltató Nonprofit Kft. (registered office: 1089 Budapest, Orczy út 1., Company registration number: 01-09-350854, tax number: 27125900-2-42, represented by: Henrik Rósa, website: <https://campus21.uni-nke.hu/>).

6. Duration of data processing

In the cases mentioned in Section 3.1 of the notice, the personal data shall be processed by the University until the consent is withdrawn. The consent can be withdrawn at any time by sending an e-mail to adatvedelem@uni.nke.hu, but this withdrawal shall not affect the lawfulness of the processing based on consent, executed before the withdrawal of the consent. In case the consent is not withdrawn, the University stores the data for fifteen days after the event is concluded.

In the cases mentioned in Sections 3.2 and 3.3 of the notice, the personal data shall be processed by the University until the consent is withdrawn, but these data shall be erased in the case of Section 3.2 on the fifteenth day following the event, whereas in the case of Section 3.3 at the end of the target year, at the latest – unless otherwise stipulated by contract or law. The image and sound recordings made at the online events specified in Section 3.3 shall be stored in line with the form of the event, in case of meetings for 21 days, whereas in case of live events for 180 days. The consent can be withdrawn at any time by sending an e-mail to adatvedelem@uni.nke.hu, but this withdrawal shall not affect the lawfulness of the processing based on consent, executed before the withdrawal of the consent.

In the case mentioned in Section 3.4 of the notice, the personal data of the data subjects shall be stored by the University for eighty years following the notification on termination of the student status.

In the case mentioned in Section 3.5 of the notice, the recordings made of the data subjects shall be stored by the University for purpose of promotion of the University and for scientific and historical reasons. The period of publication of the article informing the public, and in the case of its archiving, the storage time. The criterion for determining the storage time: possible use of the recording for purpose of future articles or university publications.

In the case mentioned in Section 4.1 of the notice, the database containing the contact data shall be reviewed quarterly, when the personal data deemed inaccurate in terms of the purpose of data processing will be erased or corrected immediately.

In the case mentioned in Section 4.2 of the notice, the images recorded of the data subjects – if not used – shall be stored by the University for 24 days after recording.

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.

9. Data transfers to third countries or international organisations

Only in terms of publication of the University's events on social media sites will personal data 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, 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. 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).

Budapest, the 4th of September, 2023.

