

Reg. number: NKE/14806-1/2025.

INFORMATION ON DATA PROCESSING
on the processing of personal data related to the online questionnaire prepared
and sent out by the Ludovika University of Public Service regarding the alumni
community

1. Name of Data Controller

Ludovika University of Public Service
Address: 1083 Budapest, Ludovika tér 2.
Telephone number: +36 1 432 9000
E-mail address: 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
Telephone number: +36 1 432 9000 / extension: 29833

3. Information on personal data processed related to the sending of online questionnaires, if the data subject provides personal data

Categories of Data Subjects	Categories of processed personal data	Purpose of data processing	Legal basis	Consequences of not providing data
Natural persons who have obtained a degree at the University according to the Neptun system.	Personal data content of the free text fields of the online questionnaire.	Review and development of the Alumni system through the feedback provided in the questionnaire.	The data subject's consent, based on GDPR ¹ Article 6. under paragraph (1) (a).	In lack of providing data, it is more difficult to develop the Alumni system.

4. Information regarding the sending of online questionnaires, in cases where the University indirectly obtains the personal data of the data subject

Categories of Data Subjects	Scope of processed data	Purpose of data processing	Legal basis	Source of personal data
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¹ GDPR: 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).

Students who have obtained a degree in a program at the University according to the Neptun system.	Email address.	Sending out the online questionnaire.	GDPR Article 6 (1) e) for the performance of the tasks of the Data Controller. ²	Neptun system.
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5. Recipients of personal data and categories for recipients

Employees of the departments who are required to access the concerned personal data and send out the questionnaires based on their employment relationship. In addition, the University uses the following data processor for the evaluation of online questionnaires and the development of the Alumni system:

- Daskalos Consulting Kft. (registered office: 6000 Kecskemét, Gázló utca 23., tax number: 32064313-2-03, website: <https://www.daskalosconsulting.hu/>).
 - o The data processor uses the services of Surveysparrow Inc. (registered office: 94114 San Francisco, Market Street 2261, STE 22625, California, United States of America, European Union data processing representative: Instant EU GDPR Representative Ltd, 69 Esker Woods Drive, Lucan Co. Dublin, Ireland, contact@gdprlocal.com, + 353 15 549 700) as a hosting service provider for the implementation of the questionnaire.

The Neptun system is operated by Campus Codeworks Zrt. (registered office: 1117 Budapest, Hauszmann Alajos utca 3/B., telephone: +36 1 209-4748, e-mail: info@campus.hu, company registration number: 01-10-140314, tax number: 11684057-2-13, website: <http://www.campus.hu/>).

6. Duration of data processing

The Data Controller shall process personal data until the purpose of data processing is fulfilled, but no later than until consent is withdrawn.

7. The conceptual implementation of data management

The Ludovika University of Public Service (hereinafter referred to as LUPS) was established in 2012 as the legal successor to several higher education institutions with decades of history.

Since their inception, thousands of people have graduated from these predecessor institutions and become active participants in the labor market. In terms of the main directions of education, most of these individuals began their careers in public administration, but they have not forgotten their alma mater as professionals, and they have been happy to participate in programs or give lectures to the students of the University, potentially being their future colleagues.

Due to the diverse educational portfolio of LUPS, former graduates form various alumni communities, having created a variety of online platforms and organizations.

Following the example of good practices abroad, LUPS has set itself the goal of bringing these alumni communities closer together in terms of both programs and online platforms, with a particular focus on strengthening international alumni activities. It is of utmost importance for LUPS to support the development of university alumni networks along a common and identical way, which promotes the further expansion of professional relationships and international cooperation among former students.

Based on the above, the Data Controller involves former students in the development of the Alumni system by giving them the opportunity to complete an online questionnaire.

² Based on Section I/B(c) of Annex 3 to Act CCIV of 2011 on National Higher Education.

The questionnaire is available at the following link:

[https://forms.office.com/Pages/ShareFormPage.aspx?id=PC6qPN4XJUSZy - nTaVOyxnRHPcNUbZMrrkB6lQpyo5UM1c1U0tDSkxEV0lGU0lDUTBBQldJMIJIVS4u&sharetoKen=Jdtp67YFdUIWUICjM9rq](https://forms.office.com/Pages/ShareFormPage.aspx?id=PC6qPN4XJUSZy-nTaVOyxnRHPcNUbZMrrkB6lQpyo5UM1c1U0tDSkxEV0lGU0lDUTBBQldJMIJIVS4u&sharetoKen=Jdtp67YFdUIWUICjM9rq).

The processing of this data directly contributes to the development of this system. The online questionnaires are sent out from the Neptun system.

8. 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. Transfer of data to a third country or an international organization

There is no direct transfer of personal data to third countries regarding the processing 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 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),
- *may withdraw consent* to processing data via e-mail sent to adatvedelem@uni-nke.hu. Such withdrawal shall not affect the lawfulness of the processing carried out on the basis of the consent before 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 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).

Budapest, 26th August 2025

