



File no.: NKE/19531-1/2024.

INFORMATION ON DATA PROCESSING regarding the Portal to apply for Programs 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:
Adrienn Bernadett Kincses dr. iur.
Direct contact: adatvedelem@uni-nke.hu
Phone: +36 1 432 9000/ extension: 29833

3. Information about the registration for the Portal to apply for Programs of the University (hereinafter: 'Portal'), in case personal data is collected directly from the data subjects

Categories of data subjects	Scope of processed data	Purpose of data processing	Legal basis	Consequences of failure to provide such data
Natural persons registering for the Portal.	Username, password, e-mail address.	Registration for the Portal.	Pursuant to Article 6 (1) a) of the GDPR ¹ , the consent of the data subject.	Data subjects cannot apply for programs through the Portal without registering an account.

4. Information on the processing of the personal data regarding registration for the <https://apply.ludovika.hu> website using other platforms or third

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)

party services, in case the University indirectly obtains knowledge of the personal data of data subjects

Categories of data subjects	Scope of processed data	Purpose of data processing	Legal basis	Source of data
Natural persons registering for the Portal.	Name, e-mail address, profile picture, password, username, IP address, city, country (optional), and personal data provided by the user voluntarily.	Registering to access the Portal.	Pursuant to Article 6 (1) a) of the GDPR, the consent of the data subject.	The third party platform chosen by the data subject (eduGAIN, Google, Microsoft, LinkedIn).

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

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

- a) IT Directorate (1083 Budapest, Ludovika tér 2., e-mail: ini@uni-nke.hu);
- b) departments or research institutes in charge of the educational or other programs available through application on the Portal.

6. Duration of data processing

The Data Controller shall process the personal data of the applicant until the withdrawal of the consent of the data subject. The data subjects may withdraw their consent to the processing at any time. The withdrawal of consent shall not affect the lawfulness of the prior processing.

7. Implementation of the processing activity

The University of Public service makes it possible for data subjects to apply for its educational and other programs through its own Portal for applications available at <https://apply.ludovika.hu>. Data subjects can access the Portal registering their own account or by using third party platforms to log in. The Data Controller shall inform data subjects about the processing of their personal data related to specific courses, educational and other programs available through the Portal on the dedicated pages of these programs.

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.



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.

9. Automated data processing (including profiling)

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

10. Data transfers to third countries or international organisations

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

11. 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),
- 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 the abovementioned consent to processing of personal data* 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, 27 November 2024.

