

Reg. number: 34000/ 12829-1/2022.

### **INFORMATION ON DATA PROCESSING**

### in connection with the data processing of the MOOC platform provided by the University of Public Service

### 1. Name of Data Controller

University of Public Service address: 1083 Budapest, Ludovika tér 2. telephone number: +36 1 432 9000, e-mail address: <u>nke@uni-nke.hu</u>; website: <u>https://www.uni-nke.hu/</u>. Represented by Dr. Gergely Deli, Rector

### 2. Name and contact details of the Data Protection Officer

University Data Protection Officer: Veronika Dr. Debreceniné Deák Direct contact: <u>adatvedelem@uni-nke.hu</u> Telephone number: +36 1 432 9000 / 29833

3. Information on data subjects on the use of the MOOC distance learning platform provided by the University of Public Service on the website <u>https://mooc.uni-nke.hu/login/index.php</u>, when the personal data are collected directly from the data subject

#### **3.1.** Data processing related to the procedure of the registration

Categories of data subjects	Scope of processed data	Purpose of data processing	Legal basis	Consequences of failure to provide such data
<u>Students and</u> <u>teachers</u> <u>participating</u> <u>in the</u> <u>EUSecure</u> <u>Summer</u> <u>University</u>	Name; email address; profile picture; password; username; IP address; city, country (optional) and other personal data voluntarily provided by the user.	To apply for courses at the Summer University and to access to the training courses.	Your consent is based on GDPR Article 6. under paragraph (1) (a).	

4. Information on the registration on the website <u>https://mooc.uni-nke.hu/login/index.php</u> provided by the University of Public Service through the use of another platform, when personal data have not been obtained from the data subject

Categories of data subjects	Scope of processed data	Purpose of data processing	Legal basis	Source of data
Students and teachers participating in the EUSecure Summer University	Name; email address; profile picture; password; username; IP address; city, country (optional) and other personal data voluntarily provided by the user.	To apply for courses at the Summer University and to access to the training courses.	Your consent is based on GDPR Article 6. under paragraph (1) (a).	Other platforms chosen by the user (eduGAIN, Google, Microsoft, LinkedIN).

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

The personal data in the MOOC platform related to the student's profile can be accessed by the students and the instructor of the course, or the student can set up in their profile what data can other students see within the platform. In the context of the operation of the MOOC platform, the system administrators of the platform and the staff of the IT Directorate are entitled to access personal data in order to perform their duties arising from their employment relationship. The personal data contained in the MOOC platform are processed solely for educational purposes and are therefore not accessible to any person other than the above-mentioned addressees. The personal data stored there need to only be transferred to a third party or organisation if required by a University regulation or to comply with a legal requirement, and also in the event that the institution sending the student submits a data request to the University in connection with the completion of the course.

### 6. Duration of data processing

The personal data concerned will be processed until the data subject's consent is withdrawn. In the absence of withdrawal of consent, the data will be deleted within 30 days of the end of the course.

# 7. Implementation of the data processing activity

The University provides a course entitled A simulation supported massive open online course for students participating in the EUSecure project at the Summer University. The University makes this course available through the MOOC platform available at <a href="https://mooc.uni-nke.hu/login/index.php">https://mooc.uni-nke.hu/login/index.php</a>. Users can register by providing their personal data on the registration form or by logging in to the platform using another platform (eduGAIN, Microsoft, Google, LinkedIN). They can then give their consent to the processing of their personal data by ticking a checkbox, in the knowledge that they have been informed beforehand.

The University will process the data provided to it solely for the purposes and under the conditions set out above. The data processing activities will be carried out in full compliance with the University's regulations on the protection and security of personal data, as well as the University's IT Security Policy.

# 8. Data protection

The University shall implement appropriate technical and organizational measures to ensure a level of data security appropriate to the level of risk, taking into account the state of science and technology, the cost of implementation, the nature, scope, context, and purposes of the processing and the varying degrees of probability and severity of the risk to the rights and freedoms of natural persons.

The University applies reasonable physical, technical, and organizational security measures to protect the data subject's data, in particular against accidental, un-authorized, or unlawful destruction, loss, alteration, disclosure, use, access or processing. Access to data is restricted and password protection is in place.

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

## 9. Automated data processing (including profiling)

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

## **10.** Data transfers to third countries or international organisations

No targeted transfers are made to third countries or international organisations.

# 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.

Data subject may request

- a) 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),
- b) 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),
- c) *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),
- d) *restrictions on the processing* of personal data (the data subject has the right to obtain from the date controller restriction of processing if the conditions set out in the GDPR are met) (Article 18 GDPR),

- e) 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),
- f) 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).
- g) to withdraw the subject consent; you may withdraw your consent at any time by sending an e-mail to <u>adatvedelem@uni.nke.hu</u>, without prejudice to the lawfulness of the processing carried out on the basis of your consent prior to its withdrawal.

The request must be submitted to the postal address of the data controller or to the following e-mail address: <u>adatvedelem@uni-nke.hu</u>. 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, 12. July 2022.