



A HAZA SZOLGÁLATÁBAN

File no.: 34000/7178/2021

INFORMATION ON DATA PROCESSING
regarding the data processing activities of the University of Public Service
required pursuant to the coronavirus epidemic

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. András Koltay Rector

2. Name and contact details of the Data Protection Officer

Data Protection Officer of the University:
Veronika Deák
Direct contact: adatvedelem@uni-nke.hu
Phone: +36 1 432 9000/ extension: 29833

3. Information on data subjects regarding the data processing activities of the University required pursuant to the coronavirus epidemic

3.1. Data provision through the Epidemiological Operational Staff reporting point

Scope of data subjects	Scope of processed data	Purpose of data processing	Legal basis	Consequences of failure to provide such data
The persons having a student or employee relationship with the University (hereinafter collectively as: University Citizens) who have completed the forms titled "COVID Registration Form" and "COVID Closure of Registration	Name, Neptun code, information on dormitory accommodation (name of the dormitory, room number), content of the report, information on residence / quarantine (e.g.: domicile), e-mail, phone	To guarantee the conditions necessary for carrying out work safely and in a manner not hazardous to health, to take measures and actions appropriate to the extent of the infection at the University.	Pursuant to Article 6 (1) c) of the GDPR, processing is necessary for compliance with a legal obligation, and pursuant to Article 6 (1) (e) of the GDPR, processing is necessary for the performance of University's core activities. The processing of health data, being a special category of	The necessary health care measures cannot be taken, furthermore the conditions needed for healthy and safe working conditions cannot be ensured in the absence of the information.

Form" available on the website at www.digioktatas.uni-nke.hu .	number, the fact of infection.		personal data, is necessary pursuant to Article 9 (2) (h) of the GDPR for the purposes of preventive or occupational medicine, and pursuant to Article 9 (2) (i) of the GDPR, for reasons of public interest.	
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3.2. Data provision by foreign students creating a legal relationship with the University

Scope of data subjects	Scope of processed data	Purpose of data processing	Legal basis of processing	Consequences of failure to provide the data
Foreign students.	Name, Neptun code, information on dormitory accommodation (name of the dormitory, room number), information on residence / quarantine (e.g.: domicile), e-mail, phone number, the fact of infection..	To comply with the epidemiological provisions, to ensure the studies of the students and the institutional operation of the University. After entering the territory of Hungary and staying in quarantine, the performance of the PCR test to ensure the student can join the University training. To enable the starting of the studies.	Article 6 (1) (a) of the GDPR, whereas in the case of health data, being a special category of personal data, processing is performed on the basis of the data subject's consent, pursuant to Article 9 (2) (a) of the GDPR.	In the case of Erasmus students, the application can be withdrawn without any consequences. In the case of students applying for a Stipendium Hungaricum, the applicant may not be granted the scholarship.

3.3. Data processing in the case of a positive PCR test result of the student living the dormitory, or in case of occurrence of coronavirus symptoms

Scope of data subjects	Scope of processed data	Purpose of data processing	Legal basis of processing	Consequences of failure to provide the data
The dormitory resident whose PCR test was positive or who has noticed the symptoms of the coronavirus.	Name, Neptun code, information on dormitory accommodation (name of the dormitory, room number),	To place the affected student into a separate room for the sake of protecting the health of other students, and to contact and	The processing of fact of the infection, being a special category of personal data, is necessary pursuant to	The boarding agreement concluded with the dormitory is terminated with immediate effect if it is proven that the failure of making the notification

	information on residence / quarantine (e.g.: domicile), e-mail, phone number, the fact of infection.	notify the relatives of the affected student regarding the affected student's possible travel home.	Article 9 (2) (h) of the GDPR for health related purposes, and pursuant to Article 9 (2) (i) of the GDPR, for reasons of public interest.	endangered the health of others.
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3.4. In connection with the questionnaire and statement provided to persons arriving from areas affected by the new coronavirus (2019-nCoV)

Scope of data subjects	Scope of processed data	Purpose of data processing	Legal basis of processing	Consequences of failure to provide the data
University Citizens.	Name, date of birth, address, phone number, e-mail, the fact of infection and the personal data (answers) provided by University Citizens. If individual measures are to be taken regarding the data subjects based on the data provided in the questionnaire and the results of the risk assessment carried out with the involvement of the occupational physician, then the personal data included in the individual decision and any possible conclusions that may be drawn	In connection with the public interest tasks performed by the University, the purpose of data processing is to guarantee the conditions necessary for carrying out work and education safely and in a manner not hazardous to health a)to assess through the questionnaire the exposure of the University Citizens to coronavirus; b)to perform a risk assessment based on the questionnaires with the involvement of the occupational physician, furthermore to take individual measures (if necessary) regarding the University Citizens (e.g.: working from home, distance learning) based on the results of the risk assessment in order	Pursuant to Article 6 (1) (c) of the GDPR, processing is necessary for compliance with a legal obligation, and pursuant to Article 6 (1) (e) of the GDPR, processing is necessary for the performance of University's core activities. The processing of health data, being a special category of personal data, is necessary pursuant to paragraphs (b), (h) and (i) of Article 9 (2) of the GDPR.	The necessary health care measures cannot be taken, furthermore the conditions needed for healthy and safe working conditions cannot be ensured in the absence of the information.

	from such personal data in terms of the data subject.	to prevent the spread of the coronavirus.		
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3.5. Data processing related to the employee test procedure

Scope of data subjects	Scope of processed data	Purpose of data processing	Legal basis of processing	Consequences of failure to provide the data
Employee who is not referred by the general practitioner or team doctor or primary care physician to a PCR test.	Name, address, social security number, e-mail, phone number.	The aim of the University by providing the testing option is to ensure a healthy work environment to its Employees and to secure proper operation of the institution.	Pursuant to Article 6 (1) (a) of the GDPR, it is based on the consent of the data subject. Pursuant to Article 9 (2) (b) of the GDPR, processing of health data is based on the consent of the data subject.	The request for the PCR test cannot be assessed.
In the 5 days prior to the application, the data subject came into direct contact with a large number of students or colleagues who had symptoms of 2019-nCoV in the course of fulfilling their job responsibilities.		The University is obliged to guarantee the conditions necessary for carrying out work safely and in a manner not hazardous to health.	The data are processed to ensure compliance with a legal obligation pursuant to Article 6 (1) (c) of the GDPR, for the purposes of occupational medicine pursuant to Article 9 (2) (h) of the GDPR, and for reasons of public interest pursuant to Article 9 (2) (i) of the GDPR.	The employee shall be obliged to consult the entity exercising the employer's rights or his/her immediate superior regarding the consequences: the options include paid time-off days, sick leave, or – if possible – working from home.
The employee is working in a post of employment where in-person work is essential, but the authority put him/her into official home quarantine through its resolution and 2 negative PCR tests				Unless 2 negative PCR test results are presented, the data subject is not allowed to resume in-person work for 14 days following the commencement of the sick leave.

are required to terminate the home quarantine and continue in-person work.				
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4. Recipients of personal data, the persons entitled to access the data

- a) In case of data provision through the Epidemiological Operational Staff reporting point:** Those employees of the University who are required to access the concerned personal data.
- b) Data processing in the case of a positive PCR test result of the student living the dormitory, or in case of occurrence of coronavirus symptoms** It shall be transferred to the Dormitory Class and the affected dormitory leaders, and to the Epidemiological Operational Staff to the e-mail at ot@uni-nke.hu.
- c) Regarding foreign students having a legal status at the University:** Those employees of the University who are required to access the concerned personal data.
- d) In case of the data provided through the questionnaire and statement by persons arriving from areas affected by the new coronavirus (2019-nCoV):** Those employees of the University who are required to access the concerned personal data.
- e) Processing related to the employee test procedure:** NKE Virus Testing Task Force virusteszteles@uni-nke.hu.
- f) Statistical data transfer (without personal data):** the number of infected and quarantined teachers and students, every day, to the Unipoll questionnaire of the Higher Education Institution Management and Financing Department of the Ministry for Innovation and Technology.
- g) Diagnostic reports sent by the data subjects to the University:** these are sent to the District 6 Government Office for purpose of issuance of the decision terminating the quarantine.
- h) The below entities shall be entitled to access the personal data in terms of the data processing actions mentioned in Section 3:**
- NUPS Epidemiological Operational Staff,
 - NUPS Epidemiological Action Committee,
 - Rector's Office (Virus Testing Task Force),
 - in case of a positive PCR test result, Dr. Gyula Gábor KÓRÓDI occupational physician and the organisational unit affected by the infection,
 - The Employees participating in keeping and operating the NUPS Epidemiological Database.

5. Duration of data processing

- **In case of a negative test result or such risk assessment that did not entail any measures:** 6 months following the submission of the questionnaire, statement, notification, request.

- **In case of a positive test result or such risk assessment that requires any measures:** 5 years following the submission of the questionnaire, statement, notification, request.

6. 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 protected. The University has both a policy on protection and security of personal data and data of public interest and a Cyber Security Policy. The University is paying special attention to ensure the confidential processing of data. For the above purpose, the data processed by the controller shall be stored exclusively on the servers under its own control.

In the case of data processing when data are transferred to the Semmelweis University (PCR tests), the health data are uploaded to the below system: Electronic Health Service Space (EESZT). In this case Semmelweis University and EESZT qualify as independent controllers.

7. Automated data processing (including profiling)

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

8. Exercising 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 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),
- *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).

The application must be submitted to the postal address of the data controller or 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 infringement, the data subject may apply to a court (the data subject may, at his or her choice, initiate the 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).