

# PRIVACY POLICY

## IN CONNECTION WITH THE INTERNATIONAL STUDENTS SURVEY OF THE UNIVERSITY OF PÉCS

The University of Pécs (University) is committed to adhering in its data processing activities to the 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 (GDPR), to Act CXII of 2011 on the Right of Informational Self Determination and the Freedom of Information (hereinafter: Privacy Act), and to the good practices developed by the Hungarian National Authority for Data Protection and Freedom of Information (NAIH).

### 1. THE DATA CONTROLLER

Name: University of Pécs

Seat and Postal Address: H-7622 Pécs, Vasvári Pál Str. 4.

Represented by: Dr. Attila Miseta, Rector and István Decsi, Chancellor

<b>Unit processing the data:</b>	<b>Rectorate's Cabinet</b>
<b>Executive:</b>	Gergely Kresák Director of Rectorate's Cabinet
<b>Contact person:</b>	Dr. Norbert Sipos
<b>Telephone:</b>	+36 20 972 67 41
<b>E-mail:</b>	<a href="mailto:sipos.norbert@pte.hu">sipos.norbert@pte.hu</a>

Name of the data protection officer: Dr. Gergely László Szőke, PhD

Contact: [adatvedelem@pte.hu](mailto:adatvedelem@pte.hu); +36 (30) 179 5672

### 2. THE SCOPE AND THE SOURCE OF THE PROCESSED DATA

The scope of the controlled data covers the data you provide during the answering the survey, or the data managed by the University of Pécs (Neptun), which will be linked to your answers to facilitate participation in the survey. The information covered: e-mail address, faculty, programme, form of training, form of financing, place of education, place of birth and correspondence (country, town), year of birth, gender, number of active semesters, previous programmes.

The source of the data is your data submission, and in case of your personal information, the linked Neptun database managed by the University of Pécs.

In case of any changes in your personal data during the duration of the data processing, please be kind to inform us via one of the e-mail addresses set forth in point 1. at the earliest convenient time.

### 3. THE PURPOSE AND LEGAL GROUND OF THE DATA PROCESSING

#### 3.1. Purpose of Data Processing

The purpose of data processing is to map students' experiences and satisfaction about university admission procedure, services, reputation.

#### 3.2. Additional Purpose of Data Processing

Another purpose of data processing is to manage the information voluntarily provided for the prize draw until its completion, including notifying the winners.

### 3.3. Processing of Data Provided in the Survey

The data provided in the survey is processed based on the respondent's consent, in accordance with Article 6(1)(a) of the General Data Protection Regulation (GDPR), for the following purposes:

<b>Purpose of Data Processing</b>	<b>Legal Basis for Data Processing</b>	<b>Scope of Processed Data</b>	<b>Source of Data</b>
International Student Research (as detailed in Section 3.1)	Article 6(1)(a)	Major, faculty, year, type of program, program duration, study mode, email address, permanent residence	Based on the consent of the student at the UP, the researchers request the data from the NEPTUN database managed by the Educational Directorate
Information necessary for conducting the prize draw (as detailed in Section 3.2)	Article 6(1)(a)	Respondent's name, email address	Based on the consent of the student at the UP, the researchers request the data from the NEPTUN database managed by the Educational Directorate

## **4. THE DURATION OF THE DATA PROCESSING**

In connection with the survey, data processing continues until the purpose of data processing is fulfilled or until consent is withdrawn, but no later than the anonymization process that takes place before data processing begins. After this point, it will no longer be possible to trace individual responses back to the respondent.

Regarding the prize draw, data processing continues until the winners have collected their prizes or, upon request, until the prizes have been mailed. After this, the deletion of the provided responses ensures that participants in the prize draw can no longer be identified.

## **5. THE SCOPE OF THE PERSONNEL WHO CAN ACCESS THE PERSONAL DATA, DATA TRANSFER, DATA PROCESSING**

The data can only be accessed by the employees of the organizational units of the University, which organizational units need the data to perform their tasks. Employees are bound by the obligation of confidentiality regarding the personal data they learn. The University may transfer anonymous data to the superior or other ministries.

The University stores the personal data in the UP EvaSys system, to which VSL Consultant and Service Provider Ltd. as a data processor has access. Data of the data processor:

Name: VSL Consultant and Service Provider Ltd.

Registered office: 2000 Szentendre Pitypang Str. 6,

Contact: Zoltán Horváth [horvath.zoltan@vsl.hu](mailto:horvath.zoltan@vsl.hu)

The University does not transfer or disclose your personal data to other recipients.

The data processor's data processing notice is available at the following link: [https://pte.hu/sites/pte.hu/files/kutatasok/Security\\_Paper\\_en.pdf](https://pte.hu/sites/pte.hu/files/kutatasok/Security_Paper_en.pdf).

## 6. DATA SECURITY

The University shall process the personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures. You can find more information in Articles 20-22. of the [University's Data Protection Regulation](#), and in Chapter IV. of the University's [IT Policy](#).

## 7. THE RIGHTS OF THE DATA SUBJECTS

7.1. You have the right to access the information in relation with the data processing related to you defined in Article 15 of the GDPR (right of access), including in particular, information by the University about

- the types of personal data,
- the purpose and legal ground,
- the source,
- the duration of the processing or the criteria for determining the duration,
- who, when, on what legal basis, to which personal data was granted access to by the University or to whom did it transfer the data,
- the rights and possible legal remedies of the data subject during the data processing.

7.2. You shall have the right to rectification of inaccurate (false or incomplete) personal data about you pursuant to Article 16 of the GDPR.

7.3. According to Article 17 of the GDPR, you have the right to erasure ('right to be forgotten'), if

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent on which the data processing is based and there is no other legal ground for the data processing;
- you have successfully objected against the processing of the data pursuant to point 7.7;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation.

The data will not be erased if the data processing is necessary:

- for compliance with a legal obligation which requires the data processing or to which the University is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the University;
- for the establishment, exercise or defence of legal claims;
- for exercising the right of freedom of expression and information;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as practicing the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that data processing.

7.4. According to Article 18 of the GDPR, you have the right to restriction of processing, if

- you contest the accuracy of the personal data, for a period enabling the University to verify the accuracy of the personal data;
- the processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead;
- the University no longer needs the personal data for the purposes of the processing, but you require it for the establishment, exercise or defence of legal claims;

- you have objected to the processing pursuant to point 7.7, pending the verification whether the legitimate grounds of the University override those of yours.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

7.5. According to GDPR Article 7 (3), you shall have the right to withdraw your consent at any time (right to withdraw the consent). The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, you shall be informed thereof. It shall be as easy to withdraw as to give consent.

7.6. You shall have the right to receive the personal data, which you provided to the University, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the University, where the processing is based on consent or on a contract (right to data portability).

7.7. You shall have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on a balance of interest, or necessary for a task carried out in the public interest or in the exercise of official authority, including profiling based on those provisions (the right to object). According to Article 21 of the GDPR, the University shall no longer process the personal data unless it 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.

7.8. You can exercise your rights free of charge via the contacts (the contact persons or the data protection officer) listed in point 1. The exercise of your rights may in most cases require identifying you, while in some cases (e.g., the exercise of the right to rectification) additional information may be required. The application for the exercise of your rights shall be assessed by the University within one month at the latest. If necessary, taking into account the complexity of the application and the number of applications, this period may be extended by a further two months, the extension being notified to the person concerned within 1 month.

## **8. COMPLAINTS AND REMEDIES**

You can make any complaints about data processing at the contact details of the contact persons indicated in point 1., or you can contact the University's data protection officer (adatvedelem@pte.hu). If you wish to make a complaint by post, you can send a mail to 7622 Pécs Vasvári Pál u. 4. addressed to the contact persons indicated in point 1. or to the data protection officer.

You may seek remedy at the Hungarian National Authority for Data Protection and Freedom of Information (contact address: H-1530 Budapest Pf.:5, Tel.: +36-1-391-1400, e-mail: ugyfelszolgalat@naih.hu, website: <https://www.naih.hu/general-information.html>), if you deem it necessary due to a supposed legal violation or in direct hazard of it.

You may file a civil action of law in case of unlawful processing at the competent or chosen Regional Court.