

Privacy notice to the Budapest Summer University

In accordance with Article 12 (1) of 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 (henceforth: **GDPR**)

Eötvös Loránd University informs you, as data subject, on the processing of your personal data related to the Budapest Summer University (BSU)

1. Who is the Data Controller?

Eötvös Loránd University

Egyetem tér 1-3.

H-1053 Budapest

Responsible faculty: International Strategy Office

Name and contact details of the contact person: Zsuzsanna Csujá (budapestsummer@elte.hu)

The employees and managers of the Data Controller may access and process personal data of the participant in the context of their professional duties or managerial mandate, to the extent necessary for the performance of their duties. In addition to the organisational unit responsible for the training indicated in your adult education contract, the processing involves the Faculty's Economic Office in the case of the Faculty, and the Directorate General for Economic Affairs of the Chancellery, the Directorate for Education and the Directorate for Legal Affairs in the case of other organisational units.

Adult education is governed by Act LXXVII of 2013 on Adult Education (hereinafter referred to as the Adult Education Act) and Government Decree 11/2020 (II. 7.) on the implementation of the Adult Education Act (hereinafter referred to as the Adult Education Act).

I. REGISTRATION, CONTACT, ORGANIZATION AND OPERATION OF THE SUMMER UNIVERSITY, INVOICING, PAYMENT

Data processed by the University	Your surname and first name Your gender Citizenship Passport Number or Identity Card Number Date of Expiry (Passport or Identity Card) Place of birth Date of birth E-mail address Telephone number Level of English language knowledge Permanent Address Bank account number Tax Number (in case of requesting invoice)
Purpose of the processing	- registration of the intended participation, identification to your Letter of Acceptance - contacting you and sharing information related to the summer university - organizing the courses - invoicing, and checking payment of the registration fee

Legal basis for the processing	<p>Article 6 (1) (b) of the GDPR: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.”</p> <p>If you do not provide us with your contact details, you will not be able to attend the courses. We can issue an invoice to you, if we receive the data needed.</p> <p>The contract will be concluded upon acceptance of your application by ELTE, but you can participate only after you have paid the fee.</p>
Duration of the processing	We process your data till the end of the summer university.
	<p>In the case of an injury/personal injury, we process your data till the end of the legal proceedings.</p> <p>Your data related to invoicing will be processed for 8 years after your invoice is issued (according to Taxation Act).</p>
Data processor	The website is operated by the IT Directorate of the ELTE, but during the developments and repairs of the system, the LogiNet Systems Kft. (data processor of the ELTE) is also able to access to data stored on the website

II. DATA GIVEN ON CONSENT

Data processed by the University	Address (in case postal matter)
Purpose of the processing	The address is processed for mailing purposes
Legal basis for the processing	<p>Article 6 (1)(a) of the GDPR: giving consent</p> <p>You, as data subject have the right to withdraw your consent at any time via e-mail (budapestsummer@elte.hu). The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p>
Duration of the processing	Until consent is withdrawn, but no later than the end of the courses.

III. VIDEO, AUDIO, AND PHOTOGRAPHY RECORDINGS, AND THEIR USE

Data processed by the University	Your image, voice and other personal data in the recording.
Purpose of the processing	Promotion of the courses and the summer university. Your images, as well as video and audio recordings can be used as the following: <ul style="list-style-type: none"> - Facebook representation (https://www.facebook.com/ELTE Budapest Summer University/) - official website of the BSU - (https://www.elte.hu/en/elte-budapest-summer-university) - Instagram representation (https://www.instagram.com/BSU/)
Legal basis (claim) of the processing of data	Point (e) of Article 6(1) GDPR: processing is necessary for the performance of a task carried out in the public interest: ELTE contributes to the social and economic development of the area by promoting the intellectual values of education and scientific research for community purposes (Article 2(5a) Act CCIV of 2011 On National Higher Education). Data processing is also necessary for the implementation of the higher education institution's task related to increasing the social recognition of science (Article 11 Act CCIV of 2011 On National Higher Education).
	You, as data subject 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 point e) of Article 6(1). 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.
Duration of processing	Until the article using the photo or recording is stored.
Data Processor/Joint controller	Data processor: LogiNet Systems Kft. (the developer of the ELTE's website). Facebook/Instagram is a joint controller with ELTE, but we cannot guarantee that the data will not be transferred to a third country not covered by the GDPR.

IV. SIGNING UP TO THE NEWSLETTER

Processed data	Name E-mail address
Purpose of data processing	To inform you about our next events.
Legal basis for data	Point a) of Article 6(1) GDPR: consent of the data subject.

processing	You may withdraw your consent any time via e-mail (budapestsummer@elte.hu). The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal
Duration of data processing	Data will be processed 2 years from the registration but not longer than the withdrawal of your consent.

V. PROCESSING OF YOUR DATA RELATED TO YOUR ADULT EDUCATION LEGAL RELATIONSHIP

Scope of data processed by the University	<p>aa) Data specified in Article 21 of the Adult Education Act: Your natural personal identification data and – in connection with the issuance of the educational identification number – your educational identification number, your e-mail address, as well as your education-related data, in connection with your highest educational level, vocational qualification, professional qualification and knowledge of foreign languages, your entry into the training and the completion of the training, and in the lack of the completion of the training, withdrawal from the training, evaluation and qualification during the training, payment obligations related to the training and the training loan used.</p> <p>ab) country of birth, foreign citizenship (in view of the provisions of Article 15, Paragraph (1) of the Adult Education Act as additional data required for the provision of data to the FAR system), as well as the permanent address, address of correspondence, notification address, and phone number.</p> <p>b) If relevant: Subject to the provisions of Act V of 2013 on the Civil Code, the data of the legal representative acting on behalf of the participant with limited legal capacity (name, e-mail address, phone number and signature).</p> <p>c) In the case of university records, data contained in Article 16 of the Adult Education Act and Article 26 of the Government Decree.</p>
	<p>Regarding the participants, pursuant to Article 16 of the Adult Education Act, the University, as an adult education institution, must keep, register and – in order to ensure the exercise of the control authority of the state administrative body for adult education – preserve the following documents until the last day of the eighth year from its creation:</p> <ul style="list-style-type: none"> – documents certifying attendance and completion of the training activity (as well as the progress log on the basis of Article 26 of the Government Decree), – the personal data of the person participating in the training, processed on the basis of Article 21, Paragraph (1), as well as the original documents certifying the conditions necessary for starting and participating in education and training, or their copies certified by the adult education institution, as well as the documents supporting the initial aptitude test and the preliminary knowledge test, – the adult education contract. <p>d) Complaint handling: the contents of the complaint.</p>

Purpose of data processing	<ul style="list-style-type: none"> – In the case of the data contained in points a) and b): in accordance with Article 21, Paragraph (1) of the Adult Education Act, conducting the training, concluding the adult training contract, fulfilling the obligation to provide data in the FAR system. – In the case of the data specified in point c): keeping the university’s internal records according to the relevant regulations (legislation [Adult Education Act, Government Decree] and internal regulations). – The use of the data specified in the Adult Education Act and according to point a) for statistical purposes – especially with regard to quality management and planning. – Ensuring the complaint handling procedure required by law.
Legal basis for the processing	<p>For the data described in points aa) and c): Article 6, Paragraph (1), point c) of the GDPR: because the law (Articles 16 and 21 of the Adult Education Act, Article 26 of the Government Decree) obliges the University to process your data. If you do not enter your data, the adult education legal relationship will not be established.</p> <p>For the data described in point b): Article 6, Paragraph (1), point f) of the GDPR: it is the legitimate interest of the data controller and the minor with limited legal capacity represented by the legal representative that a valid legal relationship be established between the parties in accordance with the rules of civil law.</p> <p>For the data described in points ab) and d): Article 6 (1), point e) of the GDPR, i.e. public interest: ab): fulfilling the obligation to provide data in the FAR system and maintaining contact; d): handling complaints and developing training courses.</p> <p><i>In the case of data processing based on Article 6, Paragraph (1), point e) and f) of the GDPR, you, as a data subject, have the right to object to the above processing of your personal data at any time for reasons related to your own situation. In the event of your objection, the data controller may no longer process the personal data, unless it proves that the data processing is justified by compelling legitimate reasons that take precedence over your interests, rights and freedoms, or that are related to the submission, enforcement or defense of legal claims.</i></p>
Duration of the processing	The University, as an adult education institution, processes the data until the last day of the eighth year from its creation.
Data transfer	<ul style="list-style-type: none"> – Based on Article 21, Paragraph (2) of the Adult Education Act: <ol style="list-style-type: none"> 1. The data according to Article 21, Paragraph (1) of the Adult Education Act can be used for statistical purposes and can be transferred for statistical

	<p>use in a way that is not suitable for personal identification, and can be transferred and used for statistical purposes in a way that is suitable for individual identification to the Central Statistical Office free of charge.</p> <p>2. Under Article 15, Paragraph (1) of the Adult Education Act: The University as an adult education institution provides relevant data to the adult education state administrative body in the adult education data provision system (FAR) about</p> <p>a) the name, nature, location, number of classes, first day of training and – with the exception of closed-system electronic distance learning – the planned date of completion of the education or training,</p> <p>b) the natural personal identification data, e-mail address and highest educational qualification of the persons participating in the training, c) the training fee.</p> <p>The obligation to provide data must be fulfilled no later than the third working day following the starting day of the training, in the case of a change in the data, no later than the third working day following the occurrence of the data change, in the case of internal training, by the last day of the quarter in which the date of completion of the internal training falls.</p> <p>Additional mandatory information in FAR: country of birth, citizenship.</p> <p>As the government’s adult education public administrative body, the Pest County Government Office has access to the data required for the audit in the adult education data service system.</p> <p>– In the case of such a provision of the agreement concluded with the participation of the participant as a party, the University, as an adult education institution, informs the employer/other person or organization that covers the cost of the training about the participant’s academic progress and participation, based on Article 6, Paragraph (1), point f) of the GDPR; it is the legitimate interest of the person/organization covering the costs to be able to check the participation and results achieved in the training paid for.</p> <p><i>You, as the data subject, have the right to object to the above processing of your personal data at any time for reasons related to your own situation. In the event of your objection, the data controller may no longer process your personal data, unless it proves that the data processing is justified by compelling legitimate reasons that take precedence over your interests, rights and freedoms, or that are related to the submission, enforcement or defense of legal claims.</i></p>
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Your rights:

1. **Transparent information, communication and modalities for the exercise of the rights of the data subject** – In this privacy notice the controller provides information about the circumstances of data processing, e.g. data controller, purposes, legal basis and duration of data processing, enforceable data subject rights, complaint procedures and available legal remedies for data subjects;
2. **Right of access by the data subject** – You have the right to obtain from the controller confirmation as to whether or not personal data concerning you are being processed, the controller shall provide complete information and a copy of the personal data undergoing processing;
3. **Right to rectification** – You have the right to obtain from the controller the rectification of inaccurate personal data concerning you and you also have the right to have incomplete personal data completed;
4. **Right to erasure (‘right to be forgotten’)** – You can ask from the controller the erasure of your personal data;
5. **Right to restriction of processing** – If you ask, your personal data can’t be processed with the exception of storage;

6. **Notification obligation regarding rectification or erasure of personal data or restriction of processing** – We inform you about the recipients referred to in GDPR under the conditions set out in the GDPR;
7. **Right to data portability** (if the controller processes your data on the basis of your consent/contract and the processing is carried out by automated means) – You have the right to receive your personal data, which you have provided to a controller, in a structured, commonly used and machine-readable format and you have the right to have the personal data transmitted directly from one controller to another, where technically feasible;
8. **Right to object** – You can object at any time to processing of your personal data if the processing is based on a legitimate interest pursued by the controller or by a third party or the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
9. **The right not to be subject to a decision based solely on automated processing, including profiling** – Tell us if you are concerned! This right is not relevant if this privacy notice does not contain information about automated decision-making.
10. **The right to legal remedy** – In the case of breach of your rights, you can apply to the data protection officer, to the National Authority for Data Protection and Freedom of Information or you can sue in court.

If you have any questions or you need legal remedy, apply to:

Data protection officer of the University:

Data Protection Office
 1053 Budapest, Ferenciek tere 6.
 Tel.: +3614116500/2855
 Email: dataprotection@elte.hu

National Authority for Data Protection and Freedom of Information

1363 Budapest, Pf. 9. www.naih.hu Tel.: +36-1-391-1400

The court:

You can sue in court according to your place of residence.

APPENDIX to privacy notice

Details concerning the rights of data subjects

For the purposes of this information sheet (and of GDPR), **'data subject' shall mean** a natural person who has been identified by reference to specific personal data, or who can be identified, directly or indirectly; **'personal data'** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (Article 4 of GDPR).

Data subjects may contact the controller with regard to all issues related to the exercise of their rights under GDPR. The controller shall provide information on action taken on a request under Articles 15 to 22 to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

You can read about your rights below:

1. **Transparent information, communication and modalities for the exercise of the rights of the data subject (See Article 12-14 of GDPR for more information)**

The data controller shall provide the data subject with information on the circumstances of the processing, including, inter alia, which personal data of the data subject, for what purposes, on what basis and for how long will be processed; the data subject's rights in relation to the processing; the source of the data if personal data have not been obtained from the data subject; to whom he or she may address any questions or complaints regarding the processing, etc.

When requested by the data subject, the information may be provided orally, provided that the identity of the data subject is proven by other means.

2. Right of access by the data subject (See Article 15 of GDPR for more information)

The data subject may request from the controller full information about the processing and a copy of his or her personal data.

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- (a) the purposes of the processing;
- (b) the categories of personal data concerned;
- (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- (f) the right to lodge a complaint with a supervisory authority;
- (g) where the personal data are not collected from the data subject, any available information as to their source; (h) the existence of automated decision-making, including profiling, referred to in Article 22 of GDPR, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

3. Right to rectification (Article 16 of GDPR)

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

4. Right to erasure ('right to be forgotten') (See Article 17 of GDPR for more information)

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- (a) the purpose of the processing has ceased;
- (b) the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- (c) the data subject objects to the processing of personal data which is based on a legitimate interest pursued by the controller or by a third party or is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, and there are no overriding legitimate grounds for the processing;
- (d) the processing is unlawful;
- (e) the personal data have to be erased in order to comply with a legal obligation in Union or Member State law to which the controller is subject;
- (f) the personal data have been collected in relation to information society services offered directly to children.

5. Right to restriction of processing (See Article 18 of GDPR for more information)

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- (a) the data subject contests the accuracy of the personal data;
- (b) the processing is unlawful and the data subject opposes the erasure of the personal data;
- (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- (d) the processing is based on legitimate interest pursued by the controller or by a third party or is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, and the data subject objects to the processing.

In this case, the controller only stores the data, with the exceptions set out in the GDPR.

6. Notification obligation regarding rectification or erasure of personal data or restriction of processing (Article 19 of GDPR)

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

7. Right to data portability (See Article 20 of GDPR for more information)

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- (a) the processing is based on consent or on a contract; and (b) the processing is carried out by automated means.

In exercising the right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The exercise of this right shall be without prejudice to the right to be erased.

The right to data portability shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

8. Right to object (See Article 21 of GDPR for more information)

The data subject 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 legitimate interest pursued by the controller or by a third party or if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, including profiling¹ 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.

9. Automated individual decision-making, including profiling (See Article 22 of GDPR for more information) The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

This provision shall not apply if the decision:

- (a) is necessary for entering into, or performance of, a contract between the data subject and a data controller; (b) is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or (c) is based on the data subject's explicit consent.

In this case, the data controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.

10. The right to legal remedy – alternative possibilities

10.1. Data protection officer (See Article 12 of GDPR and Article 38-39 of GDPR for more information)

Data subjects may contact the data protection officer with regard to all issues related to processing of their personal data and to the exercise of their rights under GDPR (Article 38(4) of GDPR).

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy (Article 12(4) of GDPR)

¹ Article 4 of GDPR: 'profiling' means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

10.2. Procedures of the National Authority for Data Protection and Freedom of Information (Articles 57-58 and 77 of GDPR; Sections 51/A (1), 52-54, 55 (1)-(2), 56-58, and 60-61 of Privacy Act¹)

Anyone (i.e. not only the data subject) may lodge a complaint with the National Authority for Data Protection and Freedom of Information (hereinafter the Authority), in order to initiate an investigation on the grounds that a personal data breach has occurred or is imminent.

It is important that the notification is not anonymous, otherwise the Authority may reject the notification without any substantive investigation. Further grounds for refusal are set out in Section 53 of Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (Privacy Act).

The Authority's investigation is free of charge and the costs of the investigation are advanced and borne by the Authority. The detailed rules for the conduct of the procedure are laid down in Sections 54, 55 (1) to (2) and 56 to 58 of the Privacy Act.

To ensure that the right to the protection of personal data is enforced, the Authority shall commence an authority procedure for data protection at the application of the data subject in line with Sections 60-61 of Privacy Act.

10.3. Right to an effective judicial remedy against a controller or processor (Sections 23-24 of Privacy Act; Article 79 of GDPR)

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, each data subject has the right to an effective judicial remedy where he or she considers that his or her rights under GDPR have been infringed as a result of the processing of his or her personal data in non-compliance with GDPR.

Proceedings against a controller or a processor shall be brought before the courts of the Member State where the controller or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the data subject has his or her habitual residence, unless the controller or processor is a public authority of a Member State acting in the exercise of its public powers.

In Hungary, the data subject, according to his/her choice may bring the action before the regional court having territorial jurisdiction over his domicile or place of residence.

Possibility to claim damages and compensation:

- The controller or the processor shall be liable for compensating any damage which another person may suffer as a result of processing that infringes the provisions laid down in laws or the binding legal act of the European Union on the processing of personal data.
- The controller or the processor shall be liable for paying a grievance award for the violation of personality rights that another person may suffer as a result of processing that infringes the provisions laid down in law or the binding legal act of the European Union on the processing of personal data, if the person whose personality rights had been violated has made a claim addressed to the controller or the processor for such a grievance award.

² Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information

¹ Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information