



**DATA PROCESSING AND DATA PROTECTION INFORMATION
ON THE PROCESSING OF THE PERSONAL DATA OF THE STUDENTS OF ÓBUDA UNIVERSITY
IN THE NEPTUN SYSTEM**

The purpose of this guide is to provide information to applicants intending to study at Óbuda University (hereinafter: University), to people admitted, pursuing studies or who used to pursue studies at the University (hereinafter: data subjects) about the scope of their personal data managed and processed by the University for the purposes specified herein, the terms and conditions of data management and data processing, the identity of the parties involved in the process, and the rights and obligations of the parties in connection with the processing of personal data in accordance with applicable legal regulations.

I. Abbreviations used herein

I.1. GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council 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)

I.2. Infotv.: Act CXII of 2011 on informational self-determination and freedom of information

I.3. Nftv.: Act CCIV of 2011 on national higher education

II. General provisions on the processing of personal data

II.1. Controller's name and contact details

Óbuda University

Registered seat: 1034 Budapest, Bécsi út 96/b.

Central homepage: www.uni-obuda.hu

You can request information on the processing of your personal data at the following e-mail address:

jog@uni-obuda.hu

II.2. Processor's name and contact details

The controller shall not hire a processor for data processing.

II.3. Scope of processed data

II.3.1. Summary of data processing related to student data processed in the Neptun system

Purpose of data processing	Purpose of data processing – as per Article 18 (1) of the Nftv.: maintenance of records specified in the Nftv. as related to the legal relationship, to the establishment and fulfilment of allowances, benefits,
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	and obligations, and for national security reasons
Legal grounds of data processing	Fulfilment of legal obligations to which the controller is subject [Article 6 (1) (c) of the GDPR, Article 18 (1) of the Nftv.]
Scope of data processed	<p>The scope of data specified in subheading I/B of Annex 3 to the Nftv.</p> <p>a) data pertaining to admission:</p> <p>aa) the applicant's name, gender, name at birth, mother's name, place and date of birth, nationality, place of residence, place of stay, address for service, telephone number and, in the case of non-Hungarian nationals, the purpose of stay in the territory of Hungary and the name and number of the document entitling to stay or, in the case of persons having the right of free movement and residence pursuant to a specific law, the document certifying the right of residence,</p> <p>ab) data on the secondary school leaving examination,</p> <p>ac) secondary school data,</p> <p>ad) data necessary for the assessment of the application for admission,</p> <p>ae) the data of the admission procedure, the application identification number,</p> <p>af) the identification number of the declaration made under Article 48/D(2)¹;</p> <p>b) data pertaining to student status:</p> <p>ba) the student's name, gender, name at birth, mother's name, place and date of birth, nationality, place of residence, place of stay, address for service, telephone number, email address and, in the case of non-Hungarian nationals, the purpose of stay in the territory of Hungary and the name and number of the document entitling to stay or, in the case of persons having the right of free movement and residence pursuant to a specific law, the document certifying the right of residence,</p> <p>bb) type of student (guest student) status, when and how student status was acquired and terminated, name of programme pursued, any state funding received for the programme, mode of study, expected date of completion, assessment of student performance, data on examinations, semesters commenced, period of funding used, periods of suspension of student status,</p> <p>bc) places and dates of courses taken at other higher education institutions abroad,</p> <p>bd) credits collected and recognised in the course of the programme,</p>

¹ Art. 48/D (2) * Persons classified as applicants whose studies may be funded through full or partial state scholarships shall at the time of enrolment make a declaration regarding the acceptance of the conditions of such form of funding.



	<p>validated studies,</p> <p><i>be</i>) data on student allowances, data necessary for the assessment of eligibility (social situation, data on parents, data on maintenance),</p> <p><i>bf</i>) data on student employment,</p> <p><i>bg</i>) data on disciplinary and damages cases involving the student,</p> <p><i>bh</i>) data necessary for the assessment of eligibility for special treatment as a disabled student,</p> <p><i>bi</i>) data on accidents involving the student,</p> <p><i>bj</i>) serial number of student identity card, identification number of master data sheet,</p> <p><i>bk</i>) student identification number, social security number,</p> <p><i>bl</i>) data on the completion of the practice period, the final certificate, the final examination (doctoral defence), the language examination, and the diploma and diploma supplement,</p> <p><i>bm</i>) data necessary for the exercise of rights and fulfilment of obligations arising from student status;</p> <p><i>c</i>) graduate tracking data;</p> <p><i>d</i>) student tax identification number;</p> <p><i>e</i>) data serving to identify the documents supporting the data;</p> <p><i>f</i>) data on fees and costs paid by the student, and any payment in instalments, deferment or exemption related to payment obligations;</p> <p><i>g</i>) if the student receives student assistance, childcare assistance, childcare benefit, regular child protection allowance or housing assistance, data on these;</p> <p><i>h</i>) in the case of scholarships established by the Government by way of a decree pursuant to Article 85(1) and (2)², data on the scholarship provided in support of the studies pursued by the student and disbursed on the basis of student status;</p> <p><i>i</i>) data on student competence assessments and the results thereof.</p>
Duration of data processing	For eighty years from the notification of the termination of student status.
Method of data processing	Electronic and paper-based

² Art 85. (1) With a view to raising the quality of educational and research activities, the Government may establish scholarships to support students, lecturers, professors and research fellows. Scholarships established by the Government shall be exempt from dues and taxes, as set out in a specific law.

(2) The rules of granting such scholarships and the conditions thereof shall be laid down by the Government.



II.3.2. Data processing related to grant data recorded in the Neptun system

Purpose of data processing	Arrangements for the application procedure of the Bursa Hungarica Municipal Higher Education Grants Programme Bursa Hungarica and checking for grant eligibility.
Legal grounds of data processing	Fulfilment of legal obligations to which the controller is subject [Article 6 (1) (c) of the GDPR, Article 2 (a) of Annex 4 to the Nftv.]
Scope of data processed	The scope of data specified in Annex 4 to the Nftv.: concerning persons applying for grants: a) natural person identification data b) tax identification number c) place of residence d) contact details e) data on tertiary programme pursued f) year of secondary school leaving examination g) personal and sensitive data of the applicant, or the applicant's close relatives or household members, proving the applicant's eligibility based on social needs h) the result of the application for admission to a higher education institution i) data on the applicant's student status
Duration of data processing	5 years from the date of expiry of the duration of the grant.
Method of data processing	Electronic and paper-based

II.4. Data transfer to third parties

The University may only communicate any facts, data and opinions on the data subject to third parties only in cases as specified by law, in order to fulfil a legal obligation, or subject to the data subject's consent.

Data transfer within the organization: Within the organizational system of the University, the personal data of the data subject may only be transferred to organizational units performing data processing tasks in conformity with the basic principles of data processing – to the degree and for the time as required for performing the relevant task.

Data transfer outside the organization: Personal data may only be transferred in order to fulfil a regulatory obligation, including the following in particular:

(i) in the event of data processing as provided in clause II.3.1, they may be transferred to the following parties pursuant to point 4, subsection I/B, Annex 3 to the Nftv.:



- a) to the maintainer, for the purpose of the performance of tasks related to maintainer control;
- b) the data necessary for taking a decision on a specific matter may be transferred to the court, the police, the public prosecutor's office, the bailiff or the public administration body concerned;
- c) all data necessary for the performance of tasks defined in the Act on National Security may be transferred to the national security services;
- d) all data may be transferred to the body responsible for the operation of the higher education information system;
- e) the following data of persons borrowing a student loan may be transferred to the Student Loan Centre:
- ea) the data listed in subpoints ba) and bb) of point 1(b), with the exception of the purpose of stay in the territory of Hungary and the name and number of the document entitling to stay or the document certifying the right of residence in the case of non-Hungarian nationals, and with the exception of the data on the assessment of student performance, examinations and the period of funding used,
- eb) of the data listed in point 1(f), the actual amount of self-funded costs payable to the higher education institution by the student, for the purpose of the examination of eligibility for a student loan, or the cessation thereof, and the establishment of the existence or suspension of repayment obligations,
- ec) the data listed in subpoints ba) and bk) of point 1(b), with the exception of the social security number, for the purpose of keeping contact with customers and the related administration, in order to enable the exercise of rights and the fulfilment of obligations arising from the loan agreement,
- ed) the data listed in subpoints ba) and bb) of point 1(b), with the exception of the data on the assessment of student performance, examinations and the period of funding used,
- ee) of the data listed in subpoint bl) of point 1(b), the data on the final certificate and the final examination (doctoral defence), for the purpose of a risk analysis related to the projected repayment of outstanding student loans and for risk-measure-based customer management;
- f) data on the programme and on student status may be transferred to the body responsible for keeping records on the fulfilment of conditions for Hungarian state scholarships.
- (ii) in the event of data processing as provided in clause 11.3.2, they may be transferred to the following parties pursuant to point 5, Annex 4 to the Nftv.:
- a) the data processors specified in point 2³ may mutually transfer to each other all applicant data listed in point 1,
- b) * the body responsible for the operation of the higher education information system may transfer to the organisation managing the applications and the local municipalities providing grants the results of applications for admission to higher education institutions and the duration of such grants,

³ a) the minister or the organization designated by the minister to conduct the applications procedure,

b) the local municipality taking part in the grant system,

c) the higher education institution making the grant payable.



c) higher education institutions may transfer data on student status to the organisation managing the applications and the local municipalities providing grants,

d) the organization managing the applications may transfer to the body responsible for the operation of the higher education information system the data required for querying the data specified in point b).

(iii) or data may be transferred upon the data subject's consent.

Data transfer for statistical purposes: the personal data of data subjects can be used for statistical purposes and can be transferred for statistical use in a manner unsuitable for personal identification.

III. Rights of the data subject related to data processing

III.1. Right of access: In accordance with Article 15 (1) of the GDPR, data subjects shall have the right to obtain information on their personal data processed. In such a case, the University shall forward the following information to the contact specified (e-mail address, mailing address) of the data subject:

- the categories of personal data processed concerning the data subject;
- the purposes of data processing;
- the duration of data processing;
- the rights of the data subject in connection with data processing;
- the right to file a complaint addressed to the National Authority for Data Protection and Freedom of Information.

Requests for information are required to be sent in a registered letter or a registered letter with return receipt requested, addressed to Óbuda University (address: 1034 Budapest, Bécsi út 96/b) or to the e-mail address jog@uni-obuda.hu.

III.2. Right to obtain a copy: Pursuant to Articles 15 (3)-(4) of the GDPR, the data subject shall have the right to obtain a copy of the personal data processed. In such a case, the personal data processed by the University with respect to the data subject shall be forwarded to the contact (e-mail address, mailing address) specified by the data subject.

III.3. Right to rectification: In conformity with Article 16 of the GDPR, personal data shall be modified or specified accordingly at the data subject's request.

III.4. Right to erasure: In accordance with Article 17 (1) of the GDPR, the data subject shall have the right to request, in respect of personal data processed on the basis of the data subject's consent, that personal data made public be erased, unless their publicity is prescribed by legal regulation.

III.5. Right to restriction of processing: The data subject shall have the right to the restriction of processing – if not contrary to the stipulations of legal regulations prescribing data processing – where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling us to verify the accuracy of the personal data;
- the data processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;



- the University no longer needs the personal data, but they are required by the data subject for the establishment, exercise or defence of legal claims.

Such request for the restriction of data processing shall also indicate the reason for which such restriction is requested by the data subject. The University shall fulfil such request for the restriction of data processing by storing such personal data separated from any other personal data, such as saving electronic files to an external data carrier and storing paper-based documents in a separate folder, by taking into consideration the requirements set out in relevant legal regulations and the internal regulations of the University.

III.6. Common rules of exercising rights: The data subject's request shall be fulfilled by the University within up to one month, which period may be extended by a maximum of two months. In the event that such request is rejected, you will be informed by the University within one month of the receipt of the request about the reasons for such rejection, and about the fact that you can lodge a complaint with the National Authority for Data Protection and Freedom of Information and that you can exercise your right to judicial remedy. The University reserves the right to request the provision of information as required for the confirmation of the personal identity of the data subject if it has reasonable doubts concerning the identity of the person submitting the request. Such cases include, in particular, the exercise of the data subject's right to obtain a copy, in which case it is reasonable for the University to make sure that such request originates from the party entitled. In the course of the exercise of rights, the requirements of the Infotv. shall also be taken into consideration.

IV. Means of redress

IV.1. The data subject shall have the right to lodge a **complaint** with the University in connection with any data processing considered by the data subject as unlawful, via the following contact: jog@uni-obuda.hu

IV.2. In the event that, in the data subject's opinion, data processing by the University is not in conformity with regulatory requirements, the data subject shall also have the right to **institute proceedings** by the **National Authority for Data Protection and Freedom of Information** (Registered seat: 1024 Budapest, Szilágyi Erzsébet fasor 22/C., Homepage: <http://www.naih.hu>, phone number: + 36 1 391 14 00, e-mail address: ugyfelszolgalat@naih.hu), mailing address: 1530 Budapest, Pf.: 5.).

IV.3. In addition, the data subject shall have the right to **court action** against data processing by the University. At the data subject's option, such lawsuit may also be instituted before the regional court competent according to the data subject's place of residence or place of stay.

V. Data Protection Regulations of the University

V.1. Access: <http://uni-obuda.hu/egyetem/szabalyzatok/az-obudai-egyetem-adatvedelmi-szabalyzata>

Dated: Budapest, 25 August 2018.