

INFORMATION OF PROCESSING OF DATA

For NEPTUN users

According to Section 20, paragraph (1) Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (InfoAct) and Section 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 (General Data Protection Regulation, GDPR) Eötvös Loránd University hereby inform Neptun users about processing their data in the Neptun electronic study system. The data procession is compulsory according to the Act CCIV. of 2011 on national higher education (HEA), Appendix 3.

For what purpose do we process your data? (Purpose of processing of data):

Purposes are specified in Section 18 (1) of Act CCIV of 2011 on national higher education:

- a) the proper functioning of the institution;
- b) applicants' and students' rights and the fulfilment of their obligations;
- c) education and research activities;
- d) employer rights, as well as those of lecturers, researchers and employees and to fulfil obligations;
- e) registering data as specified in relevant legislation;
- f) the determination, assessing and certifying allowance entitlements specified in legal regulations or in the organisation and operational manual of higher education institutions.

Which of your data are processed in the University? (Registered data):

See: 2nd Appendix

Who is concerned? (Data subjects):

Students and public servants of Eötvös Loránd university

Why can we process your data? (Legal basis (claim) of the processing of data):

For it is so disposed in Act CCIV of 2011 on national higher education (HEA), Appendix 3.

Who is the Data Controller?

Eötvös Loránd University
1053 Budapest,
Egyetem tér 1-3.
Directorate of Education
oktig@oktig.elte.hu

Who is the Data Processor?

SDA Informatika Zrt.
Seat: 2030 Érd, Retyezáti u. 46.
Representative:Fehér István

How long do we process your data? (Duration of data processing):

In the case of student: 80 years as specified in HEA, Appendix 3..

In the case of public servants: 5 years as specified in HEA, Appendix 3.

Please note, that according to the inner regulation of the University, a lot of personnel data

shall not be culled:

https://www.elte.hu/dstore/document/683/ELTE_SZMSZ_9mell_irattariterv.pdf

Your rights:

1. Transparent information, communication and modalities for the exercise of the rights of the data subject – You can ask for information concerning your data, at any time;
2. Right of access by the data subject – You can access your data at any time;
3. Right to erasure ('right to be forgotten'), right to restriction of processing – Did you find a mistake? Tell us, we will correct!
4. Information to be provided where personal data have not been obtained from the data subject – We inform you, if your data are forwarded;
5. Right to data portability (if we process your data on the basis of your consent/contract the processing is carried out by automated means.) – if you need, we will give you your data;
6. Right to object - you can object, at any time to processing of your personal data ;
7. The right not to be subject to a decision based solely on automated processing, including profiling – tell us, if you are concerned!;
8. The right to legal remedy: in the case of breach of your rights, you can turn to the data protection officer, to the National Authority for Data Protection and Freedom of Information, or you can sue a claim to the court.

Data protection officer of the University:

Dr. Kinga Rigó

Rector's Cabinet

1053 Budapest, Ferenciek tere 6.

Tel.: +3614116500/2855.

Email: strategia@rk.elte.hu

National Authority for Data Protection and Freedom of Information

1125 Budapest, Szilágyi Erzsébet fasor 22/c.

www.naih.hu

Tel.: +36-1-391-1400

The court:

You can sue for a claim according to your place of residence.

1ST APPENDIX to information of processing of data

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. ff GDPR and Section 3. of InfoAct).

Rights of the data subject according to Chapter III. of the GDPR

1. Transparent information, communication and modalities for the exercise of the rights of the data subject;
2. Right of access by the data subject;
3. Right to erasure ('right to be forgotten'), right to restriction of processing;
4. Information to be provided where personal data have not been obtained from the data subject;
5. Right to data portability (if we process your data on the basis of your consent/contract the processing is carried out by automated means.);
6. Right to object;
7. The right not to be subject to a decision based solely on automated processing, including profiling;
8. The right to legal remedy: in the case of any breach of your rights, you can turn to the data protection officer of Eötvös Loránd University, to the National Authority for Data Protection and Freedom of Information, or you can sue a claim to the court.

You can read the explanation of the rights below:

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

With this information sheet, the controller provides the information relating to processing to the data subject referred to in GDPR.

If the data subject asks, further detailed oral information can be given, if the data subject proves his or her identity.

2. Right of access by the data subject (Article 15 of GDPR)

The data subject 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(1) and (4) of GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

3. Rectification and erasure (Article 16 of GDPR)

3.1. Right to rectification (Article 16 of GDPR)

3.2. 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.

3.3. Right to erasure ('right to be forgotten') (Article 17 of GDPR)

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 personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2) of GDPR, and where there is no other legal ground for the processing;
- (c) the data subject objects to the processing pursuant to Article 21(1) of GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
- (d) the personal data have been unlawfully processed;
- (e) the personal data have to be erased for compliance 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 the offer of information society services referred to in Article 8(1) of GDPR.

3.4. Right to restriction of processing (Article 18 of GDPR)

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

- (a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- (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 defense of legal claims;
- (d) the data subject has objected to processing pursuant to Article 21(1) of GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

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. (Article 12.3 of GDPR)

4. 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 in accordance with GDPR Article 16, Article 17(1) and Article 18, 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.

5. Right to data portability (Article 20 of GDPR)

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 have 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 his or her 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 forgotten.

6. Right to object (Article 21 of GDPR)

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 point (e) or (f) of Article 6(1) of the GDPR, 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.

7. Automated individual decision-making, including profiling (Article 22 of GDPR)

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.

8. Legal remedy – alternative possibilities

8.1. Data protection officer (Article 24 of InfoAct, Article 39 of GDPR)

The data protection officer has to monitor compliance with GDPR, with other Union or Member State data protection provisions and with the policies of the controller or processor in relation to the protection of personal data, including the assignment of responsibilities, awareness-raising and training of staff involved in processing operations, and the related audits (Article 39 of GDPR)

Data protection officer of the University:

Dr. Kinga Rigó

Rector's Cabinet

1053 Budapest, Ferenciek tere 6.

Tel.: +3614116500/2855.

Email: strategia@rk.elte.hu

8.2. Investigation of the National Authority for Data Protection and Freedom of Information (Article 52-58 of InfoAc), 57., 77. Article of GDPR

Any person shall have the right to notify the Authority and request an investigation alleging an infringement relating to his or her personal data or concerning the exercise of the rights of access to public information or information of public interest, or if there is imminent danger of such infringement.

The Authority may refuse the notification without examination thereof as to merits if the infringement alleged in the notification is considered minor, or the notification is anonymous. You can find further reasons for rejection in Section 53. of the InfoAct.

National Authority for Data Protection and Freedom of Information
1125 Budapest,
Szilágyi Erzsébet fasor 22/c.
www.naih.hu
Tel.: +36-1-391-1400

8.3 Right to an effective judicial remedy against a controller or processor (Section 22. Of InfoAct. Article 79 of GDPR)

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory, 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.

2nd APPENDIX to information of processing of data

Personal and Special Data Registered and Managed by Higher Education Institutions

I/A. Data pertaining to employees

1. Data registered pursuant to this Act:

- a) name, gender, name at birth, place and date of birth, mother's name, nationality, identification number;
- b) permanent address and residence; registered address
- c) data pertaining to employment, public servant status, fixed-term employment:
 - ca) name of employer – if more than one, all shall be named, indicating where additional work-related relationship is established,
 - cb) level of qualification, professional qualifications, vocational qualifications, command of languages, scientific degree,
 - cc) time spent in employment, time that can be counted as public servant status, data pertaining to payroll status,
 - cd) honours, awards and other recognition awards, titles,
 - ce) position, executive assignment, assignment for tasks not specified for position, additional work-related relationships, disciplinary sanctions, orders to pay damages,
 - cf) hours of work, hours of overtime, wage, salary, and any related dues and its beneficiary,
 - cg) leave, leave taken,

- ch) disbursements made to the employee and their title,
- ci) benefits granted to the employee and their title,
- cj) debts of employee owed to employer and their title, c
- k) research activities, scientific work, artistic activities, their results, data pertaining to participation in the doctorate course and the doctoral degree award procedure as instructor, researcher,
- cl) declaration made pursuant to Section 26 (3), cm) data proving the fulfilment of requirements specified in Section 25 (4) for fixed-term employment established by the higher education institution as an employer related to the president or a member of the financial board,
- d) results of lecturer evaluation by students;
- e) results of the habilitation procedure;
- f) identification data pertaining to the documents supplied in evidence of data.

I/B. Data pertaining to students

1. Data registered pursuant to this Act:

- a) data pertaining to admission:
 - aa) applicant's name, gender, name at birth, mother's name, place and date of birth, nationality, permanent address, residence and phone number, in the case of non-Hungarian nationals the legal grounds for stay in the territory of the Republic of Hungary and the designation and number of the document entitling the holder thereto and, in the case of persons entitled to the right to free movement and residence as set forth in a separate act, the designation and number of the document proving the right of residence,
 - ab) data pertaining to the secondary school leaving examination,
 - ac) data pertaining to the secondary school,
 - ad) data necessary for assessment of the application for admission,
 - ae) data pertaining to the admission procedure;
- b) data pertaining to student status (PhD / DLA candidate status):
 - ba) the student's name, name at birth, mother's name, place and date of birth, nationality, registered address and residence, mailing address and phone number, electronic mail address, in the case of non- Hungarian nationals the legal grounds for stay in the territory of the Republic of Hungary and the designation and number of the document entitling the holder thereto and, in the case of persons entitled to the right to free movement and residence as set forth in a separate act, the designation and number of the document proving the right of residence,
 - bb) type of student status (PhD / DLA candidate, visiting student), date and manner of the establishment and cessation of student status, name of course attended by the student indicating if it is state-funded, its training schedule, expected ending date of the course, evaluation of the studies of the student, data pertaining to examinations, semesters the student enrolled for, state-funded period used, time of temporary termination of student status,
 - bc) time and place of studies abroad,
 - bd) credits accrued and validated, validated studies,
 - be) data pertaining to student bursaries, data necessary for establishing eligibility for bursaries (social situation, data pertaining to parents, data pertaining to maintenance),
 - bf) data pertaining to the student's employment,
 - bg) data pertaining to disciplinary and compensation issues,
 - bh) data necessary for assessment of applications for special treatment of disabled students,
 - bi) data pertaining to student accidents,
 - bj) serial number of the student pass, identification number of the master file,
 - bk) identification number and social security number of the student,

- b) data pertaining to completion of practical courses, pre-degree certificate, final examination (doctoral defence), language examination, and data pertaining to the diploma
- bm) data necessary for the exercising of rights and fulfilment of obligations deriving from student status;
- c) data related to student career monitoring;
- d) the student tax identification code;
- e) identification data pertaining to the documents supplied in evidence of data;
- f) data pertaining to the fees paid by the student;
- g) for those receiving student support, child care support, child care allowance, regular child protection benefit, accommodation grant the data thereof.