



DATA MANAGEMENT INFORMATION

University of Debrecen, Faculty of Medicine about data processing for students

Name and contact details of the Data Controller

Data Controller	University of Debrecen
Headquarters	4032 Debrecen, Egyetem tér 1.
E-mail address	adatvedelmi.tisztviselo@unideb.hu
Phone number	52/512-700

The data controller is the Faculty of Medicine of the University of Debrecen, as a department of the University, which handles the data and provides information on behalf of the University of Debrecen.

The **Faculty of Medicine of the University of Debrecen, as the Data Controller, pays** special attention to the protection of personal data and is always careful to ensure fair and transparent data processing, the basic requirement of which is to provide appropriate information on the processing of data.

This Privacy Notice provides information on the processing of personal data in the course of the provision of the Controller's services: the sources and scope of access to the processed data, the legal basis, purposes and duration of the processing, the rights and choices concerning personal data, and the contact details where the data subject can obtain answers to questions about the Controller's data protection processes.

The **Faculty of Medicine of the University of Debrecen, as the Data Controller, provides the** following information in accordance with the relevant legal provisions governing the protection of personal data, in particular the GDPR.

Name and contact details of the Data Controller

Data Controller	University of Debrecen Faculty of Medicine
Where to administer	University of Debrecen Faculty of Medicine
Representative of the data controller	Dr. László Mátyus Dean
Headquarters	4032 Debrecen, Nagyerdei krt.94.
E-mail address	lmatyus@med.unideb.hu
Phone number	(52) 411-717/58020

Legislation on data management

The following legal provisions apply to the **Data Controller's** processing:

- 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 Regulation (EC) No 95/46/EC (hereinafter "GDPR"),
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information,



- Act CCIV of 2011 on National Higher Education (hereinafter: Nftv),
- On the implementation of certain provisions of Act CCIV of 2011 on National Higher Education Government Decree 87/2015 (IV. 9.).

Data processing by the Data Controller

Data processing in connection with enrolment at the University	
Purpose of the processing:	Establishing student status
Scope of data processed:	Candidate's name and surname, gender, maiden name and surname, mother's maiden name and surname, place and date of birth, mother's name, nationality, nationality, personal identification number, tax identification number, Neptun code, education identification number, bank account number, place of residence, place of stay, notification address, telephone number, email address, school leaving certificate details, details of secondary school/secondary school, details of college/university, details of institution issuing language exams, for non-Hungarian citizens, the title of residence in Hungary and the document entitling them to stay; for persons with the right of free movement and residence under a special law, the document certifying the right of residence name and number of document
Legal basis for processing:	Article 6(1)(e) GDPR: processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of processing:	According to Annex 3, point 1/B. 3. of the Nftv., the University shall store for 80 years the data.
Accessed from with access to:	The staff of the Faculty Dean's Office Academic Affairs Department, who are responsible for the the employer shall lay down the duties in the job description.
Internal data sharing:	For the staff of the Student Administration Centre

Data processing in relation to the student's enrolment	
Purpose of the processing:	Students can register for the courses they wish to take in Neptun at the announced time, courses.
Scope of data processed:	Neptun code, study data stored in Neptun
Legal basis for processing:	GDPR Article 6(1)(e): processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of processing:	According to Annex 3, point 1/B.3 of the Nftv. University stores for 80 years
Accessed from with access to:	The staff of the Faculty Dean's Office Academic Affairs Department, who are responsible for the an employer who exercises the power to define the tasks in the



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	job description fixes.
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<i>Student presence in class</i>	
Purpose of the processing:	Keeping a record of student attendance at classes.
Scope of data processed:	name, signature. degree, year
Legal basis for processing:	Article 6(1)(e) GDPR: processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of processing:	store for 80 years, in accordance with Annex 3, point 1/B.3 of the Nftv. University of the data
Accessed from scope:	rendelkezők Staff of the Faculty of Education

<i>Data processing in relation to final papers</i>	
Purpose of processing:	storing paper-based papers until they are viewed or rejected.
Scope of data processed:	Neptun code, name, degree
Legal basis for processing:	Article 6(1)(e) GDPR: processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of data processing:	According to the Study and Examination Regulations of the University of Debrecen. one year from the end of the examination period
Accessed from scope:	rendelkezők Staff of the Faculty of Education

<i>Data processing related to exam registration</i>	
Purpose of the processing:	Students should register for the announced examination dates for the subjects they have taken v i a the Neptun system, using the period
Scope of data processed:	Name, Neptun code, subject and date taken, if necessary medical certificate details
Legal basis for processing:	GDPR Article 6(1)(e): processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of processing:	Pursuant to Annex 3, Section 1/B. 3. of Act CCIV of 2011 on National Higher Education (hereinafter: Nftv.) University keeps data for 80 years.
Accessed from scope:	rendelkezők The competent faculty members, institute administrators, Academic Department staff

<i>Processing of data related to proof of absence from an examination</i>	
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Purpose of processing:	proof of absence from the examination, recording of data in the In Neptune
Scope of data processed:	Medical certificate details, date
Legal basis for processing:	Article 6(1)(e) GDPR: processing is in the public interest or at the controller to the controller public authority authority



	for the performance of a task carried out in the exercise of needed;
Duration of data processing:	According to the rules of the De Registry
Who has access:	Instructor, Departmental administrator, a academic department staff

<i>Data processing in connection with the recording of results</i>	
Purpose of the processing:	Student study evaluation a mid-semester or during the examination period.
Scope of data processed:	Name, Neptun code, result
Legal basis for processing:	GDPR Article 6(1)(e): processing for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller needed;
Duration of processing:	In accordance with Annex 3, point 1/B.3 of the Nftv. University of the data
Who has access:	The competent faculty members, institute administrators, Academic Department staff

<i>Data processing in relation to reclassification</i>	
Purpose of processing:	After a prior warning, reclassification of an eligible student who exceeds the state-subsidised time limit or the permitted duration of the course or does not fulfil the required study conditions as a self-financed student, and reclassification of a self-financed student into a free place, following a request for based on.
Scope of data processed	Neptun code, name, personal data (place and date of birth, mother's name, mother's name), training details, GPA
Legal basis for processing:	Article 6(1)(e) GDPR: processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of data processing:	as defined in point I/B.3 of Annex 3 to the Nftv. the University will store the data for the following period.
Accessed from rendelkezők scope:	Instructor, Departmental administrator, a academic department staff

<i>Data management related to the processing of student applications</i>	
Purpose of the processing:	Completion of the student application, assessment, decision-making.
Scope of data processed:	Neptun code, birth data, address, email, phone, documents copies, the content of the certificates submitted.



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Legal basis for processing:	Article 6(1)(e) GDPR: processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of processing:	According to the rules of the De Registry



Accessed from scope:	rendelkezők	A Faculty staff, Education vice-dean, dean, members of the relevant faculty committee	Academic	Department of Studies
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<i>Data processing in relation to the end of the semester</i>		
Purpose of the processing:	Calculate student averages, close the semester in Neptun	
Scope of data processed:	Neptun code, semester study data	
Legal basis for processing:	GDPR Article 6(1)(e): processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;	
Duration of processing:	as defined in point I/B.3 of Annex 3 to the Nftv. the period for which the University stores the data	
Accessed from scope:	rendelkezők	Staff of the Faculty's Studies Department

<i>Data processing related to student transfer</i>		
Purpose of the processing:	Establishing a student status at another institution	
Scope of data processed:	Student's name, degree course, email address, telephone number, postal address, Neptun code, documents proving studies (certificate of legal status, lesson book, subject)	
Legal basis for processing:	GDPR Article 6(1)(e): processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;	
Duration of processing:	In accordance with Annex 3, point 1/B.3 of the Nftv. University of the data	
Accessed from scope:	rendelkezők	Study administrators of the host and host faculty
Data transmission:	Universities among themselves	

<i>Data management in relation to student grants based on study</i>		
Purpose of the processing:	Scholarship payment	
Scope of data processed:	Neptun code, place and date of birth, mother's name, academic average, address	
Legal basis for processing:	GDPR Article 6(1)(e): processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;	
Duration of processing:	In accordance with Annex 3, point 1/B.3 of the Nftv. University of the data	
Accessed from scope:	rendelkezők	Staff of the Faculty's Studies Department
Internal data sharing	For the Student Administration Centre	

<i>Processing of data related to student applications from non-institutional students</i>



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Purpose of the processing:	Forwarding of student applications to the applicant for
Scope of data processed:	Content of the application form prepared by the student



Legal basis for processing:	GDPR Article 6(1)(e): processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of processing:	In accordance with Annex 3, point 1/B.3 of the Nftv. University of the data
Accessed from scope:	Staff of the Faculty's Studies Department
Internal data sharing	For the Student Administration Centre

Issue certificates at the request of the student

Purpose of the processing:	With studies about certificates transfer student for
Scope of data processed:	Neptun code, personal data, study-related Data
Legal basis for processing:	Article 6(1)(e) GDPR: processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of processing:	In accordance with Annex 3, point 1/B.3 of the Nftv. University of the data
Accessed from scope:	The staff of the Faculty's Studies Department

Issuing certificates at the request of a parent liable for maintenance

Purpose of the processing:	providing information on the existence of student status or to the parent liable for maintenance payments
Scope of data processed:	a further education child Name of the child, a studies existence/termination, name of applicant, e-mail address, address
Legal basis for processing:	fulfil a legal obligation under Article 6(1)(c) of the GDPR Ptk. § 4:222 [Obligation to inform about the continuation of studies] The institution providing for the education and studies of the child in further education shall, upon request, inform the parent liable to pay maintenance of the continuation or termination of the studies.
Duration of processing:	store for 80 years, in accordance with Annex 3, point 1/B.3 of the Nftv. University of the data
Accessed from scope:	The staff of the Faculty's Studies Department

Data processing related to participation in internships

Purpose of the processing:	Student's work placement record
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Scope of data processed:	Student's name, place and date of birth, country and city of birth, mother's name, nationality, tax identification number, Neptun code, szak Title, year, bank account number, address,
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	residence address, telephone number, email address, social security number, course of study, year of graduation, traineeship in the organisation, the designated instructor name, title
Legal basis for processing:	GDPR Article 6(1)(e): processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of processing:	store for 80 years, in accordance with Annex 3, point 1/B.3 of the Nftv. University of the data
Accessed from scope:	rendelkezők The staff of the Faculty's Studies Department
Data transmission:	For the place of work placement.

Data processing related to the completion of studies and the award of diplomas

Purpose of the processing:	Termination of training and or employment, and of the training provided for all study requirements on completion of all the training requirements a issuing a final certificate and a certificate of completion.
Scope of data processed:	personal data, address, study data stored in Neptun
Legal basis for processing:	GDPR Article 6(1)(e): processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of processing:	In accordance with Annex 3, point 1/B.3 of the Nftv. University of the data
Accessed from scope:	rendelkezők The staff of the Faculty's Studies Department

Data processing in relation to the management of the final exam

Purpose of the processing:	A Final exam Committee members the invitation of, final exams organising the student's final examination results.
Scope of data processed:	Name of the member of the committee Student's name, Neptun code, final exam details
Legal basis for processing:	GDPR Article 6(1)(e): processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of processing:	store for 80 years, in accordance with Annex 3, point 1/B.3 of the Nftv. University of the data
Accessed from scope:	rendelkezők The staff of the Faculty's Studies Department, invited by the Dean internal/external selection board members

Data management related to the management of the thesis

Purpose of the processing:	Proof that the student has completed the thesis
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Scope of data processed:	Name, Neptun code, department, section, name of consultant, position, a thesis title
Legal basis for processing:	GDPR Article 6(1)(e): processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of processing:	In accordance with Annex 3, point 1/B.3 of the Nftv. University of the data



Accessed from scope:	rendelkezők	Study administrators	Department, competent institute	Departments, from
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<i>Data processing related to the issuance of a certificate</i>	
Purpose of the processing:	Upon successful completion of the requirements, the diploma and issue of a diploma supplement
Scope of data processed:	Name, basic academic and personal data stored in Neptun
Legal basis for processing:	Article 6(1)(e) GDPR: processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of processing:	In accordance with Annex 3, point 1/B.3 of the Nftv. University of the data
Accessed from scope:	rendelkezők The relevant staff of the Faculty's Studies Department
Internal data sharing:	For the staff of the Student Administration Centre, Rector The Rector signs the diplomas for the Office

<i>Data processing in connection with the preparation of invitations to the Diploma Dinner</i>	
Purpose of processing:	creating an invitation to a graduation ceremony
Scope of data processed:	name, name of the profession
Legal basis for processing:	GDPR Article 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data necessary, especially if the child concerned.
Duration of data processing:	until the end of graduation
Internal data sharing:	University of Debrecen Event Coordination and Alumni Centre, Rector's Office)
Data transmission:	to an external printing company as data processor

<i>Data management related to the registration of participants in the graduation ceremony, distribution of robes</i>	
Purpose of processing:	registration of graduates who have indicated their intention to participate their intention to attend the graduation
Scope of data processed:	name, section name, gown size
Legal basis for processing:	Article 6(1)(a) GDPR: the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes. to manage;
Duration of data processing:	until the end of graduation
Accessed from scope:	rendelkezők The relevant staff of the Faculty's Department of Studies



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Internal data sharing:

University of Debrecen Event Coordination and Alumni Centre,
Rector's Office



<i>Data processing in relation to the provision of named seating for diploma holders</i>	
Purpose of processing:	the graduate who graduated students Na according to seating me g to
Scope of data processed:	name, degree, section
Legal basis for processing:	GDPR Article 6(1)(a): the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes to manage;
Duration of data processing:	until the end of graduation
Accessed from scope: for those who have	The relevant staff of the Faculty's Department of Studies
Internal data sharing:	University of Debrecen Event Coordination and Alumni Centre, Rector's Office

<i>Data processing related to the award of diplomas at graduation ceremonies</i>	
Purpose of processing:	awarding the diploma to the student concerned
Scope of data processed:	Name
Legal basis for processing:	GDPR Article 6(1)(e): processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of data processing:	until the end of graduation
Accessed from scope: rendelkezők	The relevant staff of the Faculty's Department of Studies
Internal data sharing:	For the staff of the Student Administration Centre

<i>Taking a uniquely identifiable photograph (video, audio) of the student, disclosure to the public</i>	
Purpose of the processing:	Documenting events, university competitions and photo coverage on the university's website, university website, facebook website, other press with the permission of the University of Debrecen Press Office. Furthermore, in the case of employees, the in the university phone book.
Scope of data processed:	Picture and audio recording of the person concerned
Legal basis for processing:	GDPR Article 6(1)(a): the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes to manage;
Duration of processing:	Until consent is withdrawn. The withdrawal shall not affect the validity of the the lawfulness of the processing.
Place of appearance:	University website, university newspaper, university yearbook



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Mass recording (audio and video), publication



Purpose of processing:	Documentation of events, university competitions and photographic coverage on the university's website, university platform, internet platform, social networking site, other media on the With the permission of the University of Debrecen Press Office
Scope of data processed:	Picture and audio recording of the person concerned
Legal basis for processing:	GDPR Article 6(1)(f): processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data necessary, especially if the child concerned.
Duration of data processing:	Until archiving.
Disclosure:	University website, university newspaper, university yearbook

***Data management in relation to the teaching of students through the e-learning system on
<https://elearning.unideb.hu>***

Purpose of processing:	Teaching the student remotely.
Scope of data processed:	Name, Education ID (this is their unique access code), Date of birth (this is their initial password), Faculty, degree, year, Logs and attendance data (IP addresses, time and location), Results, points, assessments, achievements
Legal basis for processing:	Article 6(1)(e) GDPR: processing is in the public interest or in the exercise of official authority vested in the controller necessary for the performance of a task carried out in the framework of;
Duration of data processing:	On termination of student status, the data is deleted are avoided.
Internal data sharing:	The operation of the system, the provision of the system by the Debrecen University Multimedia and E-learning Technical Centre. Access to the data is granted to the relevant staff of the METK.

Data processing related to the organisation of events and conferences

Purpose of processing:	organising, running and implementing events
Scope of data processed:	As detailed in the event's own privacy policy: name, email address, other data (Due to the nature of the activity, unforeseeable data may be processed. Other data: additional data necessary for the identification of the data subject and for the organisation of the event further information required from



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Legal basis for processing:	Article 6(1)(e) GDPR: processing is in the public interest or in the interest of the necessary for the performance of a task carried out in the exercise of official authority vested in the controller;
Duration of data processing:	Event, end of conference



Data transmission:	to any other organisation involved in the organisation according to the event's own privacy policy.
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<i>Other data processing activities (preferential study and examination arrangements, credit recognition, request for tuition fee reduction)</i>	
Purpose of the processing:	How to get a discount
Scope of data processed:	name, Neptun code, contact details, course of study, subject, medical certificate details, financial certificate details, study details, the details of the certificates entitling you to the discount
Legal basis for processing:	Article 6(1)(e) GDPR: processing is in the public interest or in the interest of the the to the controller ruházott public authority authority of the controller necessary for the performance of a task carried out in the exercise of his or her functions;
Duration of processing:	In accordance with Annex 3, point 1/B.3 of the Nftv. University of the data
Who has access:	A Faculty Academic Department of Studies staff, competent members of committees

<i>Data management in relation to talent management</i>	
Purpose of the processing:	The institution of higher education is responsible for identifying and recognising students with outstanding abilities and attitudes, as well as disadvantaged and severely disadvantaged students, and for promoting their professional, academic, artistic and sporting activities. The higher education institution, either independently or in cooperation with other higher education institutions, operates a system of talent management and support and mentoring programmes, including academic student circles, vocational colleges, or Roma vocational colleges. The higher education institution may also organise mentoring programme to help students develop their talents.
Scope of data processed:	name, career details, Neptun code
Legal basis for processing:	GDPR Article 6(1)(e): processing for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller needed.
Duration of processing:	as defined in point 1/B.3 of Annex 3 to the Nftv. the University will store the data for the following period.
Who has access:	The staff of the Faculty entrusted with the tasks.

<i>Data processing in connection with the granting of faculty awards, honours and prizes</i>	
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Purpose of processing:	Awards, honours and prizes
Scope of data processed:	name, email address, faculty, department, year



Legal basis for processing:	Article 6(1)(e) GDPR: processing carried out in the public interest or in the exercise of official authority vested in the controller necessary to implement.
Duration of data processing:	according to the Data Management Rules
Who has access:	Staff of the Dean's Office, members of relevant committees

Data management for students with disabilities	
Purpose of processing:	discount, help assistance, Debrecen University of Debrecen Centre for Mental Health and Equal Opportunities (DEMEK) Governance
Scope of data processed:	name, personal data, medical documents
Legal basis for processing:	GDPR Article 6(1)(e): processing for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller needed.
Duration of data processing:	as defined in point I/B.3 of Annex 3 to the Nftv. the University will store the data for the following period.
Who has access:	The staff of the Faculty entrusted with the tasks.
Internal data sharing:	Debrecen University Mental Health and Equal Opportunities Centre (DEMEK) management

Data processor

The University will engage SDA Informatikai Zrt. as a data processor to support the operation and maintenance of the Neptun system.

Student data is recorded in the Neptun Study System. The Privacy Policy is available in the Neptun login area under downloadable documents.

Data transmission

Data may be transmitted in accordance with Annex 3, point I/B.4 of the Nftv:

- a) all data necessary for the maintenance provider to carry out the tasks related to the maintenance management;
- b) data necessary for the court, the police, the public prosecutor's office, the bailiff, the public administration to decide on a specific case;
- c) necessary for the national security service to carry out the tasks defined in the Nbtv. all data;
- d) all data to the body responsible for the operation of the higher education information system;
- e)
- f) the body responsible for registering the conditions for the Hungarian state scholarship for the course and the student.



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Data security measures



The Data Controller shall ensure the security of the data processed and shall take all measures to prevent unauthorised access, alteration, disclosure, erasure or destruction, accidental destruction or damage, inaccessibility due to changes in the technology used, i.e. to ensure that the personal data of Data Subjects are protected in accordance with the law.

The Data Controller shall process the Data Subject's data in a computer database, in an automated and manual manner, as part of the measures necessary to maintain data security and has ensured that the processing of the Data Subject's data is carried out in a closed and in any case password-protected system, saved on a hard disk and that these systems are used only in connection with the provision of the service, to the extent strictly necessary for the provision of the service, by those who are entitled to access the data.

Computer systems are equipped with a firewall and adequate virus protection.

The Data Controller shall carry out a technical check of the system and take action in the event of detection or indication of a fault. The Data Controller shall ensure that those who have access to the data are fully informed of the data protection rules. As a guarantee of data security, the Data Controller's officers and employees shall be bound by confidentiality obligations and shall bear legal liability in respect of personal data obtained in the course of their duties.

The information and network identifiers (IP address) of visitors to the website and of the Data Subject's computer that become available to the Data Controller are logged for the purposes of generating website traffic data and detecting possible errors and attack attempts. The network identifiers are not linked by the Data Controller to any other data that could identify the website visitor or the Data Subject.

Rights concerned and rules on the exercise of rights

Right to information

Pursuant to Article 15(1) of the GDPR, the data subject may request information about the personal data processed by the Controller. In this case, the Data Controller shall transmit the following information to the contact details (e-mail address, postal address) provided:

- what personal data we process about you;
- for what purposes;
- to whom we transfer personal data;
- the duration of the processing and the criteria for determining that duration;
- your rights in relation to data processing;
- the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information.

Right to request a copy

Pursuant to Article 15(3) and (4) of the GDPR, the data subject may request a copy of the personal data processed by the Controller. In this case, the controller shall transmit the personal data processed about the data subject to the contact details (e-mail address, postal address) indicated by the data subject.

Right to rectification

In accordance with Article 16 of the GDPR, we will amend or clarify your personal data at your request in accordance with your request.

Right to erasure

In accordance with Article 17(1) of the GDPR, the data subject may request the erasure of personal data disclosed.



Right to restriction

The data subject may request the restriction of processing in the following cases:

- if you dispute the accuracy of your personal data, we will restrict processing until the accuracy of the data is
The Controller will verify the accuracy of the personal data;
- the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- the controller no longer needs the personal data but the data subject requires them for the establishment, exercise or defence of legal claims; or
- if you exercise your right to object, we will limit the processing to the period during which we assess the lawfulness of your request.

In the case of a request for restriction of processing, you must also indicate the grounds for the restriction. The Controller shall comply with the request for restriction of processing by storing the personal data separately from any other personal data. For example, in the case of electronic data files, it shall save them on an external storage medium and store paper files in a separate folder.

Right to object

The data subject shall have the right to object to processing based on Article 6(1)(e) and (f) of the GDPR. In this case, the Controller shall examine the processing of the data subject and, if the request is justified, may erase the personal data.

Common rules on the exercise of rights

The Controller shall comply with the data subject's request within a maximum of one month, which may be extended by a maximum of two months. If the request is refused, the Controller shall inform you within one month of receipt of the request of the reasons for the refusal and of the right to lodge a complaint with the Authority and to seek judicial remedy. The Data Controller reserves the right, where it has reasonable doubts as to the identity of the person making the request, to request the information necessary to confirm the identity of the data subject. Such a case may be considered in particular where the data subject exercises his or her right to request a copy, in which case it is reasonable for the Controller to be satisfied that the request originates from the rightful claimant.

Enforcement options

If the data subject considers that the data processing by the Data Controller does not comply with the legal requirements, he or she may initiate proceedings before the National Authority for Data Protection and Freedom of Information (Postal address: 1363 Budapest, PO Box 9, e-mail address: ugyfelszolgalat@naih.hu) or may take legal action.

Other provisions

Data processing not listed in this Privacy Notice The Data Controller shall provide information on data processing

specific information.

If the Data Controller intends to further process personal data for a purpose other than that for which they were obtained, the Data Controller shall inform the Data Subject of that other purpose and of any relevant additional information prior to further processing.

If the Data Controller communicates the data to another addressee, it shall inform the Data Subject of this at the latest at the time of the first communication of the personal data.

Debrecen, 6 May 2024.