University of Debrecen
Faculty of Medicine
4032 Debrecen, Nagyerdei krt. 94.
Tel: +36-52-411-717, int. 58086,
Email: dekan@med.unideb.hu

Privacy Policy for Students Regarding Images and Video Recordings at Graduation Ceremonies

Graduation ceremonies at the Faculty of Medicine of the University of Debrecen are captured through individual photos and video recordings, as well as crowd photos.

An individual photograph captures a person's physical appearance, making the individual distinguishable from and identifiable among other people. In the case of an individual photograph, the consent of the person(s) depicted in the image is required to take the photograph or to use the resulting image. Individuals captured in a crowd photo are not depicted as identifiable persons but as part of the crowd as a whole. The consent of the data subjects is not required to capture or use such images.

The purpose of this document is to provide information on the capture and use – for various purposes – of individual photos and video recordings, as well as crowd photos.

The **Faculty of Medicine of the University of Debrecen** places special emphasis on the protection of personal data and ensures data processing remains fair and transparent at all times, which requires providing clear and appropriate information about how the data are processed.

Name and contacts of the Data Controller

Data Controller	University of Debrecen Faculty of Medicine
Location of data processing	University of Debrecen Faculty of Medicine
Representative of the Data Controller	Prof. Dr. Norbert Németh, Dean
Registered seat	4032 Debrecen, Nagyerdei körút 98.
Email address	nemeth@med.unideb.hu
Phone number	+36 52 258 086
Data protection officer	adatvedelmi.tisztviselo@unideb.hu

Regulations on data processing

Data processing by the Data Controller shall be subject to the following regulations:

- 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 (hereinafter: GDPR),

- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: Info Act)

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Data processing by the Data Controller

Taking of individual photos or video recordings	
Aim of data processing	To capture the students receiving their degrees at the Faculty's graduation ceremonies. The video recordings and photographs are taken by the Multimedia and E-learning Technical Center of the University of Debrecen.
Processed set of data	Photographs and video recordings of students receiving their degrees
Legal basis of the data processing	Consent of the data subject [Article 6(1)(a) GDPR]
Period of data processing	Until withdrawal of consent, but at the latest: - the University of Debrecen processes the data until the archiving of the recordings.
Scope of people having access	The recordings may be accessed by the Data Controller's staff members tasked with data processing, as well as by the data subjects.
Data Processor	none

Publication of photographs and video recordings on websites and social media channels	
Aim of data processing	To publish photographs and video recordings captured at the Faculty's graduation ceremonies on the Faculty's website and social media channels, for the purpose of providing authentic information about the event
Processed set of data	The photographs and video recordings captured at the event
Legal basis of the data processing	Consent of the data subject [Article 6(1)(a) GDPR]
Period of data processing	Until withdrawal of consent, but at the latest from the publication of the recordings until their archiving
Scope of people having access	The recordings may be accessed by the Data Controller's staff members tasked with data processing.
Data transfer	Data are transferred to the Ildikó M. Tóth Press Center, which forwards the data, citing their source, to media outlets that initiated a request to receive the press release.

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Use of photographs and video recordings in PR materials	
Aim of data processing	To use photographs and video recordings captured at the Faculty's graduation ceremonies for PR purposes (on the Faculty's website and social media channels)
Processed set of data	The photographs and video recordings captured at the event
Legal basis of the data processing	Consent of the data subject [Article 6(1)(a) GDPR]
Period of data processing	Until withdrawal of consent, but at the latest from the use of the recordings until their archiving
Scope of people having access	The recordings may be accessed by the Data Controller's staff members tasked with data processing.
Data transfer	Data are transferred to the Ildikó M. Tóth Press Center, which forwards the data, citing their source, to media outlets that initiated a request to receive the press release. The data may also be used on the Faculty's social media channels or website, or in publications distributed by the Faculty.

Taking crowd images	
Aim of data processing	To capture the Faculty's graduation ceremonies. The video recordings and photographs are taken by the Multimedia and E-learning Technical Center of the University of Debrecen.
Processed set of data	The crowd images (photos and video recordings) captured at the event
Legal basis of the data processing	Legitimate interest [Article 6(1)(f) GDPR]
Period of data processing	The duration as specified by the hired photographer. (The information given by the photographer shall be stated exactly.) The University of Debrecen processes the data until the archiving of the recordings.
Scope of people having access	The recordings may be accessed by the Data Controller's staff members tasked with data processing, as well as by the students who receive their degrees.
Data Processor	none

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Publication of crowd images on websites and social media channels	
Aim of data processing	To publish photographs and video recordings captured at the Faculty's graduation ceremonies on the Faculty's website and social media channels, for the purpose of providing authentic information about the event
Processed set of data	The crowd images (photos and video recordings) captured at the event
Legal basis of the data processing	Legitimate interest [Article 6(1)(f) GDPR]
Period of data processing	From the publication of the recordings until their archiving.
Scope of people having access	The recordings may be accessed by the Data Controller's staff members tasked with data processing.
Data transfer	Data are transferred to the Ildikó M. Tóth Press Center, which forwards the data, citing their source, to media outlets that initiated a request to receive the press release.

Use of crowd images in PR materials	
Aim of data processing	To use crowd images taken at events of the faculties of the University of Debrecen for PR purposes (on the university's website or on social media channels)
Processed set of data	crowd images (photos and video recordings) captured at the event
Legal basis of the data processing	legitimate interest [Article 6(1)(f) GDPR]
Period of data processing	From the use of the recordings until their archiving.
Scope of people having access	The recordings may be accessed by the Data Controller's staff members tasked with data processing.
Data transfer	Data are transferred to the Ildikó M. Tóth Press Center, which forwards the data, citing their source, to media outlets that initiated a request to receive the press release. The data may also be used on the Faculty's social media channels or website, or in publications distributed by the Faculty.

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Data security measures

The Data Controller undertakes to ensure the security of the data and to implement the technical measures necessary to protect the collected, stored, or processed data, and shall take all possible steps to prevent their destruction, unauthorized use, or unauthorized alteration. The Data Controller also undertakes to require any third party to whom it may forward or transfer the data to likewise fulfill the obligations in this regard. The data are stored in electronic form, on password-protected official computers of the persons authorized to access them.

Rights of data subjects and rules regarding the exercise of rights

Right to information

In accordance with Article 15(1) GDPR, the data subject may request information regarding the personal data processed by the Data Controller.

Right to request a copy of the personal data

In view of Article 15(3)-(4) GDPR, the data subject may request a copy of the personal data processed by the Data Controller.

Right to rectification

In view of Article 16 GDPR, at the data subject's request, we modify or rectify his or her personal data.

Right to restriction of processing

The data subject may request restriction of data processing in the following cases:
- if he or she contests the accuracy of his or her personal data, then we restrict data processing while the Data Controller verifies the accuracy of the personal data;
- if the data processing is unlawful and the data subject opposes the erasure of the personal data and requests restriction of their use instead;
- if the Data Controller no longer needs the personal data, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- if the data subject has objected to processing, then the data processing is restricted pending verification of legitimate grounds of the request.

Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, to processing of his or personal data which is based on point (e) or (f) of Article 6(1). In this case, the Data Controller shall no longer process the personal data unless the Data 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.

Right to erasure

In cases specified in Article 17 GDPR, the data subject may request erasure of his or her personal data.

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Options for enforcing your rights

If the data subject finds that data processing by the Data Controller violates the law, then he or she may initiate a procedure with the National Authority for Data Protection and Freedom of Information (Postal address: H-1363 Budapest, P.O. Box: 9., email address: ugyfelszolgalat@naih.hu) or bring the matter before a court.

At Debrecen, on 16 November 2026.

Prof. Dr. Norbert Németh

Dean