



DATA MANAGEMENT INFORMATION

Information for students on data management at the University of Debrecen Faculty of Dentistry

Name and contact details of Data Controller

Data controller	University of Debrecen
Head office	4032 Debrecen, Egyetem tér 1.
E-mail address	info@unideb.hu
Phone number:	0036-52/512-900
Data Controller:	adatvedelmi.tisztviselo@unideb.hu

The Data Controller is the Faculty of Dentistry of the University of Debrecen, as a department of the University, which is responsible for data management and provides information.

The **Faculty of Dentistry of the University of Debrecen as 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 Policy provides information on the processing of personal data by the Data Controller in the course of providing its services: the sources and scope of the data processed, 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 Data Controller's data protection processes.

The **Faculty of Dentistry of the University of Debrecen as 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 Data Controller

Data controller	University of Debrecen Faculty of Dentistry
Place of data management	University of Debrecen Faculty of Dentistry
Representative of Data Controller	Dr. Kinga Ágnes Bágyi, Dean
Head office	4032 Debrecen, Nagyerdei krt. 98.
E-mail address	fokdh@dental.unideb.hu
Phone number:	0036 (52) 411 717/56732, (52) 255-308

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

Data management by the Data Controller

<i>Data processing in connection with enrolment at the University</i>	
Purpose of data management:	Establishment of student status
Managed data:	Applicant's name and surname, sex, maiden name and surname, mother's name, place and date of birth, nationality, citizenship, 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, details of the school leaving examination, details of the secondary school/high school, details of the college/university, details of the institution issuing the language examination, in the case of non-Hungarian citizens, the title of residence in Hungary and the document entitling them to reside in Hungary - in the case of persons with the right of free movement and residence under a special law, the name and number of the document certifying the right of residence
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years
Competent persons:	The staff of the Academic Department of the Dean's Office of the Faculty, whose duties are specified in the job description of the person exercising the authority, the staff of the Student Administration Centre.

<i>Data processing related to the student's enrolment</i>	
Purpose of data management:	The student can enroll in the Neptun system at the announced time for the courses and subjects he/she wishes to study for the given semester.
Managed data:	Neptun code, study data stored in Neptun
Legal base of data management:	GDPR Article 6(1)(e): 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;



Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years.
Competent persons:	The staff of the Academic Department of the Dean's Office of the Faculty, whose duties are specified in the job description of the person exercising the authority.

<i>Student presence in class</i>	
Purpose of data management:	Keeping a record of the student's attendance in class.
Managed data:	Name, signature, major, year, Neptun code
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years.
Competent persons:	Staff members of the Faculty performing teaching duties

<i>Data management on midterm exams</i>	
Purpose of data management:	Storage of paper-based exams pending inspection
Managed data:	Neptun code, name, major, the content, and evaluation of exam
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	According to the Study and Examination Regulations of the University of Debrecen, for one year from the end of the examination period
Competent persons:	Staff members of the Faculty performing teaching duties

<i>Data processing on examination applications</i>	
Purpose of data management:	Students must register for the announced examination dates for the subjects they have taken via Neptun during the specified period
Managed data:	Name, Neptun code, the subject and date of the examination taken, medical certificate details, if required, financial data
Legal base of data management:	GDPR Article 6(1)(e): 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;



Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years.
Competent persons:	The responsible faculty members, institute administrators, Academic Department staff

Data processing on proof of absence from an exam

Purpose of data management:	verification of absence from an examination, recording of data in Neptun
Managed data:	Name, Neptun code, the subject and date of the examination taken, details and date of medical certificate
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	According to the Archives Regulations of UD
Competent persons:	lecturer, departmental administrator, staff of the academic department

Data management on recording of results

Purpose of data management:	Student's academic assessment of mid-term or performance during the semester or examination period.
Managed data:	Name, Neptun code, result
Legal base of data management:	GDPR Article 6(1)(e): 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;
Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years.
Competent persons:	The responsible faculty members, institute administrators, Academic Department staff

Data processing on reclassification



Purpose of data management:	After prior warning, reclassification of a subsidized student who exceeds the state-subsidized time limit or the allowed subsidy period for a given course or does not fulfil the required study conditions to self-financed, and reclassification of a self-financed student to a free place on request
Managed data	Neptun code, name, date and place of birth, mother's name, education details, grade average, financial data
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	The University shall store the data in accordance with Annex 3, Section 1/B (3) of the Nftv.
Competent persons:	lecturer, departmental administrator, staff of the academic department

Data management on student applications

Purpose of data management:	Fulfillment of the student's request, assessment, decision-making
Managed data:	Name, Neptun code, details of the forms used by the Faculty and published on its website, data content of the certificates and the request submitted
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years
Competent persons:	Staff members of the Faculty's Academic Department, Deputy Dean of Education, Dean, members of the relevant faculty committee

Data processing on the closure of the semester

Purpose of data management:	Calculation of student averages, end of semester in Neptun
Managed data:	Neptun code, semester study data
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	The University shall store the data in accordance with Annex 3, Section 1/B (3) of the Nftv.



Competent persons:	Staff of the Faculty's Academic Department
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<i>Data processing on student transfers</i>	
Purpose of data management:	Establishing a student status at another institution
Managed data:	Student's name, degree course, email address, telephone number, postal address, Neptun code, documents proving studies (certificate of enrolment, course book, subject list)
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years.
Competent persons:	Academic administrators of the transferring and receiving faculty
Transfer of data:	Universities between each other

<i>Data management on study-based institutional student allowances</i>	
Purpose of data management:	Scholarship payment
Managed data:	Name, Neptun code, place and date of birth, mother's name, average, address, tax identification number, bank account number
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years.
Competent persons:	Staff of the Faculty's Academic Department and the Student Administration Centre

<i>Data processing on non-institutional student applications</i>	
Purpose of data management:	Forwarding of student applications to the advertiser
Managed data:	Content of the application form completed by the student
Legal base of data management:	GDPR Article 6(1)(e): 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;
Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years.



Competent persons:	Staff of the Faculty's Academic Department and the Student Administration Centre
Data sharing:	To the advertiser

<i>Issue certificates at the student's request</i>	
Purpose of data management:	Provision of study certificates to the student
Managed data:	Neptun code, personal data on the certificate, study-related data
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years.
Competent persons:	Staff of the Faculty's Academic Department

<i>Issuing certificates at the request of a parent liable for maintenance</i>	
Purpose of data management:	providing information on the existence or termination of student status to a parent who is liable for maintenance
Managed data:	the name of the child, the fact of the continuation or termination of studies, the name, e-mail address and address of the applicant
Legal base of data management:	fulfilment of a legal obligation pursuant to Article 6(1)(c) of the GDPR Civil Code 4:222 [Obligation to inform about the continuation of studies] The institution providing for the education and studies of a child in further education shall, upon request, inform the parent liable to pay maintenance of the continuation or termination of the studies.
Duration of data management:	The University shall store the data in accordance with Annex 3, Section 1/B (3) data for 80 years.
Competent persons:	Staff of the Faculty's Academic Department



<i>Data processing on participation in internships</i>	
Purpose of data management:	Record of student's internship
Managed data:	Student's name, date and place of birth, country and city of birth, mother's name, nationality, tax identification number, Neptun code, course of study, year, bank account number, address, residence address, telephone number, email address, social security number, course of study, year, name and position of the designated instructor in the organization where the student completed his/her internship,
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	The University shall store the data in accordance with Annex 3, Section 1/B (3) data for 80 years.
Competent persons:	Staff of the Faculty's Academic Department
Transfer of data:	To the organization providing the internship

<i>Data processing on the completion of studies and the award of diplomas</i>	
Purpose of data management:	Issue of a final certificate and a certificate of completion of training and or legal status, as well as the issue of a final certificate upon completion of all the study requirements for the training.
Managed data:	Name, birth name, place and date of birth, mother's name, address, Neptun code, study data stored in Neptun
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years.
Competent persons:	Staff of the Faculty's Academic Department



<i>Data processing on the management of the final exam</i>	
Purpose of data management:	Recruitment of final examination board members, organization of final examinations, recording of the student's final examination results.
Managed data:	Names of committee members Student's name, Neptun code, final examination details
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	The University shall store the data in accordance with Annex 3, Section 1/B (3) data for 80 years.
Competent persons:	Staff of the Faculty of Studies, members of the internal/external final examination board appointed by the Dean

<i>Data management on the management of the thesis</i>	
Purpose of data management:	Verification of the student's thesis
Managed data:	Name, Neptun code, subject, section, name of consultant, title of thesis
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years.
Competent persons:	Academic Department, Departments, administrators of the competent institute



Data processing on the issue of a certificate

Purpose of data management:	Issue of the diploma and diploma supplement following successful completion of the requirements
Managed data:	Name, birth name, place and date of birth, level of education, degree and specialization, professional qualification, classification of degree
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years.
Competent persons:	Staff of the Faculty's Academic Department, the Student Administration Centre, and the Rector's Office

Data management related to the organization of the graduation ceremony

Purpose of data management:	Registration of graduates who have indicated their intention to attend the graduation ceremony, the organization of the graduation ceremony and the award of the diplomas, preparation of graduation invitations
Managed data:	Name, Neptun code, major, signature, phone number, gown size, personal data in the diploma and diploma supplement
Legal base of data management:	Article 6(1)(e) GDPR: 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
Duration of data management:	Until the end of graduation ceremony
Competent persons:	Staff of the Faculty's Academic Department, Dean's Office, departments and institutes, University of Debrecen Event Coordination and Alumni Centre, Rector's Office, the Student Administration Centre, and the staff members commissioned with organizing the graduation ceremony
Transfer of data:	To an external printing company as data processor

Data processing on the compilation of a list of graduates

Purpose of data management:	the compilation of a list of graduates for the purpose of the preparation of the university yearbook
Managed data:	Name, major, faculty, level, year



Legal base of data management:	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, in particular where the data subject is a child.
Duration of data management:	in accordance with the Data Protection Policy
Competent persons:	Staff of the Faculty's Dean's Office and Academic Department, University of Debrecen Event Coordination and Alumni Centre

Mass recording (video and audio), publication

Purpose of data management:	Documentation of events, university competitions and photographic reporting on the university's website, university platform, internet platform, social networking site, for other media with the permission of the University of Debrecen Press Office
Managed data:	Photo and audio recordings of the event where the person concerned is recognizable
Legal base of data management:	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, in particular where the data subject is a child.
Duration of data management:	Until archiving.
Competent persons:	Staff member of the Faculty commissioned with press-related tasks
Place of publication:	University website, university newspaper, university yearbook

Images on the photo board

Purpose of data management:	Displaying graduates on the photo board
Managed data:	Picture of the person, name, faculty, university
Legal base of data management:	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;
Duration of data management:	Until consent is withdrawn but no later than the publication of the photo board
Competent persons:	Staff member of the Faculty commissioned with related task
Place of publication:	University website, university newspaper, university yearbook



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

Purpose of data management:	Teaching the student remotely on the University of Debrecen's own e-learning system
Managed data:	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 base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	The data will be deleted upon termination of the student's status.
Competent persons:	Teachers, the competent staff of the University of Debrecen Multimedia and E-learning Technical Centre operating the system

Data processing on the organization of events and conferences

Purpose of data management:	Organization and implementation of events
Managed data:	As detailed in the event's own privacy policy: name, email address, other data. (Due to the nature of the activity, unforeseeable data may also be processed. Other data: additional data necessary for the identification of the data subject or additional data necessary for the organization of the event)
Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	By the end of the event or conference
Competent persons:	Staff members commissioned with the organization of events and conferences
Transfer of data:	to any other organization that may be involved in the organization of the event, in accordance with the event's own information notice.

Other data processing activities (preferential study and examination timetable, credit recognition, tuition fee reduction request)

Purpose of data management:	Use of discounts
Managed data:	name, Neptun code, contact details, major, faculty, medical certificate data, financial certificate data, study data, data of certificates entitling to the discount



Legal base of data management:	Article 6(1)(e) GDPR: 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;
Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years.
Competent persons:	Staff of the Faculty's Academic Department, members of competent committees

<i>Talent management data processing</i>	
Purpose of data management:	The institution of higher education is responsible for identifying and identifying students with outstanding abilities and attitudes, as well as disadvantaged and severely disadvantaged students, who are capable of performing above the curricular requirements, 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, as well as mentoring programs: in this context, it may operate academic student circles, vocational colleges or Roma vocational colleges. The higher education institution offers a mentoring program to help students develop their talents.
Managed data:	name, academic record, Neptun code
Legal base of data management:	GDPR Article 6(1)(e): 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
Duration of data management:	The University shall store the data in accordance with Annex 3, Section 1/B (3) of the Nftv.
Competent persons:	The staff of the Faculty entrusted with the performance of the tasks.

<i>Data processing on the granting of faculty awards, honors and prizes</i>	
Purpose of data management:	Awarding of recognitions, honors and prizes
Managed data:	name, email address, faculty, major, year
Legal base of data management:	GDPR Article 6(1)(e): 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
Duration of data management:	in accordance with the Data Protection Policy
Competent persons:	Staff of the Dean's Office, members of the competent committees



<i>Data management for students with disabilities</i>	
Purpose of data management:	providing benefits, assistance, referral to the University of Debrecen Mental Health and Equal Opportunities Centre (DEMEK)
Managed data:	Name, Neptun code, personal data on the documents certifying the fact of disability
Legal base of data management:	GDPR Article 6(1)(e): 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
Duration of data management:	According to Annex 3, Section 1/B (3) of the Nftv., the University shall store the data for 80 years.
Competent persons:	The staff of the Faculty entrusted with the performance of the tasks. Referral to the University of Debrecen Mental Health and Equal Opportunities Centre (DEMEK)

<i>Data processing in relation to the listing of graduates in the Fogorvosi Szemle /Dentist Scientific Journal/</i>	
Purpose of data management:	Listing of graduates in the <i>Fogorvosi Szemle</i>
Managed data:	Name, faculty, major
Legal base of data management:	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
Duration of data management:	Until consent is withdrawn but no later than the publication of the journal. The withdrawal of consent does not affect the lawfulness of the processing that preceded it.
Competent persons:	The staff of the Faculty entrusted with the performance of the tasks
Transfer of data:	To the <i>Fogorvosi Szemle /Dentist Scientific Journal/</i>

<i>Data processing in connection with the publication of students' photographs and lists in the Contact magazine, the Faculty Yearbook and the Anniversary Yearbook</i>	
Purpose of data management:	Documentation of students' university-related activities and photographic reporting of these activities
Managed data:	Photograph, name, faculty, degree course, qualification



Legal base of data management:	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, in particular where the data subject is a child.
Duration of data management:	In the case of publication in the journal or yearbook concerned, to keep the journal or yearbook as a university document.
Competent persons:	The staff of the Faculty entrusted with the performance of the tasks.

Data management on keeping records of student locker keys

Purpose of data management:	The use of lockers is essential for compulsory practical training within the faculty. The use of lockers is provided by the faculty. The purpose of the data management is to identify the student, control the use of the lockers and keep records.
Managed data:	Name, Neptun code, year, signature
Legal base of data management:	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, as referred to in Article 6(1)(e) of the GDPR.
Duration of data management:	Until the end of the academic year in question.
Competent persons:	Staff of the Faculty's Academic Department

Data processing on the use of the contact form

Purpose of data management:	By using the form on the Faculty's website, visitors to the site can contact the Faculty directly.
Managed data:	Name, e-mail address, telephone number, message content
Legal base of data management:	Article 6(1)(a) GDPR: 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;
Duration of data management:	Pending the execution of the request
Competent persons:	The staff of the Faculty entrusted with the performance of the tasks.

Data Processor

Student data is recorded in the Neptun Study System. The University will engage SDA Informatikai Zrt. as a data processor to support the operation and maintenance of the Neptun system.

Management Information is available on the Neptun login interface under downloadable documents.



Transfer of data

Student's personal data may be transferred in accordance with Annex 3, Section I/B. (4) of the Nftv.:

- a) to the maintenance provider, all data for the performance of tasks related to the management of the maintenance provider;
- b) to the court, the police, the public prosecutor's office, the bailiff, the public administration body, data necessary for the decision of a specific case;
- c) all data necessary for the National Security Service to perform the tasks specified in the Nbtv;
- d) all data to the body responsible for the operation of the higher education information system;
- e)
- f) to the body responsible for the registration of the conditions for the Hungarian state scholarship concerning the training and the student status.

Data security measures

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

The Data Controller shall, among the measures necessary to maintain data security, process the Data Subjects' data in a computer database, in an automated and manual manner, and has taken measures to ensure that the processing of the Data Subjects' data is carried out in a closed and in any case password-protected system, and that these systems are used only in connection with the provision of the service and only to the extent strictly necessary for the provision of the service by those who have access to the data.

Computer systems are equipped with firewalls and appropriate virus protection.

The Data Controller shall carry out a technical audit of the system and take action in the event of detection or indication of a fault.

The Data Controller shall ensure that those employees who have access to the data are fully trained 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.

During the visit of the website, the Data Controller records technical information (for example IP-address and network identifiers) automatically transmitted by the user's device solely for the purposes of measuring traffic and detecting security incidents, and does not link this data with any other information that would allow the identification of the visitor.

Rights of data subjects 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 provided (e-mail address, postal address):

- what personal data we process about you;
- the purposes for which the data are processed;
- to whom we transfer the personal data;
- the duration of the processing and the criteria for determining that duration;
- your rights in relation to the processing;
- your 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) to (4) of the GDPR, the data subject may request a copy of the personal data processed by the Controller. In this case, the personal data processed about the data subject shall be transmitted 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 the personal data at the data subject's request.

Right to erasure

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

Right to restriction

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

- If the accuracy of the personal data is contested, we will restrict processing until the Controller verifies the accuracy of the personal data;
- 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
- where the data subject exercises his or her right to object, we restrict the processing for the time necessary to assess the lawfulness of his or her request.

In the case of a request for restriction of processing, you must also indicate the grounds for the restriction. The Controller will comply with your 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 has the right to object to processing based on Article 6(1)(e) and (f) of the GDPR. In this case, the Controller will 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 Data Controller shall comply with the data subject's request within a maximum period of one month, which may be extended by up to 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 your 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 ascertain that the request originates from the person entitled.

Enforcement possibilities

If the data subject considers that the processing by the 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

The Data Controller shall provide specific information on data processing not listed in this Privacy Notice at the time of data collection.

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

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

Debrecen, 14 April 2026