

PRIVACY POLICY

April 5th, 2019

1. Preamble

The purpose of this Privacy Policy is to inform you about the data management operations of the **Budapest Metropolitan University** (Seat: 1148 Budapest, Nagy Lajos király útja 1-9., Institutional identification: FI33842) (hereinafter Data Controller) in connection with the educational core activities according to

- the 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)
- the applicable Hungarian legislation.

2. Data Controller

The Budapest Metropolitan University is considered to be a Data Controller (hereinafter referred to as "Data Controller") regarding the data management of this Privacy Policy. Contact information: phone: + 361-273-2987, e-mail: metujog.kapu@metropolitan.hu.

In the data management process of the Data Controller, they comply with the regulations in force and fully respect the protection of the fundamental rights and privacy of individuals with special attention to the provisions of the General Data Protection Regulation.

If you have any questions or comments, please contact us at metujog.kapu@metropolitan.hu.

3. Participation in programmes within the scope of the Act No. CCIV of 2011 on National Higher Education

3.1. Purposes of data processing

The purpose of the data processing is organizing, conducting the education offered by the Data Controller, recruiting students, maintaining contacts, and administering daily administration matters related to education, within the scope of the Act No. CCIV of 2011 on National Higher Education (Act on Higher Education). The educational core activities of higher education institutions shall include the provision of tertiary vocational programmes, bachelor programmes, master programmes, doctoral programmes and postgraduate specialization programmes.

According to Article 18 of the Act on Higher Education:

Higher education institutions shall record personal and sensitive data that are absolutely necessary for

- a) the sound operation of the higher education institution,
- b) the exercise of rights and fulfilment of obligations by applicants and students,
- c) the organization of education and research activities,
- d) the exercise of the employer's rights, the exercise of rights and fulfilment of obligations by

- lecturers, professors, research fellows and other workers,
- e) the maintenance of the records specified by law,
 - f) the determination, assessment and certification of eligibility for the benefits granted pursuant to law and the higher education institution's rules for organization and operation,
 - g) the operation of a graduate tracking system in relation to the programmes referred to Article 15 and 16.

3.2. The range of data processed

The Data Controller processes the data listed below:

- a) the range of data determined by the Act on Higher Education, contained by the annex of this Privacy Policy. The management of the data, being necessary for the assessment of eligibility for special treatment as a disabled student is also determined by the Act on Higher Education.
- b) the necessary data for the conclusion and performance of the student contract:
 - data in the data processing specified by the Student Requirement System, Ethical Code, IT Security Regulations, Organizational and Operational Order especially, but not exclusively are the following:
 - username necessary for the use of the Neptun, CooSpace systems (e.g. Neptun-code), first login password, data generated during the use of the systems
 - student requests, claims made by the student in the course of reviewing appeals, or otherwise generated by the student
 - data submitted by, or otherwise generated in connection with the student during the course of an ethical procedure
 - data occurred during library usage
 - data regarding students' union membership
 - data concerning accommodation services
 - data contained by the student status certificate requested or approved by the student
 - bank account number
 - institutional scholarship information

3.3. Data subjects

The Data Controller manages the data of individuals applying for and studying in higher education programmes provided by the Data Controller.

3.4. Legal basis of data processing

The data processing described in point a) of section 3.2. of this Privacy Policy of the Data Controller is necessary for the compliance with the provisions of the Act on Higher Education while the data processing according to point b) of section 3.2. is for the fulfilment of existing or future student contracts.

3.5. Sources of data

The data is either submitted by the student during the application, in the student contract, or otherwise, or are present in the Data Controller's electronic database. If the data is not provided by the student concerned, they will not be able to complete the studies.

3.6. Access to data, storage

The Data Controller shall pay particular attention to the fact that the data of the applicants and students are only accessible by its personnel for organizing, undertaking and controlling of the education, fulfilling the study and payment obligations, handling and evaluation of student matters, providing mandatory data and dealing with professional internships. In particular, to the data in connection with the studies can be accessed by the associate or tutor of the faculty concerned by the studies. Data in connection with students' administration are processed by the Student Information Centre. Data stored in Neptun and Coospace systems is accessible by the Directorate of Information Technology.

For the primary storage of personal data the Data Controller uses the Neptun system, the uniformly used system in the higher education, which is operated by SDA Informatika Zrt. (Seat: 2030 Érd, Retyezáti utca 46.) as Data Processor. SDA Informatia Zrt.'s conduct as Data Processor is regulated by the data processing contract with the Data Controller.

Besides the previously mentioned, the Data Controller is storing data depending on the nature of the matter or the data concerned on other electronic databases. The platform for communication and data storage Coospace used in the education is operated by DEXTER Informatikai és Tanácsadó Korlátolt Felelősségű Társaság (7622 Pécs, Vargha Damján utca 4. földszint 1.) as Data Processor.

Paper-based data is stored on the location of the education in a safe environment only accessible by authorized personnel.

3.7. Duration of data processing

The Data Controller is processing your personal data described in point a) of section 3.2. of the Privacy Policy 80 years after the cessation of the student status. The data described in point b) of section 3.2. is processed until the end of the 5th year after the cessation of the student status. Data necessary for tax obligations is stored for the maximum of 8 years.

3.8. Data forwarding

The Data Controller forwards the data of the students only to the Data Controller specified by

- the Act No. CCIV of 2011 on Higher Education, the annex of the present Privacy Policy,
- in case of foreign students, the Statute No. 114/2007. (V.24.) on the implementation of the Act No. II of 2007 on the conditions of entry and residence of third-country nationals.

4. Call Center

4.1. Purposes of data processing

The Data Controller assures their availability of the call center by the central phone number. Through the Call Center the students are able to initiate and arrange matters regarding to training, education, the quick and effective solution of the problems.

4.2. The range of data processed

In the process of the operation of the Call Center the personal data of the calling person (i.e. name, date of birth, phone number, and EHA/Neptun code), email address, date, duration and subject of the call, comments and audio file will be recorded.

4.3. Data subjects

The students of higher educational institution, their representatives, and other persons interested.

4.4. Legal basis of data processing

The data processing of the Data Controller is based on the agreement of the person making the call.

4.5. Sources of data

The data in the database that is securing the operation of the Call Center are originated from the person themselves or recorded from the phone call.

4.6. Access to data, storage

The processed data are accessible to the entitled colleagues of the Student Information Center and the Admission Office of the Data Controller. The storage of data, and the operation of the Call Center is supported by Geomant-Algotech Zrt. (office: 1013 Budapest, Krisztina tér 2.)

4.7. Duration of data processing

Data and audio files recorded in the database of the Call Center will be stored for 3 years, after which the Data Controller deletes all of the data.

5. Application for Career Scholarship

5.1. Purposes of Data Processing

Within the scope of the Application for Career Scholarship the Data Controller provides an opportunity for students who have won the application to consciously prepare for their chosen profession and help to integrate the internship into their career plans. The Application for Career Scholarship is announced in a separate section for the students of the Faculty of Business, Communication and Tourism; and art students.

5.2. The range of data processed

The documents submitted by the applicant student are necessary to verify compliance with the application conditions, especially - in addition to the basic student data – the career plan, application presentation, jury opinion, and qualification.

5.3. Data subjects

Four participating student with an active status.

5.4. Legal basis of data processing

When applying for the scholarship, the applicant gives consent to the Data Controller to handle the data necessary for the evaluation of the application. If your consent is not given or withdrawn, the application cannot be considered by the Data Controller in the evaluation process.

5.5. Sources of data

The specific data required to evaluate the application is provided by the applicant student, and the Data Controller does not regulate the categories of individual data.

5.6. Access to data, storage

The Data Controller stores the data submitted for the evaluation of the applications in its own electronic systems to which only members of the jury - who are invited to evaluate the entries – , and members of the Career Center have access.

5.7. Duration of data processing

The Data Controller handles the data submitted for the application until the end of the fourth semester after the date of submission.

6. Events organized by the Data Controller

The Data Controller organizes events supplementary to educational activity supporting the students' professional orientation (Shadow Program, Plus events, RapidRandi) and for entertainment (film club).

6.1. Purposes of Data Processing

During the Shadow program, the purpose of data management is to organize a one-day visitation program for students to get acquainted with the operation of an employer. During the film club and other events, data management is used to organize the event, and for the registration of the participants, as well as to request feedback on interest and satisfaction.

6.2. The range of data processed

Shadow program: name, e-mail address, Neptun-code, telephone number, employment status, application form, application form, photo made during the visit, employer evaluation, student report.

Plus events, Film Club, RapidRandi: name, email address, date, photo taken at the event.

6.3. Data subjects

Students attending the Shadow program, other events, or the Film Club.

6.4. Legal basis of data processing

In the case of the Shadow program the consent of the data subject, in case of the Film Club and other events the Data Controller's a legitimate interest. In the case of the Film Club and other events, the Data Controller manages the data in order to inform the candidates as accurately as possible about the details of the film club. The use of the data does not go beyond the framework necessary for the purpose of conducting the film club.

6.5. Sources of data

Data provided by the student upon application.

6.6. Access to data, storage

Data submitted upon application to the Shadow program is stored in the Data Controller's own electronic systems and, apart from the Career Center staff, only the relevant employer company has access to the name and motivation letter data.

The company BeMind Kft. (8200, Veszprém, Damjanich utca 7 / A, Cj: 19-09-512458) participates in the operation of forms present on the website www.metropolitan.hu in a separate contract as a Data Processor. The data provided through the form appearing on the website will also be stored in a repository provided by the Data Processor.

6.7. Duration of data processing

The Data Controller stores the data necessary for the execution of the Shadow program for one year from the closing of the application, while the data on participation in the film club will be deleted at the end of the film club.

7. Personal Career Consultation

7.1. Purposes of Data Processing

Experts working with the Data Controller provide counseling services that grant advice on job search, career planning, and other placements in the world of work.

7.2. The range of data processed

Data provided at registration: name, e-mail address, Neptun-code, full time / part-time, where did you inform, nature of interest, CV; related correspondence; expert comment, date of counseling.

7.3. Data subjects

Students and former students applied for counseling services.

7.4. Legal basis of data processing

When applying for counseling, the student gives his consent to the management of the data required for counseling. If your consent is not given or withdrawn, the data controller cannot provide the counseling service.

7.5. Sources of data

The data needed to provide counseling is provided by the interested student.

7.6. Access to data, storage

The Data Controller stores the data submitted for evaluation in its own electronic systems and has no personnel has access beyond the Career Center staff. The company BeMind Kft. (8200, Veszprém, Damjanich utca 7 / A, Cj: 19-09-512458) participates in the operation of forms present on the website www.metropolitan.hu in a separate contract as a Data Processor. The data provided through the form appearing on the website will also be stored in a repository provided by the Data Processor.

7.7. Duration of data processing

The Data Controller stores the data provided during the application and occurred during the consultation until the end of the current semester at the time of the consultation.

8. Confidentiality and security of data

The Data Controller processes personal data confidentially, and takes all complementary IT measures required to a safe data processing.

The Data Controller and the Data Processor shall take appropriate technical and organizational measures – taking into account the state of science and technology and the costs of implementation, the nature, scope, circumstances and objectives of data management and the risk of varying probability and severity of natural persons' rights and freedoms – to guarantee a level of security that is appropriate to the degree of risk.

The Data Controller selects and manages the IT tools used to manage personal data in the provision of the service so that the data processed

- can only be accessed to the authorized person,
- are protected against unauthorized access through server-level and application-level security procedures,
- can be verified to be unaltered, and the verification of the changes is ensured,
- is available throughout the data processing period.

9. Your rights

Please note that according to the law in force you can enforce your rights at metujog.kapu@metropolitan.hu by e-mail - under the statutory terms -:

- a) You may request access to Your personal information, and to their copies; (Article 15)

- b) You may request information about the main parameters of data processing (purpose, scope of data processed, involved data processors, duration of data management); (Article 15)
- c) You have the right to withdraw your consent at any time; (Article 7 (3))
- d) You may request the deletion of your personal information without undue delay; (Article 17)
- e) You may request a restriction of processing of your data; (Article 18)
- f) You shall have the right to receive the personal data concerning You, which You have provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller; (Article 20)
- g) shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of Your habitual residence, place of work or place of the alleged infringement; (Article 77)

In Hungary the supervisory authority is the National Data Protection and Information Authority. (Budapest, 1125, Szilágyi Erzsébet fasor 22 / c.)

In the event of a violation of rights, You may also initiate litigation against the data controller or the data processor before the court of the Member State where the data controller or the data processor is located and before the court of Your habitual residence.

10. Contacts

Please contact us at metujog.kapu@metropolitan.hu for information and privacy inquiries.

Data Controller appointed a Data Protection Officer on May 25, 2018. Contact of Data Protection Officer: adatvetelmitisztviselo@metropolitan.hu.

Upon request, we will respond to you within 30 days of your request.

The current version of our Privacy Policy is available at www.metropolitan.hu.

Annex

The registered and handled personal and special data according to the 3rd Annex I. I/B. of the Act No. CCIV of 2011 on National Higher Education:

The data recorded pursuant to this Act are the following:

a) data pertaining to admission:

aa) the applicant's name, gender, name at birth, mother's name, place and date of birth, nationality, place of residence, place of stay, address for service, telephone number and, in the case of non-Hungarian nationals, the purpose of stay in the territory of Hungary and the name and number of the document entitling to stay or, in the case of persons having the right of free movement and residence pursuant to a specific law, the document certifying the right of residence,

ab) data on the secondary school leaving examination,

ac) secondary school data,

ad) data necessary for the assessment of the application for admission,

ae) the data of the admission procedure, the application identification number,

af) the identification number of the declaration made under Article 48/D(2);

b) data pertaining to student status:

ba) the student's name, gender, name at birth, mother's name, place and date of birth, nationality, place of residence, place of stay, address for service, telephone number, email address and, in the case of non-Hungarian nationals, the purpose of stay in the territory of Hungary and the name and number of the document entitling to stay or, in the case of persons having the right of free movement and residence pursuant to a specific law, the document certifying the right of residence,

bb) type of student (guest student) status, when and how student status was acquired and terminated, name of programme pursued, any state funding received for the programme, mode of study, expected date of completion, assessment of student performance, data on examinations, semesters commenced, period of funding used, periods of suspension of student status,

bc) places and dates of courses taken at other higher education institutions abroad,

bd) credits collected and recognized in the course of the programme, validated studies,

be) data on student allowances, data necessary for the assessment of eligibility (social situation, data on parents, data on maintenance),

bf) data on student employment,

bg) data on disciplinary and damages cases involving the student,

- bh)* data necessary for the assessment of eligibility for special treatment as a disabled student,
- bi)* data on accidents involving the student,
- bj)* serial number of student identity card, identification number of master data sheet,
- bk)* student identification number, social security number,
- bl)* data on the completion of the practice period, the final certificate, the final examination (doctoral defense), the language examination, and the diploma and diploma supplement,
- bm)* data necessary for the exercise of rights and fulfilment of obligations arising from student status;
- c)* graduate tracking data;
- d)* tax identification number;
- e)* data serving to identify the documents supporting the data;
- f)* data on fees and costs paid by the student, and any payment in instalments, deferment or exemption related to payment obligations;
- g)* if the student receives student assistance, childcare assistance, childcare benefit, regular child protection allowance or housing assistance, data on these;
- h)* in the case of scholarships established by the Government by way of a decree pursuant to Article 85(1) and (2), data on the scholarship provided in support of the studies pursued by the student and disbursed on the basis of student status;
- i)* data on student competence assessments and the results thereof.

Conditions for transferring data:

Data may be transferred as follows:

- a)* all data may be transferred to the maintainer, for the purpose of the performance of tasks related to maintainer control;
- b)* the data necessary for taking a decision on a specific matter may be transferred to the court, the police, the public prosecutor's office, the bailiff or the public administration body concerned;
- c)* all data necessary for the performance of tasks defined in the Act on National Security may be transferred to the national security services;
- d)* all data may be transferred to the body responsible for the operation of the higher education information system;
- e)* the following data of persons borrowing a student loan may be transferred to the Student Loan Centre:
 - ea)* the data listed in subpoints *ba)* and *bb)* of point 1(*b*), with the exception of the purpose of stay in the territory of Hungary and the name and number of the document entitling to stay or the document certifying the right of residence in the case of non-Hungarian nationals, and with

the exception of the data on the assessment of student performance, examinations and the period of funding used,

eb) of the data listed in point 1 (*f*), the actual amount of self-funded costs payable to the higher education institution by the student, for the purpose of the examination of eligibility for a student loan, or the cessation thereof, and the establishment of the existence or suspension of repayment obligations,

ec) the data listed in subpoints *ba)* and *bk)* of point 1 (*b*), with the exception of the social security number, for the purpose of keeping contact with customers and the related administration, in order to enable the exercise of rights and the fulfilment of obligations arising from the loan agreement,

ed) the data listed in subpoints *ba)* and *bb)* of point 1 (*b*), with the exception of the data on the assessment of student performance, examinations and the period of funding used,

ee) of the data listed in subpoint *bl)* of point 1 (*b*), the data on the final certificate and the final examination (doctoral defense), for the purpose of a risk analysis related to the projected repayment of outstanding student loans and for risk-measure-based customer management;

f) data on the programme and on student status may be transferred to the body responsible for keeping records on the fulfilment of conditions for Hungarian state scholarships.

Prof. Dr. Bálint Bachmann DLA

Rector

Budapest Metropolitan University