

## Privacy Policy

### “Let’s have a coffee break” giveaway

#### 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: METU or Data Controller) regarding the data processing operations in connection with promotional game called “Let’s have a coffee break” 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; GDPR)
- the applicable Hungarian legislation.

**This Privacy Policy is to be interpreted together with the General Rules of the Game.**

#### 2. Data Controller

The METU is considered to be a data controller regarding the data management of this Privacy Policy.

Contact information:

address: 1148 Budapest, Nagy Lajos király útja 1-9.

e-mail: [adatvedelmitisztviselo@metropolitan.hu](mailto:adatvedelmitisztviselo@metropolitan.hu)

In the data management processes, the Data Controller complies with the regulations in force and fully respects 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 [adatvedelmitisztviselo@metropolitan.hu](mailto:adatvedelmitisztviselo@metropolitan.hu).

#### 3. The data processing

##### 3.1. The description and purpose of data processing

The purpose of data management is to conduct the promotional game organized by the Data Controller in accordance with the General Rules of the Game, which includes the drawing of prizes, the communication and publication of the results to the winners.

The rules of the prize draw and information about the winners are available on the website <https://metropolitan.hu/treningek>.

##### 3.2. The range of the processed data

The Data Controller handles the following data:

- a) name,
- b) Instagram profile,
- c) the personal data that the data subject shares with the Data Controller in a personal message.

The data contained in point c) is only necessary for the winners, and only the Data Controller's employee responsible for the given task can access it.

##### 3.3. Data subjects

The natural person participating in the promotional game.

##### 3.4. Legal basis of data processing

The data processing is based on the voluntary consent given by the transfer of the data, the data subject gives the consent to data processing by participating in the promotional game, and the winner by voluntarily providing personal data.

We would like to inform you that the collection, management, and storage of data is done exclusively for the purposes of indicated in point 3.1.

##### 3.5. Sources of the data

Data is provided by the data subject.

##### 3.6. Access to data, data processors, storage

The Data Controller shall take special care to ensure that the data are accessible only to authorized employees of the organizational unit responsible for the concerned task.

Data Controller uses its own IT systems for the primary storage of personal 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](http://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.

With regard to the data displayed on Instagram social networking sites, the data management information of Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbor, D2 Dublin, Ireland) is available at the following websites: <https://www.facebook.com/privacy/explanation>, <https://help.instagram.com/519522125107875>.

Prizes are drawn using the <https://www.lukky.app/> interface. Data management information: <https://www.lukky.app/privacy-policy>.

Paper-based data is stored at the Data Controller's seat under secure conditions.

### **3.7. Duration of data processing**

The Data Controller manages the personal data until the 60th day after the end of the promotional game..

### **4. 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.

### **5. Your rights**

Please note that according to the law in force you can enforce your rights at [adatvedelmitisztviselo@metropolitan.hu](mailto:adatvedelmitisztviselo@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, however, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal (Article 7 (3));
- d) you have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you (Article 16);
- e) you may request the deletion of your personal information without undue delay (Article 17);
- f) you may request a restriction of processing of your data (Article 18);
- g) 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);
- h) 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);

### **6. Questions, the right of appeal in court, complaints addressed to the supervisory authority,**

If you have any questions or requests related to data protection, please contact us at the e-mail address [adatvedelmitisztviselo@metropolitan.hu](mailto:adatvedelmitisztviselo@metropolitan.hu)!

If you request information, we will respond to your request within a maximum of 30 days, using the contact information you provided.

In case of illegal data processing experienced by the data subject, he or she may initiate a civil lawsuit against the Data Controller. The trial falls within the jurisdiction of the regional court. The lawsuit - at the option of the person concerned - can also be initiated before the court of the place of residence (you can see the list and contact details of the courts through the following link: <http://birosag.hu/torvenyszekek>).

Without prejudice to other administrative or judicial remedies, any data subject shall have the right to file a complaint to the supervisory authority, in particular in the Member State in which he or she has his or her habitual residence, place of employment or suspected infringement, if the data subject considers that the processing of personal data regarding him or her violates the GDPR.

National Authority for Data Protection and Freedom of Information

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