

PRIVACY POLICY
ON DATA MANAGEMENT RELATED TO THE OPERATION OF THE ALUMNI.METROPOLITAN.HU
WEBSITE

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 or METU) in connection with the operation of the **[https://alumni.metropolitan.hu website](https://alumni.metropolitan.hu)** (hereinafter: alumni.metropolitan.hu website or Portal) 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 an integral part of the Terms of Use of the alumni.metropolitan.hu website.

2. DATA CONTROLLER

Budapest Metropolitan University

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

Institutional identification: FI33842

Email address of the Data Protection Officer: adatvedelmitisztviselo@metu.hu

3. PURPOSE OF THE DATA MANAGEMENT

3.1. By operating the alumni.metropolitan.hu website, the Data Controller ensures the use of the Services specified in the Terms of Use.

3.2. After registering to the Portal, logging in and creating a User Profile, the purpose of data management is to provide the alumni.metropolitan.hu website services in a personalized way, search, filter according to the given preferences, facilitate social contacts between alumni Users and display job offers corresponding to the qualifications or professional experience of the Users. The Data Controller handles the data provided by the User and the personal data contained by other uploaded documents for the purpose of building stronger alumni communities for the Data Controllers alumni students.

Purposes in particular:

- a) promoting lifelong learning, further training, and gaining knowledge for registered alumni within the framework of METU, following and supporting their careers and for providing on-demand support;
- b) enabling METU graduates with a high level of expertise to share their knowledge and experience on a regular basis with other alumni, current students and instructors;
- c) preserving and continuously enhancing METU's national and international reputation and attractiveness both as a university and an Alma Mater;
- d) draws attention to the trainings of METU and maintaining the interest in it;
- e) nurturing university traditions at a higher level;
- f) assisting the work of lecturers, students, researchers and providing the most effective, up-to-date, marketable knowledge for students.

3.3. The Budapest Metropolitan University becomes a Data Controller if it receives the data from the data subject or the person authorized to transfer the data, which is done by successfully registering on the alumni.metropolitan.hu website, logging in to the User and uploading the relevant documents by the User.

3.4. Upon the consent of the User, the Data Controller shall send direct marketing messages to the User.

Data subject: the User specified in the Terms of Use is affected from the point of view of the handling of personal data.

4. LEGAL BASIS OF DATA CONTROLLING

4.1. With regard to the personal data provided as a condition during the registration on the Portal or with the login of the User, as well as the personal data specified in this Privacy Policy, the legal basis of data management is Article 6 (1) b) of the GDPR being necessary for the performance of the contract.

4.2. In case of additional personal data provided by the User, the legal basis of data management is your consent, pursuant to Article 6 (1) (a) of the GDPR, by filling in the data entry fields on the Portal, selecting the checkboxes and buttons, uploading documents and accepting the Privacy Policy, voluntarily and decisively by implicit conduct.

The data subject has the right to withdraw their consent to the processing at any time, but this does not affect the lawfulness of the data processing carried out on the basis of the consent prior to the withdrawal.

The Data Controller manages in the database of the Portal only the personal data and information necessary for the efficient and effective operation of the Portal.

4.3. The Data Controller operating the Portal reserves the right to delete content that is incompatible with the purpose of the system. The Data Controller asks the Users not to include data that does not fall into this category (e.g. hobby, marital status, political opinion) in their uploaded documents.

METU does not, in principle, handle sensitive data*, but cannot rule out the possibility that data subjects may share sensitive data about themselves during the registration and Profile page development process.

** **Sensitive data:** all data falling in the special categories of personal data that are personal data revealing racial or ethnic origin, political opinion, religious belief or worldview, or trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.*

4.4. In view of the above, if the User also provides or makes available sensitive data, they shall acknowledge that the Data Controller does not take any responsibility for accessing the special data as specified in this Privacy Policy.

5. ACCESS TO DATA

5.1. The personal data of the Users may be accessed only by the employees of the Data Controller performing operational tasks and by the employees supporting the given field with admin rights on the website. The data controller shall take the necessary data security measures to prevent unauthorized access to the personal data processed in the database.

5.2. At the Data Controller, access to the data is limited to those persons who absolutely need it in order to perform their duties in connection with the operation of the Portal.

5.3. In order to measure the registration activity, the Data Controller may compile statistics on the basis of the personal data, depriving them of their personal nature, in order to analyse, evaluate and provide quality services related to the operation of the Portal.

6. RANGE OF THE DATA MANAGED

6.1. The Data Controller handles only the personal data, identification data and contact data contained by the documents uploaded by the User directly to the alumni.metropolitan.hu website after the proper registration and the login of the Student User. Necessary data for the registration are the name,

email address and Neptun code; provision of any additional data is the voluntary choice of the data subject, and is not essential for the use of the Portal.

6.2. Profile data of the User:

- identification data: birth data, surname and first name
- contact details: e-mail address, social networking site profile information, phone number
- study-related data: name of institution, country, name of specialization / training, year of commencement, year of successful final examination, Level of education
- employment data: identification data of previous or current jobs, company name, country, city, year of start, year of completion, position held (position), field of expertise (task)
- data on language skills: name of a foreign language, name of a state-recognized language exam, level of spoken and understood language
- other: skills, strengths, soft skills, free text data, information, job search preferences
- posts of the User on the Portal's feed
- groups of the Portal in which the User is a member
- supporting data for declarations of acceptance: so-called. "log files"
- uploaded documents: profile picture
allowed upload format: "pdf", "jpeg or jpg image"
- data of the uploaded portfolio

The User may decide on the visibility of their data for other users. Users with admin rights shall access all data provided by the User.

7. DURATION OF THE DATA CONTROLLING

7.1. The Data Controller manages the data provided by the registered User until the User's profile page is deleted from the Portal, the data subject submits a deletion request or as long as it is necessary to fulfil or terminate the Terms of Use.

8. SOURCES OF DATA

8.1. The data is provided by the data subject in case the profile is created by the data subject. If the data subject does not wish to provide the data necessary for the creation of the profile, then the Data Controller cannot grant the use of the Portal Services.

8.2. If the profile is created by METU based on the consent of the data subject, the data required to create the profile comes from the METU study administration system. Data not required to create the profile is provided by the data subject.

9. DATA PROCESSING, DATA FORWARDING

9.1. The data controller uses MEVIA - Digital (93-97 Rue Eugène Caron, 92400 COURBEVOIE FRANCE) as data processor for the technical operations related to the Portal.

9.2. The data controller uses Stripe Payments Europe Limited (1 Grand Canal Street Lower, Grand Canal Dock, Dublin, D02 H210, Ireland) for the operation of the built-in payment service of the website.

10. MODIFICATION AND DELETION OF DATA

10.1. The User is entitled to modify, correct, correct or delete the data recorded in the system and database of the alumni.metropolitan.hu website and the uploaded documents at any time, or to request the complete and permanent removal of their data by requesting a permanent deletion of their registration.

10.2. The Data Controller deletes the e-mail containing the personal data received at the e-mail address adatvedelmitisztviselo@metropolitan.hu after the assessment of the application. All data management is governed by the fact that the Data Controller does not have access to the data deleted by itself or the User after the deletion, the data are removed from its database.

11. 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.

12. YOUR RIGHTS

Please note that according to the law in force you can enforce your rights at 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 – in case the legal basis of the data processing is your consent according to Section 4 –, 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.
- 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)

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

Address: H-1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1530 Budapest, Pf.: 5

E-mail: ugyfelszolgalat@naih.hu

Phone no.: +36 (1) 391-1400

Fax no.: +36 (1) 391-1410

Website: www.naih.hu 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. You can find the court of your place of residence or stay at <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.

Contacts

Please contact us at adatvedelmitisztviselo@metropolitan.hu for information and privacy inquiries. Upon request, we will respond to you within 30 days of your request, using the contact information you provided.