

Privacy Policy

on data processing related to the verification of the attendance of upper-year scholarship students

1. Data Controller

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2. Legal background

The Hungarian University of Agriculture and Life Sciences (*hereinafter referred to as the University*) shall process the personal data related to the verification of the attendance of upper-year scholarship students in accordance with the following legal 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 \(hereinafter referred to as the 'GDPR'\)](#)
- [Act CCIV of 2011 on National Higher Education](#)
- [Act V of 2013 on the Civil Code](#)
- [Government Decree No. 285/2013 \(VII.26.\) on the Stipendium Hungaricum](#)
- [Government Decree No. 120/2017 \(VI.1.\) on the "Scholarship Program for Christian Youth" and on the amendment of Government Decree No. 51/2007 \(III.26.\) on the Benefits of Students in Higher Education and on Certain Fees to Be Paid by Them](#)

The regulation serving as the basis for data processing is the relevant Operational Rules and/or Implementation Guidelines of the given scholarship program, which stipulates that the scholarship holder must register in person with the host institution at the beginning of each semester and, as a general rule, reside in Hungary during the training period.

3. Scope of personal data processed, purpose, legal basis and duration of data processing

Scope of processed personal data	Purpose of data processing	Legal basis for data processing	Duration of data processing
Student's Name	Identification of the scholarship student and documentation of the completion of the personal registration	The University's legitimate interest in monitoring and documenting the fulfilment of the student's obligations prescribed in the scholarship programme [Article 6(1)(f) of the GDPR]	For the period necessary for the fulfilment of document preservation, control and accounting obligations related to the scholarship programme: 10 years after the last professional report has been sent
Training Name and Level	Clear identification of the training related to the scholarship holder and scholarship holder's legal relationship		
"Declaration submitted" status (yes/no)	Documenting whether the student has fulfilled his/her obligation to make a declaration related to the attendance screening process		
Personal appearance / date of signing	Documentation of the date of personal registration at the beginning of the semester		
Student Signature	Credible documentation of personal appearance and registration		

3.1. Result of the balancing of legitimate interest

Pursuant to Article 6(1)(f) of the GDPR, processing may also be considered lawful if the processing is "necessary for the purposes of the legitimate interests pursued by the controller or by a third party, unless such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data." If this legal basis is applied, the data subject's consent is not required for the processing.

It is in the legitimate interest of the University to check and document whether the scholarship student fulfils its obligation to register in person at the beginning of the semester as defined in the rules of the scholarship program. The program regulation requires the scholarship student to register personally at the beginning of each semester with the organizational unit responsible for international affairs of the host institution.

The University has examined whether the above purpose can be achieved without the processing of personal data or in a way that does not affect the rights of the data subject. In order to be able to verify the personal registration afterwards, it is necessary to properly document it, therefore data processing can be considered necessary. The University limits data processing to the limited scope of data necessary to achieve the purpose.

In the course of the balancing of interests, it was taken into account that the data processing is foreseeable for the data subject, is directly related to the scholarship legal relationship, and does not

entail a disproportionate interference with the private sphere of the data subject. Therefore, based on the balancing of interests carried out, the legitimate interest of the University takes precedence over the interests, rights and freedoms of the data subject that are opposed to data processing.

4. Data security measures

4.1. Data storage

The University stores your personal data both in paper and electronic form.

The attendance sheet generated during the personal check is stored on paper. Paper-based documents are stored in a locker, in a place protected from physical influences, in the archives of the Directorate of Education. The University ensures that no unauthorized person has access to your personal data by means of appropriate organizational and organizational measures.

The status of the related "Declaration Regarding Residence in Hungary" statement is managed electronically in the NEPTUN TR. The University stores the electronically processed data on its own server located in its headquarters and in the data processing system listed in this section. With regard to the current state of technology, the University ensures the protection of the security of data processing with technical, organisational and organisational measures that provide a level of protection appropriate to the risks arising in connection with data management. Security is ensured by server-level and application-level protection procedures. It also ensures that its personal data is protected by appropriate measures, inter alia, against unauthorized access, or against their unauthorized alteration, transmission, disclosure, deletion, destruction, accidental destruction, damage, and inaccessibility due to changes in the technology used.

The University uses the assistance of the following data processor in the course of data processing:

- For the purpose of operating NEPTUN TR, Campus Codeworks Zrt. (registered office: 1117 Budapest, Hauszmann Alajos utca 3/B., tax number: 11684057-2-43, company registration number: 01-10-140314).

4.2. Access to data

Your personal data may be accessed by those employees of the Directorate of Education whose access to the data is necessary for the achievement of the purpose of data processing, in particular for the implementation of personal registration, its documentation, the monitoring of the fulfilment of the relevant obligations of scholarship students, and for the performance of the related administrative tasks, to the extent necessary for the performance of their work, and in a purpose-bound manner.

4.3. Data transfer

The University does not regularly forward the attendance register to third parties. However, the organisations authorised to supervise the implementation of the scholarship programme, in particular the organisation responsible for the management of the programme, the competent ministry and the controlling person or organisation legally authorised by them, may be entitled to access the documentation related to data processing to the extent necessary for the performance of their audit tasks.

5. Rights of data subjects in relation to data processing

You can exercise your data subject rights related to data processing at the contact details indicated in Section 1. You can also contact the Directorate of Education directly with your request oktatasi.igazgato@uni-mate.hu.

5.1. Right to information and access

You can request information about whether your personal data is being processed and, if so, which personal data is being processed, on what legal basis, for what purpose, from what source, and for how long. You can request access to the processed personal data, e.g. in the form of a copy. We will comply with the request within 1 month [Article 15 GDPR].

5.2. Right to rectification

You may request the rectification of your personal data: modification, correction or supplementation. We will try to comply with the request without delay if the veracity of the corrected data can be established beyond doubt [Article 16 of the GDPR].

5.3. Right to erasure and to be forgotten

You can request the erasure of your personal data. We will try to comply with the request without delay, provided that the conditions for it are met [Article 17 of the GDPR].

5.4. Right to restriction of processing

Request the restriction of processing [Article 18 of the GDPR],

- if you believe that they are inaccurate or not up to date. In this case, we will suspend the processing for the period of time while we verify the accuracy of the data.

- if the processing is unlawful and you oppose the deletion of your personal data. In this case, the data will be blocked.
- if we no longer need the information but you require it to establish, exercise or defend legal claims.
- if you object to the processing. In this case, the restriction will apply for the period until it is established whether the University's legitimate interests take precedence over your legitimate interests.

5.5. Right to object

You may object to the processing on grounds relating to your particular situation, or if the processing is carried out against your will and you contest the legitimate reason for it. In this case, we will investigate within 1 month whether the arguments raised in your objection override the legitimate interests of the University [Article 21 of the GDPR].

6. Legal remedies related to data processing

In case of problems and comments related to data processing, the University's data protection officer is entitled to proceed. Please report the problem to him or her first at the contact details indicated in point 1. We will investigate the problem as quickly as possible and try to find a solution to it, and we will rule out that it could happen in the future.

If a solution cannot be found to the problem, or you are not satisfied with our proposed solutions, in the event that your data is processed in violation of the regulations or in order to enforce your rights, you may turn to the court of your place of residence or residence, or you may initiate an investigation at the National Authority for Data Protection and Freedom of Information (*hereinafter referred to as the Authority*).

Contact details of the Authority:

Email address: ugyfelszolgalat@naih.hu

Phone Number: 06-1-391-1400

Fax: 06-1-391-1410

Web: www.naih.hu

Headquarters: 1055 Budapest, Falk Miksa u. 9-11.

Mailing address: 1363 Budapest, Pf.: 9.