

# Privacy Notice

- Data processing related to the Online info session event organized by the Budapest University of Economics and Business on 10<sup>th</sup> April, 2025. -

This Privacy Notice (hereinafter: "Notice") applies to the personal data collected and processed by the Budapest University of Economics and Business (hereinafter: "University") as the data controller.

The Notice provides details regarding the processing of personal data of participants in the Master's online info session (hereinafter referred to as "Session") organized by the University on 10 April, 2025. The purpose of the Session is to provide information about the University's programmes offered to international students and the admission requirements for the 2025/2026 academic year.

## 1 Controller's name and contact details:

Budapest University of Economics and

Registered seat: 1055 Budapest Markó utca 29-31.

Institution identifier: FI 82314

Website: <https://uni-bge.hu/>

Name of the organisational unit performing data processing: Brand Office

Email address of the organisational unit performing data processing: [kommunikacio@uni-bge.hu](mailto:kommunikacio@uni-bge.hu)

Contact details of the Data Protection Officer of the University: [adatvedelmitisztviselo@uni-bge.hu](mailto:adatvedelmitisztviselo@uni-bge.hu)

The University processes personal data in accordance with the applicable laws, in particular the following:

- Act CXII of 2011 on informational self-determination and freedom of information (hereinafter: "Privacy Act"),
- 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, hereinafter: "GDPR").

## 2 Definitions

In accordance with the definitions and interpretive provisions set out in Article 4 of the GDPR and Article 3 of the Privacy Act, for the purposes of this Notice the terms listed below shall have the following meaning:

*Processor:* a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

*Processing:* any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

*Transfer:* making personal data available to a specified third party.

*Pseudonymisation:* the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

*Recipient:* a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

*Data subject:* an identified or identifiable natural person whose personal data are processed.

*Third party:* a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

*Third country:* any country other than the EEA countries.

*Sensitive data:* personal data revealing racial or ethnic origin, political opinion, religious or philosophical belief or union membership, genetic data and biometric data revealing the identity of natural persons, health data, and personal data relating to the sex life or sexual orientation of natural persons.

*Profiling:* any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

*Personal data:* means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### 3 Processing activities

#### 3.1 Registration

Participation in the Session requires prior registration.

##### 3.1.1 The personal data processed, and the purpose of and the legal basis for processing data

Personal data processed	Purpose of processing	Legal basis for processing
e-mail address	Registration, preliminary assessment of attendance, confirmation of registration, communication with participants, and correspondence related to the Session.	the data subject has given consent to the processing of his or her personal data for one or more specific purposes - Article 6 (1) a) of GDPR

##### 3.1.2 Storage period

The University shall process the personal data until the 9<sup>th</sup> of May, 2025.

#### 3.2 Admission Newsletter

During registration for the Session, interested individuals have the option to subscribe to the University's admission newsletter (hereinafter referred to as "admission newsletter"). The admission newsletter includes information related to the admission process for the University's Master's programmes offered to international students, as well as promotional materials presenting the University.

##### 3.2.1 The personal data processed, and the purpose of and the legal basis for processing data

Personal data processed	Purpose of processing	Legal basis for processing
e-mail address	Sending the admission newsletter to individuals who have subscribed to it.	the data subject has given consent to the processing of his or her personal data for one or more specific purposes - Article 6 (1) a) of GDPR

##### 3.2.2 Storage period

The University will send the admission newsletter to subscribers until July 30, 2025, after which their personal data will be deleted.

If you no longer wish to receive the admission newsletter from the University, you are entitled to withdraw your consent at any time by sending a request to this effect to [kommunikacio@uni-bge.hu](mailto:kommunikacio@uni-bge.hu). Upon unsubscribing from the admission newsletter, the University will cease sending future newsletters and delete your personal data.

For newsletters sent by the University between the time of your subscription and your unsubscribing, the University acted lawfully based on your consent at the time.

#### 4 Recipients of personal data and categories of recipients:

1. Name of processor: Erős-IT Informatikai Kereskedő és Szolgáltató Kft.

Seat: 1113 Budapest, Villányi út 42. F.sz. 1/A

Tax number: 32209356-2-43

Company registration number: 01-09-412120

E-mail: [info@mhosting.hu](mailto:info@mhosting.hu)

Website: <https://www.erosit.hu/>

The processor supports the operation (support) of the University's Master's online info session registration page (<https://masterprogrammes.uni-bge.hu/>).

2. Name of processor: Microsoft Ireland Operations Limited

Seat: One Microsoft Place, South County Business Park, Leopardstown, DUBLIN, 18. Ireland

Contact: +353 1 7064099

Website: [www.microsoft.com](http://www.microsoft.com)

Processor provides Microsoft 365 services to the University, which includes cloud-based applications (e.g. storage, mail system, intranet site). Data storage and electronic communication occur through the use of Microsoft 365 services.

#### 5 Transfer of personal data to third countries or international organisations

The University transfers personal data to the following third countries or international organisations:

The personal data may also be transferred partially to a third country outside the European Union in relation to Microsoft, which organization is part of the data protection framework between the European Union (EU) and the United States (USA) (hereinafter: Data Privacy Framework).

- Microsoft Corporation (1 Microsoft Way Redmond, WA 98052; Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, DUBLIN, 18. Ireland).

The Data Privacy Framework is based on the adequacy decision adopted by the European Commission (Article 45 of the Regulation). The list of adequacy decisions can be found at the link below:

[https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en?prefLang=h](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en?prefLang=h).

The companies participating in the Data Privacy Framework can be found in the searchable list available at the link below: <https://www.dataprivacyframework.gov/list>.

The Microsoft Privacy Statement is available at the following link: <https://privacy.microsoft.com/en-gb/privacystatement>.

## 6 Automated decision making, including profiling

In the course of processing, no automated decision making, including profiling, takes place.

## 7 Source of personal data

The University collects personal data from the data subject.

Possible consequences of failure to provide data:

Without registration, participation in the Session is not possible. Without subscribing to the admission newsletter, the University will not send information related to admissions.

## 8 Data security measures

The University takes all technical and organisational measures to ensure the security of data processing and storage.

The processed data are hosted in a high-availability, reliable server environment. Physical security is provided 24 hours a day by means of an electronic access control and surveillance camera system.

The University has its IT Security Policy and Document Management Policy in place containing the detailed rules of IT data security and document management.

## 9 Rights related to the processing of personal data

Your rights as a data subject are related to the legal basis for processing. Subject to the legal bases, certain rights may not be applicable.

The following table indicates the legal bases and the rights that may be exercised:

Right of data subject / Legal basis	Right of access	Right to rectification	Right to erasure	Right to restriction of processing	Right to data portability	Right to object
Consent	✓	✓	✓	✓	✓	✗ (Instead: withdrawal of consent)
Contract preparation and performance	✓	✓	✓	✓	✓	✗
Fulfilling a legal obligation	✓	✓	✗	✓	✗	✗
Protection of vital interest	✓	✓	✓	✓	✗	✗
Performing a task in the public interest	✓	✓	✗	✓	✗	✓

Legitimate interest	✓	✓	✓	✓	✗	✓
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## 9.1 Right of access

You have the right to obtain from the University information as to whether or not your personal data are being processed and, where that is the case, the right to know the purposes of the processing, the personal data concerned by the processing, the recipients to whom your data have been disclosed or the source from which the data have been obtained by the University, the storage period, any rights you have in relation to the processing, information relating to automated decision making and profiling, and, in the case of transfer to a third country or international organisation, the safeguards relating thereto.

In exercising your right of access, you also have the right to request a copy of the data, and in the event of an electronic request, the University shall provide the requested information electronically, unless requested otherwise by the data subject. If your right of access adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of other parties, the University may refuse to comply with your request to the extent necessary and proportionate. In the event that you request more than one copy of the above information, the University may charge a reasonable fee proportionate to the administrative costs of producing such additional copies.

## 9.2 Right to rectification

You have the right to obtain from the University without undue delay the rectification of any inaccurate personal data relating to you. Taking into account the purposes of the processing, you may have your incomplete personal data completed, including by means of providing a supplementary statement.

If you request the rectification of data, you shall be required to substantiate the accuracy of the data concerned. Only then shall the University be able to assess whether the supplied data are accurate and, if so, whether it can amend the previous data.

The University also encourages you to report any changes to your personal data as soon as possible in order to facilitate lawful processing and the exercise of your rights.

## 9.3 Right to erasure (right to be forgotten)

You have the right to obtain from the University the erasure of personal data relating to you. If you request the erasure of any or all of your personal data, the University shall delete such data without undue delay if:

- a) the University no longer needs the personal data for the purposes for which they were collected or otherwise processed;
- b) the processing was based on your consent, but you have withdrawn your consent and there is no other legal ground for the processing;

- c) the processing was based on a legitimate interest of the University or a third party, but you have objected to the processing and there are no overriding legitimate grounds for the processing, other than objection to processing for direct marketing purposes;
- d) the University processed the personal data unlawfully, or
- e) the erasure of personal data is necessary to fulfil a legal obligation.

Where the University has made the personal data public and is obliged to erase such data in accordance with the above, the University, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

The University is not always obliged to erase or forget personal data under Article 17 (3) of the GDPR, for example, where processing is necessary for the establishment, exercise or defence of legal claims.

#### 9.4 Right to restriction of processing

You have the right to obtain from the University restriction of processing where one of the following applies:

- a) you contest the accuracy of the personal data, in which case the restriction applies for a period enabling the University to verify the accuracy of the personal data;
- b) the processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead;
- c) the University no longer needs the personal data for the purposes of processing, but you require the data for the establishment, exercise or defence of legal claims, or
- d) you have objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

#### 9.5 Right to data portability

You have the right to request from the University your personal data that you have provided to them, and to receive such data in a structured, commonly used and machine-readable format, and even to transmit those data to another controller or, where technically feasible, request their transmission directly to another controller designated by you, provided that the processing is based on your consent or on a contract, and is carried out by automated means (for example, in a computer system).

In the event that the exercise of your right to data portability would adversely affect the rights and freedoms of others, the University may refuse to fulfil your request to the extent necessary.

This right shall not apply to processing necessary for the performance of a task carried out in the public interest.

## 9.6 Right to object

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you, including profiling in accordance with the applicable provisions, where the processing is based on a legitimate interest of the University or a third party, or is necessary for the performance of a task carried out in the public interest.

The University shall no longer process your personal data, unless

- a) it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or
- b) the processing is related to the establishment, exercise or defence of legal claims by the University.

However, if the University fails to verify such circumstances, it shall delete the personal data concerned by the objection without delay.

## 9.7 Withdrawal of consent

Where the legal basis for the processing is your consent, you have the right to withdraw your consent at any time and request deletion of your data. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

If you have given your consent by ticking a checkbox on the University's online platform or by using privacy settings (privacy dashboard), the University shall provide a similar method to withdraw your consent.

## 9.8 Submission of requests and deadline for responding

As a data subject, you may exercise the above rights by sending an electronic mail to the electronic mailing address provided in Section 1 or by post to the University's head office.

The University shall inform you without undue delay, but no later than 30 days after receipt of your request of the action taken on your request, including, where applicable, the rejection of the request and the reasons for rejection.

Where necessary, taking into account the complexity of the request and the number of applications, the 30-day deadline may be extended by an additional 60 days. The University shall inform you of any such extension within 30 days of receipt of your request, together with the reasons for the delay.

Information and action relating to the exercise of your rights as a data subject shall be provided by the University free of charge. If your request is clearly unfounded or excessive, in particular due to its repetitive nature, the University may

- a) charge a reasonable fee, taking into account the administrative costs of providing the information or taking the action requested, or
- b) may refuse to act on the request.



## 10 Possible ways to enforce data subject rights (right to complain, right to judicial remedy)

If you believe that the University has violated the applicable data protection legislation, in particular the GDPR in the course of processing your personal data, you have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH).

Complaints can be submitted using any of the following contact details:

National Authority for Data Protection and Freedom of Information (NAIH)

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

Mailing address: 1363 Budapest, Pf. 9.;

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: [www.naih.hu](http://www.naih.hu)

Irrespective of your right to lodge a complaint, you may also initiate proceedings with a court, which shall rule on the case as a matter of priority. Such cases fall within the jurisdiction of the general courts. You may decide to bring the case before the court of your place of residence or before the court of the seat of the University (the Metropolitan Court of Budapest) (for a list of courts and their contact details visit the link <http://birosag.hu/torvenyszekkek>).