

PRIVACY POLICY CUSTOMER SERVICE

1. Preamble

The purpose of this Privacy Policy is to inform you about the data management operations of the **Budapest Metropolitan University** (registered office: 1148 Budapest, Nagy Lajos király útja 1-9., institutional identification: FI33842; hereinafter: METU or Data Controller) regarding the data processing operations in connection with with personal, online and telephone customer service 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; GDPR)**
- **the applicable Hungarian legislation.**

2. Data Controller

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

Contact information:

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

e-mail: 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.

3. Data processing

3.1. Purpose of data processing

Pursuant to Section 18 (1) (b) and (e) of the Act CCIV of 2011 on National Higher Education (hereinafter: NHE), the Data Controller shall process and keep records of the personal and special categories of personal data necessary for the exercise of the rights and obligations of the applicants and students, as well as for the keeping of the records specified by law. METU maintains a student register in the Neptun electronic study administration system, which contains the data specified in Annex 3 of the NHE, which is an appendix to this Privacy Policy.

In order to facilitate the exercise of student rights and the fulfilment of obligations, to ensure the widest and most efficient administration, as well as to answer questions and solve problems related to the student legal relationship, the Data Controller operates a personal, online and telephone customer service as follows:

- The Data Controller shall provide **personal customer service** on its own premises, where the case allows, without processing personal data.
- The Data Controller enables **online customer service** using the form available on its website.
- The Data Controller ensures the availability of its **telephone customer service** via a central telephone number. Through the telephone customer service, it is possible to initiate and settle matters related to university education and studies, and to solve problems quickly and efficiently.
 - Telephone **calls are recorded**, the purpose of which is to ensure the quality of the customer service activity, to increase it, and, if necessary, to clarify the facts at a later stage.
 - The Data Controller performs software **analysis** on the text of the recorded telephone calls to indicate the occurrence of certain words and phrases and other quantitative and qualitative properties of the call¹ in order to improve the quality of the Data Controller's employees.

The logic and definition of the software analysis process of audio material:

Using a copy of the recording of the conversation with the administrator, the Data Controller creates a transcript with the help of a text recognition algorithm. Based on pre-set parameters (keywords, sentences) in the transcript, the algorithm looks for text fragments that may indicate the need to record the complaint, satisfaction or dissatisfaction. The keyword database was specially prepared by the Data Controller for words of anger, profanity, Hungarian and generally used foreign language expressions.

¹ The length and date of the call; line quality; repeating words; keywords; call categories (which topic you called); length of waiting (music); length of silence; customer talk length; operator speech length; operator speech rate; talking onto each other; number of words spoken.

The algorithm recognizes and marks the participants in the conversation, the sections of conversation, the waiting time, and the place of the music in the conversation process.

The system can identify the parts of the conversation where one of the participants is dissatisfied based on the use of words. Based on the copy of the recorded audio file, the system is able to identify the characteristic features of the conversation, including intonation, speech speed, volume, articulation, silence, talking to each other, and changes in these parameters. Based on the recorded data, the system assigns a total value to the conversation and to each of the parties participating in the conversation.

3.2. Range of the data processed

For each request, the Data Controller shall process the data that is essential for the request of the client from the data specified in Part I/B of Annex 3 of the NHE.

3.3. Data subjects

Natural persons using personal, online and/or telephone customer service.

3.4. Legal basis of the data processing

The processing of data referred to in points 3.1. (a) to (c) and (cb) shall be based on the **consent** of the individual concerned, which shall be given in writing in the case of the personal customer service; by selecting the check box in the case of online customer service; by continuing the call in the case of telephone customer service, and by pressing the button after having been informed about the software analysis of the recorded call text.

The data processing referred to in point 3.1. (ca) shall be based on the **legitimate interests** of the Data Controller to ensure the development of the customer service activity as a service and the individual development of the employee working at the customer service, furthermore, in the event of a dispute between METU and the customer, the sound recording may be used to clarify the facts or support METU's claim. The Data Controller has performed the necessary balancing of interests in support of its legitimate interests, in the framework of which it has examined the risks and disadvantages affecting the rights and freedoms of individuals in order to reduce and mitigate them and take precedence over their interests. If the data subject wishes to avoid having his or her voice recorded, he or she may conduct his or her affairs in one of the personal or written forms of communication.

3.5. Sources of the data

The data included in Annex 1 are extracted from the electronic study system by the Data Controller.

If the person using the customer service is not a student, the data subject must provide the information strictly necessary for the administration.

3.6. Access to data, storage, data processors

The Data Controller shall pay particular attention to the fact that the data of the applicants and students are only accessible by its authorised personnel of the organizational units responsible for the performance of the given task.

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

Data Processor	Function
SDA Informatika Zrt. registered office: 2030 Érd, Retyezáti utca 46. reg. number: 01-10-140314	operation of the Neptun system used for the primary storage of personal data as a unified study administration system in higher education
BeMind Kft. registered office: 8200, Veszprém, Damjanich utca 7/A reg. number: 19-09- 512458	operation of the www.metropolitan.hu website
GEOMANT-ALGOTECH Zrt. registered office: 1013 Budapest, Krisztina tér 2. reg. number: 01-10-048136	operation of the Contact Expert customer service platform, hosting service
X D R O I D Informatikai és Szolgáltató Kft. registered office: 1031 Budapest, Záhony utca 7. reg. number: 01-09-172420	hosting service, content analysis of the text of recorded telephone calls (software operation to indicate the occurrence of certain words and

	phrases and other quantitative and qualitative properties of the call), which is used by the Data Controller to improve the quality of its employees
--	--

3.7. Duration of the data processing

The data controller stores the data for 3 years after contacting customer service. The duration of the data processing of the data transferred to the data processor for the purpose of speech analysis: 1 week from the date of transfer in the case of a copy of the original audio recording, 1 year in the case of audio files compressed for playback from the original audio files and the result of the analysis.

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 by e-mail - under the statutory terms.

Pursuant to Article 7(3) of the GDPR, the data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Pursuant to Article 15 of the GDPR, the data subject may request access to personal data concerning him or her as follows:

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- (a) the purposes of the processing;
- (b) the categories of personal data concerned;
- (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- (f) the right to lodge a complaint with a supervisory authority;
- (g) where the personal data are not collected from the data subject, any available information as to their source;
- (h) the fact of automated decision-making, including profiling, and at least in these cases, comprehensible information on the logic used and the significance of such data management and the expected consequences for the data subject.

The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

Pursuant to Article 16 of the GDPR, the data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her as follows:

At the request of the data subject, METU is obliged to correct inaccurate personal data concerning them without undue delay. Taking into account the purpose of the data processing, the data subject has the right to request that the incomplete personal data be supplemented, inter alia, by means of a supplementary statement.

Pursuant to Article 17 of the GDPR, the data subject has the right to request the deletion of personal data concerning him or her from METU as follows:

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the data subject objects to the data processing in the public interest, in the exercise of a public authority or in the legitimate interest of the controller (third party) and there is no overriding legitimate reason for the data processing, or the data subject objects to the data processing for direct business acquisition;
- (d) the personal data have been unlawfully processed;
- (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, 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.

According to the GDPR, the further retention of personal data can be considered lawful, in case the data processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject
- for the performance of a task carried out in the public interest
- for the exercise of official authority vested in the controller;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest,
- for scientific or historical research purposes or statistical purposes; or
- for the establishment, exercise or defence of legal claims.

Pursuant to Article 18 of the GDPR, the data subject has the right to request METU to restrict the processing of personal data concerning him as follows:

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- (a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- (d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted based on the above, 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.

Under Article 20 of the GDPR, the data subject is entitled to the portability of personal data concerning him or her as follows:

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- the legal basis of the data processing is the consent of the Data Subject or the performance of the contract concluded with the Data Subject;
- the processing is carried out by automated means.

In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The exercise of the right to data portability shall be without prejudice to the right to erasure. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

The right referred to data portability shall not adversely affect the rights and freedoms of others.

Pursuant to Article 21 of the GDPR, the data subject has the right to object to the processing of personal data concerning him or her by METU as follows:

The data subject has the right to object at any time, for reasons related to their situation, to the processing of their personal data in the public interest, in the exercise of public authority or in the legitimate interest of the data controller (third party), including profiling. In this case, METU may no longer process personal data unless it demonstrates that the processing is justified by overriding legitimate reasons which take precedence over the interests, rights and freedoms of the data subject or which relate to the submission, enforcement or protection of legal claims.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

At the latest at the time of the first communication with the data subject, the right to object shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

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!

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

Address: 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

Personal data processed by Data Controller based on the NHE:

I/B. Student data

1. 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,
 - ab) 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,
 - ac) data on the secondary school leaving examination,
 - ad) secondary school data,
 - ae) data necessary for the assessment of the application for admission,
 - af) the data of the admission procedure, the application identification number,
 - ag) 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 recognised 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, identity document number, photograph, social security number,
 - bl) electronic copy of the thesis (diploma thesis) and the diploma supplement, data on the completion of the practice period, the final certificate, the final examination (doctoral defence), 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;
 - j)* information on the existence and type of the loan granted by the Student Loan Centre, as well as the amount of the student loan applied for by the student, the number of the loan agreement, the amount transferred to the higher education institution and the date of the transfer;
 - k)* the date and reason for leaving the personal data and address register.
- 2. The purpose of data processing: as defined in Article 18(1). Higher education institutions shall process personal and sensitive data only in relation to student status, the determination of allowances, benefits, and obligations, and the fulfilment thereof, for national security reasons and for the purpose of maintaining the registers defined in this Act, to the extent necessary for the purpose of data processing, in compliance with the purpose limitation principle.
- 3. Duration of data processing: the data may be retained for eighty years from the notification of the termination of student status.
- 4. 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)* -
 - 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.