Privacy Policy

on personal data processed during the online enrolment in connection with the epidemiological measures introduced to prevent the spread of COVID-19

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), in connection with the personal data processed during the **online enrolment** in connection with the epidemiological measures introduced to prevent the spread of COVID-19.

METU acts in accordance with the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 201 on the 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: GDPR) and the National Higher Education Act when processing students' personal data

The data management in order to prevent the spread of COVID-19 will be carried out on the basis of the information and standpoint of the Higher Education Training Department of the Ministry for Innovation and Technology dated 15 January 2021.

Due to the fact that it is necessary to identify the student by an authentic instrument when enrolling, the Data Controller will request copies of the documents electronically from the enroller during the online enrolment.

	Data Controller
Name:	Budapest Metropolitan University
Seat:	1148 Budapest, Nagy Lajos király útja 1-9.
E-mail:	adatvedelmitisztviselo@metropolitan.hu

1. The purpose of data management

As it is not possible to enrol in person during a state of danger and to verify the authenticity and accuracy of the data by presenting identification documents, online enrolment is required, during which the data reconciliation takes place electronically to avoid personal contact.

Registrants send copies of documents to the Data Controller electronically. The data controller performs the identification of the enrolling student by an authentic instrument, which is necessary for the performance of their public service.

2. Legal basis of data controlling

The legal basis for data handling is the performance of public service tasks according to Article 6 (1) e) of the GDPR.

3. The range of data managed

The data controller typically handles the following data and information:

- In case of an identity card, the data on both sides; the photo and CAN number in case

of a new type of identity card must be obscured.
- In case of a passport: only the data of the page containing personal data; the photo must be obscured.
- In case of a license: data on the first page only; the photo must be obscured.
- In case of an address card: only the data of the page containing the address.
- Details of the document certifying the social security number, (social security card or EU card or certificate of health insurance).
- Details of the document certifying the tax identification number.

4. Duration of data controlling

Following the identification of the enrolling student by an authentic instrument, the Data Controller shall destroy the electronically requested copies of the documents immediately after the reconciliation of the data and the authentication of the enrolment form.

5. Data subjects

The data controller manages the data of the applicants and enrollers for the higher education training programmes it provides during the online enrolment.

6. Data transferring

Conditions for transferring data under the National Higher Education Act in the following cases:

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.

7. Security of data

The Data Controller 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 shall be accessible to those entitled to it (availability);
- the data processed shall be authentic and its authentication shall be ensured (authenticity of data management);
- the processed data's invariance must be verifiable (data integrity);
- the data processed shall be accessible only to the entitled, protected against unauthorized access (data confidentiality).

8. The rights of the data subjects can be enforced by the data subject at the e-mail address metujog.kapu@metropolitan.hu

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.

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

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.

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.

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

The right of appeal in court, complaints addressed to the supervisory authority, questions

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

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