

## PRIVACY POLICY FOR APPLICANTS AND STUDENTS OF EDUCATIONAL PROGRAMMES

### 1. Preamble

The purpose of this Privacy Policy is to inform you about the data processing of the **Budapest Metropolitan University** (registered office: 1148 Budapest, Nagy Lajos király útja 1-9., institutional identification: FI33842; hereinafter: METU, University or Data Controller) in connection with METU's educational core activities according to

- **the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (General Data Protection Regulation; GDPR)**
- **the applicable Hungarian legislation.**

The educational core activities of higher education institutions shall include the provision of tertiary vocational programmes, bachelor programmes, master programmes, doctoral programmes and postgraduate specialization programmes. In addition to carrying out its core activities, the University also conducts other types of educational activities.

### 2. Data Controller

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

Contact information:

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

e-mail: [adatvedelmitisztviselo@metropolitan.hu](mailto:adatvedelmitisztviselo@metropolitan.hu)

During the data processing, 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](mailto:adatvedelmitisztviselo@metropolitan.hu).

### 3. Data processing in connection with the student status

The scope of personal data to be processed by METU according to Annex 3 to the Act CCIV of 2011 on National Higher Education (hereinafter: NHE).

Purpose of data processing	Legal basis of data processing	Processed personal data	Duration of data processing
<p><b>The purpose of data processing is to conduct the admission procedure in accordance with the law.</b></p> <p><b>Processing of data relating to admission, in connection with the legal relationship, the establishment and fulfilment of benefits, advantages and obligations, and for the purpose of preventing abuses related to entry into Hungary.</b></p>	<p>Article 6(1)(e) of the GDPR; processing is necessary for the performance of a task carried out in the public interest.</p> <p>(NHE 18. § (1) a))</p>	<p>The data specified in Annex 3, I/B.1(a) of the NHE.</p> <p>For applicants applying through the DreamApply platform: the DreamApply ID, registration data.</p>	<p>Eighty years from the notification of the termination of student status.</p> <p>If the admission procedure does not result in the establishment of a student status, the personal data relating to the admission will be processed for two years from the end of the enrolment period following the end of the relevant higher education admission period in case of foreign nationals.</p>

<p>In case of applicants from non-EU countries, the data controller tracks the visa process in order to examine the legal eligibility of the applicant for in-person training and, in the absence thereof, inform the student in due time of the expected result of the assessment of the application.</p>			
<p><b>Keeping the records required by law and managing data in the electronic study administration system.</b></p> <p>The Data Controller operates a unified electronic study administration system in order to fulfil its statutory data recording tasks.</p>	<p>Article 6(1)(e) of the GDPR; processing is necessary for the performance of a task carried out in the public interest.</p> <p>(NHE 18. § (1) e)</p> <p>Government Decree 87/2015 (IV.9.) on the Implementation of Certain Provisions of the Act CCIV of 2011 on National Higher Education (hereinafter: NHE GD) 34. §)</p>	<p>The data specified in Annex 3, Subtitle I/B. of the NHE; and § 60 of the NHE GD.</p>	<p>Eighty years from the notification of the termination of student status.</p>
<p><b>To ensure the proper functioning of the institution, to organise education and research and to enable students to exercise their rights and fulfil their obligations – including conducting the (preliminary) credit transfer procedure, as well as the completion of e-learning courses.</b></p>	<p>Article 6(1)(e) of the GDPR; processing is necessary for the performance of a task carried out in the public interest. In the case of authorizing an extraordinary passive semester, with regard to special (health) data that are strictly necessary for the evaluation of the application, Articles 9(2)(b) and (f) of the GDPR also apply.</p> <p>(NHE 18. § (1) a)-c); f)</p> <p>Annex 2 of the NHE, Subtitle II)</p>	<p>The data specified in Annex 3, Subtitle I/B. of the NHE.</p> <p>In case of recognition of professional experience as credit:</p> <ul style="list-style-type: none"> <li>- professional CV</li> <li>- employer's certificate related to professional experience, job description</li> </ul> <p>In the case of e-learning courses:</p> <ul style="list-style-type: none"> <li>• name, e-mail address</li> <li>• course completion result, date, and related information regarding the result</li> </ul>	<p>Eighty years from the notification of the termination of student status.</p> <p>Data relating to participation in fire safety training will be kept until the end of the training, while data required to fulfil tax and accounting obligations will be kept for a maximum of eight years.</p> <p>In the case of authorizing an extraordinary passive semester, the documents provided to substantiate the unforeseen reason(s) are presented for review only; the Data Controller does not retain copies of them.</p>

<p><b>The processing of data as set out in the Student Requirement System, the Code of Ethics, the House Rules, the IT Security Policy, the Intellectual Property Policy and the University's Organisational and Operational Rules.</b></p>	<p>Article 6(1)(e) of the GDPR; processing is necessary for the performance of a task carried out in the public interest. (NHE 18. § (1) a)-c); f) Annex 2 of the NHE, Subtitle II)</p>	<p>In particular, but not exclusively:</p> <ul style="list-style-type: none"> <li>- username necessary for the use of the Neptun, CooSpace systems, first login password, data generated during the use of the systems,</li> <li>- student requests, claims made by the student while reviewing appeals, or otherwise generated by the student,</li> <li>- data submitted by, or otherwise generated in connection with the student during the course of an ethical procedure or disciplinary,</li> <li>- data occurred during library usage,</li> <li>- data regarding students' union membership,</li> <li>- data concerning accommodation services,</li> <li>- data contained by the student status certificate requested by the student,</li> <li>- bank account number,</li> <li>- participation data regarding the fire safety training,</li> <li>- tuition fee discounts provided to the applicant or student,</li> <li>- data regarding health insurance of foreign nationality applicants and students.</li> </ul>	
<p><b>The processing of data relating to students' benefits or preferences, the determination and assessment of eligibility for benefits or preferences – including the determination of the duration of the Hungarian state scholarship support period - provided by law and the Data Controller's Organisational and Operational Rules.</b></p>	<p>With regard to the benefits that are granted to the student by law, Article 6(1)(e) of the GDPR, processing is necessary for the performance of a task carried out in the public interest; with regard to sensitive (concerning health) absolutely necessary for the assessment of the request of the student, Article 9(2)(b) and (f) of the GDPR.</p>	<p>Information on student allowances, benefits and preferences, data necessary to assess eligibility for them (social status, parental data, allowance data, in connection with the state scholarship, data concerning the student's marital status and parental student status.).</p>	<p>Eighty years from the notification of the termination of student status.  The Data Controller retains data concerning the student's marital status and parental student status for ten years from the date of notification of the termination of the student status.</p>

	<p>For benefits provided by the Data Controller in its institutional capacity, Article 6(1)(a) of the GDPR, consent of the data subject.</p> <p>In the case of establishing and assessing entitlement to preferences provided in the Data Controller's Organisational and Operational Rules, Article 6(1)(e) of the GDPR, the processing is necessary for the performance of a task carried out in the public interest.</p> <p>(NHE 18. § (1) f))</p>	<p>For benefits provided by the Data Controller in its institutional capacity, the data required for the awarding of institutional scholarships, as defined in the Organisational and Operational Rules.</p>	
<p><b>Data processing for the purposes of online (distance) education and examinations.</b></p>	<p>Article 6(1)(e) of the GDPR; processing is necessary for the performance of a task carried out in the public interest.</p> <p>(NHE 18. § (1) c))</p>	<p>Name; e-mail address; Neptun code; image; voice; picture of the document presented for identification during the examination; during the practical lesson, if the masking function is not used to mask the background, the environment; in the case of a registered student with special needs, the personal data of the assistant.</p>	<p>Eighty years from the date of the announcement of the termination of the student's employment, except for the image and sound recording, which are stored only in the case of recording of the lesson<sup>1</sup>.</p> <p>Recording of the examinations is prohibited.</p>
<p><b>Representation of students' interests in the committees of METU regulated in the Organisational and Operational Rules.</b></p>	<p>Pursuant to § 12 (5) of the NHE, the consent of the data subject. In the event of withdrawal of consent to the processing of personal data, the membership (delegation) mandate will be revoked.</p>	<p>Name, email address, Neptun code.</p>	<p>Eighty years from the notification of the termination of student status.</p>
<p><b>Supporting the integration and progress of students with disabilities, providing benefits through the Equal Opportunities Committee.</b></p> <p><i>In the case of this present data processing, the handling of special data is unavoidable.</i></p>	<p>Article 6(1)(e) of the GDPR; processing is necessary for the performance of a task carried out in the public interest.</p> <p>(NHE 43. § (1); 49. § (8); 54. §)</p> <p>With regard to sensitive (concerning health) absolutely necessary for the assessment of the request of the student, Article 9(2)(b) and (f) of the GDPR.</p>	<p>The data specified in Annex 3, I/B.1(bh) of the NHE.</p>	<p>Eighty years from the notification of the termination of student status.</p>

<sup>1</sup> Detailed information is available in the privacy policy on the recording of lessons.

<p><b>Organization of internships, helping students to complete their internships, practice periods.</b></p>	<p>Article 6(1)(e) of the GDPR; processing is necessary for the performance of a task carried out in the public interest.</p> <p>(14. § of the Government Decree 230/2012. (VIII. 28.) on vocational training in higher education and certain aspects of professional practice in higher education)</p>	<p>Name, training programme, work schedule, Neptun code, contact details (e-mail address, telephone number).</p>	<p>Eighty years from the notification of the termination of student status.</p>
<p><b>Tracking of graduates.</b></p>	<p>Article 6(1)(e) of the GDPR; processing is necessary for the performance of a task carried out in the public interest.</p> <p>(NHE 18. § (1) g))</p>	<p>Neptun code, name, sex, e-mail address, date of birth, year of graduation, year of enrolment, name of the training programme, level of training, training organisation, location, faculty, work schedule, form of financing.</p>	<p>Eighty years from the notification of the termination of student status.</p>
<p><b>Sending informative e-mails regarding educational rights and obligations to facilitate the exercise the rights of applicants and students and the fulfillment of obligations.</b></p>	<p>Article 6(1)(b) of the GDPR; the processing is necessary for the performance of a contract to which the data subject is party.</p>	<p>Neptun code, name, e-mail address, year of enrolment, name of the training programme, level of training, training organisation, location, faculty, work schedule, form of financing.</p>	<p>3 years from the notification of the termination of student status.</p>
<p><b>Career consultation:</b> <b>Experts working with the Data Controller provide counselling services that grant advice on job search, career planning, and on further question regarding the world of work.</b></p>	<p>Article 6(1)(a) of the GDPR; the data subject has given consent to the processing of his or her personal data for one or more specific purposes.</p>	<p>Data provided at registration: name, e-mail address, Neptun code, full time/part-time status, where did you inform, nature of interest, CV, related correspondence, expert's note, date of counselling.</p>	<p>The Data Controller stores the data provided during the application and occurred during the consultation until the end of the current semester at the time of the consultation.</p>
<p><b>Visa assistance:</b> <b>In order to conclude the student contract according to Article 39(3) of the NHE, applicants from third countries shall obtain a visa. Upon the applicant's request, the Data Controller shall provide assistance in the official procedure of the National Directorate-General for Aliens Policing</b></p>	<p>Article 6(1)(b) of the GDPR; the processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.</p>	<p>Personal, income and other data to be used for legal assistance in official visa proceedings, in particular: birth data, passport number, address, mother's name, education and place of work, telephone number, e-mail address, data of the residence permit</p>	<p>The Data Controller handles the data in connection with the Visa Assistance service for 6 months after the end of the official procedure.</p>

<b>Claims management related to student debts</b>	Article 6(1)(f) of the GDPR, the legitimate interest of the data controller.	Name, place and time of birth, place of residence, e-mail address, legal title and amount of money owed.	Until the claim related to the collection of the money debt expires.
<b>In connection with the cooperation with ASU (Arizona State University), the completion of courses providing an ASU certificate and the verification of such completion.</b>	Article 6(1)(a) of the GDPR, the data subject's consent.	name, course or subject title and code, e-mail address, course completion result, and other course-related information (e.g., date of completion)	Aligned with the validity period of the certificate.

#### **4. Data processing in connection with adult education**

The data processing activities carried out in the course of providing the training are governed by the provisions of Act LXXVII of 2013 on Adult Education (hereinafter: Adult Education Act).

<b>Purpose of data processing</b>	<b>Legal basis of data processing</b>	<b>Processed personal data</b>	<b>Duration of data processing</b>
<b>Receiving applications, running the planned programmes and events, arranging accommodation including keeping in touch with the participants</b>	Article 6(1)(a) of the GDPR, the data subject's consent.	identification data (name, age, gender, nationality, passport number, place of birth, date of birth, mother's name); contact information (e-mail address, phone number, mailing address); personal data that is in the entry qualification documents (eg. active student status, passport, visa, DA ID); education data (highest education, university, major); training cost bearer (name, address, tax number); name of the programme for which they are applying; housing information (if applicable); food sensitivity (if applicable); language; profile picture (optional) If the applicant has not yet reached the age of 18, the approval and identification data of the legal representative	The duration of the data processing is aligned with the general limitation period for claims (5 years from the end of the course).
<b>Lawful conduct and documentation of adult learning</b>	Article 6 (1)(c) of the GDPR, legal obligation to which the Data Controller is subject	Data on the person participating in the training and the data related to the training pursuant to Section 21 (1) of the Adult	Until the deadline set out in the Adult Education Act, i.e. until the last day of the 8th year following the conclusion of the

	<p>Adult Education Act Sections 16, 21</p>	<p>Education Act: identification data (participant's name and surname, surname and first name at birth, place of birth, date of birth, mother's name and surname at birth, education identification number); contact information (participant's e-mail address); educational information (highest level of education, vocational qualification, professional qualification, foreign language skills); training-related data (entry and completion of training, exit from training, assessment and qualification during training, training-related payment obligations and training credit used)</p> <p>Personal data included in the documents specified in Section 16 of the Adult Education Act: attendance sheets kept during contact hours and signed by the participant of the training, as well as documents certifying professional preparation and supervision carried out electronically with the participant; the original documents required to commence and participate in the education or training (e.g. approval of the legal representative for participants under the age of 18) or certified copies thereof; furthermore, documents certifying the input competency assessment and the assessment of prior knowledge; the adult education contract, the training programme, the documents certifying the implementation of the training in accordance with the training programme, as well as the certificate issued pursuant to Section 13/B of the Adult Education Act.</p>	<p>adult education contract or, as applicable, the creation of any other documents to be kept as per Section 16 of the Adult Education Act.</p>
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<b>Management of the training satisfaction surveys</b>	Article 6(1)(f) of the GDPR - to improve the quality of training and the activities of the trainers	identification data (e.g. name of participant); contact details (participant email address); participant feedback	The data is processed from the time of recording the response to the survey only until anonymisation is completed, after which it stores only statistical data (after the completion of the questionnaire, the responses are no longer linked to the data subject).
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### 5. Data processing in connection with other programmes

Other programmes organized by METU does not constitute a higher or adult education course as defined in the relevant Hungarian legislation (Act CCIV of 2011 on National Higher Education and Act LXXVII of 2013 on adult education).

Purpose of data processing	Legal basis of data processing	Processed personal data	Duration of data processing
<b>Receiving applications, running the planned programmes and events, arranging accommodation including keeping in touch with the participants</b>	Article 6(1)(a) of the GDPR, the data subject's consent.	identification data (eg. name, age, gender, nationality, passport number, place of birth, date of birth, mother's name); contact information (e-mail address, phone number, mailing address); personal data that is in the entry qualification documents (eg. passport, visa, DA ID); education data (highest education, university, major); training cost bearer (name, address, tax number); name of the programme for which they are applying; housing information (if applicable); food sensitivity (if applicable); language; profile picture (optional). If the applicant has not yet reached the age of 18, the approval and identification data of the legal representative	The duration of the data processing is aligned with the general limitation period for claims (5 years from the end of the course).
<b>Lawful conduct and documentation of the contract</b>	Article 6 (1)(b) of the GDPR, for the performance of a contract	identification data (eg. participant's name and surname); enrollment data (e.g. e-mail address, selected programme, acceptance of the General Terms and Conditions, approval of the legal representative if the applicant has not yet reached the age of 18.	The retention period of the data processed for this purpose is determined by taking into account 5 years from the date of termination of the General Terms and Conditions.

<b>Management of the training satisfaction surveys</b>	Article 6(1)(f) of the GDPR - to improve the quality of training and the activities of the trainers	identification data (e.g. name of participant); contact details (participant email address); participant feedback	The data is processed from the time of recording the response to the survey only until anonymisation is completed, after which it stores only statistical data (after the completion of the questionnaire, the responses are no longer linked to the data subject).

## 6. Source of data

METU primarily obtains personal data directly from the data subjects. However, in certain cases, applications for METU programs may be managed by external agents, in which case the data are provided by them and they are considered the source of the data. The final submission of the application is, of course, always made by the applicant themselves, and METU provides information on the processing of personal data by making this privacy notice available.

## 7. Access to data, recipients

The Data Controller forwards the data of the students only in cases specified by Annex 3 of NHE.

The audit of METU is performed by the appointed auditor, who, in accordance with Section 3:38 of the Civil Code, is entitled to request and inspect data. METU may transmit data to the auditor in order to verify the legality of its accounting. Through METU's cooperation with Arizona State University (hereinafter: ASU), personal data are generally not transferred (see, for example, the so-called Global Link course). However, if students complete a program for which the certificate is issued by ASU, it is necessary to transfer the following information: the data subject's name, the title and code of the subject or course, e-mail address, and the result of the completed course (including percentage results if required for issuing the certificate). The recipient of the data transfer in this case is Arizona State University, official address: 1151 S. Forest Ave., Tempe, AZ 85281, USA, website: <https://www.asu.edu/>, privacy notice: <https://www.asu.edu/about/privacy>.

In case of student claims management, METU forwards the data for the purpose of conducting the payment order procedure, enforcing claims in court, using an external organization dealing with claims management, and selling the claim.

METU does not intend to transfer personal data outside the European Union; such transfers may only occur in exceptional cases. If a data transfer to a third country takes place, depending on the specific destination, it will be carried out on the basis of an adequacy decision adopted by the European Commission or standard data protection clauses (Articles 45–46 of the GDPR), or based on your explicit consent (Article 49 of the GDPR). Such a case in particular is the transfer of data to ASU, which METU performs based on your explicit consent.

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 for organizing, undertaking and controlling of the education, fulfilling the study and payment obligations, handling and evaluation of student matters, providing mandatory data and dealing with professional internships. In particular, to the data in connection with the studies can be accessed by the associate or tutor of the faculty concerned by the studies. Data in connection with students' administration are processed by the Student Information Centre. Data stored in Neptun and Coospace systems is accessible by the Directorate of Information Technology and the Neptun Office.

In the procedure required to assess the special treatment of persons with disabilities, the Equal Opportunities Coordinator, the Equal Opportunities Committee has access to

the data. In the case of legal remedies, the Student Legal Remedy Committee has access to the data.

For the primary storage of personal data, the Data Controller uses the Neptun system, the uniformly used system in the higher education, which is operated by SDA Informatika Zrt. as Data Processor. SDA Informatika Zrt.'s conduct as data processor is regulated by the data processing contract with the Data Controller.

Data Controller may store data depending on the nature of the matter or the data concerned on other electronic databases.

The platform for communication and data storage CooSpace used in the education is operated by DEXTER Informatikai és Tanácsadó Kft. as data processor.

In connection with the ESG partial knowledge training, the partner engaged by METU is Sustainable Business Academy Kft., which, in the course of its participation in the program, may have access to the following data: identification and contact details, as well as information related to the course and its completion (i.e. information verifying the student's academic progress and performance, such as time spent on studies, completion of assignments and tests, successful completion of the course, and achieved results).

The Central Document Registration System (K2) of the Data Controller is used to register documents related to equal opportunities procedures, with access rights granted to the Equal Opportunities Coordinator. Paper-based data is stored in METU's training locations under secure conditions. The data of the names and specialties of the persons who took part in the fire protection training are also stored by the reception service operating at the relevant training sites of the Data Controller and used for secure entry.

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

METU transfers data to (in case of adult education):

Name: Pest County Government Office (the competent adult education public administration body)

Headquarters: 1052 Budapest, Városház street 7.

E-mail address: pest@pest.gov.hu

Phone number: + 36 1 328-5812

The data transferred include: personal identification data (name, name at birth, place and date of birth, mother's name), e-mail address, highest level of education.

Purpose of the data transfer: to implement the training / course in accordance with the legal requirements and to fulfil the legal obligations set out in Act LXXVII of 2013 on Adult Education (Art. 15).

Pursuant to Article 21 (2) of the Act, data relating to the provision of training / course may be used for statistical purposes and may be transmitted in a manner that does not allow identification of the individual for statistical purposes, and may be transmitted to and used by the Hungarian Central Statistical Office free of charge in a manner that allows individual identification for statistical purposes.

The Data Controller may transfer personal data to the dormitory in cases where it provides accommodation to the student:

Name: CEU Conference and Residents Center

Headquarters: 1106 Budapest, Kerepesi út 87.

E-mail address: ceucenter@ceu.edu

Phone number: +36 1 327 3150

The data transferred include: personal identification data (name, gender, nationality), current university, room type.

**Data processors in particular:**

<b>Data Processor</b>	<b>Function</b>
<b>SDA Informatika Zrt.</b> 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
<b>DEXTER Informatikai és Tanácsadó Kft.</b> registered office: 7622 Pécs, Vargha Damján utca 4. földszint 1.) reg. number: 02 09 061782	operation of the CoosSpace e-learning framework
<b>DREAMAPPLY OÜ</b> registered office: Harjumaa, Tallinn linn, Pärnu mnt 102b, 11312 reg. number: 11417364 <a href="#">Privacy Policy (dreamapply.com)</a>	operation of the application and enrolment management DreamApply online platform in case of foreign national students and students of higher education vocational programmes
<b>Microsoft Ireland Operations Limited</b> registered office: One Microsoft Place, South County Business Park, Leopardstown, Dublin 18., Írország <a href="https://privacy.microsoft.com/en-us/privacy-questions">https://privacy.microsoft.com/en-us/privacy-questions</a>	operation of Microsoft Teams used as an education platform; Microsoft OneDrive hosting
<b>Zoom Video Communications, Inc.</b> registered office: 55 Almaden Blvd. Suite 600, San Jose, CA 95113 <a href="https://zoom.us/privacy">https://zoom.us/privacy</a>	operation of the Zoom software used as an educational platform
<b>DMS One Zrt.</b> registered office: 1117 Budapest, Infopark sétány 1. I. ép. reg. number: 01-10-046112	operation of the K2 document registration program for the registration of decisions related to the student status
<b>BeMind Kft.</b> registered office: 8200, Veszprém, Damjanich utca 7/A reg. number: 19-09- 512458	operation of the <a href="http://www.metropolitan.hu">www.metropolitan.hu</a> website
<b>Instructure, Inc. (Canvas Learning Management System)</b> Registered office: 6330 South 3000 East, Suite 700, Salt Lake City, UT 84121, USA Website: <a href="https://www.instructure.com/canvas">https://www.instructure.com/canvas</a>	operates the Canvas e-learning platform. Instructure Inc. is listed on the Data Privacy Framework list: <a href="https://www.dataprivacyframework.gov/list">https://www.dataprivacyframework.gov/list</a> , therefore data transfers rely on the EU–US adequacy decision.

Contact: <a href="mailto:privacy@instructure.com">privacy@instructure.com</a>	
<b>Sustainable Business Academy Kft.</b> Registered office: 1038 Budapest, Temes utca 11, Building E, Ground floor, Door 1 Company registration number: 01-09-402519	participates in the implementation of the ESG advisory partial knowledge training, providing e-learning services (based on the MOODLE system) as well as personal consultation.

## 8. 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 processing 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 process 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.

## 9. Your rights

Please note that according to the law in force you can enforce your rights at [adatvedelmitisztviselo@metropolitan.hu](mailto: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.

**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.

**10. 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](mailto: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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