

Detailed rules on the content of the records

The **University of Óbuda** (hereinafter referred to as "**University**") is subject to the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as "**Regulation**" or "**GDPR**") and the provisions of the Act on the right to information self-determination and freedom of information of 2011. In order to comply with the provisions of Act CXII of 2011 on Information Privacy, Data Protection and Data Security, and with regard to the principle of accountability set out in Article 5(2) of the Regulation, the content of the records that the University is required to keep is regulated in detail below.

This document is an integral part of the University's Privacy and Data Protection Policy (the "**Policy**").

1. Data Asset Inventory

- 1.1. In accordance with Article 30 of the Regulation, the University shall keep a register of its data processing activities (inventory of data assets), which shall include all data processing purposes and processes of the University and their main characteristics.
- 1.2. The inventory of data assets for each data processing operation includes the following:
 - a) the purpose of the processing;
 - b) categories of personal data processed;
 - c) categories of persons concerned;
 - d) Recipients;
 - e) the duration of the processing;
 - f) information on transfers to third countries or international organisations;
 - g) other comments.
- 1.3. Where the University carries out processing activities, it shall keep records of the processing activities carried out on behalf of its clients in accordance with Article 30 of the Regulation, which shall contain the following information:
 - a) the name and contact details of any data controller for whom or on whose behalf the University is acting as processor and, if any, the names and contact details of the representatives of the data controllers acting as processors and of their Data Protection Officers;
 - b) the categories of processing activities carried out on behalf of each controller;
 - c) information on transfers to third countries or international organisations;
 - d) the date of conclusion of data processing contracts;
 - e) data security measures;
 - f) other comments.

2. Additional registers

- 2.1. The University keeps records of the data processors used, the exercise of data subjects' rights and data protection incidents.

- 2.2. The University keeps a register of its data processors, which includes the following characteristics of data processing:
- a) the purpose of the processing to which the processor is contributing;
 - b) data processor data;
 - c) the range of data to be processed;
 - d) characteristics of data management;
 - e) whether the data processor uses an additional data processor, and if so, the details of that data processor.
- 2.3. The register on the exercise of data subjects' rights and the fulfilment of requests relating thereto includes:
- a) personal data concerning the data subject;
 - b) identification has been done or not;
 - c) subject of the request (name of the right exercised);
 - d) the date of receipt of the application;
 - e) the deadline for fulfilling the request;
 - f) how and through which channel to submit your request;
 - g) the action taken on the request;
 - h) the date of execution of the request;
 - i) the date on which the information on the action taken on the request was provided to the data subject.
- 2.4. Where the data subject has requested the erasure of his or her personal data, subsection (a) of the register referred to in point 2.3 shall be erased.
- 2.5. The University keeps a record of data breaches, indicating the main facts and circumstances surrounding the data breach as follows:
- a) the date of occurrence;
 - b) notification deadline;
 - c) the nature of the injury;
 - d) type of incident;
 - e) description of the incident;
 - f) the impact of the incident on those affected;
 - g) number of people affected;
 - h) categories of persons concerned;
 - i) the scope and number of personal data concerned;
 - j) the consequences of an incident;
 - k) measures taken to remedy the consequences of the incident;
 - l) whether and when stakeholders have been informed;
 - m) other comments.

3. Keeping records

- 3.1. The records in force at the time of when this Policy enters into force are set out in Chapter VIII of this Policy. The rules relating to the keeping of records are set out in point 13 of the Policy.