

PRIVACY NOTICE

I. INTRODUCTION OF DATA CONTROLLER

In order to ensure the legality of its internal data protection processes and the rights of the data subjects, **Obuda University** (hereinafter: University, Data controller, We/Us) formulates the following privacy notice.

Name of data controller:	Obuda University
Ministry of Education ID nr.:	FI12904
Headquarters of Data controller:	1034 Budapest, Bécsi út 96/B
Representative of Data controller:	Prof. Dr. Kovács Levente rector
Data protection officer:	Bovard Kft. (info@bovard.hu)

As an institution for higher education the data processor is an organisation founded with the core activities of education, scientific research, and artistic creation – as set forth in Act CCIV of 2011 on National Higher Education. This obligatory data processing is necessary for the University to guarantee its lawful operation and to ensure the realization of the educational goals set forth in relevant law.

The personal data of the data subjects are managed in accordance with the requirements of all effective laws, but primarily in accordance with the requirements of the following laws:

- Act CXII of 2011 on the right of informational self-determination and the freedom of information (hereinafter: Infotv.),
- 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).

The University keeps personal data confidential and employs technical and organizational measures relating to the storage of processing of said data in order to ensure its safety.

Definitions

The conceptual framework of this Privacy Notice is identical to that described in Article 4 of the GDPR, and in some points supplemented by the interpretative provisions of Section 3 of the Infotv.

When the Privacy Notice mentions data or data processing/controlling it refers to personal data and the processing/controlling of personal data.

II. DATA PROCESSING PURPOSE: Communication

While carrying out its public tasks, the University communicates with any data subject by post or via electronic means. Anyone may contact the University by sending mail via post or sending an electronic message (either in the form of an e-mail, or using the contact form available on the website).

During the communication with the data subject – in any matter – the Data controller processes the data in accordance with the information provided in this privacy notice.

The purpose of data processing

Communication between the University and the data subject. The Data controller uses all the data provided by the data subject during the contact process solely for the purpose of the communication and the administration in the matters included in the message. The data subject may contact the University in any matter by post or via electronic means.

Processed personal data

Name, email address, alternatively phone number or postal address, as well as any other information provided by the data subject during the communication with the Data controller.

Legal basis of data processing

Data processing is required for carrying out the public task performed by the University, which, in this case is to communicate with data subjects during the process of carrying out its public tasks, therefore, the legal basis is Article 6 Paragraph (1) Point e) of GDPR.

The source of personal data

The data subject. As the data subject is the source of personal data, information shall be provided directly on any changes in the scope of the data processed at the time of registration thereof.

Access to the personal data provided

Personal data provided by the data subject shall only be processed by employees of the University who have decision or recommendation rights regarding the matters included in the message or letter sent by the data subject, or regarding the usual administration process based on such matters.

Transfer of personal data to a third country or international organization

The Data controller does not transfer any personal data of the subject to a third country or international organization.

Time period of processing personal data

In the event of any kind of contract (agreement) is concluded between the University and the data subject, the Data controller will process the personal data obtained in the course of the communication in relation to the contract in question, in accordance with the relevant privacy notice.

If no contract is concluded between the University and the data subject following the pre-contractual processing, or if the communication is not related to a contract and the communication cannot have any future legal effect, the University will process the personal data obtained during the communication until the communication is finally terminated.

Automated decision making and profiling

No automated decision making and profiling shall take place during the data processing.

Consequences of failure to provide personal data

Providing personal data is a condition for replying to the message and thus for communication between the data subject and the University.

III. THE RIGHTS OF THE DATA SUBJECT

Right to be informed

The data subject has the right to be informed with regard to the data processing, which right is observed by the Data controller by providing this privacy notice.

Right of access by the data subject

The data subject shall have the right to obtain from the Data 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 planned period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the data subject is informed about their 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 directly from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Upon request, the Controller shall provide a copy of the personal data undergoing processing.

Right to rectification

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. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a request is made to rectify (modify) personal data then the data subject needs to prove the authenticity of the data to be modified. Additionally, the data subject must verify that the person

requesting rectification is authorised to do so. This is the only way for the data controller to verify the authenticity of the new data before modifying it.

Please report any changes in your personal data to the Data controller as soon as possible, facilitating the legality of data processing and the enforcement of your rights.

Right to erasure ('right to be forgotten')

The data subject shall have the right to obtain from the Data 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 withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing of personal data for direct marketing purposes;
- 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;
- f) the personal data have been collected in relation to the offer of information society services.

Right to restriction of processing

The data subject shall have the right to obtain from the Data 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 pending the verification whether the legitimate grounds of the controller override those of the data subject.

Right to object

Because the processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller (point (e) of Article 6(1) of the GDPR), the data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, including profiling based on the relevant provisions.

PROCEDURES FOR ENFORCING THE RIGHTS OF DATA SUBJECTS

The above rights can be exercised by data subject by sending an electronic mail to this e-mail address: jog@uni-obuda.hu, or regular mail to the seat of the Data controller or in person at the seat of the Data controller. The data subject shall be informed about the measure taken in response to the request within 1 month. If we are unable to fulfil the request, we inform the data subject about the reasons of the rejection and the administrative and judicial redress rights of the data subject.

The rights of the deceased may be enforced within five (5) years by an authorised person who possesses administrative provisions, or a statement towards the data processor included in a public document or full probative private document. If multiple such statements exist at the same data processor, then the statement made the latest will prevail. If the subject has made no such legal statement, then a close relative – as defined in Act V of 2013 on the Civil Code – is still able to enforce certain rights of the deceased within five (5) years of death. These rights are defined in Article 16 (right to rectification) and Article 21 (right to object), as well as – if the data processing was unlawful during the life of the subject, or the purpose of data processing has ceased with the death of the subject – Articles 17 (right to erasure) and 18 (right to restriction of processing) of the GDPR. The close relative who exercises their right first will be entitled to enforce rights of the subject as set forth in this Paragraph.

IV. THE RIGHT TO LODGE A COMPLAINT AND TO AN EFFECTIVE JUDICIAL REMEDY

To ensure your right to an effective legal remedy you may seek the Court's decision if in your judgement our University or one of our data processors, or data controllers working according to our provisions has handled your personal data by breaching the relevant legal provisions or regulations set forth in the compulsory legal acts of the European Union. The court will handle the case out of turn. Resolving the case is the authority of the Court. The claim may be filed – according to the subject's decision – at the court of the subject's residence, or at the court of our University's seat (Fővárosi Törvényszék). Court locator: <https://birosag.hu/birosag-kereso>.

If in your judgement your personal data was handled in breach of the law or there is a direct threat of it happening, or if the University hinders you in exercising your right regarding data processing, or if the University denies your request to exercise such rights, you may lodge a formal complaint at the Hungarian National Authority for Data Protection and Freedom of Information (NAIH).

The claim can be filed at one of the below addresses:

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

Mailing address: Po. box.: 9, Budapest, H-1363

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

E-mail: ugyfelszolgalat@naih.hu

URL: <http://naih.hu>

Budapest, 21 October 2025