

PRIVACY NOTICE

**OBUDA UNIVERSITY
(1034 BUDAPEST, BÉCSI ÚT 96/B.)**

22 April 2026

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I. INTRODUCTION OF DATA CONTROLLER

In order to ensure the legality of its internal data protection processes and data subjects' rights, **Obuda University** (hereinafter: University, Controller, Data Controller or "We") issues the following privacy notice.

Name of Data controller:	Obuda University
Institutional identification nr.:	FI12904
Registered seat:	1034 Budapest, Bécsi út 96/B.
Electronic address:	jog@uni-obuda.hu
Representative:	Prof. Dr. Levente Kovács rector
Data protection officer (DPO):	Bovard Kft. (info@bovard.hu)

As specified in Act CCIV of 2011 on national higher education (hereinafter: Nftv.), the Controller is an organization established for pursuing the core businesses of education, scientific research, and artistic activity – hereinafter jointly: higher education tasks –, which processes personal data required for performing this public task in the course of its operations by law.

The University processes personal data in compliance with applicable law, in particular the following:

- Act CXII of 2011 on informational self-determination and freedom of information (hereinafter: Infotv.);
- 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: Regulation or GDPR).

The Data Controller 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 structure of this information coincides with the interpretative definitions specified in Article 4 of the Regulation, supplemented at some points by the interpretative provisions of Infotv. Section 3.

When this information sets out provisions on data or data processing, they should be interpreted as personal data and the processing thereof.

II. PURPOSES OF DATA PROCESSING

The doctoral schools of the University (hereinafter collectively: Doctoral School or Doctoral Schools) organize doctoral training programs aimed at obtaining a PhD/DLA degree. Application for such programs is a complex procedure designed to ensure the selection of the most suitable candidates for academic succession and research excellence.

The admission procedure is conducted by the Admission Committees of the respective Doctoral Schools. During the selection process, the professional suitability and research plans of the

applicants are evaluated, taking into account the expectations of the scientific field and the curriculum of the respective Doctoral School. To ensure transparency and fairness, decisions are made based on objective criteria. The data and documents submitted during the application process are handled solely for the purpose of making admission decisions, performing administrative tasks, and facilitating the enrolment process.

Applying to any program of a Doctoral School requires the payment of an application fee. This fee must be paid online by card.

The University provides the following privacy notice in relation with the data processing operations concerning the registering on the Doctoral School's admission platform, submitting an application, and proceeding through the enrolment process in case of a successful application.

As a general rule, the University provides information on the processing of personal data relating to doctoral training and concerning doctoral students through its privacy notice on the processing of student data, which is supplemented by the present notice with information specific to doctoral training.

1. Registration on the doctoral program admission portal

The purpose of data processing

The purpose of the data processing is to create a user account on the website.

Additionally, the email address is processed to send system messages to the data subject (e.g., confirmation of successful registration, password recovery, service outage notifications).

Processed personal data and the legal basis of the data processing

During registration, the data subject must provide the following:

- email address;
- password (encrypted).

The legal basis for the data processing is the performance of a task carried out in the public interest by the University. In this case, it is the creation of a user account, which is a prerequisite for applying to the doctoral programs, and thus, ultimately, for participating in the University's doctoral education. Therefore, the legal basis is Article 6(1) (e) point of the GDPR.

The source of personal data

The data subject.

Access to personal data

The personal data of the data subject may only be known by the employees of the Data Controller, in order to perform their duties concerning the organisation of the registration process and the managing of the website laid out in their job descriptions.

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

The data subject may request deletion of their user account at any time. In such a case, all related data will be anonymized. After the final conclusion of the admission procedure, the account will be automatically deleted.

Automated decision making and profiling

No automated decision making and profiling is taking place during the data processing.

2. Application to a doctoral program, admission procedure

The purpose of data processing

The purpose of data processing is to manage applications for the programs of the Doctoral School, handle the necessary payment procedures, make admission decisions, and notify accepted candidates of their admission to the respective Doctoral School.

The admission procedure is carried out in accordance with the provisions laid out in the Nftv. and the University's current Doctoral and Habilitation Regulations.

Processed personal data and the legal basis of the data processing

In addition to the data provided during registration, the University processes the following personal data of the data subject for the purpose of conducting the admission procedure, specifically in relation to the chosen doctoral program (which program of which Doctoral School):

- a) name (for identification), and in the case of foreign applicants, also the birth name (for identification);
- b) place (country and city) and date of birth (for identification);
- c) mother's name (for identification);
- d) nationality (for identification and application assessment);
- e) sex (for identification);
- f) permanent address (for contact and billing);
- g) residence address (for contact);
- h) email address (for contact);
- i) website address (for the assessment of the application – not mandatory);
- j) phone number (for contact);
- k) occupation (for application assessment);
- l) name and address of workplace, workplace telephone number, and position (for the assessment of the application – not mandatory);
- m) university of graduation (for application assessment);
- n) title and classification of the university degree (for application assessment);
- o) copies and details of documents proving qualification, including the diploma ID and date (for application assessment);

- p) language proficiency data and copies of certificates, including ID number and date (for application assessment);
- q) details of the selected doctoral program, the chosen supervisor, and the title of the doctoral topic/program, as well as a declaration on whether the applicant has applied to another doctoral school/program;
- r) professional CV with list of publications (for application assessment);
- s) declaration on whether the applicant wishes to be admitted (to a self-funded program) even if they are not awarded a scholarship (for application assessment).

Additionally, the University may process further data disclosed during the oral part of the admission procedure.

As part of the application, the Doctoral School requires the submission of documents verifying qualifications and language skills, including uploading copies of MSc/MA/university diplomas and language certificates during the application and presenting the originals during the oral interview. This is also required to meet the condition set forth in Section 40 (6) of the Nftv.: “only those holding a master's degree and qualification, as well as the foreign language knowledge defined in the doctoral school's regulations, may be admitted to a doctoral program.”

Additional documents required during the application:

- a) proof of payment of the application fee;
- b) statement of acceptance from the chosen institute or research organisation, and supervisor (in case of applications for state-funded training);
- c) preliminary research plan signed by the prospective supervisor(s), list of publications (in case of individual preparation);
- d) employer's letter of support (for individual applicants with an employment relationship);
- e) other documents (e.g. recommendations).

During the application to the University's Cooperative Doctoral Program, in addition to the above, it is also required to upload a proof of employment required for participation in the 'Cooperative Doctoral Training'.

The legal basis for processing is the performance of a public task by the University, specifically the operation of doctoral education in accordance with Section 2 (3) of the Nftv.. Thus, the legal basis is Article 6 (1) (e) of the GDPR.

The source of personal data

The data source is the data subject, or for current students, the University's Neptun system.

In the case of international applicants, the University's International Education Office collects and provides the data to the Doctoral Schools.

Access to personal data

Only employees of the University who are responsible for the organisation and management of the doctoral admission process and the website are entitled to access the personal data of the data subjects.

Data submitted in connection with doctoral applications is stored on the folders of the University's internal servers and Microsoft-based cloud services (OneDrive, SharePoint). These applications are operated by Microsoft Ireland Operations Limited (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland), whose general data protection policy is available at <https://www.microsoft.com/hu-hu/privacy/privacystatement#mainteamsmodule>. Microsoft Ireland Operations Limited stores the data managed by the University on its servers in the European Union (<https://products.office.com/en-us/where-is-your-data-located?geo=Europe#Europe>) and has joined the Transatlantic Privacy Shield Framework.

During the payment process, Obuda University Nonprofit Ltd. (headquarters: 1034 Budapest, Bécsi út 96/B; company registration no.: 01-09-913230) is also involved. In this role, it independently processes the data of applicants necessary for payment as a separate data controller. Their privacy notice is available here: <https://jegy.oenonprofit.hu/cms/show/aszf-adatvedelem>.

If card payment is selected, it is processed via the Barion system on the Obuda University Nonprofit Ltd.'s website (<https://jegy.oenonprofit.hu/>), in which case Barion Payment Inc. (1117 Budapest, Irinyi József utca 4-20. 2nd floor) acts as an independent data controller.

Transfer of personal data to a third country or international organization

The University does not transfer personal data to any third country or to any international organisation; however, the transfer of personal data to a third country may occur through Microsoft Ireland Operations Limited. Such data transfers are carried out by Microsoft Ireland Operations Limited in accordance with the provisions of Chapter V of the Regulation, i.e. on the basis of an adequacy decision pursuant to Article 45 of the GDPR. Information on the participants of the Trans-Atlantic Data Privacy Framework is available at the following website: <https://www.dataprivacyframework.gov/s/participant-search>.

Time period of processing personal data

For applicants not admitted to the doctoral program, their data is retained for the duration of the admission procedure and the subsequent appeal period, or – if an appeal is filed – until the end of the semester following the appeal's conclusion.

For admitted applicants, the University uploads their data to the Neptun system and retains it in accordance with the University's general data protection notice for doctoral programs, including the enrolment data detailed in the next section.

Automated decision making and profiling

No automated decision making and profiling is taking place during the data processing.

3. Enrolment in a doctoral program, establishment of student status

The purpose of data processing

According to Section 39 (3) of the Nftv., student status is established upon enrolment following a decision on admission or transfer. Accordingly, after successful admission, the admitted student enrolls in the first academic semester of the respective doctoral program. The purpose of data

processing is the efficient execution of this enrolment process, particularly verifying the data provided during application and recording basic personal information.

The rules of enrolment are defined by Government Decree No. 87/2015. (IV. 9.) implementing provisions of the Nftv., and the University's current Doctoral and Habilitation Regulations.

Processed personal data and the legal basis of the data processing

Based on data recorded in the Neptun system, the University generates a paper-based enrolment form, which, in accordance with Section 39 (3) of the Government Decree mentioned above, contains the following data:

- a) the name and institutional ID of the higher education institution,
- b) the name of the academic year and semester,
- c) the student's data as defined in Annex 3 I/B 1 ba) of the Nftv., including the education ID number,
- d) the type of student status,
- e) the student's tax identification number and social security number,
- f) the student's declaration of having read the institutional information,
- g) additional data defined in the University's regulations related to student rights and obligations,
- h) the date of the completion and authentication of the form, and the signature of the student or their representative,
- i) authentication in accordance with Section 34 (4) of the Government Decree mentioned above,
- j) the title of the doctoral topic, the name of the supervisor, and the doctoral candidate's declaration of having received information on the requirements and procedures of obtaining a doctoral degree at the institution.

The admitted doctoral student must appear in person at the EDHI Office (University Doctoral and Habilitation Office), where their personal data is verified, and original documents are presented to the staff. The enrolment form is then printed based on the Neptun data and signed by the doctoral student. This document is kept in the student's personal file.

Additionally, the student may declare any disability during the enrolment. A student (applicant) with a disability must provide an expert opinion issued by a body defined in Section 63 (2) or (3) of the Government Decree mentioned above. Based on this, the student may request exemptions from study obligations or exams, alternative arrangements for completing these, or exemption from foreign language requirements under Section 49 (8)-(9) of the Nftv.

For students residing abroad and for students for whom in-person enrolment is not possible or is difficult to arrange, the University exceptionally provides the option of online enrolment. In this process, the documents required for enrolment must be presented by the enrolling student during a video call conducted via the Microsoft Teams system used by the University, and, by the nature of online enrolment, the University necessarily processes the student's image and voice recording.

The legal basis for processing is the performance of a public task by the University, specifically the operation of doctoral programs in accordance with Section 2 (3) of the Nftv. Thus, the legal basis is Article 6 (1) (e) point of the GDPR.

Data concerning disabilities qualifies as special category (sensitive) health data, the processing of which is permitted under Article 9 (2) (g) of the GDPR to comply with the provisions of the Nftv. and the Government Decree mentioned above, promoting equal opportunities.

The source of personal data

The source of the personal data is the data subject. In the case of international applicants, data is collected and forwarded to the Doctorate Schools by the University's International Education Office.

Access to personal data

Personal data may only be accessed by those University staff members responsible for organizing and administering doctoral school enrolment as part of their job duties.

Following the establishment of student status, the University is required to report the student's personal and enrolment data to the Higher Education Information System (FIR). This electronic system is operated by the Educational Authority as an independent data controller. Data is submitted via the NEPTUN system, which also records it. NEPTUN is developed and maintained by Campus Codeworks Zrt. (1117 Budapest, Hauszmann Alajos utca 3/B.), acting as a data processor.

The operator of the Microsoft Teams application is Microsoft Ireland Operations Limited (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland), whose general privacy statement is available at the following link: <https://www.microsoft.com/hu-hu/privacy/privacystatement#mainteamsmodule>. Microsoft Ireland Operations Limited stores the data processed by the University on servers located within the European Union (<https://products.office.com/en-us/where-is-your-data-located?geo=Europe#Europe>); at the same time, it has joined the Trans-Atlantic Data Privacy Framework.

Transfer of personal data to a third country or international organization

The University does not transfer personal data to any third country or to any international organisation; however, the transfer of personal data to a third country may occur through Microsoft Ireland Operations Limited. Such data transfers are carried out by Microsoft Ireland Operations Limited in accordance with the provisions of Chapter V of the Regulation, i.e. on the basis of an adequacy decision pursuant to Article 45 of the GDPR. Information on the participants of the Trans-Atlantic Data Privacy Framework is available at the following website: <https://www.dataprivacyframework.gov/s/participant-search>.

Time period of processing personal data

The University processes the personal data for the duration of the doctoral program to which the student was admitted. After the completion of the program, the data is retained for 80 years in accordance with Annex 3 I/B point 3 of the Nftv.

In the case of online enrolment, the University prepares minutes of the statements made during the enrolment process and processes such minutes until the end of the semester concerned by the enrolment. The video recording made of the student is deleted by the University without delay following the preparation of the minutes.

Automated decision making and profiling

No automated decision making and profiling is taking place during the data processing.

4. Data Processing Related to Doctoral Programmes

The purpose of data processing

The purpose of the data processing is the performance of the tasks defined in applicable legislation and in the University's internal regulations in the context of doctoral programmes, doctoral degree award procedures and habilitation procedures, including in particular the fulfilment of the obligations set out in Nftv. and in the University's Doctoral and Habilitation Regulations (hereinafter: EDHSz).

Processed personal data and the legal basis of the data processing

In connection with the doctoral student status, pursuant to point 1/B 1(b) of Annex 3 to Nftv., the University maintains records of the following personal data:

- a) Data related to the student status:
 - the student's name, gender, birth name, mother's name, place and date of birth, nationality, permanent address, place of residence, mailing address and telephone number, e-mail address; in the case of non-Hungarian citizens, the legal basis for residence in Hungary and the designation and number of the document entitling the person to reside in Hungary – in accordance with a separate act, in the case of persons enjoying the right of free movement and residence, the document certifying the right of residence;
 - the type of student (or guest student) status, the date and manner of its commencement and termination, the designation of the programme pursued by the student, its state funding status and study schedule, the expected date of completion of the programme, the evaluation of the student's studies, examination data, semesters commenced, utilised support period, and any suspension of the student status;
 - the place and duration of partial studies completed at a foreign higher education institution;
 - credits obtained and recognised during the programme, and recognised studies;
 - data relating to student benefits, and data necessary for assessing eligibility for such benefits (social circumstances, data concerning parents, maintenance-related data);
 - data relating to student employment;
 - data relating to student disciplinary and liability cases;
 - data necessary for assessing entitlement to special treatment for students with disabilities;
 - data relating to student accidents;
 - the serial number of the student ID card and the master record identification number;
 - the student's educational identification number, personal identification document number, photograph, and social security identification number;
 - data relating to the doctoral defence, language examinations, as well as the diploma, diploma supplement and micro-credential;
 - data necessary for the fulfilment of rights and obligations arising from the student status;
- b) data relating to graduate career tracking;
- c) the student's tax identification number;
- d) data serving to identify documents certifying the personal data;

- e) data relating to fees and charges paid by the student, including instalment payment arrangements, deferrals and exemptions related to the obligation;
- f) in the case of the provision of student or housing support, where such support is granted due to receipt of infant care allowance, childcare allowance, child-raising support, childcare benefit, regular child protection allowance, or on the grounds of disadvantaged status, data relating to such fees and benefits;
- g) data relating to scholarships paid in support of the student's studies, granted in consideration of the student status, established by government decree pursuant to Sections 85(1) and (2) of Nftv.;
- h) data relating to student competence assessments and their results;
- i) data relating to the existence and type of student loan granted by the Student Loan Centre, and, in the case of earmarked loans, the amount of the student loan requested by the student, the loan agreement number, the amount transferred to the higher education institution and the date of transfer;
- j) the date and reason for removal from the personal data and address register.

In addition to the above, the University processes data relating to the student's marital status and status as a student with children for the purpose of determining the support period under the Hungarian state scholarship scheme.

Data Processing Related to the Coursework and Research Phase

The doctoral programme consists of two phases: (i) the coursework and research phase, and (ii) the research and dissertation phase.

During the coursework and research phase, the University processes the data specified in its privacy notice on the processing of student data, as well as data related to the student's project work and research reports. At the conclusion of the coursework and research phase, and as a prerequisite for commencing the research and dissertation phase, the student is required to take a comprehensive examination, which assesses and evaluates academic and research progress. The University records minutes of the comprehensive examination. As a general rule, the comprehensive examination takes place in person; however, in justified cases, it may be conducted online. In such cases, the University also processes the data necessary to enable online participation.

Following the comprehensive examination, during the doctoral degree award procedure, the student participates in the research and dissertation phase, the purpose of which is the attainment of the doctoral degree.

Data Processing Related to Doctoral Degree Award Procedures

The University issues a final certificate (absolutorium) to a doctoral student who has fulfilled the requirements set out in the EDHSz in connection with their research results or documented artistic activities during the doctoral programme.

The conditions for obtaining the degree are defined in Section 18 of the EDHSz, in accordance with Section 53(5) of Nftv. Accordingly, the University processes the data necessary to verify compliance with these conditions, in particular:

- the application for the doctoral degree and the decision of the Doctoral Council (DIT) regarding the acceptance of the application;
- proof of obtaining the absolutorium;

- the doctoral dissertation;
- the thesis booklet presenting the achieved independent scientific results, or technical/artistic creations and the underlying research results;
- proof of language proficiency;
- publications required for the degree;
- a declaration confirming that no unsuccessful defence has taken place within the past two years;
- data supporting the fulfilment of additional requirements set by the Doctoral School, taking into account the specifics of the field; and
- proof of payment of the degree award procedure fee (except where the student participates in a state-funded programme and initiates the degree award procedure during their student status).

In the case of individual preparation for the doctoral degree, pursuant to Section 15 of the EDHSz, the individual candidate demonstrates readiness for the degree award procedure through scientific publications or artistic work.

A prerequisite for obtaining the degree is also the presentation and defence of the doctoral dissertation. In connection with this, the Data Controller processes not only the dissertation but also the minutes recorded during the pre-defence (workshop discussion) and the public defence. As a general rule, the defence takes place in person; however, in justified cases, it may be conducted online. In such cases, the University also processes the data necessary to enable online participation. The University issues the diploma for the awarded doctoral degree and conducts any necessary data verification in connection with this. The University maintains a register of awarded doctoral degrees, which is publicly accessible, and the doctoral dissertation and its theses are also publicly available – the University maintains records of these as well.

Data Processing Related to the Recognition of Foreign Academic Degrees

Pursuant to Act C of 2001 on the Recognition of Foreign Certificates and Diplomas (hereinafter: the Recognition Act), the recognition (equivalency) of a foreign academic degree is the responsibility of the University, provided that the University is entitled to award a doctoral degree in the corresponding scientific or artistic field.

The University recognises a foreign academic degree as a doctoral (PhD or DLA) degree, provided that:

- a) it was issued by a foreign educational institution authorised under the legal system of the foreign state to award academic degrees; and
- b) the requirements for obtaining the degree comply with, or can be made to comply through the imposition of supplementary requirements, the requirements for obtaining a doctoral (PhD or DLA) degree as set out in the applicable legislation and in the EDHSz.

The University processes the data necessary to assess compliance with the above conditions, including in particular the data contained in the application for recognition and its attachments pursuant to Section 28 of the EDHSz, as well as any additional data requested for the purpose of examining the recognition requirements.

Data Processing Related to the Cooperative Doctoral Program

A special form of doctoral training is the so-called cooperative doctoral program. In this framework – pursuant to Section 108(22a) of Nftv. – the doctoral student, in parallel with their doctoral student status, is employed in a field related to their doctoral topic for at least 20 hours per week: (i) at a higher education institution in a teaching or research position, (ii) at a healthcare provider, or (iii) at another organization that meets the requirements set out in Government Decree 387/2012 (XII. 19.) on doctoral schools, doctoral procedures, and habilitation (hereinafter: Doctoral Government Decree). During the admission procedure – see Section II.2 of this notice – and throughout the training period, the University may examine whether the conditions for participation in the program are met, i.e. whether the doctoral student maintains an employment relationship in accordance with Section 108(22a) of the Nftv.

If a doctoral student participating in the cooperative doctoral program is employed by the University in a teaching or research position, the University provides information on data processing related to the employment relationship through its employee privacy notice.

If a doctoral student participating in the cooperative doctoral program is employed by another organization, the University provides information to the data subject on any data transfers between that organization and the University on a case-by-case basis.

Data Processing Related to the Habilitation Procedure

The prerequisite for initiating the habilitation procedure is the possession of a doctoral degree. During the habilitation procedure, the University acts in accordance with the provisions of the Doctoral Government Decree.

The habilitation procedure is initiated upon request. The conditions for submitting a request are specified in Section 21(2) of the Doctoral Government Decree and in Sections 29–30 of the EDHSz. In accordance with these provisions, the University processes the data necessary to verify compliance with these conditions (habitus examination), in particular:

- data contained in the request for the habilitation procedure;
- the content of the university (MSc/MA) diploma, the doctoral (PhD/DLA) diploma, and documents certifying language proficiency;
- data required to verify a clean criminal record;
- additional documents and data evidencing the applicant’s professional and scientific activity and scholarly publications; and
- a declaration by the applicant that no habilitation procedure is currently pending and that no habilitation request in the same scientific field has been rejected within the past two years.

Following the habitus examination, the University evaluates the habilitation theses, and subsequently conducts the scientific presentation, public discussion, and classroom habilitation lecture. In the course of these activities, the Data Controller processes the data necessary for their evaluation, as well as the data contained in the minutes recorded in connection with them.

Upon successful completion of the habilitation procedure, the University issues a habilitation diploma and maintains a register of the diploma (doctoral register).

The source of personal data

The source of the personal data is the data subject.

Access to personal data

The University's students' personal data may only be accessed by University employees whose job responsibilities require such access. The Doctoral Student Union is also authorised to access the University email addresses provided to doctoral students for the purpose of effective communication related to student life.

Student personal data is maintained in the NEPTUN system, developed by Campus Codeworks Zrt. (1117 Budapest, Hauszmann Alajos utca 3/B), which acts as a data processor.

Under the law, the University is obliged to maintain the prescribed records in its academic system and to provide data electronically to the national statistical data collection program, the higher education information system, or any other system prescribed by law.

Specifically for doctoral programmes, the University is also required to provide data to the National Doctoral Council (hereinafter: ODT), which maintains the national doctoral register. Accordingly, the University is required to record the doctoral dissertation, its theses, and the scheduling of the public defence in the ODT database, and to submit a report to the ODT regarding the completion of the habilitation procedure. In these data processing activities, the ODT acts as an independent data controller.

If either the comprehensive examination, any defence (e.g., public defence), or, in justified cases upon request, the habilitation procedure is conducted online or in a hybrid format, the University uses the Microsoft Teams application. The Microsoft Teams application is operated by Microsoft Ireland Operations Limited (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland), whose general privacy statement is available at <https://www.microsoft.com/hu-hu/privacy/privacystatement#mainteamsmodule>. Microsoft Ireland Operations Limited stores the data processed by the University on servers located within the European Union (<https://products.office.com/en-us/where-is-your-data-located?geo=Europe#Europe>) and has joined the Transatlantic Data Privacy Framework.

Transfer of personal data to a third country or international organization

The University does not transfer personal data to any third country or to any international organisation; however, the transfer of personal data to a third country may occur through Microsoft Ireland Operations Limited. Such data transfers are carried out by Microsoft Ireland Operations Limited in accordance with the provisions of Chapter V of the Regulation, i.e. on the basis of an adequacy decision pursuant to Article 45 of the GDPR. Information on the participants of the Trans-Atlantic Data Privacy Framework is available at the following website: <https://www.dataprivacyframework.gov/s/participant-search>.

Time period of processing personal data

The University processes the personal data for the duration of the doctoral program to which the student was admitted. After the completion of the program, the data is retained for 80 years in accordance with Annex 3 I/B point 3 of the Nftv.

Automated decision making and profiling

No automated decision making and profiling is taking place during the data processing.

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 subjects shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning them 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.

At the data subject's request, the Data Controller shall also provide the data subject with a copy of their personal data.

Right to rectification

The data subjects shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning them. 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 subjects shall have the right to obtain from the Data controller the erasure of personal data concerning them 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

If 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 subjects shall have the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them, including profiling based on the relevant provisions.

Right to data portability

The data subjects shall have the right to receive the personal data concerning them, which they have provided to the Data 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:

- a) the processing is based on consent of the data subject or on a contract according to Article 6 Paragraph (1) Point b) of the GDPR; and
- b) the processing is carried out by automated means.

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 in 1 month about the reasons of the rejection and the administrative and judicial redress rights of the data subject.

The rights of the deceased data subject may be enforced within five (5) years by an authorized person who possesses administrative provisions, or a statement towards the Data Controller included in a public document or full probative private document. If multiple such statements exist at the same Data Controller, then the statement made the latest will prevail. If the data 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 data subject, or the purpose of data processing has ceased with the death of the data 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 data subject as set forth in this Paragraph.

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

In order to enforce their right to judicial remedy, the data subjects may take legal action against the Controller if they consider that the Data Controller or a data processor acting on behalf of or under the instructions of the Data Controller is processing their personal data in breach of the provisions of laws on the processing of personal data or of binding legal acts of the European Union. According to Article 79 (2) of the GDPR proceedings against the data controller shall be brought before the courts of the Member State where the data controller has an establishment, i.e., before the Budapest-Capital Regional Court (Hungary). The court shall deal with the case as a matter of priority. Alternatively, such proceedings may be brought before the courts of the Member State where the data subject has habitual residence. Court application: <https://birosag.hu/birosag-kereso>.

Without prejudice to judicial remedy, according to Article 77 (1) of the GDPR every data subject shall have the right to lodge a complaint with the supervisory authority, in particular in the Member State of data subject's habitual residence, place of work or place of the alleged infringement (i.e. in Hungary), alleging that the processing of personal data by the Data Controller has resulted in a violation of rights or an imminent threat thereof, or that the Data Controller is restricting the exercise of rights related to the processing of personal data or is refusing to exercise such rights.

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

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

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

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

E-mail: ugyfelszolgalat@naih.hu

URL: <http://naih.hu>

