

PRIVACY POLICY

SHADOW PROGRAM

1. Preamble

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

- **the 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; GDPR)**
- **the applicable Hungarian legislation.**

2. Data Controller

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

Contact information:

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

e-mail: adatvedelmitisztviselo@metropolitan.hu

In the data management processes, 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.

3. The data processing

3.1. The purpose of data processing

The purpose of the data processing is for the Data Controller to perform the promotional tasks related to the Shadow Program series of events organized in person as well as online on the Zoom platform between May 2-20, 2022, and to accept the applications of the students as participants. With respect to the participants of the event, the handling of contact data is for the sole purpose of maintaining contact with the data subject for the purpose of the proper execution of the event. The purpose of the Shadow Program is to organize a one-day visitation program for students to get acquainted with the operation of an employer with the help of mentors. During the visit, photos are being taken for the purpose of documentation and promotion.

3.2. The range of the processed data

The Data Controller handles the following data of the mentors:

- a) name and title,
- b) photograph,
- c) the company's logo,
- d) website,
- e) LinkedIn profile,
- f) a quote from the presenter.

The Data Controller handles the following data of the student as participant:

- a) name,
- b) email address,
- c) Neptun code,
- d) phone number,
- e) existence of employment,
- f) data of the application,
- g) registry sheet,
- h) photos made during the visit,
- i) employer evaluation,
- j) student report.

3.3. Data subjects

Mentors and student participants of the Shadow Program series of events organized by the Data Controller.

3.4. Legal basis of data processing

Data processing by the Data Controller is based on the consent of the individual concerned.

Please be advised that the collection, management, and storage of data is solely in accordance with the purposes set out in point Section 3.1.

3.5. Access to data, storage, data processors

The Data Controller shall take special care to ensure that the personal data are accessible only to authorized employees of the organizational unit responsible for the concerned task.

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. (registered office: HU-2030 Érd, Retyezáti utca 46.) as Data Processor. SDA Informatia Zrt.'s conduct as Data Processor is regulated by the data processing contract with the Data Controller.

Participant registration takes place in the CooSpace system used as a communication and data storage platform operated by DEXTER Informatikai és Tanácsadó Korlátolt Felelősségű Társaság (registered office: HU-7622 Pécs, Vargha Damján utca 4. földszint 1.) acting as Data Processor.

To facilitate the event, Data Controller can use the Zoom platform (Zoom Video Communications, Inc.; registered office: 55 Almaden Blvd. Suite 600, San Jose, CA 95113; privacy policy: <https://zoom.us/privacy>).

The Data Controller displays the personal data of the presenter of the event set out in point 3.2. on the website <https://www.metropolitan.hu/shadow-program>, on CooSpace and on METU's Facebook page and METU's Instagram page (<https://www.instagram.com/metumybrand/>) (<https://www.facebook.com/METUmybrand>).

The Data Controller shall, on an ad hoc basis, use additional data processors to achieve the data processing purpose set out in point 3.1.

3.6. Duration of data processing

The Data Controller will process the data described in provision 3.2. until the **end of the calendar year following the date of the event**. METU has no means to recall the already published photos.

3.7. Data forwarding

The Data Controller does not transfer the processed data to third countries.

4. 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 management and the risk of varying probability and severity of natural persons' rights and freedoms – to guarantee a level of security that is appropriate to the degree of risk.

The Data Controller selects and manages the IT tools used to manage personal data in the provision of the service so that the data processed

- 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.

5. Your rights

Please note that according to the law in force you can enforce your rights at 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.

Pursuant to Article 16 of the GDPR, the data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her

At the request of the data subject, METU is obliged to correct inaccurate personal data concerning them without undue delay. Taking into account the purpose of the data processing, the data subject has the right to request that the incomplete personal data be supplemented, inter alia, by means of a supplementary statement.

Pursuant to Article 17 of the GDPR, the data subject has the right to request the deletion of personal data concerning him or her from METU as follows:

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the data subject objects to the data processing in the public interest, in the exercise of a public authority or in the legitimate interest of the controller (third party) and there is no overriding legitimate reason for the data processing, or the data subject objects to the data processing for direct business acquisition;
- (d) the personal data have been unlawfully processed;
- (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

According to the GDPR, the further retention of personal data can be considered lawful, in case the data processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject
- for the performance of a task carried out in the public interest
- for the exercise of official authority vested in the controller;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest,
- for scientific or historical research purposes or statistical purposes; or
- for the establishment, exercise or defence of legal claims.

Pursuant to Article 18 of the GDPR, the data subject has the right to request METU to restrict the processing of personal data concerning him as follows:

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- (a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- (d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted based on the above, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

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

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

If you have any questions or requests related to data protection, please contact us at the e-mail address adatvedelmitisztviselo@metropolitan.hu!

If you request information, we will respond to your request within a maximum of 30 days, using the contact information you provided.

In case of illegal data processing experienced by the data subject, he or she may initiate a civil lawsuit against the Data Controller. The trial falls within the jurisdiction of the regional court. The lawsuit - at the option of the person concerned - can also be initiated before the court of the place of residence (you can see the list and contact details of the courts through the following link: <http://birosag.hu/torvenyszeketek>).

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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