Data Privacy Notice

Based on 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 Regulation (EC) No 95/46/EC (General Data Protection Regulation), the Corvinus University of Budapest as data controller ("University", "Data Controller") provides the following information to its graduates ("Alumni member", "Data Subject") on data processing with regard to creating and managing their Alumni membership ("Alumni").

1. Name and contact details of the data controller, data protection officer:
Data controller: Corvinus University of Budapest
Registered seat: 1093 Budapest, Fővám tér 8.
Phone:+36 1 482 5000
Website: https://www.uni-corvinus.hu/
Data Protection Officer: dr. Balázs Locsmándi
E-mail: adatvedelem@uni-corvinus.hu

2. Purpose of data processing and relevant legislation
2.1 he University will upload the data retrieved from the Neptun system and provided by the Alumni member to the basic storage space of the Hivebrite system hosting the alumni platform ("Storage Space").
A.) The University processes the data of the Alumni Member uploaded to the storages space for the purpose of establishing and managing his/her Alumni membership as follows:
- promoting events and university programmes that are relevant for alumni members or specifically targeted at this group;
- inviting graduates to complete career tracking questionnaires (e.g. Graduate Career Tracking System (DPR), Financial Times Ranking, etc.);
- inviting members to complete research questionnaires, contacting members to get involved in the work of the University, support schemes (e.g. guest speakers, mentoring scheme, fundraising, etc.);
-announcing educational programmes,
-providing information to alumni members on available services,
- providing information to target groups on job vacancies and other career opportunities, international and other internships.

2.2
A.) The University processes the data of the Alumni Member for the purpose of creating and managing the graduate's Alumni Membership as follows:
- promoting events and university programmes that are relevant for alumni members or specifically targeted at this group;
- inviting graduates to complete career tracking questionnaires (e.g. Graduate Career Tracking System (DPR), Financial Times Ranking, etc.);
- inviting members to complete research questionnaires, contacting members to get involved in the work of the University, support schemes (e.g. guest speakers, mentoring scheme, fundraising, etc.);
-announcing educational programmes,
- providing information on services for alumni members
- providing information to target groups on job vacancies and other career opportunities, international and other internships.

2.3. The legislation relating to the provision of the Service includes in particular:
-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 Regulation (EC) No 95/46/EC (General Data Protection Regulation), in particular Article 6(1)a:

3. Purpose and legal grounds of the data processing, scope of the personal data processed and duration of the processing:

Purpose of data processing	Legal grounds for data processing	Scope of the personal data processed	Duration of data processing

3.1 In case of using the Storage Space, establishing and operating your Alumni membership as follows:
- promoting events and university programmes that are relevant for alumni members or specifically targeted at this group;
- inviting graduates to complete career tracking questionnaires (e.g. Graduate Career Tracking System (DPR), Financial Times Ranking, etc.);
- inviting members to complete research questionnaires, contacting members to get involved in the work of the University, support schemes (e.g. guest speakers, mentoring scheme, fundraising, etc.);
-announcing educational programmes,
- providing information on services for alumni members
- providing information on job vacancies and other career opportunities,
	Consent by the data subject (Articles 6(1)(a) the GDPR).
	
	Withdrawal of consent by the data subject does not affect the lawfulness of the data processing that took place before the withdrawal.
		Data transferred from the Neptun system:
		• Personal data:
		   o First name:
		   o Family name:
		   o Nationality
		• Contact data:
		   o Private email address,
		   o Postal address
		• Study information:
		   o Start date of programme(s),
		   o Year of obtaining the diploma(s),
		   o Name of programme(s),
		   o Academic level (bachelor, master, etc.),
		   o Name of the faculty/faculties from which the student graduated;
		   o Name of the institution(s)
		
		Data provided by the data subject:
		• Contact data:
		   o Private e-mail address (if different from the one stored in Neptun)
			As long as the alumni membership is maintained

international and other internships.			

3.2 Creating and operating your alumni membership as follows:
- promoting events and university programmes that are relevant for alumni members or specifically targeted at this group;
- inviting graduates to complete career tracking questionnaires (e.g. Graduate Career Tracking System (DPR), Financial Times Ranking, etc.);
- inviting members to complete research questionnaires, contacting members to get involved in the work of the University, support schemes (e.g. guest speakers, mentoring scheme, fundraising, etc.);
-announcing educational programmes,
- providing information on services for alumni members
- providing information to target groups on job vacancies and other career opportunities, international and other internships.
	Consent by the data subject(Articles 6(1)(a) the GDPR).
	
	Withdrawal of consent by the data subject does not affect the lawfulness of the data processing that took place before the withdrawal.
		Data transferred from the Neptun system and provided by the Data Subject in accordance with Section 3.1.
		
		Data that the data subject may provide:
		• Personal data:
		   o Title,
		   o Sex,
		   o Domicile
		• Contact data:
		   o Notification address:
		   o Further email address,
		   o Phone number,
		   o Sharing your Linkedin profile,
		   o Sharing your Instagram profile,
		   o Sharing your Facebook profile,
		• Information on workplace:
		   o Industry sector(s),
		   o Workplace(s),
		   o Job title(s):
		   o Work area(s),
		   o Start and end date(s) of job,
		• Study information:
		   o Average grade of diploma,
		• Extra-curricular skills:
		   o Activities in a student union and college for advanced studies,
		   o Experience in exchange programmes, in courses taken at another higher education institution
		   o Sport activity(ies),
		   o Demonstrator activity(ies),
		   o Scientific activity(ies),
		   o Case study and other study competition(s),
		   o Language skills;
		   o IT skills:
		   o Training course(s) completed,
		   o Other skills;
		• Scientific publications,
		   o Scientific publications,
		• Alumni membership and institutional cooperation data:
		   o Membership category,
		   o Areas of cooperation with the institution,
		   o Requested institutional services,
		• Other sets of data:
		   o Area(s) of interest,
		   o "I am a jobseeker" status,
		   o "Recommend at least three friends to whom we can send the news of the platform" text box*,
		   o "What is the first thing you remember about your former university" text box,
			As long as the alumni membership is maintained

		* The Data Subject is entitled to make a recommendation if the recommended persons have given their prior consent.- The Data Controller is not obliged to verify the existence of consent or its content, the Data Subject is solely responsible for the availability of consent.	

4. Automated decision-making (including profiling):
No automated decision making, including profiling, takes place during the processing.

5. Transfer of personal data, recipients of personal data and categories of recipients:
5.1 Currently the Data Controller uses the following data processor in connection with data processing:
- name, address and contact details of the data processor: KIT UNITED SAS (French company registration no: 75339171300025, registered seat: 5 rue des Italiens, Paris, 75009, FR, Website: https://hivebrite.com/, e-mail privacy@hivebrite.com.),
- its current data management activity is the provision of the Hivebrite platform service to Alumni.

5.2 The University will disclose the processed personal data only to the recipients and in the cases specified in law.

6. The Data Subject's rights in relation to data processing:
6.1 General rules on the exercise of rights by the data subject:
The Data Controller shall inform the Data Subject of the action taken in response to his or her request without undue delay, but no later than one month from the date of receipt of the request. If necessary, in view of the complexity of the request and the number of requests, this deadline may be extended by two months. The extension of the deadline shall be communicated to the Data Subject by the Data Controller within one month of receiving the request. The cause of the delay shall be identified. If the Data Subject has submitted the request by electronic means, the information shall be provided by electronic means where possible, unless the Data Subject requests otherwise.
The Data Controller shall provide the Data Subject with information and action free of charge. If the Data Subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the Data Controller, taking into account the administrative costs of providing the information requested or of taking the action requested:
(a)   may charge a reasonable fee, or
(b)   may refuse to act on the request.
The Data Controller shall bear the burden of proof of the manifestly unfounded and excessive nature of the request. If the Data Controller has reasonable doubts about the identity of the natural person making the request, it may request additional information necessary to confirm the identity of the Data Subject.

6.2 Right of access:
The data subject has the right to receive feedback from the Data Controller as to whether his or her personal data are being processed and, if such processing is underway, the right to access the personal data. The Data Controller shall make available to the Data Subject a copy of the personal data that are subject to data processing. The Data Controller may charge a reasonable fee associated with the administrative costs for further copies requested by the Data Subject. If the Data Subject has submitted the request by electronic means, the information shall be provided in a commonly used electronic format, unless the Data Subject requests otherwise.

6.3 Right to rectification:
The Data Subject shall be entitled to have any inaccurate personal data relating to him or her rectified by the Data Controller without undue delay.

6.4 Right to object:
The Data Subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data on the basis of Article 6(1)(e) or (f) of the GDPR. In such a case, the Data Controller may no longer process the personal data, unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

6.5 Right to restriction of data processing

At the request of the Data Subject, the Data Controller shall restrict data processing if one of the following conditions is met:

(a)   the data subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the Data Controller to verify the accuracy of the personal data,

(b)   the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use,

(c)   the Data Controller no longer needs the personal data for the purposes of data processing, but the data subject requires them for the establishment, exercise or defence of legal claims, or

(d)   the data subject has objected to the data processing pursuant to Article 21(1) of the GDPR; in this case, the restriction shall apply for the period until it is determined whether the legitimate grounds of the Data Controller prevail over the legitimate grounds of the data subject.

If the processing is restricted, such personal data, except for storage, may only be processed with the consent of the Data Subject 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 important public interests of the Union or of a Member State.

6.6. Right to data portability

The Data Subject shall also have the right to receive personal data concerning him or her which he or she has provided to the Controller in a structured, commonly used, machine-readable format and the right to transmit such data to another controller without hindrance from the controller to which he or she has provided the personal data, if: (i) the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation or on a contract pursuant to Article 6(1)(b) of the General Data Protection Regulation; and (ii) the processing is carried out by automated means.

6.7. Right to erasure

The Data Subject may request the deletion of his/her personal data processed by the University. The University will examine the request and, if justified, will take action to erase the data. The University shall reject the request for erasure in the cases provided for in Article 17(3) of the GDPR, in particular in cases where the data are still necessary for the performance of the University's tasks carried out in the public interest or where the processing is necessary for the establishment, exercise or defence of legal claims.

7. Enforcement options:

7.1 The Data Subject may at any time contact the Data Protection Officer of the Data Controller (dr. Balázs Locsmándi, e-mail: adatvedelem@uni-corvinus.hu).

7.2 In the event of a complaint regarding the processing of personal data, the Data Subject may also contact the National Authority for Data Protection and Freedom of Information (postal address: 1363 Budapest PO Box 9., address: 1055 Budapest, Falk Miksa utca 9-11.; phone:+36 (1) 391-1400; fax: +36 (1) 391-1410; e-mail address: ugyfelszolgalat@naih.hu ;website: www.naih.hu).

7.3 The Data Subject may take the Data Controller to court in the event of a breach of his or her rights. The case shall be given priority by the court. The Data Controller is required to prove that the processing complies with the law. In the event of court proceedings, the Budapest Metropolitan Court (Fővárosi Törvényszék) shall have jurisdiction. The action may also be brought before the courts of the place of residence or domicile of the Data Subject.

The Data Controller shall compensate for any damage caused to others by the unlawful processing of the Data Subject's data or by breaching the requirements of data security. The Data Controller shall be exempted from liability if it can prove that the damage was due to an unavoidable cause beyond the scope of data controlling. No compensation is payable if the damage was caused intentionally or by gross negligence on the part of the victim.

Place and date: Budapest, 2024