

DATA PROCESSING NOTICE

on data processing in connection with the practice period of the Corvinus University of Budapest and the professional training facility, as joint data controllers

In relation to the data of programmes they manage, the Corvinus University of Budapest (hereinafter: CORVINUS or University) and the professional training facility as joint data controllers have been prepared and issued the present Data Processing Notice in order to provide the data subjects with adequate information on the processing of their data and their rights in relation to the processing of their data in accordance with Articles 13 and 14 of the GDPR.

1. NAME OF THE DATA CONTROLLERS

1.1. CORVINUS

Address: 1093 Budapest, Fővám tér 8.
Telephone: +36-1-482-5604
Website: www.uni-corvinus.hu

Data Protection Officer: Dr. Balázs Locsmándi
Email: adatvedelem@uni-corvinus.hu

1.2. Professional training facility: the details of the professional training facility as data controller are available on the website of the given professional training facility.

2. LEGISLATION ON WHICH THE DATA PROCESSING IS BASED

- 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): GDPR);
- Act CXII of 2011 on informational self-determination and the freedom of information;
- Act CCIV of 2011 on National Higher Education (hereinafter referred to under the Hungarian abbreviation: Nftv);
- Government Decree 87/2015 (9 April) on the implementation of certain provisions of Act CCIV of 2011 (hereinafter: Vhr.), and
- Government Decree 230/2012 (28 August) on certain aspects of tertiary vocational training and practice periods within the framework of higher education

3. CATEGORIES OF DATA SUBJECTS

Students completing their practice period at the University.

4. SUBJECT MATTER

In the bachelor and master programmes, the student is required to complete a practice period in an external professional training facility. The practice period is a partly independent student activity to be carried out in the professional training facility of the University, as jointly defined by the University and the professional training facility, and planned, organised and evaluated in accordance with the curriculum of the study programme as defined in the programme and outcome requirements. The University and the professional training facility are considered to be joint controllers according to Article 26 of the GDPR. The present Data Processing Notice sets out the essential circumstances for the processing of personal data in the context of the practice period in accordance with Article 13, 14 and 26 of the GDPR.

5. SCOPE OF THE PROCESSED DATA

5.1. SCOPE OF THE DATA JOINTLY PROCESSED:

- a) name;
- b) place and date of birth;
- c) the designated study programme(s), academic level, language of the programme, mode of study
- d) contact details of the student (permanent address, e-mail address, telephone number);
- e) information on the student's attendance during the practice period;
- f) management assessment and details regarding the student's practice period.

5.2. Regarding to the data processed beyond the scope of data included in point 5.1, the data controllers are considered as independent data controllers. The independent processing of data by the professional training facility as an employer (Article 6(1)(b) of the GDPR) is also implemented.

6. PURPOSE OF DATA PROCESSING:

The completion of the practice period.

7. LEGAL GROUNDS FOR DATA PROCESSING:

7.1. The performance of a public task in relation to CORVINUS - Article 6(1)(e) of the GDPR

7.2. In the case of legal grounds used by the professional training facility, the information provided by the professional training facility shall prevail.

8. DURATION OF DATA PROCESSING:

8.1. In the case of CORVINUS, the data will be processed for a period of eighty years from the date of the notification of the termination of the student's status. This obligation is the responsibility of the University.

8.2. In the case of the professional training facility, the information provided by the professional training facility shall prevail as regards the duration of the data processing.

8.3. Joint data processing will cease if any of the following circumstances occur:

- the data subject's student status with CORVINUS is terminated;
- the legal relationship of the data subject with the professional training facility is terminated;
- The agreement between CORVINUS and the professional training facility is terminated.

9. ACCESS TO DATA

The personal data may be accessed by the relevant staff of the organisational units involved in the organisation and implementation of the study programme on behalf of the data controllers in order to perform their tasks, as defined in the university regulations.

10. INFORMATION ON THE CONTENT OF THE AGREEMENT OF JOINT DATA PROCESSING PURSUANT TO ARTICLE 26(2) OF THE GDPR

- The parties shall cooperate in the joint data processing to enforce the rights of students under the General Data Protection Regulation. Students may exercise these rights in relation to and against both Parties, regardless of the terms of the agreement.

- CORVINUS and the Professional Training Facility are obliged to notify the other joint data controller without undue delay if a student intends to exercise his or her rights under the General Data Protection Regulation or has lodged an objection (complaint) alleging a violation of the legal provisions on data processing. Unless otherwise agreed, the Party to which the request or objection has been submitted is obliged to take action on the request or objection. The Party taking the action shall inform the student and the other Party without delay of the execution or refusal of the request.
- The Parties shall allow their employees or agents access to the personal data of students covered by this Agreement only to the extent necessary for the performance of their activities to achieve the purpose of the data processing set out in this Agreement.
- The parties may use a data processor. They may only use data processors that provide adequate guarantees to implement appropriate technical and organisational measures to ensure compliance with the legal requirements for data processing and the requirements set out in this Agreement and to protect the rights of students. With regard to the joint data processing, the Party concerned is obliged to inform the data subject with regard to the data processor used by one of the Parties according to Article 13(1)(e) of the GDPR.
- CORVINUS and the Professional Training Facility shall inform the other Party without undue delay, but no later than twenty-four hours from the time of discovery, if they become aware of a personal data breach, providing at least the information required by Article 33(3) of the General Data Protection Regulation. If the personal data breach is likely to result in a high risk to the rights and freedoms of students, the Party in whose interest the personal data breach primarily occurred must inform the students of the personal data breach in accordance with Article 34 of the General Data Protection Regulation. In the event of a dispute, the Parties shall agree on the identity of the Party providing the information.
- The Parties are jointly and severally liable towards the students or other third parties for the lawfulness of the joint data processing.

11. TRANSFER OF DATA

11.1. CORVINUS may transfer data without the consent of the data subject, as defined in point I/B.4 of Annex 3 to the Nftv:

- a) all data necessary for the maintainer to carry out the tasks related to the maintenance management;
- b) the data necessary for the court, the police, the public prosecutor's office, the bailiff, the state administration body to decide on a specific case;
- (c) all data necessary for the National Security Service to perform the tasks assigned to it by law;
- d) all data to the body responsible for the operation of the higher education information system;
- e) to the body responsible for recording the fulfillment of the conditions for the Hungarian state scholarship in relation to the study programme and the student status.

11.2. No transfer of data will take place. No data is transferred to 3rd countries.

11.3 The University is entitled to transfer the data referred to in point 5.1 of the present Data Processing Notice to the professional training facility for the purpose of carrying out the practice period, with the exception of points e) and f), and for the purpose of concluding the employment contract.

11.4 The information provided by the professional training facility shall prevail regarding the transmission of data implemented by the professional training facility.

12. DATA SECURITY MEASURES

12.1. The University stores personal data on the University servers. The University does not use the services of another company to store the data. The University shall take appropriate measures to ensure that personal data are protected against, inter alia, unauthorised access, and to ensure the continued confidentiality, integrity, availability and resilience of the systems and services used to process personal data, and the ability to restore in a timely manner access to and availability of personal data in the event of a physical or technical incident.

12.2 The information provided by the professional training facility shall govern the data security measures applied by the professional training facility.

13. ENGAGING A DATA PROCESSOR

CORVINUS does not use a data processor for joint data processing. The information provided by the professional training facility shall prevail regarding the data processors possibly used by the professional training facility.

14. RIGHTS IN RELATION TO DATA PROCESSING

14.1. *The right to request information*

You may request information from data controllers in writing, using the contact details provided in point 1:

- the nature of the processed personal data,
- the legal grounds of the data processing,
- the purpose of the data processing,
- the sources,
- the duration of the data processing,
- to whom, when, under which law, to which personal data the data controller(s) has (have) given access or to whom the controller(s) has (have) transferred your personal data.

14.2. *The right to rectification*

You may request in writing, via the contact details provided in point 1, that the data controller amend any of your personal data (for example, you may change your e-mail address or postal address at any time).

14.3. *The right to erasure*

You may request the erasure of your personal data by writing to the controller using the contact details provided in point 1.

14.4. *The right to blocking (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 disputes the accuracy of the personal data, in which case the restriction applies for the period of time that allows 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.

The data subject may request in writing, via the contact details provided in point 1, that his/her personal data be blocked by the data controller (by clearly indicating the limited nature of the data processing and ensuring that they are kept separate from other data). The blocking will last as long as necessary for the reason you have given.

14.5. Right to object:

You may object in writing to the data processing related to recording via the contact details provided in point 1. An objection is a statement in which you object to the processing of your personal data.

The Data Subject may address his or her request to any of the Data Controllers, exercise his or her rights related to data processing in relation to any Data Controller or against any of them. The Joint Data Controllers are obliged to cooperate with each other in this context.

The Data Controller shall, without undue delay, but not later than 1 month from the date of the request, provide information in writing in an intelligible form on the action taken on the request or on the refusal of the request and the reasons for such refusal.

15. LEGAL ENFORCEMENT IN RELATION TO DATA PROCESSING

In the event of unlawful processing, the data subject may refer the matter to the National Authority for Data Protection and Freedom of Information (NAIH) or a court as follows:

15.1 Notifying the authorities

If you believe that there has been or is an imminent threat of a breach of rights in relation to the processing of your personal data or the exercise of your rights of access to data of public interest or data in the public interest, you may initiate an investigation with the supervisory authority:

NAIH contact details (<https://naih.hu/uegyfelszolgalat,-kapcsolat.html>):

address: 1055 Budapest, Falk Miksa utca 9-11.
postal address: 1363 Budapest, PO Box 9.
phone number: +36 (1) 391-1400
fax: +36 (1) 391-1400
e-mail address: ugyfelszolgalat@naih.hu
web: <https://naih.hu/>

15.2 Initiating legal proceedings

If you find that your personal data is unlawfully processed, you can file a civil suit against the data controller. Adjudication of the lawsuit falls within the jurisdiction of the court. According to the data subject's choice, the lawsuit can also be brought before the court of the place of residence (the contact details of the courts can be found at the following link <http://birosag.hu/torvenyszekek>).