

**DATA PROCESSING NOTICE**

**on data processing by Corvinus University of Budapest (hereinafter: University or Data Controller 1) and OneVendor Szolgáltató és Üzemeltető Kft. (hereinafter: Operator or Data Controller 2) as joint data controllers in connection with the delivery of physical education classes for university students and the preferential access of university students and employees to the Sports Center**

On 08 March 2024, the University and the Operator entered into an Operating Agreement for the operation of the Sports Center established in the building at 1118 Budapest, Mányoki út 9. (Corvinus Gellért Camus), which is used and rented by the University. Under the Operating Agreement, the Operator shall operate the Sports Center. The Operator shall provide the venue and access for the physical education classes prescribed for the students of the University under the terms and conditions set out in the Operating Agreement.

The Operator uses an electronic access control system at the Sports Center under its sole responsibility. With regard to the processing of personal data in connection with the use of the access control system, the Operator is the data controller under the GDPR.

The University shall hold the physical education classes for its students according to the timetable and ensure their access to these classes. With regard to the processing of personal data in connection with the organisation and delivery of physical education classes, the University is the data controller under the GDPR.

According to Section 4.18 of the Operating Agreement, the Operator shall provide recreational sports services to the University's employees and students on preferential terms. The Operator shall be the data controller under the GDPR in respect of personal data relating to the performance of individual sports service contracts with students and employees.

On the basis of the above circumstances, the provision of services at preferential rates as set out in the Operating Agreement to the employees and students of the University, the operation of the access control system and the processing of data in this context, as well as the delivery of physical education classes for students, and the processing of data in this context are only possible together, assuming the processing of data by each data controller; therefore, the Parties are joint controllers within the meaning of Article 26 of the GDPR ([edpb\\_guidelines\\_202007\\_controllerprocessor\\_final\\_hu.pdf \(europa.eu\)](#)– Point 55), in view of which they set out below the division of their responsibilities for fulfilling their obligations under the GDPR, in particular in relation to the exercise of data subjects' rights and the provision of information referred to in Articles 13 and 14.

## 1. NAME AND DETAILS OF THE DATA CONTROLLERS

### 1.1 Data Controller 1:

Name: Corvinus University of Budapest  
Address: 1093 Budapest, Fővám tér 8.  
Phone: +36-1-482-5604  
Website: [www.uni-corvinus.hu](http://www.uni-corvinus.hu)

Data Protection Officer: Dr. Balázs Locsmándi  
Email: [adatvedelem@uni-corvinus.hu](mailto:adatvedelem@uni-corvinus.hu)

### 1.2 Data Controller 2:

Name: OneVendor Szolgáltató és Üzemeltető Kft.  
Address: 1023 Budapest, Bécsi út. 35., 4. lph., 1. em. 2. ajtó  
Communication or reporting in data protection matters:  
Phone: 0670-458-4159  
Email: [szabo.balazs@gravitybudapest.com](mailto:szabo.balazs@gravitybudapest.com)

## 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 Directive 95/46/EC (General Data Protection Regulation: GDPR);
- Act CXII of 2011 on informational self-determination and the freedom of information

## 3. CATEGORIES OF DATA SUBJECTS CONCERNED BY JOINT PROCESSING

Students and employees of Data Controller 1.

## 4. SCOPE OF THE PROCESSED DATA

### 4.1 SCOPE OF THE DATA PROCESSED JOINTLY:

- a) name,
- b) email address,
- c) date of birth,
- d) date and time of physical education classes

4.2 For data processed in addition to the set of data referred to in Section 4.1, the controllers are considered to be independent controllers.

## 5. PURPOSE OF JOINT DATA PROCESSING:

The purpose of the joint data processing is to provide physical education classes for the students of Data Controller 1 and to provide the employees and students of Data Controller 1 with the discount access set out in the Operating Agreement.

## **6. LEGAL BASIS FOR THE PROCESSING BY THE PARTIES:**

6.1 In the case of Data Controller 1, regarding the delivery of physical education classes, the performance of a task carried out in the public interest under Article 6(1) of the GDPR, in accordance with I/B.1. bb) of Annex 3 of Act CCIV of 2011 on National Higher Education.

6.2 In the case of Data Controller 2, regarding the operation of the access control system, Article (6)(1)(f) of the GDPR (legitimate interest of the Operator), and regarding the provision of sports services at preferential rates, Article 6(1)(b) of the GDPR (contract performance).

## **7. DURATION OF JOINT DATA PROCESSING:**

The joint processing will cease regarding the data subject if any of the following circumstances occur:

- the data subject's student status at Data Controller 1 ceases,
- the data subject ceases to have an employment relationship with Data Controller 1,
- The Agreement between Data Controller 1 and Data Controller 2 is terminated.
- Data Controller 1 so provides for other reasons.

## **8. INFORMATION ON THE CONTENT OF THE JOINT PROCESSING AGREEMENT PURSUANT TO ARTICLE 26(2) OF THE GDPR**

- In the course of the data flows between the Data Controllers, the Data Controllers shall ensure that they only make available or transfer to each other data that is necessary for the purpose of the joint data processing.
- Both Data Controllers are liable for data security, for taking appropriate technical and organisational measures at their own discretion under Article 32 of the GDPR.
- In ensuring data subjects' rights under Articles 12-21 of the GDPR, Data Controllers are obliged to cooperate as follows:
  - Within the scope of joint processing, Data Controller 1 is responsible for informing the data subject pursuant to Articles 13 and 14 of the GDPR.
  - The rectification of data, with the exception of data processing under the exclusive competence of Data Controller 2, shall be ensured primarily by Data Controller 1 to the data subjects.
  - Data subjects have the right to communicate their request to exercise their rights (data subject's rights under Articles 12-21 GDPR) to either of the Data Controllers.
- The Data Controllers agree that each Party shall be responsible for the legality of the processing operations which it carries out itself or through its processors.
- With regard to processing not covered by the scope of joint processing, the Data Controllers are responsible as independent controllers under the GDPR.
- Data controllers are entitled to use a data processor. The Party that engages a processor assumes full responsibility for the processor it engages. The Party using the data processor shall inform the data subject of the data processor it uses.
- In the event of any personal data breach under the GDPR, the obligation under Articles 33 and 34 of the GDPR shall be fulfilled by the Party to whom the incident is attributable.

## 9. DATA SECURITY MEASURES

11.1 Data Controller 1 shall store personal data on the University servers. It does not use the services of another company to store the data. Data Controller 1 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.

11.2 The data security measures applied by Data Controller 2 shall be governed by the Data Controller 2's Data Processing Notice.

## 10. ENGAGING A DATA PROCESSOR

With regard to joint processing, Data Controller 1. does not use a data processor. With regard to any data processors used by Data Controller 2, the provisions of Data Controller 2's Data Processing Notice shall apply.

## 11. RIGHTS IN RELATION TO DATA PROCESSING

**The data subject may address his or her request to either of the Data Controllers, exercise his or her rights in relation to data processing in relation to either of the Data Controllers or against either of them.**

### *The right to request information*

The data subject may request information from data controllers in writing, using the contact details provided in clause 1 on:

- 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 what law, to which personal data the data controller(s) has/have given access or to whom it/they has/have transferred personal data.

### *The right to rectification*

The data subject may request in writing, via the contact details provided in Section 1, that the data controller amend any of his/her personal data (for example, he/she may change his/her e-mail address or postal address at any time).

### *The right to erasure*

The data subject may request the deletion of his/her personal data by writing to the data controller, using the contact details provided in clause 1.

### *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 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.

The Data Subject may request in writing, via the contact details provided in Section 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 indicated by the data subject.

*Right to object:*

The data subject may object in writing, using the contact details provided in Section 1, to processing for the purposes of the legitimate interests pursued by the Data Controllers or third parties. An objection is a statement in which the processing of personal data is challenged.

### **13. LEGAL ENFORCEMENT IN RELATION TO DATA PROCESSING**

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

*13.1. 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, Pf. 9.  
phone number: +36 (1) 391-1400  
telefax: +36 (1) 391-1400  
Email address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)  
<https://naih.hu/>

*13.2. Initiating legal proceedings*

If you find that your personal data is unlawfully processed, you can file a civil suit against the data controller. The General Courts shall have competence to determine the case. The action 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>).