

**PRIVACY POLICY STATEMENT**  
**on processing data relating to the Semmelweis University Alumni Network**

Pursuant to Sections 16 and 17 of Act CXII of 2011 on the right to informational self-determination and freedom of information (hereinafter Info Act) and to Article 12 (1) and Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter **GDPR**), Semmelweis University hereby informs all involved parties about data processing in relation to the **Semmelweis University Alumni Network**.

**1. Name and contact details of the data controller:** Semmelweis University, Central Administration: 1085 Budapest, Üllői út 26. Mailing address: 1428 Budapest pf.: 2. Telephone number: 06-1-459-1500 Website: <http://semmelweis.hu>

**2. Name and contact details of the representative of the data controller:** Prof. Dr Béla Merkely rector, Semmelweis University, Central Administration: 1085 Budapest, Üllői út 26. Mailing address: 1428 Budapest pf.: 2. Telephone number: 06-1-459-1500 Website: <http://semmelweis.hu/>

**3. Name and contact details of the data protection officer:** Dr Sára Trócsányi, **Central Administration: 1085 Budapest, Üllői út 26. Mailing address: 1428 Budapest Pf.: 2. Telephone number: 36-1/224-1547** e-mail: [adatvedelem@semmelweis-univ.hu](mailto:adatvedelem@semmelweis-univ.hu)

**4. The purpose of data processing:**

The purpose of data processing is to maintain and to continuously develop the Alumni Network of Semmelweis University so that the graduates of the institution do not lose contact with the university or each other. For this purpose, the Semmelweis University Alumni Directorate would like to strengthen the alumni's sense of attachment to the University with its constantly expanding services, events, communication platforms, newsletters, information services, and various benefits for current and former students. Further goals of our data processing are to follow the careers of our graduates, to operate a graduate career tracking system, to support our graduates' career paths with individual and collective career counselling, to help connect job seekers to job opportunities with the involvement of labour market participants, and to organize class reunions and fundraising for Semmelweis University. In particular:

- a) to provide, for registered alumni, lifelong learning at Semmelweis University, support for professional training and continuing education, and career tracking;
- b) to enable famous and exemplary Semmelweis graduates with a high level of expertise and experience to regularly share their knowledge with other alumni, current students and lecturers;
- c) to preserve and continuously improve Semmelweis University's national and international reputation and position in rankings;
- d) to maintain and generate interest in the academic programmes of Semmelweis University;
- e) to support the studies and research of talented students and researchers;
- f) to nurture university traditions more widely and at a higher level;
- g) to provide information on the above by means of regular and continuous communication in accordance with the spirit of Semmelweis University;
- h) to provide registered alumni with a variety of opportunities that meet their interests.

**5. The legal basis for data processing:**

- Article 6 (1) a) of the GDPR: the data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- Article 6 (1) c) of the GDPR: Pursuant to Section 18 (1) g) of Act CCIV of 2011 on national higher education, higher education institutions shall keep records, in their education systems, of personal and special data essential for the purpose of tracking the careers of alumni who have graduated according to Sections 15 and 16.

**6. The categories of the personal data and sensitive personal data (if any) being processed:**

- a) Data required for registration:
- name
  - e-mail address
  - faculty and date of graduation
- b) Data that are optional to provide during registration:
- phone number
  - address
  - place and date of birth
  - major/specialization
  - current workplace
  - former workplace (in the event of retirement)

**7. The data subjects:** Members of the Semmelweis University Alumni Network.

**8. The data retention period:** Data processed in the legal framework of Act CCIV of 2011 (hereinafter Nhea) shall be retained, pursuant to Annex 3 (I/B) 3) of the Nhea, by the Alumni Directorate for eighty years from the notification of the termination of student status. Data processed on the basis of the data subject's consent shall be retained by the Alumni Directorate until the withdrawal of consent. The data subject has the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the legality of data processing based on consent prior to the withdrawal. The data subject shall receive information on the above before giving his or her consent. The withdrawal of consent shall be made possible in the same simple manner as the giving of consent.

**9. Name and address of the data processor:**

No data processor shall be engaged.

**10. The legal basis of data transfer in case of data transfer to a third country or international organization:**

No data shall be transferred to international organizations. The data shall be transferred to the registry of the Graduate Career Tracking System.

**11. The recipients of personal data:** The body responsible for the operation of the academic registry.

## **Information for data subjects about their fundamental rights**

### **1. Information**

Data subjects have the right to be informed in a concise, transparent, comprehensible, and easily accessible form.

### **2. Right of access for the data subject**

The data subject has the right to access their personal data and data referred in GDPR Article 15. The controller provides a copy of the personal data which are the subject of the data processing to the data subject. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs.

### **3. Right to rectification**

The data subject has the right to obtain from the controller without undue delay the rectification of their inaccurate personal data. The data subject also has the right to have incomplete personal data completed.

### **4. Right to erasure (right to be forgotten)**

The controller has the obligation to erase personal data requested by the data subject without undue delay where any of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected;
- the data subject withdraws consent on which the processing is based; thus, there is no legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- 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 to erase the personal data, the controller, taking account of available technology and the cost of implementation, takes reasonable steps to inform other controllers which are processing the personal data of which the data subject has requested the erasure of any links to, or copy or replication of those personal data.

The right of erasure of the data subject will not apply when data processing is necessary for:

- exercising the right of freedom of expression and information;
- archiving purposes in the public interest, scientific or historical research purposes in so far as the erasure would likely render impossible or seriously impair the achievement of the objectives of that processing;
- the establishment, exercise, or defence of legal claims.

## **5. Right to restriction of data processing**

The controller restricts the processing on request of the data subject where one of the following applies:

- 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;
- the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- 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;
- the data subject has objected to processing, in which case restriction is exercised until the verification of the legitimate grounds of the controller which override those of the data subject.

## **6. Right to data portability**

The data subject has the right to receive their personal data in a structured, commonly used, and machine-readable format.

The data subject has the right to transmit those data to another controller.

The data subject has the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The controller, without undue delay, but within 25 days of receipt of the request, informs the data subject in accordance with Points 2. to 6. on the action taken in response to the request. If necessary, taking into account the complexity of the application and the number of applications, this time limit may be extended by a further two months.

## **REMEDIES**

### **1. Data Protection Officer**

### **2. Right to complain to the supervisory authority**

Supervisory Authority: The National Authority for Data Protection and Freedom of Information, 1055 Budapest, Falk Miksa utca 9-11., Website: [www.naih.hu](http://www.naih.hu)

### **3. The right to a judicial remedy against the controller / data processor**

Irrespective of the official procedure and other procedures, the data subject may take a legal action against the controller and the data processor before the court in the location where the controller / processor operates. The action may also be brought in the courts of the Member State in which the data user concerned resides.

Ordinary court with general jurisdiction over the controller:

Budapest-Capital Administrative and Labour Court, Budapest-Capital Regional Court, (1055 Budapest Markó u. 27.)

## **Disclosure and registration clause**

I have arranged for the above data processing information to be published on the website of the organizational entity available to anyone without restriction at the internet link below:  
<https://semmelweis.hu/alumni/>

I have entered the above data management information document in the register of data management information under serial number X / 2021

Budapest, 17 June 2021

**Stamp**

Vágó Levente Béla  
director  
Semmelweis University  
Alumni Directorate