



SEMMELWEIS UNIVERSITY

Institute of Biostatistics and Network Science

Director

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Index number:

LEGITIMATE INTEREST ASSESSMENT

Purpose of data processing: photography conducted to support PR communication during the Biomedical Data Science Summer School and Conference, organized by the Institute of Biostatistics and Network Science at Semmelweis University, held between 28 July and 8 August 2025.

1. The legitimate interest of the data controller or a third party:

Photographs are to be taken of participants during the event, which will be used to illustrate university life in a dignified manner. The resulting images will be used by the Institute of Biostatistics and Network Science of Semmelweis University for internal identity building and external reputation-enhancing communication.

1.1. The interest of the data controller:

The Directorate aims to store and register photos taken of participants in order to be able to verify (e.g. in relation to consent) any potential future inquiries concerning the use of such images.

1.2. Justification of the legitimacy of the interest:

The Directorate's objective is to strengthen the university's reputation and employee identity through photographs used in online and offline PR communications.

1.3. Demonstrating the specificity of the legitimate interest:

The Directorate aims to conduct communication that enhances the university's reputation and fosters a sense of identity among staff.

1.4. Validity and relevance of the legitimate interest:

The Directorate intends to take photos at university events and during planned photo shoots with staff and students, for use in internal and external communication channels to promote the university.

2. Necessity of the data processing:

2.1. Clear explanation of why data processing is strictly necessary and appropriate for achieving the interest:

The data processing is carried out to promote the University, based on the data subjects' consent for photography.

2.2. Possible alternative solutions to protect the data subjects:

None.

2.3. Examination of the nature of the interests:

- **2.3.1. Legitimate interest of the data controller:**
Consent of the data subject and notification of their right to object.
- **2.3.2. Interest of the data subject:**
The right to object to the use of their image upon being informed, and to withdraw their consent regarding further use.
- **2.3.3. Nature of the data involved:**
Image (likeness), name, organizational unit, job title.

3. Impact assessment of the data processing:

3.1. Situation of the data subject:

There is a direct relationship between the data controller and the data subject.

3.2. Position of the data controller:

The data controller processes personal data pursuant to Article 6(1)(c) of the GDPR (legal obligation). However, for further processing, the compatibility of the purpose must be evaluated in accordance with Recital 50 of the GDPR. Following compliance with all requirements of the original legal basis, the data controller considers—among other things—the link between the original and further processing purposes, the context of the data collection, including the reasonable expectations of the data subjects based on their relationship with the controller, as well as the nature of the personal data. No new legal basis is found necessary, thus the further processing is based on Article 6(1)(f) of the GDPR.

3.3. Relationship between the data subject and the data controller:

The data subject is either an active staff member or student of Semmelweis University or a guest attending the event.

3.4. Impact of data processing on data subjects, considering their relationship with the controller:

Minimal risk: possible loss of control over personal data.

3.5. Reasonable expectations of the data subject:

In case of objection to data processing, the data controller must cease processing. Data subjects are explicitly informed of this right in the privacy notice.

4. Method of data processing:

Data will be recorded and stored both electronically and in paper form.

5. Information provided to the data subject regarding data processing:

Available on the data controller's website:

<https://semmelweis.hu/biostat/en/data-protection-information/>

6. Security measures:

6.1. Retention period of the data:

Five years from the date of consent provided by the data subject.

6.2. Limitation of access to the data:

Only accessible to the data controller and the data processor, within a closed online system and on paper.

7. Outcome and documentation of the legitimate interest assessment:**7.1. Existence of a legitimate interest:**

The data controller and any relevant third party have a legitimate interest in the data processing.

7.2. Assessment of the nature of the interests:

Only data strictly necessary for the purpose are processed, for a limited time, with appropriate safeguards in place.

7.3. Assessment of the impact of data processing:

The processing is necessary and proportionate.

8. Result of the legitimate interest assessment:

The data controller's interest in conducting the data processing outweighs the interest of the data subject not to have their data processed for this specific purpose.