



SEMMELWEIS UNIVERSITY

Students' Union

President

GECSEY RÉKA CSENGE

PRIVACY POLICY

regarding data controlling within Semmelweis University in connection with the University's anonymous reporting system

In accordance with Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereafter referred to as "Act on Information") sections 16 and 17, as well as Article 12, Paragraph 1, Article 13 and Article 14 of the General Data Protection Regulation 2016/679 of the European Parliament and of the Council ("**GDPR**"), the Semmelweis University Students' Union hereby informs the relevant persons ("Data Subjects") of about the processing of personal data **in connection with activities regarding the usage of the anonymous reporting system of Semmelweis University (hereafter: SU).**

1. Name and contact information of the data controller: Semmelweis University Students' Union, address: 1089 Budapest, Nagyvárad tér 4.

2. Name and contact information of the representative of the data controller: presiding president (Réka Csenge GECSEY), e-mail address: hok.president@semmelweis.hu

3. Name and contact information of the Data Protection Officer (DPO) dr. Sára TRÓCSÁNYI, address: 1125 Budapest, Kútvölgyi út 6., phone: +36 1 459-1500 ext. 62547, e-mail address: adatvedelem@semmelweis.hu

4. Purpose of data processing:

The purpose of data processing is to aid the process of providing assistance to students regarding the situation outlined in their report, as well as providing a way to file a report that could form the basis for the initiation of a process based on applicable laws and rules of the University (Plan of Equal Opportunities, Code of Conduct), using a specific form created for that purpose, making it possible for the reporting party to be unidentifiable for any third party.

5. Legal basis of data processing

The processing is based on the Data Subjects' consent to processing their personal data for one or more specific purposes, in accordance with Article 6, paragraph (1) subsection a) of the GDPR.



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6. Categories of the processed personal and (if applicable) protected personal data of the Data Subjects:¹

- a.** Student's name, gender, programme, faculty, NEPTUN code
- b.** Subject of the report and the form in connection with it
- c.** Student's contact information (e-mail and other contact information)

7. Those affected by data processing:² Students of SU (participating in Hungarian and international programmes).

8. General duration of data processing:² From the submission of the report to the end of the then-active semester, unless a legal process has been initiated regarding the report, in which case data processing lasts until the case is closed.

9. Time of data storage:³ In accordance with the plan outlined by SU's Document Management Regulations, Appendix I, but at most from the submission of the report to the end of the then-active semester, unless a legal process has been initiated regarding the report, in which case data processing lasts until the case is closed.

10. Name and address of the data processor:⁴

SU does not use a data processor.

¹ The range of processed personal data is to be determined by Article 4, Section 1, and Article 9 of the GDPR.

² The Data Subjects are to be determined in accordance with Article 4, Section 1 of the GDPR.

³ The timespan of data processing is to be determined by the time spent performing the activities in accordance with Article 4, Section 2 of the GDPR

⁴ Regarding the timespan of the preservation of data, after the cessation of data processing, a preservation time has to be determined by the Document Management Regulations and Management Plan as well as specific laws regarding the given type of data, of no less than 5 years, in a manner which describes the legal grounds prescribing the preservation time.

⁵ The Data Processor has to be identified in accordance with Article 4, Section 8, and Article 28 of the GDPR.

⁶ In case of regular data transfer, the recipients have to be identified. The range of recipients has to be determined in accordance with Article 4, Section 9 of the GDPR, its legal basis determined identically to the legal basis described on the ADL page in accordance with article 6 of the GDPR, data transfer may only have one legal basis, and in case of data processing based on legal grounds, both the legal basis in accordance with Article 6 of the GDPR and the exact legal grounds of the data processing (name of act, paragraph, section, subsection) have to be presented.



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11. Legal grounds for the transferring of data, to a third country or an international organization if applicable⁵:

No data transfer to an external international organization shall occur.

INFORMING THE DATA SUBJECTS OF THEIR BASIC RIGHTS

1. Information

Data Subjects have the right to information regarding the use of their personal data in a succinct, transparent, easily accessible and understandably phrased manner. The Data Controller must comply with a request of this nature by the Data Subject submitted in writing or in any other applicable manner, after the verification of the Data Subject's identity, without delay, but within 1 month at latest.

Providing data in this manner is done by the Data Controller free of charge, unless the query is unfounded, excessive and/or repetitive in nature.

2. Right to access to data

Data Subjects have the right to access their controlled personal data and the following information: One copy of their personal data (further copies at their expense).

3. Right to rectification

Data Subjects are entitled to rectify inaccurate (false or incomplete) data without any unjustified delay.

4. Right to erasure (right to be forgotten)

At the request of the Data Subject, the Data Controller is required to erase any personal data of the Data Subject without any unjustified delay in the following cases:

- the purpose of its controlling ceased to exist, the data is no longer needed
- the Data Subject withdraws their consent, removing the legal basis of the controlling of their data
- the Data Subject objects against the processing of the data
- in case of unlawful data processing
- to fulfill its legal responsibilities.

Under the right to be forgotten, if the Data Controller is required to erase any publicized personal data – taking into account the available technology and the cost of the process – it shall take all reasonably expectable steps to contact other data controllers in order to delete any copies of or links towards the data in question.

Exceptions to the exercising of Data Subject's rights as detailed in points 3 and 4 occur if the data processing is necessary. Data processing is necessary if it's vital for any of the following:

- for maintaining a person's freedom of expression
- for fulfilling legal responsibilities, or exercising official authority vested in the University by the public

⁷ In case of data transfer to a third country, data has to be described in accordance with Articles 44-47 of the GDPR.



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- for serving public interest in the field of public health
- for archival for reasons in the public interest, or for scientific and historical research purposes
- for establishing, exercising and defending legal claims.

5. The right to restriction of data processing

The Data Controller shall restrict data processing at the request of the Data Subject at their request if

- the Data Subject argues against the accuracy of the personal data
- the data processing is unlawful but the Data Subject opposes the erasure of said data
- the Data Controller no longer needs the personal data, but the Data Subject requests their preservation to establish, exercise and defend legal claims
- the Data Subject opposed the processing of their personal data, and the investigation at the Data Controller is still underway.

6. Right to data portability

The Data Subject has the right to receive the personal data it has granted to the Data Controller:

- in a structured, widely used, machine-readable format
- has the right to forward said data to another data controller
- may request the direct transfer of said data to another data controller (if technically feasible).

LEGAL REMEDIES & APPEALS

1. **Data Protection Officer (DPO)**

2. **Right to file a complaint at a supervising authority**

Supervising authority: Hungarian National Authority for Data Protection and Freedom of Information, address: 1055 Budapest, Falk Miksa utca 9-11., website: www.naih.hu

3. **Right to a legal appeal against the Data Controller/Data Processor**

The Data Subject may, independently of any official or other procedures, file a civil suit against the Data Controller and Data Processor at the court under the jurisdiction of which the Data Controller/Processor has its location of activities. The suit may also be filed at a court in the Member State of the EU in which the Data Subject currently resides. The court which holds general jurisdiction over the Data Controller: Budapest-Capital Regional Court (1055 Budapest Markó u. 27.)

Budapest, November 7th, 2023

Gecsey Réka Csenge
President
Students' Union
Semmelweis University