

Semmelweis University Regulations on Data Protection, Disclosure, and Requests for Data of Public Interest

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Book 3: Policy on the Procedures for Complying with Requests for Data of Public Interest

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Preamble

Pursuant to Article 30 paragraph (6) of Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter: "Infotv."), as well as pursuant to the authorization granted in Article 13 paragraph (2) lit. h) of Government Decree No. 368/2011 (XII. 31.), pursuant to the authorization granted in Article 13 paragraph (2) lit. h), Semmelweis University (hereinafter: the University) hereby adopts the following Semmelweis University Regulations on Data Protection, Disclosure, and Requests for Data of Public Interest, Book 3 (hereinafter: Regulations on Data Protection, Disclosure, and Requests for Data of Public Interest (AKK) Book III: Policy on Requests for Data of Public Interest (KASZ), Policy).

1. General Provisions

1.1 Purpose of the Policy

Article 1

(1) The purpose of the Policy is to ensure the exercise of the fundamental right to access data of public interest, as guaranteed by Article VI paragraph (3) of the Fundamental Law, in accordance with Articles 26, 28 paragraph (1), and 32 of the Information Act.

(2) Furthermore, the purpose of these Policy is to establish the University's procedures for handling data requests in order to support integrity-based public service operations.

1.2 Principles Governing the Application of the Policy

Article 2

(1) In applying these Policy, one must act in accordance with the principle of data protection, recognize that restrictions on public access are the exception rather than the rule, and bear in mind the requirement to protect personal data.

(2) The University shall review every data request on its merits and respond accordingly.

(3) The University shall fulfill the data request in a machine-searchable format whenever possible, unless the requester requests a different method of fulfillment and the University is able to fulfill the data request in this manner in accordance with the provisions of Article 30 paragraph (2) of the Information Act.

(4) If the University rejects the data request on the grounds of an exemption or refusal, it shall communicate the reasons for the rejection to the data requester within the statutory deadline in sufficient detail to ensure that the data requester has adequate information to make a decision regarding the pursuit of legal remedies.

1.3 Scope of the Policy

Article 3

(1) All employees of the University are required to apply these Policy when performing tasks related to data requests.

(2) If a person who has entered into a civil law contract with the University is involved in performing tasks related to data requests, the University shall duly inform such person of these Policy.

(3) These Policy shall apply to all requests for data of public interest submitted to the University.

1.4 Definitions

Article 4

(1) For the purposes of these Policy:

a)	*"request for data*":	a request submitted to the University seeking access to data of public interest or data that is public by virtue of the public interest;
b)	*data requester*:	the person submitting the data request;
c)	*the organizational unit coordinating the fulfillment of the data request*:	The Directorate General for Legal and Administrative Affairs is the organizational unit of the University responsible, pursuant to the University's Rules of Procedure, for coordinating tasks related to the review, response, and fulfillment of data requests;
d)	*data processing*:	data processing as defined in Article 3 paragraph (10) of the Information Act;
e)	*Data Protection Officer*:	the term as defined in Article 4 of Regulation (EU) 2016/679 of the European Parliament and of the Council 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;
f)	*access*:	the provision of access to data of public interest or data that is public in the public interest, as specified in the data request, at the location and in the manner designated by the University;
g)	*Infotv*.:	Act CXII of 2011 on the Right to Self-Determination in Information and Freedom of Information;
h)	*Organizational unit responsible for records management*:	Directorate General for Legal Affairs and Records Management, as well as the organizational units performing records management tasks;
i)	*Organizational unit responsible for legal affairs*:	Directorate General for Legal Affairs and Records Management;
j)	*Manager authorized to issue documents*:	any employee or officer of the University whose duties, as determined by the decision of the person exercising employer authority, include issuing a response to a data request;
k)	*Reimbursement of costs:*	reimbursement of costs that may be determined in accordance with Articles 29 paragraphs (3)–(4) and (5)–(6) of the Information Act, provided that the conditions specified in the cost regulation are met*;*
l)	*Cost Regulation*:	Government Decree No. 301/2016 (IX. 30.) on the amount of reimbursement of costs that may be determined for fulfilling a request for data of public interest;
m)	*Public interest data*:	data of public interest as defined in Article 3 paragraph (5) of the Information Act;
n)	*Data in the Public Interest*:	data made public in the public interest as defined in Article 3 paragraph (6), Article 26 paragraphs (2)–(3), and Article 27 paragraph (3) of the Information Act;
o)	*monitoring form*:	a form used to document the timely fulfillment of requests for data of public interest, on which the Directorate-General for Legal and Administrative Affairs specifies, among other things, the so-called internal response deadline available to the University's organizational unit(s).
p)	*Additional organizational unit*:	an organizational unit of the University other than those specified in lit. *d)*, *i)*, and *j)*, which, by virtue of its duties and authority, is specifically involved in the production, retrieval, systematization, and interpretation of the

requested data, as well as in redacting data that cannot be disclosed to the data requester, making copies of the requested data, determining the amount of reimbursement for costs associated with fulfilling the data request, or performing other similar operations.

(2) A data request is considered submitted in writing if the written request is delivered via a postal service provider or in person, or if it is submitted electronically.
(3) For the purposes of submitting a data request, "electronic means" includes submission via email, as well as submission through an interface designated for electronic communication or any other electronic platform (such as the Company Portal, Government Portal, or e-Paper service).
(4) For the purposes of these Policy, the University is considered the data controller as defined in Article 3 paragraph (9) of the Information Act.
(5) If any organizational unit of the University receives a request regarding the fulfillment of a request for access to data of public interest, it is required to forward it immediately tokozerdeku@semmelweis.hu ;

2. Detailed Provision

2.1 Organizational units involved in fulfilling data requests:

2.1.1 Directorate-General for Legal and Administrative Affairs – Responsibilities

Article 5

(1) The Director General for Legal and Administrative Affairs—within the scope of his or her responsibility for records management, coordination of data requests, and issuance of documents—ensures
   a) that data requests are registered on the day they are received by the University and are immediately forwarded to the designated person at the Directorate General for Legal and Administrative Affairs who coordinates the fulfillment of the request;
   b) that the response to the data request is filed on the day it is issued and sent to the data requester.
(2) In connection with fulfilling the data request, it shall ensure that
   a) the review of the data request in terms of form and content;
   b) if necessary, requesting the data requester to clarify the data request;
   c) identifying additional organizational units and involving them in fulfilling the data request by setting a deadline;
   d) if necessary, involving the data protection officer in fulfilling the data request by setting a deadline;
   e) preparing and sending a response to the data requester that covers available legal remedies and includes a statement of reasons;
   f) processing the data requester's name for the purpose specified in Article 28 paragraph (2) of the Information Act, for the period specified therein, and deleting it following the lawful retention period;
   g) maintaining a record of rejected data requests pursuant to Article 30 paragraph (3) of the Information Act, including the reasons for the rejection;
   h) pursuant to Article 71/D paragraph (4) of the Information Act, the provision of data to the National Authority for Data Protection and Freedom of Information (hereinafter: NAIH).

(3) The Director General for Legal and Administrative Affairs shall decide on the extension of the deadline for fulfilling a data request.
(4) The Director General for Legal and Administrative Affairs shall ensure the legal compliance of the prepared draft response.
(5) Based on the approval of the draft response, the Rector, and the person exercising managerial authority (Chancellor, President of the Clinical Center), the Director General for Legal and Administrative Affairs decides whether to comply with or reject the data request, issues the response to be sent to the data requester, and ensures that the response is sent to the data requester.

2.1.2 Responsibilities of the Organizational Unit Handling the Data Request

Article 6

(1) If fulfilling the data request requires the involvement of an additional organizational unit, the Directorate General for Legal and Administrative Affairs shall ensure that the additional organizational unit is involved.
(2) The Directorate-General for Legal and Administrative Affairs shall set a reasonable deadline for the additional organizational unit to perform its assigned task using the Monitoring Data Sheet and shall attach an Information Notice regarding the tasks related to fulfilling the request for data of public interest.
(3) The organizational unit responsible for fulfilling the data request shall review the request and immediately notify the Directorate-General for Legal and Administrative Affairs in the following cases:
   a) the data request is unclear and requires clarification,
   b) the data request is extensive or involves a large volume of data, or fulfilling the data request would entail a disproportionate use of the workforce required for the organizational unit to carry out its core activities, thereby
   c) requiring an extension of the deadline for compliance,
   d) alternative options for fulfilling the data request that do not require the creation of copies are available, along with a description of those options,
   e) a fee must be assessed to fulfill the data request, with the amount of the fee specified,
   f) the data request cannot be fulfilled, with the reasons provided,
   g) further legal clarification is required regarding the fulfillment of the data request.
(4) The organizational unit responsible for fulfilling the data request is required to fulfill the request by the specified deadline, provided that no obstacles to fulfilling the request arise.
(5) The organizational unit acting as the data controller is responsible for the accuracy and completeness of the information provided.

2.1.3 Duties of the Data Protection Officer

Article 7

(1) If fulfilling the data request—particularly regarding the admissibility of disclosing personal data, the purpose-limitation of disseminating personal data in the public interest, or the need to redact, remove, or anonymize data prior to fulfilling the request, or for any other similar reason— —

affect the duties and authority of the data protection officer, the Director General for Legal and Administrative Affairs shall ensure that the data protection officer is involved.

(2) The Directorate-General for Legal and Administrative Affairs shall, to the extent possible, take simultaneous action to involve the relevant organizational unit and the data protection officer.

(3) In fulfilling the data protection officer's annual reporting obligation, the report includes a separate Article providing information to the rector, the chancellor, and the president of the clinical center regarding the processing of requests for data of public interest.

2.2 Rules of Procedure

2.2.1 How to Submit a Data Request

Article 8

(1) Anyone may submit a data request to the University using the contact information below
- *a)* In person:
  - *aa)* Name: Semmelweis University, Directorate General for Legal and Administrative Affairs
  - *ab)* Location and hours for in-person visits: 1085 Budapest, Baross utca 52, at a time agreed upon in advance
  - *ac)* Conditions for in-person visits (appointment required)
- *b)* By phone: 06-1/459-1500, 62709
- *c)* By mail:
  - *ca)* Mailing address: 1085 Budapest, Üllői út 26
  - *cb)* Mailing address: 1428 Budapest, P.O. Box 2
- *d)* by email
  - *da)* by email: kozerdeku@semmelweis.hu
  - *db)* via the designated electronic communication platform:
    - *dba)* Government Portal: Short name: SEMEDUNIV; KRID: 648905308
    - *dbb)* The University's e-paper service: e-papir.gov.hu

(2) Name of the person responsible for information rights: Data Protection Officer

(3) For data requests made verbally, the person designated by the University's organizational unit responsible for receiving such requests shall take minutes or prepare a memo. If the verbal data request is not recorded by the person designated at the Directorate General for Legal and Administrative Affairs, the minutes or memo regarding such a data request must be sent to the Directorate General for Legal and Administrative Affairs without delay.

2.2.2 Steps to Be Taken Upon Receipt of the Data Request

Article 9

(1) The Directorate-General for Legal and Administrative Affairs reviews the data request. The review of the data request involves an assessment of its content.

(2) If the data requester has requested multiple sets of data, the evaluation is conducted separately for each set of data in accordance with the data policy.

(3) During the substantive review, the following criteria must be evaluated:
- *a)* whether the submission containing the data request includes a request for the application of any other procedural rules in addition to the data request;

b) Can the content of the data request be clearly determined?
c) whether the requested information qualifies as data of public interest or data that is public in the public interest;
d) whether there are any legal grounds for refusing to comply with the data request;
e) if a ground for refusal under Article 27 paragraph (5) of the Information Act exists, whether the data may be disclosed pursuant to Article 30 paragraph (5) of the Information Act;
f) Is the requested information available from a public source?
g) whether the conditions set forth in Articles 29 paragraphs (1a) and (1b) of the Information Act are met;
h) Does fulfilling the data request require the creation of new data?
i) whether there is one or more reasons necessitating an extension of the deadline for fulfilling the data request.

2.2.3 Procedure in the Event of a Request for Clarification of the Data Request

Article 10

(1) If the data request is unclear with regard to the requested data or the method of fulfillment, the Directorate-General for Legal and Administrative Affairs shall, pursuant to Article 28 paragraph (3) of the Information Act, request the data requester to clarify the data request.
(2) In the notice referred to in paragraph (1), the organizational unit coordinating the fulfillment of the data request shall explain in detail how the University interprets the data request, which parts or phrasing of the data request it considers unclear, and which parts or phrasing of the data request it requests be clarified.
(3) If the data requester does not clarify the data request, the University will proceed based on the information available in the data request.

2.2.4 Procedure in the Event of an Extension of the Deadline for Fulfilling the Data Request

Article 11

(1) The deadline for fulfilling the data request may not be extended if there are grounds for rejecting the request.
(2) Prior to making a decision, the Directorate General for Legal and Administrative Affairs shall, if necessary, seek the opinion of other organizational units involved in fulfilling the data request, and the involved organizational unit may also initiate the extension.
(3) The Directorate General for Legal and Administrative Affairs shall notify the data requester of the extension of the deadline for the data request within 15 days of the University's receipt of the data request.

2.2.5 Determination of the Feasibility of Complying with the Data Request

Article 12

(1) The Director General for Legal and Administrative Affairs shall decide on the feasibility of a data request seeking access to public interest data upon which the decision is based, in accordance with the provisions of Article 27 paragraph (5) of the Information Act.

(2) The Director General for Legal and Administrative Affairs shall decide on the fulfillment of the data request no later than the third day prior to the expiration of the deadline specified in Article 29 paragraph (1) of the Information Act or the extended deadline.
(3) The Directorate-General for Legal and Administrative Affairs shall record the name of the data requester and a description of the requested data for the purpose of determining the applicability of the grounds specified in Article 28 paragraph (2) of the Information Act, and shall delete the data requester's personal data after a specified period of time has elapsed and upon the fulfillment of a specified condition.

2.2.6 Method of Fulfilling the Data Request

Article 13

(1) If the requested data of public interest cannot be provided in the manner specified by the data requester, the Director General for Legal and Administrative Affairs shall decide on the method of fulfilling the data request and shall inform the data requester of this decision and the reasons for it at the same time as the data request is fulfilled.
(2) If the requested public data can be provided through on-site inspection, the Director General for Legal and Administrative Affairs shall, in his or her response, instruct the data requester to coordinate the date and time of the inspection with the head of the organizational unit coordinating the fulfillment of the data request, and shall simultaneously provide the requester with the contact information for that individual.

2.2.7 Refusal to Comply with a Data Request on the Basis of an Exemption

Article 14

(1) The University may refuse to fulfill a data request if the conditions set forth in Article 29 paragraphs (1a) or (1b) of the Information Act are met.

2.2.8 Refusal to Comply with a Data Request

Article 15

(1) If the requested data of public interest
a) is not held by the University; or
b) is held by the University, but one of the grounds for refusal specified in Article 27 paragraphs (1)–(2) or (4)–(6) of the Information Act applies
the Directorate General for Legal and Administrative Affairs shall prepare a draft response regarding the refusal of the data request, setting forth the reasons for the refusal and the available remedies.

2.3 Other Provisions

2.3.1 Other duties related to data requests

Article 16

(1) The Directorate-General for Legal and Administrative Affairs shall maintain a register of data requests.
(2) The record referred to in paragraph (1) shall include
   a) the date the data request was received by the University;
   b) the decision made regarding the data request;
   c) the name of the data requester and the contact information for communicating with the data requester;
   d) a description of the requested data;
   e) in the event of a decision to deny the request, the reason for the denial.
(3) The Directorate-General for Legal and Administrative Affairs, based on the record referred to in paragraph (1),
   a) shall inform the National Authority for Data Protection and Freedom of Information of the reasons for the rejections by January 31 of each year,
   b) publishes annually, among the data concerning the University's activities and operations, the data required for mandatory statistical reporting on information of public interest,
   c) initiates a decision by the University's head pursuant to Article 37 paragraph (6) of the Information Act.
(4) To comply with the disclosure requirement, the Directorate General for Legal and Administrative Affairs publishes the Regulations on its website, available at [www.semmelweis.hu], and on the kozadat.hu website.

3. Final Provisions

(1) The Senate of Semmelweis University, pursuant to the authorization granted in Article 19 paragraph (10) lit. d) of Part I.1 of Book I of the Organizational and Operational Regulations, adopted the Regulations on Data Protection, Disclosure, and Requests for Data of Public Interest, Book III. "Policy on Requests for Data of Public Interest," by its Resolution No. 62/2025 (July 25).
(2) Book III of the Regulations on Data Protection, Disclosure, and Requests for Information of Public Interest—Policy on Requests for Information of Public Interest—shall enter into force on the day following the publication of the Senate Decision on the JIF website.
(3) Upon the entry into force of these Policy, the "Regulations on Data Protection, Disclosure, and Requests for Information of Public Interest—Book III—Policy on the Procedures for Fulfilling Requests for Information of Public Interest," adopted by Senate Decision No. 6/2025 (January 23), shall be repealed.

4. Appendices

1. Appendix No. : Registration form for recording data requests—available in the form library
2. Appendix No. : Reply letter forms:
   Appendix No. 2a: Response letter requesting clarification – available in the form repository
   Appendix No. 2b: Response letter regarding extension of a deadline – available in the form repository

Appendix 2c: Response letter regarding the determination of reimbursement of costs – available in the form library

Appendix 2d: Response letter regarding the fulfillment of a data request – available in the form library

Appendix 2e: Response letter regarding the refusal to fulfill a data request – available in the form library

3. Appendix No. : Form for the minutes regarding the fulfillment of a data request by allowing in-person access to the data – available in the form repository
4. Appendix [number]: Audit trail

	Process Steps	Preparation steps	Levels of Responsibility					a document generated as a result of a process
			task owner	Auditor	Verification method	Approver	Method of approval	
1.	Review of a request for access to public information (Is the requested information in the public interest? Are there any obstacles to fulfilling the request?)	Registration of the received request; forwarding of requests received by organizational units to the Directorate-General for Legal and Administrative Affairs.	Designated staff member of the Directorate General for Legal and Administrative Affairs	Director General for Legal and Administrative Affairs	Approval	Director General for Legal and Administrative Affairs	Email/Signature	Document containing a legal opinion (email, paper copy).
2.	If the request can be fulfilled, forward it to the organizational unit concerned with a monitoring data sheet and an information notice; if there are obstacles, reject the request. If warranted, consult with the Data Protection Officer in advance.	Preparation of the outgoing letter.	Designated JIF staff member	Director General for Legal and Administrative Affairs	Approval	Director General for Legal and Administrative Affairs	Email/Signature	Document forwarding or rejecting the request (email, paper), with monitoring data sheet and information sheet attached
3.	The organizational unit concerned with the data request reviews the request and informs the JIF whether further action is required.	Is it necessary to clarify the data request, extend the deadline, request reimbursement of costs, or obtain a further legal opinion, etc.?	The local data protection officer of the relevant organizational unit	The head of the relevant organizational unit	Approval	The head of the relevant organizational unit	Email/Signature	Document requiring further action (email, paper).
4.	Taking the necessary actions (extending the deadline, specifying the amount of reimbursement, requesting clarification of the request, providing a further legal opinion)	Reviewing the justification for the actions and preparing an outgoing letter.	Designated JIF staff member	Director General for Legal and Administrative Affairs	Approval	Director General for Legal and Administrative Affairs	Email/Signature	Document detailing the actions taken (email, paper copy).
5.	The organizational unit fulfills the request to the JIF	Compilation of the requested data.	The local data protection officer of the relevant organizational unit	The head of the relevant organizational unit	Approval	The head of the relevant organizational unit	Email/Signature	Document containing the requested data (email, paper copy).

	Process Steps	Preparation steps	Levels of Responsibility					a document generated as a result of a process
			task owner	Auditor	Verification method	Approver	Method of approval	
6.	Fulfilling the data request	Preparation of an outgoing letter.	Designated JIF staff member	Director General for Legal and Administrative Affairs	Approval	Director General for Legal and Administrative Affairs	Email/Signature	Document containing the requested data (email, paper copy).
7.	Maintaining a record of incoming data requests	Filing and recording of requests	Designated JIF staff member	Director General for Legal and Administrative Affairs	Approval	N/A	N/A	Electronic Records
8.	Preparation of an annual report for NAIH	Preparing the report based on the relevant records	Designated JIF staff member	Director General for Legal and Administrative Affairs	Approval	N/A	N/A	Annual Report
9.	Preparing an annual report for the Rector, Chancellor, and President of the Clinical Center regarding requests for public information, their fulfillment, rejections, and deadlines	Preparing the report based on the relevant records	Designated JIF staff member, Data Protection Officer	Director General for Legal and Administrative Affairs	Approval	N/A	N/A	Chapter on requests for public information in the annual report prepared for the Rector, the Chancellor, and the President of the Clinical Center