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

Effective Date: September 26, 2026

Book II: Disclosure Policy

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1. General Provisions

1.1. Purpose of the Policy

Article 1

(1) To define the procedures for fulfilling Semmelweis University's (hereinafter: the University) legal obligation to electronically publish data of public interest or data made public in the public interest (hereinafter collectively: data of public interest) on the University's website, as required by law.

1.2. Scope of the Policy

Article 2

(1) Semmelweis University's Regulations on Data Protection, Disclosure, and Requests for Data of Public Interest, Book II: Disclosure Policy (hereinafter: Regulations on Data Protection, Disclosure, and Requests for Data of Public Interest (AKK), Book II: Disclosure Policy (KÖSZ), Policy) applies to
   a) all data classified by law as data of public interest or data made public in the public interest;
   b) the University and all of its organizational units where data of public interest or data made public in the public interest is processed;
   c) all persons who process data of public interest;

(2) The Directorate General for Legal and Administrative Affairs (hereinafter: JIF) provides support to facilitate uniform interpretation and application.

2. Detailed Provisions

2.1. Responsibilities, Duties, and Authorities

Article 3

(1) With regard to the persons and organizational units concerned, the duties, responsibilities, and authorities are defined in accordance with the University's Organizational and Operational Regulations and internal regulations.

2.2. Procedures for the Publication of Data of Public Interest

Article 4

(1) [1]An itemized list of the data to be disclosed, as well as—for each item of data—the designation of the data controller (organizational unit) and the rules governing the disclosure and modification of the data are contained in Annexes 1/A–1/B of the Policy (general and specific disclosure lists).

(2) The data controller shall fulfill its obligation to disclose (provide) public interest data falling within its scope of responsibility, as set forth in Annexes 1/A–1/B of this Policy, at the frequency specified therein, by sending an email to the JIF (hereinafter: "data recipient") at kozzetetel@semmelweis.hu .

[1]Reason for Articles 33–37/a of the Infotv.

(3) The data controller shall fulfill this obligation by sending data of public interest—in accordance with the content specified in Government Decree No. 499/2022 (XII. 8.) (hereinafter: Government Decree)—is responsible for the electronic publication, continuous accessibility, authenticity, and updating of the data of public interest. The data provider does not verify the completeness or accuracy of the submitted data.
(4) The data controller is responsible for the content of public interest data transmitted to the unified public data search system and for the regular updating of such data, as well as for ensuring that the data listed in the publication lists specified in this Policy is accurate, up-to-date, and compliant with applicable laws.
(5) The data provider shall notify the data controller via email of the electronic publication of the submitted data of public interest.
(6) Within three business days of receiving the notification specified in paragraph (5), the data controller shall verify that the publication has taken place and that the published data is accurate and complete.
(7) If necessary, the data controller shall immediately send the correction of the published data to the data provider at kozzetetel@semmelweis.hu .

2.3. Other Responsibilities of the Data Provider

Article 5

(1) Within the JIF organization, the Organizational and Administrative Center, as the data provider, shall, with respect to the data to be published:
   a) within the framework established by law, design the data structure and format of the website so that it is suitable for the electronic publication of data of public interest, as well as for the provision of data to the Central Information and Public Data Registry (hereinafter: KIF);
   b) ensures the continuous availability and regular updating of the data to be published;
   c) ensures that the published data matches the data provided for publication by the data controller;
   d) ensures that the previous version(s) of the data to be published are archived where required by law;
   e) ensures that electronically published data is recorded in the KIF system and remains continuously accessible;
   f) ensures compliance with the mandatory data reporting requirements on the KIF platform at the frequency prescribed by law (every two months, by the end of the month following the reporting period).

2.4. Requirements for Compiling and Reviewing Publication Lists

Article 6

(1) [2]The University publishes the data in the disclosure lists in the format specified in Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter "Info Act") and in the Government Decree, using the official templates and data structure (KIF data sheets) standardized therein.

(2) The organizational unit responsible for data processing, as identified in the public interest data, shall review the up-to-date status of the publication lists on an ongoing basis, but at least in accordance with the bimonthly central data reporting obligation set forth in Article 37/C paragraph (1) of the Info Act Article 37/C paragraph (1) of the Info Act (by the 10th day of every even-numbered month). This review does not replace the data controller's obligation to report data to be published as specified in Article 4 paragraph (2) of this Policy.

(3) Based on information provided by the data controllers, in order to keep pace with changes in legislation, and in response to requests for access to data of public interest that arise in significant proportion or volume, the JIF shall initiate immediate or periodic amendments to the publication lists with the Chancellor as necessary.

3. Final Provisions

Article 7

(1) The Senate of Semmelweis University, acting 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 Semmelweis University Regulations on Data Protection, Disclosure, and Requests for Data of Public Interest, Book II. Publication Policy of Book II of the Regulations on Data Protection, Disclosure, and Requests for Data of Public Interest by Senate Decision No. 97/2026 (September 24).

(2) The Semmelweis University Regulations on Data Protection, Disclosure, and Requests for Data of Public Interest, Book II: Disclosure Policy, shall enter into force on September 26, 2026, the day following the electronic signing of the Senate Decision.

(3) Upon the entry into force of Book II of Semmelweis University's Regulations on Data Protection, Disclosure, and Requests for Data of Public Interest—Disclosure Policy—the Policy adopted by Senate Decision No. 107/2022 (December 19) and Senate Decision No. 113/2023 (December 13), as modified by Senate Decisions No. 82/2024 (October 3), and Senate Decision No. 6/2025 (January 23)—shall be repealed.

4. Appendix

Appendix No. 1: Disclosure Lists
Appendix No. 2: Audit Trail

[2] Infotv. Articles 37/A–37/B

Appendix No. 1 : Publication Lists

1/A General Disclosure List

I. Organizational and personal data (contact information, organization, executives)

	Description of the data	**The data controller**	**Frequency of the data controller's disclosure obligations; data updates**	**Frequency of deletion / Retention**
1.	The University's official name (in Hungarian, English, and German), registered office, mailing address (correspondence address and P.O. box), phone number, email address (Hivatali Kapu), and website URL	Director General for Legal and Administrative Affairs	Immediately following any changes	The previous entry must be deleted
2.	The University's organizational structure, including the names of the organizational units and the responsibilities of each unit	Director General of Legal and Administrative Affairs	Immediately following any changes	The previous entry must be deleted
3.	Names, titles, and contact information (phone number, email address) of the University's senior leadership and the heads of each organizational unit	Director General of Human Resources Management	Immediately following any changes	The previous entry must be deleted
4.	Number of Senate members, composition, names of members, positions, and contact information	Secretary General of the Senate	Immediately following the changes.	The previous version must be deleted (for compliance with the GDPR and the Information Act).
5.	List of other public bodies performing public functions that are under the University's management, supervision, or control, or that operate under its authority (name, registered office, mailing address, email address, website, other identifying information)	Heads of public education institutions and vocational training institutions	Immediately following any changes	The previous status shall be retained in the archives for 1 year
6.	Name, registered office, and contact information (mailing address, phone number, email address) of business entities in which the University holds a majority stake or in which it participates; scope of activities; name of the representative; and the University's shareholding percentage	Director General of Legal and Administrative Affairs	Immediately following any changes	The previous status shall be retained in the archives for 1 year
7.	The names of publications founded by the University, the names and addresses of the editorial office and publisher, and the name of the editor-in-chief	Director General of Marketing and Communications Student Government	Immediately following any changes	The previous status shall be retained in the archives for 1 year
8.	Name, phone and fax numbers, and email address of the University's department or individual responsible for media relations	Director General of Marketing and Communications	Immediately following any changes	The previous version is to be deleted.
9.	Details of the University's governing body as specified in point 1	Director General for Legal and Administrative Affairs	Immediately following any changes	The previous status shall be retained in the archives for 1 year

II. Data Regarding Activities and Operations

	Description of the data	**The data controller**	**Frequency of the data controller's reporting obligation and data updates**	**Frequency of deletion / Retention**
1.	The full and current text of the fundamental laws governing the University, the public law regulatory instruments applicable to the University, as well as the organizational and operational regulations and the data protection and information security regulations that define the University's mission and core activities	Director General for Legal and Administrative Affairs	Immediately following any changes	The previous version shall be deleted or moved to a separate archive.
2.	The names and content of public services provided by the University or financed from its budget, the procedures for accessing such services, the fees payable for public services, and any discounts granted thereon	Director General of Budget and Controlling	Immediately following any changes	The previous version will be retained in the archive for 1 year
3.	Descriptive information regarding databases and records maintained by the University (name, format, purpose of data processing, legal basis, duration, scope of data subjects, source of data, and—in the case of data collection via questionnaire—the questionnaire to be completed); the types of data collected and processed by the University as part of its core activities, the method of access, and the costs of making copies	Chief Information Officer	Immediately following any changes	The previous version will be retained in the archive for 1 year
4.	The University's public publications and contact information	Chief Director of Marketing and Communications	Quarterly	The previous version will be retained in the archive for 1 year
5.	University website and news portal	Chief Director of Marketing and Communications	Ongoing	Retained in the archive for at least 1 year
6.	Detailed descriptions of calls for proposals issued by the University, as well as domestic and European Union co-funded projects in which the University participates, including their results and justifications.	Director of Grants and R&D Network Management	Ongoing	The previous version will be retained in the archive for 1 year
7.	Public findings of audits and inspections related to the University's core activities	Director of Audits	Immediately after reviewing the investigation report and receiving the approved action plan	The previous version will be retained in the archive for 1 year
8.	The modified, current procedure for handling requests for access to public information, the name and contact information of the competent organizational unit, and, where designated, the name of the data	Director General for Legal and Administrative Affairs	Immediately following the changes.	The previous version is to be deleted

	protection officer or the person responsible for information rights			
9.	Results of statutory statistical data collection regarding the University's activities, and changes over time	Director General of Budget and Controlling	Quarterly	The previous version will be retained in the archive for 1 year
10.	Data pertaining to a specific body regarding mandatory statistical reporting on information of public interest	SZIK Director	Quarterly	The previous version will be retained in the archive for 1 year
11.	Special Publication List for the University	Director General for Legal and Administrative Affairs	Immediately following any changes	The previous version is to be deleted

III. Financial Data

	Data	**Data Controller**	**Update**	**Retention**
1a.	The University's Annual Budget	Director General of Budget and Controlling	Immediately following any changes	For 10 years following publication
1b.	The University's Annual Report and Public Benefit Statement	Director General of Finance and Asset Management	Immediately following any changes	For 10 years following publication
2.	Aggregated data on the number of employees at the University and their compensation, as well as the aggregate salaries, wages, and regular benefits of managers and senior executives, along with their expense reimbursements, and the types and amounts of benefits provided to other employees	Director General of Human Resources Management	Quarterly	To be retained in the archives for the period specified in separate legislation, but for at least 1 year
3.	Data regarding the names of recipients of budgetary subsidies provided by the University in accordance with the Act on Public Finances, the purpose and amount of the subsidy, and the location where the subsidy program is implemented, unless the budgetary subsidy is revoked or the recipient waives it prior to publication	Director General for Finance and Asset Management	Monthly (by the last day of the month following the reporting month, on the kif.gov.hu website)	For 5 years following publication

4.	The use of public funds and the management of public assets in connection with the procurement of goods, construction projects, the ordering of services, the sale of assets, the utilization of assets, or the transfer of assets or rights of a pecuniary nature, as well as the name (type) and subject matter of contracts concerning the granting of concessions, the names of the contracting parties, the value of the contract, the duration of the contract in the case of a fixed-term contract, and any changes to the aforementioned data—excluding classified information—as well as the date of the contract, the dates of payments, and the ratio of domestic to EU funding. The value of the contract refers to the consideration stipulated for the subject matter of the contract—calculated excluding value-added tax; in the case of a gratuitous transaction, the higher of the market value or the book value of the asset shall be taken into account. For contracts that recur periodically—and are concluded for a term longer than one year—the value shall be calculated based on the amount of the consideration for one year. The values of contracts with the same subject matter concluded with the same contracting party within a single fiscal year shall be aggregated.	Director General of Finance and Asset Management Director of Procurement	Monthly (by the last day of the month following the reference month, on the kif.gov.hu website)	For 5 years following publication
5.	Funds provided by the University for purposes other than its core functions (including, in particular, support for associations, professional and employee representative bodies of its employees, to support organizations promoting educational, cultural, social, and sports activities for its employees, beneficiaries, and patients, and for payments related to tasks performed by foundations)	Director General for Finance and Asset Management	Monthly (by the last day of the month following the reporting month, on the kif.gov.hu website)	To be retained in the archives for the period specified in separate legislation, but for at least 1 year
6.	Description of development projects implemented with European Union funding, along with the relevant contracts	Director of the Grant Management Center	Quarterly *(monthly on kif.gov.hu for contracts exceeding 5 million HUF)*	To be retained in the archives for at least 1 year
7.	Public procurement information (annual plan, summary of bid evaluations, contracts awarded)	Director of Procurement	Quarterly (immediately upon any change in legislation)	To be retained in the archives for at least 1 year

1/B SPECIAL PUBLICATION LIST

I. Organizational and personnel data

	Description of the data	The data controller	Frequency of the data controller's disclosure obligations and data updates	Frequency of deletion / Retention	Legislation requiring disclosure
1.	Articles of Incorporation, regulations, and other publicly disclosed internal policies	Director General for Legal and Administrative Affairs	Immediately following any changes	The previous version shall be removed from the current list and placed in the internal archive.	Act CCIV of 2011 on National Higher Education (Nftv.), Article 11(1)(b)
2.	The heads of the student organizations	leaders of student organizations	Immediately following any changes	With the previous version retained in the archives for 1 year	Act I of 2012 (Labor Code)

II. Data regarding activities and operations

	Description of the data	The data controller	Frequency of the data controller's disclosure obligations and data updates	Frequency of deletion / Retention	Legislation requiring disclosure
1.	Decisions of the Senate	Secretary General of the Senate	Immediately following any changes	To be retained indefinitely (with personal data filtered in accordance with the GDPR)	Act CCIV of 2011 on National Higher Education (Nftv.)
2.	Requirements for Establishing Student Status (Admission Requirements)	Vice Rector for Academic Affairs	Immediately following any changes	The previous version is to be deleted.	Article 11(1)(f) of Act CCIV of 2011 on National Higher Education (Nftv.)
3.	Procedures for Exercising Employer Rights	Director General of Human Resources Management	Immediately following any changes	The previous version shall be placed in the internal archive.	Act CCIV of 2011 on National Higher Education (Nftv.), Article 24(7)
4.	Report on the University's educational, research, development, and innovation activities and current results	Director of the Office of Academic Affairs, Vice Rector for Research and Innovation and Director of the Business Development Center	Within 90 days following the end of the academic year	To be retained in the archives for 5 years following publication	Act CCIV of 2011 on National Higher Education (Nftv.)
5.	The institutional waiting list	Director General for Medical Affairs	Within 3 days of the change	The previous status may be deleted.	Act LXXXIII of 1997 on Compulsory Health Insurance Benefits, and Government Decree No. 287/2006 (December 23) on Waiting Lists Available Under Compulsory Health Insurance

6.	Fees for certain health care services available for a fee	Director General for Budget and Controlling, Director General for Medical Affairs	Immediately following any changes	To be retained in the archives for 5 years following publication	Government Decree No. 284/1997 (December 23) on Fees for Certain Healthcare Services Available for a Fee
7.	Student Benefits, Discounts, Scholarships, and User Fees (Regulations on Benefits and User Fees)	Vice Rector for Academic Affairs	Immediately following the changes.	The previous version shall be deleted and archived.	Act CCIV of 2011 on National Higher Education (Nftv.) and Government Decree No. 51/2007 (III.26.)

Appendix No. 2 : Audit Trail

2/A. Procedures for the Publication of Data of Public Interest

	Steps in the process	**Preparation steps**	**Levels of Responsibility**					**Document Generated as a Result of the Process**
			Task Owner	**Reviewer**	**Method of verification**	**Approver**	**Method of approval**	
1.	Initiating the Publication of Data	Data collection and preparation	Designated employee of the data controller's organizational unit, local data protection officer	Head of the organizational unit responsible for data	Approval	Head of the organizational unit responsible for data	Email/Signature	Electronic document or letter prepared in a specified format
2.	Data Publication	Receipt of submitted data and verification of compliance with formal requirements.	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	Data published in the specified format on the University's website, and, in the case of financial data specified by law, successful data upload and publication in the Central Public Data Registry (kif.gov.hu).
3.	Review of Publication Lists	Checking the current status, initiating the publication of data	Designated employee of the data controller's organizational unit, local data protection officer	Head of the organizational unit responsible for data	Approval	Head of the organizational unit responsible for data	Email/Signature	Letter containing the results of the review

n.a.: not applicable

2/B. Procedure for Fulfilling Requests for Access to Public Information

	Steps in the process	**Preparation steps**	**Levels of Responsibility**					**Document generated as a result of the process**
			Task Owner	**Reviewer**	**Method of verification**	**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; if there are obstacles, reject the request.	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).
3.	The organizational unit concerned with the data request reviews the request and informs the JIF whether further action is necessary (a significant workload alone does not justify a rejection).	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	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).

	Steps in the process	**Preparation steps**	**Levels of Responsibility**					**Document generated as a result of the process**
			Task Owner	**Reviewer**	**Method of verification**	**Approver**	**Method of approval**	
			organizational unit					
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.	Maintenance of a record of incoming data requests	Filing and Recording Requests	Designated JIF staff member	Director General for Legal and Administrative Affairs	Approval	N/A	N/A	Electronic Records
8.	Annual reporting to the NAIH (by January 31 of the year following the reporting year)	Maintenance of a record of rejected requests and the reasons for their rejection	Designated JIF staff member/Data Protection Officer	Director General for Legal and Administrative Affairs	Approval	N/A	N/A	Annual Report