



File No.: 25352/NHKK/2023

**Information on data processing for the persons affected by data processing  
in connection with the processing of personal data by the Center of International Training Programs of  
Semmelweis University**

**1. DATA OF CONTROLLER**

**1.1. Name of Data Controller:**

Semmelweis Egyetem, seat: 1085 Budapest, Üllői út 26., mailing address: 1428 Budapest Pf.: 2., phone number: +36-1-459-1500, website: <http://semmelweis.hu>

**1.2. Name and contact details of Data Controller**

Prof. Dr. Béla Merkely, Rector, seat: 1085 Budapest, Üllői út 26., mailing address: 1428 Budapest Pf.: 2., phone number: +36-1-459-1500, website: <http://semmelweis.hu>

**1.3. Name and contact details of Data Protection Officer (DPO)**

Dr. Sára Trócsányi, seat: 1085 Budapest, Üllői út 26., mailing address: 1428 Budapest Pf.: 2., phone number: +36-1/224-1547 <https://semmelweis.hu/jogigfoig/adatvedelem-betegjog/> E-mail address: [adatvedelem@semmelweis-univ.hu](mailto:adatvedelem@semmelweis-univ.hu)

**1.4. Name of Data Processor: Center of International Training Programs** 1094 Budapest, IX. Tűzoltó utca 37-47. phone number: +36 1 459 1500 / 60069 E-mail address: [titkarsag.nhkk@semmelweis.hu](mailto:titkarsag.nhkk@semmelweis.hu) website: [semmelweis.hu/nhkk/](http://semmelweis.hu/nhkk/)  
Prof. Dr. Alán Alpár, Vice-Rector for International Studies

**2. ACCESS TO INFORMATION ON DATA PROCESSING**

2.1. Information on data processing relating to the **administrative activities** of the processor: [link](#)

2.2. Information on data processing relating to the processor's activities in the field of **labour management and financial services**: [link](#)

2.3. Information on data processing relating to the processor's activities in the field of **education management**: [link](#)

**3. CONTENTS OF THE INFORMATION DISCLOSED IN THE CONTEXT OF DATA PROCESSING**

- |   |   |
|---|---|
| 3.1. data processing and name of the filing system  | 3.10. in the case of electronic processing, the name of the processing system   |
| 3.2. quality of the data processing activity  | 3.11. data processing operations  |
| 3.3. place of processing and the position of persons having access  | 3.12. the general processing period and the planned deletion date of the data   |
| 3.4. categories of data subjects and the source of the data   | 3.13. general physical and logical protection measures applied to ensure data security  |
| 3.5. categories of personal data and special types of personal data processed   | 3.14. the potential risk of a personal data protection incident   |
| 3.6. purpose of processing  | 3.15. recipients of regular data transmission, legal basis for data transmission, scope of data   |
| 3.7. the legal basis for the processing of the data is Article 6 of the GDPR and, where the legal basis for the processing is a legal regulation, its precise specification is required | 3.16. name and address of the data processor, categories of data subjects, categories of data affected by the processing, and the processing activities carried out by the data processor |
| 3.8. the legal basis for the processing of sensitive data is Article 9 of the GDPR and, where the legal basis for the processing is a legal act, its specification is required          |   |
| 3.9. the method of processing   |   |



## 4. INFORMING DATA SUBJECTS ABOUT THEIR FUNDAMENTAL RIGHTS AND THE WAYS TO EXERCISE THEM

### 4.1. RIGHTS OF DATA SUBJECTS

#### 4.1.1. Right to information

Data subjects have the right to receive information in a concise, transparent, intelligible and easily accessible form, using clear and plain language. The Controller shall comply with such a request by the data subject in writing or by any other appropriate means, after verifying the identity of the data subject, without undue delay but not later than 1 month. The Controller shall provide such information free of charge, unless the request is unfounded, excessive or repetitive.

#### 4.1.2. Right of access

Data subjects are entitled to have access to their personal data and to the following information: a copy of their personal data (additional copies are available for a fee)

#### 4.1.3. Right to rectification

Data subjects are entitled to rectify or complete inaccurate data without undue delay.

#### 4.1.4. Right to erasure ('right to be forgotten')

At the request of the data subject, the Controller shall delete personal data relating to the data subject without undue delay if any of the following applies:

- the purpose has become obsolete, the data are no longer necessary
- the data subject withdraws his or her consent and the legal basis for the processing therefore ceases to exist
- the data subject objects to the processing
- unlawful processing
- to comply with a legal obligation

In the case of processing based on consent, data subjects have the right to withdraw their consent at any time, which does not affect the lawfulness of the processing carried out on the basis of consent prior to the withdrawal.

In the context of the data subject's right to be forgotten, if the Controller is obliged to delete personal data that has been disclosed, the Controller shall take reasonable steps, taking into account the available technology and the cost of implementation, to inform other data controllers about the deletion of the links, copies or duplicates in question. An exception to this provision shall be made where the processing is necessary

- for freedom of expression
- to comply with a legal obligation or to exercise official authority powers
- for reasons of public interest in the field of public health

- for archiving in the public interest, for the purposes of scientific or historical research
- for the enforcement of legal claims

#### 4.1.5. Right to restriction of processing

The Controller shall restrict processing at the request of the data subject if

- the data subject challenges the accuracy of the personal data
- the processing is unlawful and the data subject objects to the erasure of the data
- the Controller no longer needs the personal data but the data subject requests them for the establishment, exercise or defence of legal claims
- the data subject has objected to the processing and the Controller is still investigating the matter.

#### 4.1.6. Right to data portability

Data subjects shall have the right

- to obtain the data which they have provided to the Controller in a structured, commonly used, machine-readable format
- to transmit their data to another data controller to request the direct transfer of their data to the other data controller

#### 4.1.7. Right to object

Data subjects can object to the processing of their data

- on grounds of public interest/public authority and on the basis of the balancing of interests
- for direct marketing purposes
- for profiling with the purpose of direct marketing

In the event of the data subject's objection, processing must be stopped immediately, except in the case of compulsive and justified grounds and in order to enforce legal claims.

Rights in relation to automated decision-making and profiling

The data subject has the right not to be subject to solely automated processing, including profiling.

Exceptions to this are

- if it is permitted by law for the purpose of concluding or performing a contract
- if the data subject has given his or her explicit consent

Data subjects are entitled to

- request human intervention
- express their point of view
- lodge an objection.



## 4.2. OPTIONS FOR LEGAL REMEDY

### 4.2.1. Right to contact the Data Protection Officer

In case of prejudice, data subjects have the right to seek the assistance of the Data Protection Officer of the Controller to enforce their rights before the Controller. The Data Protection Officer shall assist the data subject in exercising their rights, investigate the data subject's complaint and initiate the necessary measures with the Controller to address the complaint.

### 4.2.2. Right to lodge a complaint with a supervisory authority

Supervisory authority: National Authority for Data Protection and Freedom of Information (hereinafter "the Authority" or "NAIH"), address: 1055 Budapest, Falk Miksa utca 9-11., mailing address: 1363 Budapest, Pf. 9.

### 4.2.3. Right to an effective judicial remedy

If the Authority does not make a decision on the complaint or does not provide information about it within 3 months, the data subject has the right to take the matter to court.

Right to judicial remedy against the data controller/processor

Irrespective of the authority procedures and other procedures, the data subject may take legal action against the data controller and the data processor at the competent court based on the business location of the data controller/processor. Legal proceedings may also be initiated in the courts of the Member State in which the data subject is resident.

The competent ordinary court for the Controller is the Administrative and Labour Court of Budapest, Metropolitan Court of Budapest (1055 Budapest, Markó u. 27.)

Date: **Budapest,** day **March** month **2023** year

**Prof. Dr. Alán Alpár**  
Vice-Rector for International Studies  
head of the organisational unit

#### **Publication and registration clause**

I have arranged for the above information on data processing to be published on the website of the organisational unit in question, which is accessible to anyone without restriction at the following link: <https://semmelweis.hu/nhkk/>

I have included the above information on data processing in the register of data processing information documents of the Center of International Training Programs of Semmelweis University under the serial number 1.

Date: **Budapest,** day **March** month **2023** year

**Zsuzsanna Busa**  
Head of Secretariat  
local data protection officer  
of the organisational unit