



Data Processing Policy Excellence Award

The purpose of this Data Processing Policy (hereinafter: Policy) is to provide information to all data subjects regarding data processing in connection with the assessment and administration of the Excellence Scholarship (hereinafter: Scholarship) announced by Semmelweis University (hereinafter: SE) and College International Oktatási Kft. (hereinafter: CI), the operator of the Budapest Campus of McDaniel College, as contracting parties (hereinafter individually: Party, collectively: Parties) and the processing of images taken for the purpose of promoting the Scholarship and for informational purposes.

The processing and storage of personal data specified in this Policy applies to the personal data of applicants for the Scholarship (hereinafter referred to as Applicants) and Scholarship recipients (hereinafter referred to as Scholarship Recipients) as data subjects (hereinafter collectively referred to as Data Subjects) in accordance with the data protection regulations in force at any given time, with particular regard to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 *on the protection of natural persons with regard to the processing of their personal data and on the free movement of such data, and repealing the Directive 95/46/EC* (General Data Protection Regulation) (hereinafter: GDPR).

On the protection of personal data

The Parties, as joint data controllers (hereinafter referred to as Data Controllers), shall respect the protection of personal data in accordance with the provisions of the agreement on joint data processing and shall ensure the processing and storage of such data in accordance with the applicable legal regulations. The Data Controllers may only use personal data for the specified purposes, shall not combine them with their databases from other sources, shall not transfer the personal data processed to third parties without the express consent of the Data Subject, *unless expressly required by law*, and shall make every reasonable and expected effort to protect such data.

Data controllers and their contact details:

Semmelweis University:

- seat: 1085 Budapest, Üllői út 26.
- data protection officer: dr. Sára Trócsányi
- e-mail: adatvedelem@semmelweis.hu

College International Oktatási Kft.:

- seat: 1071 Budapest, Bethlen Gábor tér 2.
- data protection officer: Géza Nagy
- e-mail: gnagy@mcdaniel.hu

Scope of personal data processed:

- In the case of the Applicant: name, place of birth, date of birth, mother's name, nationality, NEPTUN code, grade point average related to the application;

- In the case of the Scholarship Recipient: name, place of birth, date of birth, mother's name, nationality, NEPTUN code, bank account number;
- In the case of images: a photograph of the Scholarship Recipient.

Purpose of data processing:

- In the case of the Applicant, the purpose of data processing is to evaluate the submitted application and notify the Applicant of the outcome of the evaluation;
- In the case of Scholarship Recipients, the purpose of data processing is to fully comply with the rights and obligations set out in the contract between the Data Controllers and the Scholarship Recipients (hereinafter: Scholarship Contract).
- In the case of images of Scholarship recipients (hereinafter referred to as Images) taken in connection with the Scholarship, the purpose of data processing is to create and use Images for the purpose of promoting the Scholarship, jointly by the Data Controllers, or separately on online platforms and on social media platforms operated by them.

Legal basis for data processing:

- In the case of Applicants: the Applicant's voluntary consent based on information provided [GDPR Article 6(1)(a)];
- In the case of the Scholarship Recipients: data processing is required for compliance with a legal obligation that the controller is subject to [GDPR Article 6(1)(c)];
- In the case of Images: the Scholarship Recipients' voluntary consent based on information provided to them [GDPR Article 6(1)(a)].

Duration of data processing:

- In the case of the Applicants: 1 (one) year after the conclusion of the application evaluation process, or until the withdrawal of consent or the exercise of the right to object;
- In the case of affected Scholarship Recipients: 8 (eight) years following a decision to award the Scholarship;
- In the case of Images: until the withdrawal of consent or the exercise of the right to object.

Accessibility of data:

- In the case of all Data Subjects, the personal data provided by them may only be accessed by the authorized employees of Data Controllers, and Data Controllers shall treat such data as confidential.
- In the case of Images, after publication, they may be accessed by anyone.

Data storage and data security:

- Data Controllers shall take appropriate measures to protect personal data against, among other things, unauthorized access and unauthorized alteration.
- In the event of a data breach as defined in Article 4(12) of the GDPR, the Data Controller who becomes aware of the breach shall notify the other Data Controller without undue delay, but no later than 24 (twenty-four) hours after becoming aware of the breach, and shall immediately commence an investigation of the breach without delay, and shall notify the competent supervisory authority within 72 (seventy-two) hours at the latest, as well as inform the Data Subjects if the data breach is likely to result in a risk to the rights of the affected Data Subjects.

Rights of the data subject in relation to the processing of their personal data:

If the Data Subject believes that their personal data is not being processed lawfully, they should first contact us, as the data controller, at one of the contact details listed above, so that we can process and handle the comment as quickly and efficiently as possible.

In addition to the above, all Data Subjects can exercise their rights related to personal data processing in accordance with the GDPR and the provisions of Act CXII of 2011 on the right to information self-determination and freedom of information.

In the event of a violation of rights or an imminent threat of a violation of rights in connection with the processing of personal data, the data subject may lodge a complaint with the National Authority for Data Protection and Freedom of Information (www.naih.hu, 1055 Bp., Falk Miksa utca 9-11., telephone: + 36 1/ 391-14 00).