**Data Processing Policy**

**concerning the use of data handled by The College for Advanced Pedagogy and Communication of the University of Dunaújváros through the Photo Competition**

The aim of this document is to provide an overall information about the Photo Competition announced by the College for Advanced Pedagogy and Communication of the University of Dunaújváros for the participants. 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 personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) its Article 13, futhermore the § 20. of the Act CXII of 2011 on information self-determination and freedom of information (hereinafter referred: Act. Info.) define it.

1. **The controller and its contact details**

University of Dunaújváros (hereinafter referred : the University)

Headquarters: 2400 Dunaújváros Táncsics M. u. 1/A

Postal Address: **2401 Dunaújváros, Pf.: 152.**

E-mail address: rektorihivatal@uniduna.hu

**Phone number: (06-25) 551-100**

**Fax: (06-25) 551-231**

**Webpage:** <http://www.uniduna.hu>

Supervisory body: Ministry of Human Capacities, 1055 Budapest, Szalay u. 10-14.

Data privacy officer's name: Szemere Brigitta PhD

E-mail: SZEMEREB@dufoffice365.onmicrosoft.com

1. **The legal basis of data processing**

Personal data may be processed under the fundamental right of the acceptance of the participant.

1. The applicant with his/her application for the Photo Competition agrees that his/her submission could be handled and used by the University without any remuneration.
2. The person displayed on any of the submissions/photos agrees with a separate declaration of consent to his/her personal data processing. The lack of this declaration can entail the disqualification of the applicant from the Photo Competition.

Range of personal data processed: the applicant’s e-mail address, the person’s facial image displayed on the submission.

1. **The purpose and the duration of data processing**

The purpose of data processing: Organisation and documentation of the Photo Competition, promotion of the University.

The duration of data processing is an indefinite period but not longer than the revocation of the declaration of consent. The revocation of the declaration of consent does not concern the legality of the production and the usage of the facial image made before the revocation and done according to the declaration of consent. The restriction concerns the producer and the user of the photo shoot only for the period after the decision to withdraw.

1. **The consumption of the data processor**

The University uses the data processor mentioned below according to the rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data: Microsoft Magyarország Kft.

Headquarters: 1031 Budapest, Graphisoft Park 3.

Webpage: https://www.microsoft.com/

1. **The security of processing**

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk.

There is no available decision making policy based on automated data processing at the University.

1. **The rights of data subject**

Rights of the data subject concerning data processing:

1. ***Right of access by the data subject.***: The data subject shall have the right to obtain from the University confirmation as to whether or not personal data concerning him or her are being processed according to the given accessibilities mentioned in the 1. paragraph above . The University fulfils this written request within 25 days sent to the accessibility previously given by the data subject (GDPR Article 15.)
2. ***Right to rectification***: The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her sent to the accessibilities mentioned in the 1. paragraph above witin 15 days after the change in written form.. (GDPR Article 16.)
3. ***Right to erasure and Right to restriction of processing:*** The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay via the given accessibilities mentioned in the 1. paragraph above and the controller shall have the obligation to erase personal data without undue delay. The data subject shall have the right to obtain from the controller restriction of processing where any of the conditions according to GDPR apply. (GDPR Articles 17. and 18.)
4. ***Right to object***:. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions via the given accessibilities mentioned in the 1. paragraph above. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, for reasons of public interest, for scientific researches. (GDPR Article 21.)
5. ***Right to data portability***: The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided where any of the conditions according to the GDPR apply. (GDPR Article 20.),

**Right to lodge a complaint with a supervisory authority:** Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in his/her habitual residence, place of work or place of the alleged infringement or can ask for the investigation of the case from the National Authority for Data Protection and Freedom of Information (Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.) if the data subject considers that the processing of personal data relating to him or her infringes this Regulation.

Dunaújváros, 11th November 2019.