**DATA MANAGEMENT INFORMATION**

**For the processing of student data at the University of Dunaújváros**

1. **Name of the data controller**

**University of Dunaújváros** (hereinafter referred to as the University)

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

1. Mailing address: 2401 Dunaújváros, P.O. Box 152.
Email address: kabinet@uniduna.hu
th@uniduna.hu
Central phone number: +36-30-553-1211
Website: <http://www.uniduna.hu>

Data Protection Officer: Dr. Ágnes Hegedűs (+36-30/553-1299; adatvedelem@uniduna.hu)

1. **Laws governing data processing**

a)Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information

b) Act CCIV of 2011 on National Higher Education (hereinafter: Nftv.)

c) Government Decree No 87/2015 (IV. 9.) on the implementation of certain provisions of Act CCIV of 2011 on National Higher Education

d) 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 Regulation (EC) No 95/46/EC (General Data Protection Regulation, GDPR)

1. **Principles of data processing**

a) The University processes personal data in a lawful and transparent manner, ensuring fairness in the processing of personal data concerning natural persons. (lawfulness, fairness and transparency)

b) The University shall process personal data only for specified lawful purposes, for the exercise of rights and for the performance of obligations. At all stages of processing, the purpose of the processing must be fulfilled and the collection and processing of data must be fair and lawful (purpose limitation).

c) The University shall only process personal data that is necessary for the purpose of the processing and is suitable for achieving that purpose. Personal data may only be processed to the extent and for the duration necessary to achieve the purpose (principle of data minimisation and limited storage).

d) The University must ensure that personal data is accurate and up-to-date, bearing in mind that inaccurate personal data should be rectified (accuracy).

e) The University shall process personal data in such a way that appropriate technical or organizational measures are in place to ensure the security of personal data, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage (availability, integrity, and confidentiality).

1. **Legal basis for data processing, scope of processed data**

The legal basis for the processing of personal data is Article 6(1)(e) of the GDPR, i.e. "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller". Data processing is mandatory, and its legal basis is provided by Article 18 (1) to (2) of the Nftv. The scope of the data processed is set out in Annex 3 to the Nftv.

* 1. **Registration of a new student**
		1. **Purpose of data processing:** the purpose of data processing is the registration of students who are part of the admission procedure, including those transferring from other institutions, as well as visiting students and students enrolled in partial study programs. This also involves ensuring the exercise of the applicants' rights and the fulfillment of their obligations.
		2. **Processed Data:** the applicant's name and surname, gender, passport photo, maiden name and surname, mother's maiden name and surname, place and date of birth, nationality, place of residence, place of stay, notification address, email address and other contact details, and telephone number, educational identification number, type of identity document, number and validity of identity document, tax identification number, social security identification number, digital citizen identification number, in the case of non-Hungarian citizens, the title of residence in the territory of Hungary and the name and number of the document entitling to residence - in the case of persons with the right of free movement and residence, the document certifying the right of residence according to a special law – the Hungarian ID card, the Hungarian family member ID card, international insurance document data, secondary school graduation exam data, the data of the secondary school, the data required for the assessment of the application for admission, admission procedure data, the admission identification number, the identification number of the declaration pursuant to § 48/D(2) of the Nftv.
		3. **Data transfer:** during the data management processes related to the registration of a new student, data transfer to third parties outside the student and the University will occur only in cases specified by law.
	2. **Data processing in relation to student status**
		1. **Purpose of data processing:** to exercise the rights and fulfil the obligations of students, to keep records as required by law, to track the career paths of graduates.
		2. **Data processed:**
1. the student's name, gender, name at birth, mother's name, place and date of birth, nationality, place of residence, place of stay, notification address and telephone number, e-mail address, in the case of non-Hungarian citizens, the title of residence in Hungary and the name and number of the document entitling the student to stay - in the case of persons with the right of free movement and residence, the document certifying the right of residence according to a separate law
2. the type of student (visiting student) status, the date and method of its establishment and termination, the name of the course the student is enrolled in, its the state funding and the work schedule, the expected date of completion of the course, the student's academic evaluation, examination results, semesters started, the period of funding utilized, the termination of the student's status,
3. the place and time of study abroad,
4. credits acquired and recognised during the course of training, credited studies,
5. data of student benefits, data necessary for the assessment of eligibility for benefits (social status, parental data, maintenance data),
6. data related to student employment,
7. data on student disciplinary and compensation cases,
8. data necessary for assessing special treatment for students with disabilities,
9. data relating to student accidents,
10. the student's student card serial number, identification number of the registration sheet,
11. the student's educational identification number, identity document number, passport photo, social security identification number,
12. an electronic copy of the thesis (diploma thesis) and the diploma supplement, information on the completion of the internship, the diploma, the final examination (doctoral thesis), the language exams, the diploma and the diploma supplement, and micro-certificates
13. data necessary for the fulfilment of rights and obligations arising from the student status;
14. data relating to student career tracking;
15. the student's tax identification number;
16. data for the identification of the supporting documents;
17. data on fees and reimbursements paid by the student, such as instalment rebates, deferrals and exemptions from obligations;
18. in the case of student or housing support, if it is provided on the basis of receipt of maternity leave allowance, child care assistance, child-raising allowance, childcare allowance, regular child protection allowance or is granted based on the student’s disadvantaged status, details of such allowances or grants;
19. the details of scholarships paid to the student in support of his/her studies in respect of the student's legal status, established by the Government by decree in accordance with Article 85(1) and (2);
20. data on the student's competency assessment and its results;
21. data on the existence and type of the loan granted by the Student Loan Centre and, in the case of a tied loan, the amount of the student loan applied for by the student, the number of the loan contract, the amount transferred to the higher education institution and the date of the transfer.
22. the date and reason for removal from the register of identity and address.
23. The higher education institution keeps records of the student's marital status and student status with children for a period of ten years from the notification of the termination of the student status, for the purpose of determining the duration of Hungarian state scholarship eligibility.
	* 1. **Data transfer:** in the course of data management processes, data is transferred to third parties outside the student and the University in cases specified by law.
	1. **Data management related to student benefits**
		1. **Purpose of processing:** to establish, assess and verify eligibility for the benefits provided by law and the University's Student Entitlement Scheme
		2. **Processed data:** data on student benefits, the personal and special data of the student and their close relatives or household members, which verify the student’s social need for assistance and are necessary for determining eligibility for benefits. This also includes data on fees and reimbursements paid by the student - instalment rebate, deferment, exemption related to the obligation; in case of receiving student support in the form of childcare allowance, childcare allowance, regular child protection allowance, housing allowance, data on such support; data on scholarships paid to support the student's studies in respect of the student's legal status - established by the Government by decree pursuant to Article 85 (1) and (2) of the Nftv;
		3. **Data transfer:** in the course of data management processes, data is transferred to third parties outside the student and the University in cases specified by law.
24. **Purpose and duration of data processing**
	1. The University
25. the proper functioning of the institution,
26. the exercise of the rights and fulfilment of the obligations of applicants and students,
27. the organisation of training and research,
28. the exercise of the rights of employers and the exercise of the rights and fulfilment of the obligations of teachers, researchers and staff,
29. the keeping of records required by law,
30. to establish, assess and certify entitlement to benefits provided for by legislation and the organisational and operational rules of the higher education institution,
31. to keep personal and special records essential for the purpose of tracking carreer paths of graduates.

The University processes the personal and special data specified in Annex 3 of the Nftv. only in connection with the legal relationship, the establishment and fulfilment of benefits, discounts, obligations, for reasons of national security, for the purpose of managing the records specified in the Act, to the extent appropriate for the purpose, and for the purpose for which they are intended.

The data recorded may be used for statistical purposes and transmitted to the official statistical service for statistical use.

* 1. **Duration of data processing:** the University shall store the student's personal data for a period of eighty years from the date of notification of the termination of the student's legal status, in accordance with the provisions of the Nftv.
1. **Use of a data processor**

To support the operation and maintenance of IT systems, the University engages the following entities as data processors, with whom it has a data processing contract:

1. SDA Informatikai Zrt. (registered office: 2030, Érd Retyezáti utca 46., mail: info@sdainformatika.hu, company registration number: 13-10-011083) for the purpose of technological and legal monitoring and support of the Neptun system.
2. **Transmission of data**

The University may transfer data within the scope regulated in Annex 3 of the Nftv. The data may be transmitted:

1. to the maintenance provider, all data for the performance of tasks related to the management of the maintenance provider;
2. to the court, the police, the public prosecutor's office, the bailiff, the state administration body, data necessary for the decision of a specific case;
3. all data necessary for the National Security Service to perform the tasks specified in the Nbtv;
4. all data to the body responsible for the operation of the higher education information system;
5. to the body responsible for the registration of the conditions for the Hungarian state scholarship concerning the training and the student status.
6. **Security measures, access to data**
	1. The University stores the personal data of students processed by it on servers located at the University's headquarters (2400 Dunaújváros Táncsics M. u. 1/A), in the Neptun.NET Unified Study System and, based on the legal provision, in the Higher Education Information System (HIS). In addition, student personal data is stored in the MOODLE, EPER-BURSA, thesis.uniduna.hu and HASIT-Avatar systems. The University shall take appropriate measures to protect the personal data of students that it processes, including against unauthorised access or unauthorised alteration, taking into account the legal and IT possibilities available to it. For example, the University keeps a log of access to personal data stored on its servers, so that it is always possible to check who has accessed what personal data, when and to what extent. Physical security is provided by 24-hour security, electronic access control and a CCTV surveillance system. The University's IT and Information Security Policy sets out the security requirements and information security policy.
	2. The personal data of students processed by the University may be accessed by employees of the University solely for the purpose and to the extent and for the extent necessary for the performance of their duties. The data processor shall have the right to access the data in order to perform its tasks under a data processing contract with the University.
7. **Rights related to data management, enforcement possibilities**
	1. In relation to student data processing, the student has the following rights:
8. **Right to request information:** on the basis of which the student concerned by the processing of student data may request information in writing, through the contact details provided in point 1, about what personal data the University processes, on what legal basis, for what processing purposes, from what source, for how long, and to whom, when, under what law, to what personal data the University grants access and to whom the personal data is/are transferred. The University will respond to a written request within a maximum of 25 days by letter to the contact details provided by the requesting student.
9. **Right to rectification:** in the event of a change of data or incorrect recording of data, the student concerned by the data management may or must request in writing, through the contact details provided in point 1, the rectification or correction of his/her personal data within 15 days of the change.
10. **Right to erasure, restriction of processing.** no request for erasure or restriction may be made in respect of the scope of the data processed as defined by law. In the case of non-mandatory data processing beyond this - based on personal consent - the right is granted to the student who gave the consent.

In the event of a request for restriction of processing, the restriction shall last for as long as the reason stated by the requesting student makes it necessary to store the data.

1. **Right to object:** the student concerned may object to the processing of personal data on grounds relating to his or her particular situation, if the University would transfer or use the personal data for direct marketing, public opinion polling, profiling or scientific research purposes, in writing to the contact details provided in point 1.
	1. **Enforcement:** in the event of a violation of their rights, the student may take the data controller to court (the court of their place of residence or domicile) or request the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11., mailing address: 1363 Budapest, Pf. 9., website URL: http://naih.hu , e-mail address: ugyfelszolgalat@naih.hu).
2. **Automated processing (including profiling)**

No automated decision-making based on data management takes place at the University.

1. **Other provisions**

The University reserves the right to change this Privacy Policy. In particular, this may be the case if required by law.

The change in the processing must not imply a processing of personal data for purposes other than those for which they were collected. The University will publish the information on its website 15 days before the processing.