**Data Processing Policy**

**concerning the use of data handled by The College for Advanced Pedagogy and Communication of the University of Dunaújváros for its Short Film Competition**

The aim of this document is to provide overall information about the Short Film Competition announced by the College for Advanced Pedagogy and Communication of the University of Dunaújváros for its 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, furthermore the § 20. of the Act CXII of 2011 on information self-determination and freedom of information (hereinafter referred: Act. Info.), define the following:

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

University of Dunaújváros (hereinafter: University)

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

Postal address: 2401 Dunaújváros, Pf.: 152.

E-mail address: kabinet@uniduna.hu

Telephone number: (06-25) 551-100

Website: http://www.uniduna.hu

Data protection officer: dr. Ágnes Hegedűs (06-25/551-191; adatvedelem@uniduna.hu)

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

a) CXII of 2011 Act on the right to self-determination of information and freedom of information

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

c) Government Decree 87/2015 (IV. 9) CCIV of 2011 on national higher education on the implementation of certain provisions of the Act

d) Act V of 2013 on the Civil Code (Ptk.)

e) Regulation (EU) 2016/679 of the European Parliament and of the Council (April 27, 2016) on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, and on the repeal of Regulation 95/46/EC (General Data Protection Regulation, GDPR)

f) The data management and data protection policy of the University of Dunaújváros (see at https://www.uniduna.hu/rolunk/ervenyes-szabalyzatok-rolunk/758-02\_11\_adatkezelesi\_es\_adatvedelmi\_szabalyzat\_20220322/file)

1. **Legal basis for data management and the scope of the managed data**

Legal basis for data management: the consent of the data subject.

a) By entering the application, the applicant (student) consents to the management and use of his/her works by the University, without any separate remuneration.

b) The person featuring in the short film submitted to the competition consents to the processing of their personal data by a separate statement of consent. Failure to provide consent will result in the exclusion of the applicant from the application.

Range of processed data: applicant's name, place of birth, time, e-mail address, portrait of the person(s) included in the entry.

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

The purpose of data processing: organisation and documentation of the Short Film 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 short film only for the period after the decision to withdraw.

1. **The use of a 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 data controller and the data 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 the data subject**

Rights of the data subject concerning data processing are:

1. ***Right of access by the data subject***: The data subject shall have the right to obtain confirmation from the University as to whether or not personal data concerning them are being processed according to the given accessibilities mentioned in paragraph 1 above. The University processes this written request within 25 days sent to the address 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 them sent to the address mentioned in paragraph 1 above within 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 them without undue delay via the availability given in paragraph 1 above, and the controller shall have the obligation to erase the 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 their particular situation at any time, to the 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 paragraph 1 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, or for scientific researches (GDPR Article 21.).
5. ***Right to data portability***: The data subject shall have the right to receive the personal data concerning them, which they have provided to the 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.).

**7.2. Legal enforcement:** in the event of the violation of their rights, the data subject may apply to the Court (the court of their place of residence) against the data controller, or file a request to the National Data Protection and Freedom of Information Authority (1055 Budapest, Falk Miksa utca 9-11., mailing address: 1363 Budapest, Pf. 9., website URL address: http://naih.hu, email address: ugyfelszolgalat@naih.hu).

Dunaújváros, 7th November 2022.