

## Data Privacy Notice

*Effective from 25 April 2024 until amended or revoked*

The purpose of this Data Privacy Notice ensures that data processing by the Data Controller respects the privacy of natural persons and complies with the constitutional principles and requirements of data protection and security. The notice also provides Data Subjects with prior information concerning the processing of personal data by the Data Controller and access to detailed information on data processing.

Company name:	Soproni Egyetem / University of Sopron, Hungary
Headquarters:	4 Bajcsy-Zsilinszky Street, Sopron H-9400
Tax number:	19253086-2-08; International: 19253086
Website:	<a href="http://uni-sopron.hu/">http://uni-sopron.hu/</a>
Email:	rektor@uni-sopron.hu
Phone:	+36 99 518 142
Legal representative:	Prof. dr. Attila Gábor Fábrián, Rector

Purpose of data processing: Event-related data processing	
Process	Registration, application for the event, identification
Data Subjects	Event participants
Type of data	Personal data, public data
Personal data	Name, title, company name, e-mail address, type and language of the presentation
Legal notice	Required in relation to the contract of the Data Subject
Legislation	Non-legislatively defined
Data retention period	until the end of the event
Process	Information on the event, contacts, communication
Data Subjects	Event participants
Type of data	Personal data
Personal data	E-mail address, name
Legal notice	Required in relation to the contract of the Data Subject
Legislation	Non-legislatively defined
Data retention period	Until the end of the event
Process	Taking, transmitting and sharing photos, video and audio recordings and their subsequent use

Data Subjects	Event participants
Type of data	Personal data
Personal data	Photo (portrait)
Legal notice	Consent of the Data Subject
Legislation	Non-legislatively defined
Data retention period	Until objection or withdrawal of consent
Process	Data process related to giveaways
Data Subjects	Event participants
Type of data	Personal data
Personal data	Name
Legal notice	Legal obligation of the Data Controller
Legislation	Act CXVIII of 1995 on Personal Income Tax, § 3, points 26) and 27), and § 70, points 6) and 9)
Data retention period	for 8 years
Process	Data processing related to certificates
Data Subjects	Event participants
Type of data	Personal data
Personal data	Name
Legal notice	Consent of the Data Subject
Legislation	Non-legislatively defined
Data retention period	Until objection or withdrawal of consent, until the end of the event
Process	Data processing related to the abstract book
Data Subjects	Event participants
Type of data	Personal Data, Public Data
Personal data	Name, title, company name, company address, title of the presentation
Legal notice	Consent of the Data Subject
Legislation	Non-legislatively defined
Data retention period	Until objection or withdrawal of consent

## Voluntary Consent

The Data Controller also processes the personal data of Data Subjects on a voluntary consent basis. This consent may be withdrawn at any time.

### **Terms and definitions:**

*Data subject:* any natural person identified or can be identified directly or indirectly based on personal data.

*Consent:* a voluntary and explicit expression of the Data Subject's wishes, based on appropriate information, by which unambiguous consent to personal data processing is granted, fully or partially.

*Personal data:* data that can be associated with the Data Subject, in particular name, identification number and one or more factors specific to physical, physiological, mental, economic, cultural or social identity, and the inferences that can be drawn from the data concerning the Data Subject.

*Data Controller:* the natural or legal person or unincorporated body which, alone or jointly with others, determines the purposes for which the data are to be processed, takes and implements decisions regarding the processing (including the means used) or has the data processed.

*Data processing:* any operation or set of operations performed upon data, regardless of the procedure used; in particular, any collection, recording, recording, organisation, storage, alteration, use, retrieval, disclosure, transmission, alignment or combination, blocking, erasure or destruction of data, prevention of further use, taking of photographs, sound recordings or images, or any other physical means of identification of a person (e.g. fingerprints, palm prints, DNA samples, iris scans).

*Transfer:* making data available to a specified third party.

*Data processor:* a natural or legal person or unincorporated body that processes personal data on behalf of the Controller.

*Data processing:* the performance of processing operations, technical tasks, irrespective of the method and means used to perform the operations and the place of application.

*Disclosure:* making data accessible to any person.

*Data erasure:* rendering data unrecognisable in a way that makes it irretrievable.

*Machine processing:* includes the following operations, when performed wholly or partially automated means: data storage, logical or arithmetical operations on data, alteration, deletion, retrieval and dissemination of data.

*System:* the totality of the technical solutions operating the computerised processing of the Data Controller and, where applicable, the pages and services of its partners accessible via the Internet (hereinafter referred to as the "System").

### **Data Processing Principles**

Personal data must be obtained and processed fairly and lawfully.

Personal data should only be stored for a specified and legitimate purpose and should not be used in any other way.

The scope of the personal data processed must be proportionate to and compatible with the purpose for which it is stored and must not extend beyond that purpose.

Appropriate security measures should be taken to protect personal data stored in automated data files against accidental or unlawful destruction or accidental loss and against unlawful access, alteration or dissemination.

### **Data transmission**

The Data Controller is entitled and obliged to transmit to the competent authorities any stored personal data at its disposal in accordance with the law. It is obliged to transmit this data by law or by a final decision of a public authority or where the Data Subject is suspected of having committed a crime or an offence. The Data Controller shall not be held liable for such transfers or the consequences thereof.

In addition, the Data Controller shall transfer data only to its contractually related co-controllers and/or processors, including only those who are under a contractual obligation to the Data Subject; accordingly, the Data Controller shall transfer data to third parties only for the purposes and to the extent necessary to fulfil the purposes set out in this Data Privacy Notice. Such transfers shall not place the Data Subject in a less favourable position than the data processing and data security rules stipulated in the current version of this notice.

### **Security of processing**

The Data Controller shall, in accordance with its obligation under Article 32 of the GDPR, make every effort to ensure the security of the Data Subjects' data and shall take the necessary technical and organisational measures and establish the necessary procedural rules to enforce the GDPR and other data protection and confidentiality rules, taking into account the reasonable expectations of the Data Subject in its relationship with the Data Controller, as well as the state of science and technology and the costs associated with the implementation risks and the nature of the personal data to be protected.

The Controller processes data via paper and automated means. Where the processing is performed by automated means, the processing of any data by human intervention shall be conducted only exceptionally and to the extent that it is necessary and justified.

In particular, the Controller shall protect the data against unauthorised access, alteration, disclosure, erasure or destruction and against accidental destruction or damage. Data which are automatically and technically recorded during the operation of the Controller's System(s) shall be stored for a period from the moment they are generated, which is reasonable for the purposes of ensuring the functioning of the System. The Data Controller shall ensure that these automatically recorded data cannot be linked to other personal data except as required by law.

If such a link is established, the Data Controller department employees in charge of data processing shall treat the personal data they have obtained as business secrets. To this end, Data

Controller employees are also specifically obliged and shall, in the course of their work, ensure that no unauthorised persons have access to personal data. Personal data are stored in such a way that they cannot be accessed, altered or destroyed by unauthorised persons.

Data that are automatically and technically recorded during the operation of the System(s) of the Data Controller are stored for a period from the moment they are generated until a time reasonable for the operation of the system. The Controller shall ensure that these automatically recorded data cannot be linked to other personal data except as required by law.

The Data Controller's executive officer, who has decision-making powers at any given time, shall determine the organisation of data protection, the tasks and powers relating to data protection and related activities, and shall designate the person responsible for supervising data processing, taking into account the specific characteristics of the Controller.

### **How the data is collected**

The Data Controller receives and obtains the Data Subject data under this Data Privacy Notice through a legal representative — an authorised representative or from a public source — and in all other cases, directly from the Data Subject based on voluntary consent, legal obligation and obligation to perform a contract.

In all cases, the Data Subject is responsible for the accuracy of the personal data provided. The Controller does not verify the personal data provided to it.

In compliance with its obligation under Article 14(3) of Chapter III of the GDPR, the Data Controller shall inform the Data Subject of any personal data not obtained from the Data Subject, using contact details known to it, preferably by e-mail, if known, without undue delay and at the latest within one month, of the following:

- the identity and contact details of the Data Controller and, if any, of the Data Controller's representative;
- contact details of the Data Protection Officer, if any;
- the purposes for which the personal data are intended to be processed and the legal basis for the processing;
- the categories of personal data;
- the recipients or categories of recipients of the personal data, if any;
- where applicable, the fact that the controller intends to transfer the personal data to a recipient in a third country or to an international organisation and the existence or absence of an adequacy decision by the Commission or, in the case of a transfer referred to in Article 46 of the GDPR, Article 47 of the GDPR or the second subparagraph of Article 49(1) of the GDPR, an indication of the appropriate and suitable safeguards and a reference to the means of obtaining a copy of the personal data or their availability;
- the duration of the storage of the personal data or, where this is not possible, the criteria for determining that duration;
- where the processing is based on Article 6(1)(f) of the GDPR, the legitimate interests of the Data Controller or third party;
- the right of the Data Subject to request the Controller to access, rectify, erase or restrict the processing of personal data. The Data Subject also has the right to object to the processing of personal data and the right to data portability;

- in the case of processing based on Article 6(1)(a) or Article 9(2)(a) of the GDPR, the right to withdraw consent at any time, without prejudice to the lawfulness of the processing performed based on consent prior to its withdrawal;
- the right to lodge a complaint with a supervisory authority;
- the source of the personal data and, where applicable, whether the data originate from publicly accessible sources;
- the fact of automated decision-making, including profiling, as referred to in Article 22(1) and (4) of the GDPR and, at least in these cases, the logic used and clear information on the significance of such processing and its likely consequences for the Data Subject.

### **Data processors**

The Data Controller does not use a data processor to process the data covered by this notice.

### **Records of processing activities**

The Controller shall keep records of the processing activities performed under its responsibility. These records shall contain the following information:

- the name and contact details of the Data Controller and the name and contact details of the Data Protection Officer;
- the purpose of the data processing;
- a description of the categories of Data Subjects and the categories of personal data;
- the categories of recipients to whom the personal data are or will be disclosed, including recipients in third countries or international organisations;
- where applicable, information concerning the transfer of personal data to a third country or international organisation, including the identification of the third country or international organisation and, in the case of a transfer according to the second subparagraph of Article 49(1) of the GDPR Regulation, a description of the appropriate safeguards;
- where possible, the time limits envisaged for the deletion of the different categories of data;
- where possible, a general description of the technical and organisational measures referred to in Article 32(1).

The Data Controller shall make the register available to the supervisory authority upon request.

### **Data Protection Officer**

Taking into account the existence of the mandatory case provided for in Article 37 of the GDPR Regulation — systematic and systematic large-scale monitoring of Data Subjects, the performance of a public task, the processing of sensitive data — a Data Protection Officer was appointed on 02 February 2021.

The Data Controller hereby informs the Data Subjects that the Data Protection Officer may be contacted if the Data Controller notices a procedure, incident or other circumstance that raises data protection concerns or that otherwise may be objectionable from a legal, technical or

organisational perspective, or at least justifies investigation, with the information of the competent employee or manager, but independently of this, via the following contact details:

Name and contact details of the Data Protection Officer: iColl Engineering, Consulting and Services Ltd., 2089 Telki, Ózike Street 14. [adatvedelem@uni-sopron.hu](mailto:adatvedelem@uni-sopron.hu)

## **Rights of the Data Subject**

### ***Right to information***

The Data Subject must be informed clearly and in detail of all the facts relating to data processing before the processing starts.

#### *The Data Subject*

- may request information about the processing of personal data;
- request the rectification of personal data;
- request the erasure or restriction of personal data;
- exercise the right to data portability;
- object to the processing of personal data;
- withdraw processing consent;
- in the event of a breach of rights, have recourse to the Data Controller, the Data Protection Authority and the courts.

### ***Right of access***

Where the information cannot be refused by law, the Data Controller shall, upon request, provide the Data Subject with information concerning

- the purposes of the processing;
- the legal basis for the processing;
- the categories of personal data concerned;
- the names and addresses of any data processors and their activities in relation to the processing;
- the categories of recipients to whom the personal data have been or will be disclosed;
- the duration of the processing;
- the circumstances and effects of a possible data protection incident and the measures taken to address it;
- the right to request the Controller to rectify, erase or restrict the processing of personal data and to object to the processing of such personal data;
- the right to lodge a complaint with a supervisory authority;
- where the personal data have not been collected from the Data Subject, any available information about the data source;
- where applicable, the fact of automated decision-making, including profiling, and, at least in these cases, the logic used and clear information on the significance of such processing and its consequences for the Data Subject;
- where applicable, the transfer of the Data Subject's personal data to a third country.

The controller shall provide the information in writing in an intelligible form within the shortest possible time from the date of the request but not later than thirty (30) days.

### ***Right to rectification***

At the request of the Data Subject, the Data Controller shall correct inaccurate or inaccurate personal data. Taking into account the purposes of the processing, the Data Subject may request the completion of incomplete personal data, including by means of a supplementary declaration. As long as the data cannot be corrected or completed, the Controller shall restrict the processing of personal data and temporarily suspend the processing operations, except for storage.

### ***Right to erasure***

The Data Subject shall have the right to obtain from the Controller, upon request and without undue delay, the erasure of personal data where

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- the Data Subject has withdrawn consent, and there is no other legal basis for the processing;
- the Data Subject objects to the processing of personal data, and the Controller has no overriding legitimate grounds for the processing, or the Data Subject objects to processing for direct marketing purposes;
- the personal data have been unlawfully processed;
- the personal data must be erased to comply with a legal obligation under Union or Member State law to which the Controller is subject;
- the personal data have been collected directly in connection with the provision of information society services to children without the consent of the person having parental responsibility.

Where the Controller determines that there is an obligation to erase personal data it has processed, it shall cease processing and destroy the personal data previously processed.

Where the Data Controller has disclosed personal data and is under an obligation to erase it, it shall — taking available technology and implementation costs into account — take reasonable steps to inform the controllers of the deletion of links to or copies or duplicates of the personal data in question.

The Controller may not delete personal data where the processing is necessary

- for the exercise of the right to freedom of expression and information;
- to comply with an obligation under Union or Member State law or to exercise official authority;
- in the public interest of public health;
- necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, where erasure would make the processing impossible or seriously impair it;
- to establish, exercise or defend legal claims.



### ***Right to restriction***

The Controller shall, at the request of the Data Subject, restrict the processing of personal data where

- the Data Subject contests the accuracy of the personal data;
- the processing is unlawful, and the Data Subject opposes the erasure of the data and requests the restriction of their use;
- the Controller no longer needs the personal data, but the Data Subject requests them for the purpose of pursuing legal claims
- the Data Subject has objected to the processing, and the Controller is still investigating.

Except for storage, personal data contingent on the restriction may be processed only in the following cases:

- with the Data Subject's consent;
- to assert, exercise or defend legal claims or defend the rights of another natural or legal person,
- important public interest of the Union or of a Member State.

The Data Controller shall inform the Data Subject requesting the restriction prior to lifting the restriction.

### ***Right to data portability***

In the case of voluntary consent of the Data Subject, the performance of a contract or automated decision-making, the Data Subject is entitled to the following concerning data provided to the Data Controller

- to receive it in a structured, commonly used, machine-readable format;
- to transmit it to another controller;
- to transmit it directly to another controller, where technically feasible.

The Data Subject may not exercise the right to portability where the processing is in the public interest or the exercise of official authority.

### ***Right to object***

The Data Subject has the right to object to the processing of personal data by the Controller at any time based on legitimate interest and profiling, in particular where personal data are used for direct marketing, public interest or scientific research purposes.

The Data Controller shall examine the objection within a maximum of thirty (30) days from the date of the request and inform the Data Subject in writing of its decision. The Controller shall suspend processing for the duration of the investigation but for a maximum of five (5) days.

If the Data Subject's objection is deemed justified, the Data Controller shall terminate the processing, including any further data recording and transmission. The Data Controller shall

also block the data and notify all persons to whom the data have been disclosed and who are obliged to take action to enforce the right to objection and its consequences.

If the Data Subject disagrees with the decision of the Data Controller, he or she has the right to take legal action within thirty (30) days of the notification of the decision or of the last day of the time limit.

### **General notification obligation**

The Data Controller shall inform each recipient of any rectification, erasure, objection or restriction of processing to whom or with which the personal data have been disclosed unless this proves impossible or involves a disproportionate effort. The Data Subject shall, upon request, be informed by the Controller of such recipients.

### **Enforcement options**

In the event of questions, comments, requests and complaints, the Data Subjects may contact the Data Controller to assert their rights, in particular at the following contact details:

University of Sopron  
9400 Sopron, Bajcsy-Zsilinszky utca 4.  
+36 99 518-142  
[adatvedelem@uni-sopron.hu](mailto:adatvedelem@uni-sopron.hu)

#### *Legal remedies:*

National Authority for Data Protection and Freedom of Information  
Headquarters.  
Postal address: 1363 Budapest, PO Box 9.  
Phone: +36 1 391 1400  
Fax number: +36 1 391 1410  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)  
Website: <https://www.naih.hu>  
Online case filing: <https://www.naih.hu/online-uegyinditas.html>

#### *Judicial enforcement*

In addition to administrative remedies, the Data Subject may have recourse to the courts against the Data Controller's activities. The rules of the GDPR, the Info Act, the Civil Code and the Civil Procedure Code apply to the lawsuit. The court of law has jurisdiction to decide on the lawsuit. At the Data Subject's discretion, the lawsuit may also be brought before the court of the Data Subject's place of residence (for a list of courts and their contact details, please consult the following link: <http://birosag.hu/torvenyszekek>).

This Data Privacy Notice is hereby accepted and entered into force.

Sopron, 25 April 2024.

**University of Sopron**



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Prof. dr. Attila Gábor Fábán  
Rector, Data Controller \*

