

DATA MANAGEMENT POLICY

WITH REGARD TO CORVINUS' WEBSITE

1. NAME OF DATA CONTROLLER

Corvinus University of Budapest (hereinafter: Corvinus or University)

Address: 1093 Budapest, Fővám tér 8.
E-mail: kommunikacio@uni-corvinus.hu
Phone: +36 1 482 5000
Websites: <http://www.uni-corvinus.hu>

Data Protection Officer (DPO): Dr. Marica Sárközi-Kerecsi
E-mail: marica.kerecsi@uni-corvinus.hu
Tel: +36 1 482 5577

2. RELEVANT LEGISLATION

- 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: GDPR).
- Act CXII of 2011 on informational self-determination and on freedom of information.
- Act CCIV of 2011 on higher education.

3. SUBJECT MATTER OF DATA MANAGEMENT, DATA SUBJECTS

Subject matter of data processing: data controlling taking place on the website of CORVINUS and during its use.

Data subjects: citizens of CORVINUS University

4. SCOPE OF DATA, PURPOSE, LEGAL BASIS AND DURATION OF DATA MANAGEMENT, SOURCE OF DATA

SCOPE OF MANAGED PERSONAL DATA	PURPOSE OF DATA MANAGEMENT	LEGAL BASIS FOR DATA MANAGEMENT	DURATION OF DATA MANAGEMENT	SOURCE OF DATA	ACCESS TO DATA
surname, first name, title, position, or-organisational unit, contact details at work (building, floor, office, phone number, e-mail address)	to make the University's operations transparent	task carried out in the public interest - GDPR Article 6 (1) (e)	for persons in an employment status until the termination of such status, for students until the termination of the student status	data subject	anyone may access the data, they are published by Corvinus
cusman identifier	to verify right of access	task carried out in the public interest - GDPR Article 6 (1) (e)	until the termination of the employment or the students status	code generated automatically by the system	the cusman identifier may be accessed by web editors
content management system activity log	data security	task carried out in the public interest - GDPR Article 6 (1) (e)	for half a year from the establishment of the activity	code recorded automatically by the system	system administrator access
photo	to make the University's operations transparent	voluntary consent if granted by the data subject on the „edit profile” page– GDPR Article 6 (1) (a)	until the termination of the status or the withdrawal of the consent	data subject	anyone may access the data, they are published by Corvinus
CV information	to make the University's operations transparent	voluntary consent if granted by the data subject on the „edit profile” page– GDPR Article 6 (1) (a)	until the termination of the status or the withdrawal of the consent	data subject	anyone may access the data, they are published by Corvinus

5. TRANSFER OF DATA, DATA PROCESSING

The University may only transfer personal data to third parties unless authorised to do so by law or with the consent of the data subject, and only in exceptional cases. CORVINUS does not avail itself of a data controller.

6. DATA SECURITY MEASURES

The University shall ensure through technical and organisational measures that personal data managed by it are protected from accidental or unlawful destruction, loss, alteration as well unauthorised data management, access and disclosure

7. YOUR RIGHTS IN CONNECTION WITH DATA CONTROLLING

7.1 Right to request information

By using our contact details provided in Section 1, you may address a written request for information to the University about:

- what personal data,
- on what legal basis,
- for what data management purpose,
- from what source,
- for how long are managed,
- to whom, when, under what legislation and which personal data did the University provide access to or to whom did it forward your personal data

7.2 Right to rectification

By using the contact details provided in Section 1, you can make a written request to the University to have an item of your personal data modified (e.g. you can change your e-mail or postal address at any time).

7.3 Right to erasure

By using the contact details provided in Section 1, you can make a written request to the University to have your personal data erased.

7.4 Right to block (restrict access to) data

The data manager shall restrict data management at the request of the data subject if one of the following conditions are present:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.

By using the contact details provided in Section 1 you can make a written request to have your personal data restricted by the University (by clearly indicating the nature of the restricted data management and by ensuring separate management from the other data). Blocking shall last as long as the reasons indicated make it necessary.

7.5 Right to be informed of recipients informed of the rectification, erasure or restriction of personal data

By using the contact details provided in Section 1, you can ask the University to indicate which recipients you have informed about the correction, deletion or restriction of data processing.

7.6 The right to data portability

If the legal basis for the data processing is the data subject's consent, the data subject may exercise his or her right to data portability: in relation to the data subject's personal data provided to the University and processed in an automated manner, the data subject may request to receive it in a readable format or to transmit this data to another data controller. You may also request, if technically feasible, that the transfer of your personal data directly to another data controller be done by the University.

7.7 Right to object

By using the contact details provided in Section 1, you have the right to object to data management in writing. Objection is a declaration in which the management of personal data is challenged.

7.8 Right to revoke voluntary consent

The data subject may revoke his consent by clicking on the „unsubscribe” link provided in the newsletter. The data manager shall provide written information in a comprehensible form about the measures taken or about the rejection of the application and the grounds thereof without undue delay, but not later than within 1 month of the submission date.

8. COMPLAINTS WITH REGARD TO DATA MANAGEMENT

In case of unlawful data management you have the right to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information or to seek remedy before a court.

8.1 Notifying the authority

If you believe that a breach has occurred or may arise with respect to managing your data or to exercising your rights to access public data or data available publicly on the grounds of public interest, you can initiate an inquiry with the supervisory authority:

Contact details of the Hungarian National Authority for Data Protection and Freedom of Information (NAIH):

<https://www.naih.hu/general-information.html>

address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Postal address: 1530 Budapest, PO BOX:5

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1400

e-mail: ugyfelszolgalat@naih.hu

website: <https://naih.hu/>

8.2 Initiating a legal procedure

In case you experience that your personal data are treated in an unlawful manner, you may bring a civil action against the data controller. Judgement shall fall in the jurisdiction of the court. The lawsuit may be filed at the court of your of your domicile. (You can find the courts and their contact information under this link:

<http://birosag.hu/torvenyszekek>).