

March 1, 2024



**Data processing notice
for persons who have student status at the Corvinus University of Budapest**

General part

1. Scope of the data processing notice

1.1 Personal scope

A.) This data processing notice applies to students ("Student") who have student status at the Corvinus University of Budapest ("University").

1.2. Material scope

A.) The data processing notice covers the following subparagraphs (data relating to student status) of paragraph 1.b) of Section I/B of Annex 3 to Act CCIV of 2011 on National Higher Education (hereinafter: Nftv.):

(i) student's personal identification data (subparagraphs ba), bk) of paragraph 1.b) of Section I/B of Annex 1 of Nftv.)

(ii) data on student's programme (subparagraphs bb), bc), bd), bl), bm) of paragraph 1 of Section I/B of Annex 3 to Nftv.)

(g) data on student disciplinary and compensation cases (subparagraphs bg), bm) of paragraph 1 of Section I/B of Annex 3 to Nftv.)

(iv) data necessary for the assessment of eligibility for special treatment as a student with disabilities (subparagraphs bh), bm) of paragraph 1 of Section I/B of Annex 3 to Nftv.)

(i) data on student accidents (subparagraphs bi), bm) of paragraph 1 of Section I/B of Annex 3 to Nftv.)

(vi) data concerning student identity cards (subparagraphs bj), bm) of paragraph 1 of Section I/B of Annex 3 to Nftv.)

B.) The data processing notice does not cover the following subparagraphs (data relating to student status) of paragraph 1. b) of Section I/B of Annex 3 to Nftv. Students shall be informed thereof in a separate data processing notice by the University:

data on student benefits (subparagraph be) of paragraph 1 of Section I/B of Annex 3 to Nftv.)

II. Special provisions

2. Detailed data processing notice

2.1 Data processing notice

A.) Data processing notice applying to student status (Annex 1)

Data processing notice

Based on 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), the Corvinus University of Budapest as data controller (hereinafter: University or Data Controller) provides the following information to its students (hereinafter: Student or Data Subject) on the processing of their personal data in connection with their student status.

1. Name and contact details of the data controller and the data protection officer:

1.1 Data controller: Corvinus University of Budapest

Registered seat: 1093 Budapest, Fővám tér 8.

Phone: [+36 1 482 5000](tel:+3614825000)

Website: <https://www.uni-corvinus.hu/>

Data Protection Officer: dr. Balázs Locsmándi

Email: adatvedelem@uni-corvinus.hu

2. Purpose of data processing and relevant legislation

2.1 The purpose of the data processing by the University is the establishment of student status and the exercise of rights and fulfilment of obligations relating to student status with regard to Point I/B. 1. b) of Annex 3 of Act CCIV of 2011 on National Higher Education (hereinafter: Nftv.) (data relating to student status).

2.2 Laws and regulations governing student status, in particular:

- 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), in particular Article 6(1)(a) and (e) and Article 9(2)(b) and (g),
- Act CCIV of 2011 on National Higher Education (hereinafter: Nftv.), in particular Sections 12, 39, 49, 50–51, 55–58, Point II.3. of Annex 2, and Points I/B. 1. b) and 2–4 of Annex 3,

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- Government Decree No 87/2015 (9 April) on the implementation of certain provisions of Act CCIV of 2011 on National Higher Education (hereinafter: Implementing Decree), in particular Sections 25, 28, 34, 35–47, 50, 60, 62–64, and Annex 9,
- Government Decree No 362/2011 (30 December) on ID Cards used in Education (hereinafter: Education ID Cards Decree), in particular Sections 9, 12, 36 and 38
- Government Decree No 51/2007 (26 March) on grants available to and certain fees payable by higher education students (hereinafter: Grants Decree),
- Government Decree No 230/2012 (28 August) on Higher education vocational training and certain issues concerning internship in connection with training in higher education (hereinafter: Internships Decree), in particular Section 16,
- The Study and Examination Regulations of Corvinus University of Budapest (hereinafter: SER), in particular Section 5 (Administration of study and examination matters), Section 7 (Study committees), Section 9 (Proceedings of study committees at first instance), Section 10 (Student Appeals Committee), Sections 22–25 (Enrolment), Section 26 (Student training contract), Section 32 (Student identity card), Sections 44–52 (Provisions concerning studies), Sections 59–72 (Assessment of student performance), Sections 73–88 (Provisions concerning the completion and conclusion of studies), Sections 89–91 (Diploma and diploma supplement), Sections 96–98 (Documents related to study and examination matters handled by the University),
- Regulations on the procedure for the assessment of first-instance applications and appeals in connection with student status at Corvinus University of Budapest (hereinafter: Student Status Regulations),
- Student Disciplinary and Compensation Regulation of Corvinus University of Budapest (hereinafter: SDCR), in particular Section 3 (Documents relating to disciplinary and compensation proceedings), Section 23 (Disciplinary remedies), Section 24 (Disciplinary proceedings at second instance), Section 29 (Compensation procedure),
- The Code of Ethics of Corvinus University of Budapest (hereinafter: CE), in particular Clause 5 (University Ethics Committee),
- Regulations ensuring equal academic opportunities for students with disabilities at Corvinus University of Budapest (hereinafter: Disabled Students Regulations), in particular Section 8 (General rules on benefits for students with disabilities), Section 9 (Applicable benefits), Section 10 (Method of proving disability),
- Student Accident Prevention Regulations at Corvinus University of Budapest (hereinafter: SAPR), in particular Section 3 (Accidents involving students), Section 8 (Reporting, investigating and recording student accidents).

3. Purpose and legal grounds of the data processing, scope of the personal data processed and duration of the processing:

Purpose of data processing	Legal grounds for data processing	Scope of the personal data processed	Duration of data processing
3.1 Enrolment for the University	Performing the public service	3.1.1 The enrolment form contains	The University processes the data

	<p>mission of the University (Article 6(1)(e) of GDPR, Paragraph (3) of Section 39 of the Nftv., Paragraph (8) of Section 25, Paragraph (1) of Section 28, Paragraph (4) of Section 34 and Paragraph (3)–(4) of Section 38 of the Implementing Decree, and Sections 22–25 of the SER)</p>	<p>the following data (Paragraph (3) of Section 38 of the Implementing Decree):</p> <ul style="list-style-type: none"> (a) the name of the higher education institution and its institution identification number, (b) the specification of the current academic year and semester, (c) the student’s data and education identification number as defined in Subpoint (ba) of Point (b) of Point 1 of Chapter I/B. of Annex 3 of the Nftv., d) the name, level, mode of study, language and form of financing of the study programme started and the place of education, (e) the type of the student status, (f) the student’s tax ID and social security number, (g) for applicants classified for training supported by a Hungarian state (partial) scholarship, the declaration of the applicant in accordance with Annex 9 that he/she has read and accepts the conditions of the programme supported by a Hungarian state (partial) scholarship as set out 	<p>for a period of eighty years from the date of notification of the termination of student status. (Point 3 of Chapter I/B of Annex 3 of the Nftv.)</p>
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		<p>in the Nftv.,</p> <p>(h) the student’s declaration of having read the Institutional Guide,</p> <p>(i) additional information on students’ rights and obligations, as defined in the institution’s regulations,</p> <p>(j) the date of completion and authentication of the enrolment form and the signature of the student or his/her representative , and</p> <p>(k) the authentication pursuant to Paragraph (4) of Section 34.</p> <p>3.1.2 Annexes to the enrolment form (Paragraph (4) of Section 38 of the Implementing Decree):</p> <p>(a) a copy of the document(s) submitted to meet the conditions for admission during the admission procedure, which the higher education institution authenticates by comparing it to the original document ,</p> <p>(b) an original copy of the training contract between the higher education institution and the self-financing students, signed</p>	
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		<p>by all parties,</p> <p>(c) other statements requested by the higher education institution, and</p> <p>(d) for students enrolled through a representative, the representative's document entitling him/her to represent the student.</p>	
<p>3.2 Conclusion and performance of a student training contract</p>	<p>Performing the public service mission of the University (Article 6(1)(e) of the GDPR, Paragraph (3) of Section 39 of the Nftv., Section 50 of the Implementing Decree and Section 26 of the SER)</p>	<p>3.2.1 The student training contract includes (pursuant to Section 50 of the Implementing Decree)</p> <p>(a) the name of the student,</p> <p>(b) the name of the programme,</p> <p>(c) the amount applicable to the self-funded programme,</p> <p>(d) details of the Corvinus scholarship,</p> <p>(e) the student's signature</p>	<p>The University processes the data for a period of eighty years from the date of notification of the termination of student status. (Point 3 of Chapter I/B of Annex 3 of the Nftv.)</p>
<p>3.3 Operating an electronic student information system ("Neptun") and ensuring continuous access to the personal and study information recorded</p>	<p>Performing the public service mission of the University (Articles 6(1)(e) and 9(2)(b) and (g) of the GDPR, Point (b) of Point 1 of Chapter I/B of Annex 3 of the Nftv., Section 60 of the Implementing Decree, Sections 44–52, 59–72, 73–88, 89–91 of the SER, and Sections 16–17 and 21 of the Grants Decree)</p>	<p>3.3.1 Data relating to the student status (Point (b) of Point 1 of Chapter I/B of Annex 3 of the Nftv.):</p> <p>(a) the student's name, NEPTUN code, 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 case of non-Hungarian citizens the title of residence in</p>	<p>The University processes the data for a period of eighty years from the date of notification of the termination of student status. (Point 3 of Chapter I/B of Annex 3 of the Nftv.)</p>

		<p>Hungary and the name and number of the residence document, in case of persons having the right of free movement and residence according to a specific law, those of the document certifying the right of residence,</p> <p>(b) the type of student (guest student) status, the date and manner of its establishment and termination, the name of the programme followed by the student, its state funding and delivery mode, the expected date of completion of the programme, assessment of the student's study performance, exam results, semesters started, the periods for which funding was received, the suspension of student status,</p> <p>(c) the place and time of study abroad,</p> <p>(d) credits earned and recognised during the programme and credited studies,</p> <p>(e) data on student benefits and data necessary for the assessment of eligibility for benefits (social status, parents' data, maintenance data),</p>	
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		<p>(f) details of the student's employment, (g) data on student disciplinary and compensation cases, (h) the data necessary for the assessment of the special treatment of disabled persons, (i) data on student accidents, (j) the serial number of the student's student identity card and the identification number of the master data sheet, (k) the student's educational identification number, identity document number, photograph and social security number, (l) electronic copies of the bachelor/master thesis and the diploma supplement and information on the completion of the internship, the final certificate, the final examination (doctoral dissertation defence), the language certificate, the diploma and the diploma supplement, (m) data necessary for the fulfilment of rights and obligations arising from the student status,</p> <p>3.3.2 Data registered on the</p>	
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		<p>completion of studies in terms in credits (Section 60 of the Implementing Decree):</p> <p>(a) the form of the student's contribution to the costs of the programme,</p> <p>(b) programme information: the title of the study programme, the tertiary vocational programme and the professional qualification, designation of the programme cycle, the organisational unit responsible for the programme, the delivery mode, language and location of the programme and the chosen specialisation,</p> <p>(c) information on the subjects included in the specific curriculum of the student: name, code and credit value of the subject, number of contact hours, name of subject leader, name of the lecturer of the subject, the compulsory, compulsory elective or free elective nature of the subject,</p> <p>(d) additional information on the taking up and completion of a given subject or curriculum unit: number of times the subject has been taken</p>	
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		<p>up, number of exam attempts in the given semester and taking into account all the times the subject has been taken up, number of times a subject has been taken up and the number of attempts to obtain a grade in a subject with a grade obtained during the semester, grade and credit value obtained on the basis of the requirements, grade and date of the exam,</p> <p>(e) the names and credit values of the subjects and curriculum units included in the individual curriculum for the given semester and the total credit value of the subjects included; the total credit value of the subjects and curriculum units completed in a given semester and the credit index,</p> <p>(f) the total number of credits earned during a given academic term and the cumulative weighted average academic performance calculated for the total duration of studies up to that point; the ratio of credits completed in a given semester to the credits included in the individual curriculum for that semester; the adjusted credit index</p>	
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		<p>for the semester,</p> <p>(g) the number of active and passive semesters in the course of study up to the end of the semester; information on the minimum number of credits to be earned for the period in question, as required by the regulations of the higher education institution,</p> <p>(h) in the case of courses taken at a higher education institution abroad, their location and the total number of credits that can be credited to the given programme for the semester in question,</p> <p>(i) the number of free elective credits that may be taken into account according to the recommended curriculum of the programme; the number of credits that the student has already completed and still needs to complete by the end of the semester by taking the elective courses,</p> <p>(j) subjects, curriculum units and their credit values, recognised on the basis of previous studies or parallel studies completed as a guest student or on the basis of work and</p>	
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		<p>other experience,</p> <p>(k) the duration of the practice period, the date of its completion, its credit value and its grade,</p> <p>(l) the fact that the language requirements have been met,</p> <p>(m) the fulfilment of the other criteria set out in the programme and outcome requirements, and</p> <p>(n) the thesis grades, the subjects and grades of the final exam and the final exam grade and, if the grade of the final exam and the grade of the diploma are different, the grade of the diploma and the date of issue of the diploma.</p>	
3.4 Continuation of student studies and assessment of student performance	Performing the public service mission of the University (Article 6(1)(e) of the GDPR, Point (b) of Point 1 of Chapter I/B of Annex 3 of the Nftv., Section 60 of the Implementing Decree and Sections 44-52, 59-72, 73-88 and 89-91 of the SER)	<p>3.4.1: student’s programme data (Subpoints (bb), (bc), (bd), (bl) and (bm) of Point 1 of Chapter I/B of Annex 3 of the Nftv.)</p> <p>3.4.2: Data under Clause 3.3.2</p>	The University processes the data for a period of eighty years from the date of notification of the termination of student status. (Point 3 of Chapter I/B of Annex 3 of the Nftv.)
3.5 Documents required to be held by the University	Performing the public service mission of the University (Articles 6(1)(e) and 9(2)(b) and (g) of the GDPR, Sections 50–51,	3.5.1 The documents that the University is obliged to process (Section 35 of the Implementing Decree) include personal data in	The University processes the data for a period of eighty years from the date of notification of the termination of student status.

	<p>Point (b) of Point 1 of Chapter I/B. of Annex 3 of the Nftv., Sections 35–47 and Annex 9 of the Implementing Decree, Sections 73–88., 89–91, 96–98 of the SER)</p>	<p>accordance with the following legislative references:</p> <ul style="list-style-type: none"> (a) master data sheets and extracts from the master data sheet (Section 36 of the Implementing Decree), (b) doctoral candidates’ master data sheets (Section 37 of the Implementing Decree), (c) enrolment forms (Sections 38 and 39/A of the Implementing Decree), (d) doctoral candidates’ registration forms (Sections 39 and 39/A of the Implementing Decree), (e) certificates of legal relationship (Section 40 of the Implementing Decree), (f) transcripts and certificates of completion (Section 41 of the Implementing Decree), (g) credit certificates (Point 8 of Annex 9 of Section 43 of the Implementing Decree), (h) examination sheets (Section 42 of the Implementing Decree), (i) minutes of the final examination (Section 42 of the Implementing Decree), (j) minutes of the doctoral rigorosum 	<p>(Point 3 of Chapter I/B of Annex 3 of the Nftv.)</p>
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		<p>and minutes of the complex exam (Section 42 of the Implementing Decree),</p> <p>(k) minutes of the doctoral dissertation defence (Section 42 of the Implementing Decree),</p> <p>(l) final certificate (absolutorium) (Point 2 of Annex 9 of Section 44 of the Implementing Decree),</p> <p>(m) certificates on the issue of the final certificates (absolutorium) (Section 45 and Point 4 of Annex 9 of the Implementing Decree),</p> <p>(n) certificates on the successful completion of the final exams (on the diploma which may not be issued due to the failure to meet the language requirements) (Point 4 of Annex 9 of Section 45 of the Implementing Decree),</p> <p>(o) certificates on the issue of the diploma (Section 45 and Point 4 of Annex 9 of the Implementing Decree),</p> <p>(p) diploma and diploma supplement (Section 46–47 and Point 5–7 of Annex 9 of the Implementing Decree),</p> <p>(q) certificates of student status</p>	
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		(Point 1 of Annex 9 of Implementing Decree)	
3.6 Student participation in the work of committees and councils established by the Senate to deal with student affairs	<p>Student contribution and performing the public service mission of the University (Article 6(1)(a) and (e) of the GDPR, Paragraph (5) of Section 12 of the Nftv., Paragraph (4) of Section 6 of the SER)</p> <p>The consent may be withdrawn at any time and the withdrawal of the consent does not affect the lawfulness of the data processing that took place before the withdrawal.</p>	<p>3.6.1 The processing of personal data is necessary, in particular, for the participation of students in the following standing committee (Paragraph (4) of Section 6 of the SER):</p> <p>(a) the study committee of a given programme portfolio, (b) Ethics Committee, (c) Student Disciplinary Committee, (d) Student Disciplinary Appeals Committee, (e) Appeals Committee, (f) Disability Committee.</p>	<p>In case of withdrawal of consent, the University will no longer process the data.</p> <p>In case of performance of a task carried out in the public interest, the University processes the data for a period of eighty years from the date of notification of the termination of student status. (Point 3 of Chapter I/B of Annex 3 of the Nftv.)</p>
3.7 Assessment of student applications concerning student status (proceedings at first instance)	<p>Performing the public service mission of the University (Article 6(1)(e) of the GDPR, Point (b) of Point 3 of Chapter II of Annex 2 and Point (b) of Point 1 of Chapter I/B of Annex 3 of the Nftv., Sections 5 and 9 of the SER and Chapter I of the SSP)</p>	<p>3.7.1 When assessing student applications, personal data are contained in the following documents (Sections 5 and 9 of the SER and Chapter I of the SSP):</p> <p>(a) student application, (b) students' submissions and documents necessary to clarify the facts, (c) resolution at first instance.</p>	<p>The University processes the data for a period of eighty years from the date of notification of the termination of student status. (Point 3 of Chapter I/B of Annex 3 of the Nftv.)</p>
3.8 Assessment of student appeals	<p>Performing the public service</p>	<p>3.8.1 When assessing student</p>	<p>The University processes the data</p>

<p>against resolutions concerning student status (appeals procedure)</p>	<p>mission of the University (Article 6(1)(e) of the GDPR, Point (b) of Point 3 of Chapter II of Annex 2 and Point (b) of Point 1 of Chapter I/B of Annex 3 of the Nftv., Section 10 of the SER and Chapter II of the SSP)</p>	<p>appeals, personal data are contained in the following documents (Section 10 of the SER and Chapter II of the SSP): (a) request for a review, (b) first instance documents and other documents necessary for the review, (c) resolution at second instance.</p>	<p>for a period of eighty years from the date of notification of the termination of student status. (Point 3 of Chapter I/B of Annex 3 of the Nftv.)</p>
<p>3.9 Initiating and conducting disciplinary proceedings against students, clarifying the facts, determining or excluding disciplinary responsibility and keeping records of disciplinary cases</p>	<p>Performing the public service mission of the University (Article 6(1)(e) of the GDPR, Section 55 and Point (b) of Point 1 of Chapter I/B of Annex 3 of the Nftv., Sections 4–28 of the SDCR)</p>	<p>3.9.1 Data processed in accordance with the SDCR (Sections 4–28): (a) the identification and contact details of the data subject (name, NEPTUN code, email address, telephone number), (b) the subject matter of the proceedings, (c) a description of the act which gave rise to the disciplinary proceedings and the circumstances of the case, (d) facts/evidence/statements taken into account in the procedure, such as metadata from the Moodle system (log files, IP address, event context), (e) the content of the resolution taken in the proceedings,</p>	<p>The University processes the data for a period of eighty years from the date of notification of the termination of student status. (Point 3 of Chapter I/B of Annex 3 of the Nftv.)</p> <p>The duration of access to the Moodle metadata will be aligned with the end of the active semester covered by the disciplinary proceedings.</p>

<p>3.10 Conducting student compensation and ethics proceedings (proceedings at first instance)</p>	<p>Performing the public service mission of the University (Article 6(1)(e) of the GDPR, Section 56 and Point (b) of Point 1 of Chapter I/B of Annex 3 of the Nftv., Section 3 of the SDCR and Point 5 of the CE)</p>	<p>(f) the sanctions applied.</p> <p>3.10.1 In damages proceedings, personal data are contained in the following documents (Section 3 of the SDCR):</p> <ul style="list-style-type: none"> (a) the document initiating the proceedings and the documents sent as annexes, (b) the submissions of the student subject to the proceedings, (c) the minutes of the meeting, (d) a request for expert advice, (e) the document to contact witnesses, (f) witness testimony, (g) expert statements, (h) documentary evidence, (i) resolution at first instance. <p>3.10.2 In ethics procedures, personal data are contained in the following documents (point 5 of the EC):</p> <ul style="list-style-type: none"> (a) the document initiating the proceedings and the documents sent as annexes, (b) the submissions of the student subject to the proceedings, (c) the minutes of the meeting, (d) documents relating to the evidentiary procedure, 	<p>The University processes the data for a period of eighty years from the date of notification of the termination of student status. (Point 3 of Chapter I/B of Annex 3 of the Nftv.)</p>
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<p>3.11 Assessment of student appeals in compensation and ethics proceedings (proceeding at second instance)</p>	<p>Performing the public service mission of the University (Article 6(1)(e) of the GDPR, Sections 57 and 58 and Point (b) of Point 1 of Chapter I/B of Annex 3 of the Nftv., Section 29 of the SDCR and Point 5 of the CE)</p>	<p>(e) resolution at first instance.</p> <p>3.11.1 The following documents contain personal data in the context of an appeal in damages proceedings (Sections 23–24 and 29 of the SDCR):</p> <ul style="list-style-type: none"> (a) appeals, (b) documents of first instance, (c) the documents necessary for the assessment of the appeal, (e) resolution at second instance. <p>3.11.2 In the context of an appeal in an ethics procedure, personal data are contained in the following documents (Point 5 of the EC):</p> <ul style="list-style-type: none"> (a) appeals, (b) documents of first instance, (c) the documents necessary for the assessment of the appeal, (e) resolution at second instance. 	
<p>3.12 Promoting equal opportunities for students</p>	<p>Performing the public service mission of the University (Articles 6(1)(e) and 9(2)(b) and (g) of the GDPR, Section 49 and Point (b) of Point 1 of Chapter I/B of Annex 3 of the Nftv., Sections 62–64 of the Implementing Decree and Sections 8–10 of the Disabled Students Regulations)</p>	<p>3.12.1 The processing of personal data is necessary to certify the following disabilities (Paragraphs (2)–(7) of Section 62 of the Implementing Decree):</p> <ul style="list-style-type: none"> (a) students with reduced mobility, (b) hearing-impaired students, (c) visually impaired students, (d) students with speech disabilities, 	<p>The University processes the data for a period of eighty years from the date of notification of the termination of student status. (Point 3 of Chapter I/B of Annex 3 of the Nftv.)</p>

		<p>(e) students with mental disabilities, (f) students with autism.</p> <p>3.12.2 The processing of personal data is necessary to provide the following benefits (Paragraph (8) of Section 49 of the Nftv.):</p> <p>(a) disability-appropriate preparation and examination, (b) assistance in meeting the obligations arising from the student status, (c) exemption from studying certain subjects or parts of subjects or from the examination obligation. (d) exemption from the language examination or part or level of the examination, (e) longer preparation time shall be provided during examinations, (f) the use of aids shall be allowed during written assessments, (g) the replacement of written assessments by verbal ones or verbal assessments by written ones shall be allowed.</p>	
<p>3.13 Reporting, investigating and recording student accidents</p>	<p>Performing the public service mission of the University (Articles 6(1)(e) and 9(2)(b) and (g) of the GDPR, Point (b) of Point 1 of</p>	<p>3.13.1 The student accident report shall contain the following information:</p> <p>(a) accident (registration number),</p>	<p>The University processes the data for a period of eighty years from the date of notification of the termination of student status.</p>

	<p>Chapter I/B of Annex 3 of the Nftv., Sections 3 and 8 of the SAPR)</p>	<p>(b) student (name, sex, mother’s name, date and place of birth, place of residence), (c) student (faculty, study programme, year), (d) university (name, address, telephone), (e) accident (place, data and time, background, course of events, victim’s activity, cause, role of factors, injury, action), (f) other (participation of the representative of the Student Union, name and signature of the University’s representative).</p>	<p>(Point 3 of Chapter I/B of Annex 3 of the Nftv.)</p>
<p>3.14 Application and validation of a student identity card</p>	<p>Performing the public service mission of the University (Article 6(1)(e) of the GDPR, Point (b) of Point 1 of Chapter I/B of Annex 3 of the Nftv., Sections 9, 12, 38 of the Education ID Cards Decree and Section 32 of the SER)</p>	<p>3.14.1 Student identity card records contain the following information (Section 9 of the Education ID Cards Decree): (a) the date and time of sending the application, (b) the unique identifier of the education identity card, (c) the date of validation of the education identity card, the serial number of the validation sticker issued, (d) the reason and date of the</p>	<p>The University shall destroy the withdrawn student identity card within 30 days. (Section 38 of the Education ID Cards Decree)</p>

		<p>withdrawal of the education identity card, (e) the unique data chip identifier of the education identity card, (f) the date of receipt of the education identity card by the holder, (g) the details of the certificate pursuant to Section 12 of the Education ID Cards Decree.</p>	
<p>3.15 Student employment in dual programmes and practice periods</p>	<p>Performing the public service mission of the University (Article 6(1)(e) of the GDPR, Section 44 and Point (b) of Point 1 of Chapter I/B of Annex 3 of the Nftv., Section 16 of the Internships Decree, Point 13 of Paragraph (2) of Section 36 of the Implementing Decree)</p>	<p>3.15.1 Data managed jointly with the companies receiving interns in dual programmes: (a) Data relating to student status: (aa) the name of the student, (ab) the student's Neptun code, (ac) contact details of the student (permanent address, email address, telephone number), (ad) information on the student's programme (programme, semester of enrolment), (ae) information on the student status (active or passive status, termination of student status, information on courses taken at a higher education institution abroad, semester),</p>	

		<p>(af) the form of funding, (ag) information on the student's attendance at the internship location during the practice period, (ah) management evaluation for the student's internship during the practice period and its data, (ai) data and results concerning the results, achievements, progress, exam papers and projects in the dual subject(s).</p> <p>3.15.2 Data processed in connection with the completion of practice periods for each programme (Point 13 of Paragraph (2) of Section 36 of the Implementing Decree)</p> <p>(a) name, (b) evaluation, (c) credit value, (d) name of the professional training facility, (e) the duration of the professional training, (f) the names of the training principals, (g) the date of acceptance of performance, (h) the name and position of the</p>	
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		accepting person.	
3.16 Accessing and using the University's IT systems	Performance of the public service mission of the University (Article 6(1)(e) of the GDPR, Paragraph (1) of Section 18 and Point 1/b of Chapter I/B of Annex 3 of the Nftv.	Cusman ID	30 days after the termination of the student status.
3.17. Operation of the Moodle (e-learning) system, indirect assessment of students' studies, exercise of the rights and fulfilment of the obligations arising from student status and facilitation of the proper functioning of the University	Performance of the public service mission of the University (Article 6(1)(e) of the GDPR, Paragraph (1) of Section 18 and Point 1/b of Chapter I/B of Annex 3 of the Nftv.	name, email address, Neptun code Moodle metadata (log files, IP address, event context), programme data, course requirements, lecturer materials/presentations, classwork, papers to be submitted, exam tasks	30 days after the termination of the student status.
3.18. Use of telephone numbers in the access control system 30 days after the termination of the student relationship	According to GDPR Article 6 (1) point f), the University has a legitimate interest in using the telephone number in a special application to allow access to buildings efficiently without issuing and administering magnetic cards, as well as operating a helpdesk service involving	student's mobile phone number	30 days after the termination of the student relationship
3.19. facilitating the integration and progress of the student, supporting career planning via the University's information and advisory system, including career counselling, organizing workshops on various career/soft skills and informing	Performance of the public service mission of the University (Article 6(1)(e) of the GDPR, Paragraph (1) of Section 18, Paragraph (3) of Section 11 of the Nftv.	Data according to points I/B 1. b)-k) of Annex 3 of the Nftv, except <ul style="list-style-type: none"> • data related to student disciplinary and compensation cases, • data on student accidents, • student tax identification number, • fees and charges paid by the 	The University processes the data for a period of eighty years from the date of notification of the termination of student status. (Point 3 of Chapter I/B of Annex 3 of the Nftv.)

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students on job advertisements, upcoming events		student, • scholarship data, • student loan data	
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4. Automated decision-making (including profiling):

4.1 No automated decision making, including profiling, takes place during the data processing.

5. Transfer of personal data, recipients of personal data and categories of recipients:

5.1 The University will disclose the personal data processed in connection with student status only to the recipients and in the cases specified in law. The conditions for the transfer of data are laid down in Point 4 of Chapter I/B of Annex 3 of the Nftv.

5.2 The University relies on a data processor for the operation of the electronic student information system (“Neptun”):

Data processor: SDA Informatika Zártkörűen Működő Részvénytársaság

Registered seat: 1117 Budapest, Hauszmann Alajos u. 3/b.

Website: <https://sdainformatika.hu/>

Email: info@sdainformatika.hu

Its activities: Neptun is an authentic higher education administration system used by the University to record student data related to the student status, benefits, allowances, rights and obligations, study and examination matters.

5.3 Following the establishment of the student status, the University shall register the student's personal data and the student status data in the higher education information system (Paragraph (1) of Section 28 of the Implementing Decree). The data is sent to the higher education information system via Neptun. The higher education information system is operated by the Educational Authority as an independent data controller (Paragraph (8) of Section 25 of the Implementing Decree).

Data controller: Educational Authority

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Registered seat: 1055 Budapest, Szalay utca 10-14.

Email: info@oh.gov.hu

Website: www.oktatas.hu

Its activities: Operation of the higher education information system.

5.4 The University shall report the fact of validation of the student identity card and the serial number of the issued validation sticker to the Educational Authority (Paragraph (6) of Section 36 of the Education ID Cards Decree).

Data controller: Educational Authority

Registered seat: 1055 Budapest, Szalay utca 10-14.

Email: info@oh.gov.hu

Website: www.oktatas.hu

Its activity: central registration of student identity cards.

5.5 In the case of dual programmes, the University and the professional training facility will be considered as joint data controllers and the essence of their joint data processing agreement is as follows:

A) Purpose of data processing: Ensuring student employment for dual programmes.

B) Duration of data processing: The University processes the data for a period of eighty years from the date of notification of the termination of student status. (Point 3 of Chapter I/B of Annex 3 of the Nftv.)

C) Categories of Data Subjects: Students.

D) Types of the personal data processed:

(a) Data relating to student status:

(aa) the name of the student,

(ab) the student's Neptun code,

(ac) contact details of the student (permanent address, email address, telephone number),

(ad) information on the student's programme (programme, semester of enrolment),

(ae) information on the student status (active or passive status, termination of student status, information on courses taken at a higher education institution abroad, semester),

(af) the form of funding,

(ag) information on the student's attendance at the internship location during the practice period,

(ah) management evaluation for the student's internship during the practice period and its data,

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(ai) data and results concerning the results, achievements, progress, exam papers and projects in the dual subject(s).

E) Data processors approved and used by data controllers: No data processor is used.

F) Technical and organisational measures related to the activities of the Data Controllers.

5.6 The data of the Moodle system can be accessed by the University's lecturers for research purposes (Point (c) of Paragraph (1) of Section 18 of the Nftv.).

5.7 In the development of the Moodle system, [*company name*: Píramis Sárvár Ltd., *address*: H-9600 Sárvár, Dózsa utca 4., *website*: www.piramissarvar.hu, *e-mail address*: peter@csonka.dev, *brief description of the activity*: IT development regarding the University's AOL accreditation.] is the data processor contracted by the University in accordance with Article 28 of the GDPR.

5.8. In connection with the use of the phone numbers in the access control system, the University has engaged the following data processor:

Data processors name:

Headquarters:

Website:

E-mail:

5.9 Data transfer in the context of "study abroad"

In the context of "Study abroad", the Partner University and CORVINUS are considered as joint data controllers as follows. With regard to Article 26 of the GDPR, the data subject may exercise his or her rights in relation to the data processing against any of the joint data controllers.

The essence of the joint data processing agreement between Corvinus and the Partner University:

A) Subject matter of the data processing: Data transfer in the framework of the cooperation agreement between Corvinus and the Partner University.

B) Nature and purpose of the data processing: Student participation in the cooperation agreement between Corvinus and the Partner University, operation of the "Study Abroad" Programme.

C) Duration of data processing: The duration of the student's participation in the "Study Abroad" Programme.

D) Categories of data subjects: University students (see table below for more details)

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E) Types of the personal data processed: 1. The data subject's name, 2. gender, 3. date and place of birth, 4. first email address, 5. second email address, 6. mobile phone number, 7. transcript copy, 8. the fact of violation of the internal regulations of the host university on student status, as agreed between the universities (disciplinary cases)

F) The data processors used and approved by the Data Controllers: The data processors used for data transfers under the cooperation agreement between Corvinus and the Partner University may vary from programme to programme. For information on the identity of any data processors used, the data subject can contact CORVINUS (adatvedelem@uni-corvinus.hu) and the Partner University.

G) Technical and organisational measures related to the activities of the Data Controllers:

- (i) preventing unauthorised access to systems that also process personal data,
- (ii) ensuring that persons with access to data processing systems have access only to data appropriate to their level of authority and that personal data cannot be read, copied, modified or deleted by unauthorised persons during their collection and use or after their recording,
- (iii) ensuring that personal data cannot be read, copied, modified or erased by unauthorised persons during electronic transmission, transport or recording on a storage medium and that it is possible to verify or identify where the personal data was transmitted by means of the data transmission equipment,
- (iv) ensuring that it is possible to retrospectively identify who and when added, modified or deleted the personal data from the Data Processing System,
- (v) ensuring that personal data processed by subcontractors can only be processed in accordance with the instructions of the ordering party,
- (vi) ensuring that personal data is protected against unintentional destruction or loss,
- (vii) ensuring that personal data is protected against accidental or unlawful alteration or unauthorised disclosure.

In the case of an outgoing "Study Abroad" student, the scope of personal data transferred to Corvinus, the legal ground for the processing of the transferred data by Corvinus, the purpose and duration of the transfer:

Scope of the personal data transferred	Legal ground for the processing of the transferred data by Corvinus	Purpose of the processing of data by Corvinus	Duration of the data transfer
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<ol style="list-style-type: none"> 1. The data subject's name 2. gender 3. place and date of birth 4. first email address 5. second email address 6. mobile phone number 7. transcript copy 8. the fact of violation of the internal regulations of the Partner University on student status, as agreed between the universities 	<p>The public service mission of Corvinus under Article 6(1)(e) of the GDPR, laid down by Point I. I/B of Annex 3 of the Nftv.</p>	<p>Ensuring student participation in and implementation of the cooperation agreement between Corvinus and the Partner University, as well as the performance of the University's public service mission (exercising rights and fulfilling obligations arising from student status).</p>	<p>The duration of the student's participation in the "Study Abroad" Programme.</p>
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In the case of an incoming "Study Abroad" student, the scope, legal ground and purpose of the transfer of personal data transferred by Corvinus to the Partner University in the context of the programme:

Scope of the personal data transferred	Legal basis for the transfer	Purpose of data transfer	Duration of data transfer
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<p>1. The data subject's name 2. gender 3. place and date of birth 4. first email address 5. second email address 6. mobile phone number 7. transcript copy 8. the fact of violation of the internal regulations of CORVINUS on student status, as referred to in Point 4.7 of the agreement between the universities</p>	<p>(I) If the Partner University operates in the EU/EEA or in a third country that has been determined by a decision of the EU Commission to have an adequate level of security:</p> <p>CORVINUS has a legitimate interest within the meaning of Article 6(1)(f) of the GDPR in order to fulfil its obligations under the cooperation agreement with the Partner University.</p> <p>(II) If the partner university operates in a third country:</p> <p>Performance of a contract in the interest of the data subject and the establishment, exercise and defence of legal claims pursuant to Article 49(1)(c) and (e) of the GDPR.</p>	<p>Ensuring student participation in and the implementation of the cooperation agreement between CORVINUS and the Partner University.</p>	<p>The duration of the student's participation in the "Study Abroad" Programme.</p>
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6. The Data Subject's rights in relation to data processing:

6.1 General rules on the exercise of rights by the Data Subject:

The Data Controller shall inform the Data Subject of the action taken in response to his or her request without undue delay, but no later than one month from the date of receipt of the request. If necessary, in view of the complexity of the request and the number of requests, this deadline may be extended by two months. The extension of the deadline shall be communicated to the Data Subject by the Data Controller within one month of receiving the request.

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The cause of the delay shall be identified. If the Data Subject has submitted the request by electronic means, the information shall be provided by electronic means where possible, unless the Data Subject requests otherwise.

The Data Controller shall provide the Data Subject with information and action free of charge. If the Data Subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the Data Controller, taking into account the administrative costs of providing the information requested or of taking the action requested:

- (a) may charge a reasonable fee; or
- (b) may refuse to act on the request.

The Data Controller shall bear the burden of proof of the manifestly unfounded and excessive nature of the request.

If the Data Controller has reasonable doubts about the identity of the natural person making the request, it may request additional information necessary to confirm the identity of the Data Subject.

6.2 Right of access:

The data subject has the right to receive feedback from the Data Controller as to whether his or her personal data are being processed and, if such data processing is underway, the right to access the personal data. The Data Controller shall make available to the Data Subject a copy of the personal data that are subject to data processing. The Data Controller may charge a reasonable fee associated with the administrative costs for further copies requested by the Data Subject. If the Data Subject has submitted the request by electronic means, the information shall be provided in a commonly used electronic format, unless the Data Subject requests otherwise.

6.3 Right to rectification:

The Data Subject shall be entitled to have any inaccurate personal data relating to him or her rectified by the Data Controller without undue delay.

6.4 Right to object:

The Data Subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data on the basis of Article 6(1)(e) or (f) of the GDPR. In such a case, the Data Controller may 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.

6.5 Right to restriction of data processing:

At the request of the Data Subject, the Data Controller shall restrict data processing if one of the following conditions is met:

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- (a) the data subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the Data Controller to verify the accuracy of the personal data,
- (b) the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use,
- (c) the Data Controller no longer needs the personal data for the purposes of data processing, but the data subject requires them for the establishment, exercise or defence of legal claims, or
- (d) the data subject has objected to the data processing pursuant to Article 21(1) of the GDPR; in this case, the restriction shall apply for the period until it is determined whether the legitimate grounds of the Data Controller prevail over the legitimate grounds of the data subject.

If the processing is restricted, such personal data, except for storage, may only be processed with the consent of the Data Subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the Union or of a Member State.

6.6 Right to erasure:

In connection with the Admission Examination, the Data Subject may request the deletion of his/her personal data processed by the University. The University will examine the request and, if justified, will take action to erase the data. The University shall reject the request for erasure in the cases provided for in Article 17(3) of the GDPR, in particular in cases where the data are still necessary for the performance of the University's tasks carried out in the public interest or where the processing is necessary for the establishment, exercise or defence of legal claims.

7. Enforcement options:

7.1 The Data Subject may at any time contact the Data Protection Officer of the Data Controller (dr. Balázs Locsmándi, e-mail: adatvedelem@uni-corvinus.hu).

7.2 In the event of a complaint regarding the processing of personal data, the Data Subject may also contact the National Authority for Data Protection and Freedom of Information (postal address: 1363 Budapest, Pf. 9., address: 1055 Budapest, Falk Miksa utca 9-11., telephone: +36 (1) 391-1400; telefax:+36 (1) 391-1410; email: ugyfelszolgalat@naih.hu; website: www.naih.hu).

7.3 The Data Subject may take the Data Controller to court in the event of a breach of his or her rights. The case shall be given priority by the court. The Data Controller is required to prove that the processing complies with the law. In the event of court proceedings, the Budapest Metropolitan Court (Fővárosi Törvényszék) shall have jurisdiction. The action may also be brought before the courts of the place of residence or domicile of the Data Subject.

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The Data Controller shall compensate for any damage caused to others by the unlawful processing of the Data Subject's data or by breaching the requirements of data security. The Data Controller shall be exempted from liability if it can prove that the damage was due to an unavoidable cause beyond the scope of data controlling. No compensation is payable if the damage was caused intentionally or by gross negligence on the part of the victim.

Place and date: Budapest, 21 December 2022