

Privacy and data processing information

for participants in adult education at the University of Miskolc

In accordance with Regulation (EU) No 2016/679/EU 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) (hereinafter referred to as "GDPR"), the Hungarian Data Protection Act 2011. CXII of 2013 (hereinafter referred to as the "Infotv."), subject to the provisions of Act LXXVII of 2013 on Adult Education (hereinafter referred to as the "Adult Education Act"), Government Decree. 11/2020. (II. 7.) (hereinafter referred to as Government Decree), Act CXXXIII of 2005 on the Rules of Personal and Property Protection and Private Investigation (hereinafter referred to as the "Act on the Protection of Persons and Property and Private Investigation"), and other relevant provisions of the law, as well as in accordance with the University of Miskolc's Data Protection, Data Management and Public Interest Data Disclosure and Disclosure Policy (hereinafter referred to as the "Data Protection and Data Management Policy"), the University of Miskolc (hereby referred to as the "University") provides the following information on data management at the University for participants in adult education at the University of Miskolc.

I. Purpose of the information notice

The purpose of this Privacy and Data Processing Notice (hereinafter referred to as the "Notice") is to provide information on the processing of personal data of natural persons participating in adult education, the legal basis and purpose of the processing of personal data, the duration of the processing, the identity and contact details of the processor, the identity and contact details of the data protection officer, the rights of the data subject and the remedies available to the data subject.

II. Scope of the notice

This notice applies to all processing carried out by the University as data processor.

The processing of data carried out by all departments of the University and the processing activities of all persons acting on its behalf shall be considered as processing by the University.

III. Identification of the processor and the data protection officer

III.1. The processor and its representative:

University of Miskolc
3515 Miskolc - Egyetemváros

Institution identifier: FI87515
Tel: 46/565-111
Website: www.uni-miskolc.hu

Represented by: *Prof. Dr. Zita Horváth*
Rector
rektor@uni-miskolc.hu
3515 Miskolc, Egyetemváros, A/4. I. floor 145.
46/565-111/10-32

III.2. Contact details of the Data Protection Officer:

Legal and Compliance Center, 3515 Miskolc, Egyetemváros, A/4. I. floor 125. Tel.: 46/565-111/1760

adatvedelem@uni-miskolc.hu

The role of the Data Protection Officer is set out in the Data Protection and Privacy Policy in force at the time, in accordance with the GDPR.

The department responsible for data management is the Adult Education Centre, represented by Dr. Viktória Bárdosné Soós, Head of the Centre. Contact: viktoria.soos@uni-miskolc.hu

IV. Information on data management

The data subject: with regard to the processing of data covered by this privacy statement, the data subject is any natural person who applies for, participates in and has participated in adult education organized by the University of Miskolc (hereinafter referred to as the data subject).

IV.1. Applying for adult education training

IV.1.1. Method of data processing: participation in the adult education courses offered by the Adult Education Provider is voluntary. Interest to participate must be indicated by submitting an application form, on which the personal data of the data subject must be provided in order to be identified by the Adult Education Provider and to organize the training.

Legal basis for processing: for the performance of a task carried out in the public interest (education) [Article 6(1)(e) GDPR].

Purpose of processing: to organize and conduct adult education and to identify applicants, and to comply with the legal obligation under the Adult Education Act [based on Article 6 (1) (c) GDPR, Article 21 (1) and Article 16 (b) of the Adult Education Act].

Duration of data processing: last day of the eighth year following the conclusion of the adult education contract.

Scope of personal data processed: the scope of personal data that may be processed for the purposes of adult education is defined in paragraph (1) of Article 21 of the Adult Education Act as follows:

The Adult Education Provider will manage the following data in order to provide the training:

- a) data regarding the person participating in the training:
 - aa) natural person identification data and, in connection with the issuing of an education identification number, his/her education identification number,
 - ab) his/her electronic mail address and
 - (ac) details of his/her highest level of education.
- b) data relating to the training:
 - (ba) the participant's highest level of education, vocational qualification, professional qualification and knowledge of foreign languages,
 - (bb) the participant's entry into and completion of the training or, in the absence of completion, his/her exit from the training,
 - (bc) evaluation and assessment during training,
 - bd) the payment obligations and the use of training loans in connection with the training.
- (c) original documents or a copy certified by the adult education provider attesting to the conditions for entry to and participation in the training, as well as documents attesting to the assessment of entry competences and the preliminary knowledge assessment.

These data may be used for statistical purposes and may be transmitted in a non-personally identifiable form for statistical purposes and may be transmitted and used free of charge to the Central Statistical Office in a uniquely identifiable form for statistical purposes.

Source of the data: the data subject.

Legal consequence of not providing the data: participation in the training is voluntary. If the data subject wishes to participate in the training, the data subject is obliged by law to provide the data indicated. If the data subject does not provide the data, the processor cannot provide the training to the data subject.

IV.1.2. Further contact in the context of adult education: if the data subject gives his or her consent, the University will process the data subject's postal address and telephone number for the purpose of contacting the data subject. The postal address and telephone numbers provided by the data subject shall be stored by the processor in a database.

The scope of the personal data processed: the postal address and telephone number of the data subject, as well as the data subject's personal identification data, such as full name, mother's name, place and date of birth, and the data subject's signature.

Subject to the provisions of Act V of 2013 on the Civil Code, the details of the legal representative of the minor participant with limited capacity (name, e-mail address, telephone number, signature).

Legal basis for processing: consent of the data subject [Article 6(1)(a) GDPR].

Purpose of the processing: to contact the data subject in relation to the adult education provided by the processor to the data subject. The processor processes the personal identification data of the data subject (full name, mother's name, date and place of birth and the data subject's signature) for the purpose of identifying the data subject.

Duration of processing: until the delivery of the certificate of successful completion of the training. After that, the telephone number of the data subject will be deleted.

Source of data: the data subject.

Legal consequence of not providing data: consent is voluntary. If the data subject does not give his/her consent, the data processor will only contact the data subject by electronic mail.

IV.2. Participation in adult education

IV.2.1. Starting the adult education: participation in adult education and starting the training is subject to the conclusion of an adult education contract between the Adult Education Provider and the participant.

Legal basis for data processing: for the performance of a task in the public interest (education) [Article 6 (1) (e) GDPR] and for the fulfilment of a legal obligation under Article 13 (1) and Article 21 (1) of the Adult Education Act, based on Article 6 (1) (c) of the GDPR].

Purpose of the data processing: for the purpose of concluding the adult education contract and the administration of the adult education.

Duration of the data processing: last day of the eighth year following the conclusion of the adult education contract.

Scope of personal data processed: the scope of personal data that may be processed for the purposes of adult education is defined in Section 21 (1) of the Adult Education Act, supplementing Section 13 (1) of the Adult Education Act, as follows:

"The adult learning contract includes:

- a) the title and number of classes of the training,
- b) the training's
 - (ba) planned starting and finishing dates by year, month and day, taking into account the credit for prior learning,
 - (bb) the timetable for the progress of the training, broken down into units of learning material, except in the case of self-paced distance learning,
- (c) an indication of the document which may be obtained on completion of the training,
- (d) the means of monitoring and evaluating the performance during the training and, if the training is subject to an examination as defined by law, the conditions for passing the examination,
- (e) the maximum number of absences and the consequences for the trainee if these are exceeded,
- (f) the amount and method of payment of the training fee, taking into account the crediting of prior learning and the timetable for payment of the training fee in proportion to the completion of the training, where the training is linked by law to an examination and the adult education provider is entitled to organize the examination, the examination fee and any necessary additional examination fees,
- (g) an indication of the amount of the training grant by budget and by EU source,
- (h) the amount of the training grant and the conditions for its payment,
- (i) the consequences of any breach of contract between the participant and the adult education provider."

Source of the data: the data subject.

Legal consequence of not providing the data: participation in the training is voluntary. If the data subject wishes to participate in the training, the data subject is obliged by law to provide

the data indicated. If the data subject does not provide the data, the processor cannot provide the training to the data subject.

IV.2.2. Attendance at the classes (contact hours): the data processor - with the assistance of the instructor acting on his/her behalf - verifies attendance at each contact hour by preparing an attendance sheet. The attendance sheet must be signed by the data subject.

Legal basis for data processing: for the performance of a task in the public interest (education) [Article 6 (1) (e) GDPR] and for the fulfilment of a legal obligation under Article 16 (a) of the Adult Education Act, based on Article 6 (1) (c) of the GDPR].

Purpose of data processing: for the purposes of adult education.

Duration of data processing: last day of the eighth year following the conclusion of the adult education contract.

Scope of personal data processed: full name and signature of the data subject.

Source of the data: the data subject.

IV.2.3. Successful completion of adult education: upon successful completion of the adult education, the Adult Education Provider will issue a certificate, which will necessarily entail additional data processing.

Legal basis for data processing: for the performance of a task in the public interest (education) [Article 6 (1) (e) GDPR] and for the fulfilment of a legal obligation under Article 13/B of the Adult Education Act and Article 22 (1) of the Government Decree, based on Article 6 (1) (c) of the GDPR].

Purpose of data processing: to certify successful completion of adult education.

Duration of data processing: last day of the eighth year following the conclusion of the adult education contract.

Scope of personal data processed: "The certificate contains:

- a) the certificate serial number,
- (b) the name and registration number of the adult education provider,
- (c) the first name and surname of the trainee, the first name and surname at birth, the place and date of birth, the mother's first name and surname at birth,
- (d) the title, date and number of hours of training,

(e) a reference to the fact that

(ea) the certificate does not certify professional qualifications and qualifications; and

(eb) the certificate does not give entitlement to a post but entitles the holder to pursue an activity in cases provided for by law,

(f) the place and date of issue of the certificate,

(g) the name and position of the person issuing the certificate."

Data processing in relation to the delivery of the certificate: the processor will contact the data subject by electronic mail after the successful completion of the training in order to obtain his/her declaration of willingness to receive the certificate of completion of the training in person or by post. If the trainee declares that he or she wishes to receive the certificate of completion of the training by post, the trainee shall provide the processor with the postal address details. When providing the data, the data subject shall give his or her consent and send it electronically to the processor.

The scope of the personal data processed: the postal address of the participant in the training and the content of the consent form (name of the person concerned, mother's name, date and place of birth and signature).

Legal basis for data processing: the trainee's consent [Article 6(1)(a) GDPR].

Purpose of data processing: for the purpose of mailing a certificate of successful completion of the adult education course. Other personal data processed on the consent form (name, mother's name, date and place of birth and signature of the data subject) are processed by the processor for the purpose of identifying the data subject.

Duration of data processing: last day of the eighth year following the conclusion of the adult education contract.

Source of data: the data subject.

Legal consequence of not providing the data: the provision of the data is voluntary, however, if the data subject wishes to receive the certificate by post, it is obligatory to provide the postal address for mailing, otherwise the data processor cannot mail the certificate.

IV.3. Administration of the adult education

The data management process: the Adult Education Provider shall store and preserve the documentation generated during the data management processes indicated in IV.1. and IV.2.

Legal basis for data processing: for the performance of a task in the public interest (education) [Article 6 (1) (e) GDPR] and for the fulfilment of a legal obligation under Article 16 of the Adult Education Act and Article 26 (1)-(4) of the Government Decree, based on Article 6 (1) (c) of the GDPR].

Purpose of data processing: for the purposes of adult education.

Duration of data processing: the last day of the eighth year following the date of the documentation.

Scope of the personal data processed: personal data contained in all documents processed in the course of the processing operations indicated in points IV.1 and IV.2.

V. Place and method of data processing

The place of data processing is: University of Miskolc, 3515 Miskolc, Egyetemváros, Adult Education Centre.

Method of data processing: both automated (electronic) and non-automated (paper-based).

VI. Information on data transmission and reporting obligations

The processor shall not transfer personal data concerning the data subject to third parties in the absence of an appropriate legal basis. On the basis of the applicable legislation, data processed in the course of adult education may be transferred as follows.

The adult education centre provides data on

- (a) the name, nature, location, number of hours, first day of training and, except in the case of self-paced distance learning, the planned date of completion of the education or training,
- (b) the participants' personal identification data, electronic mail address and highest educational qualification,
- (c) the training fee and the entity responsible for paying it,

for the data system of the state adult education and training administration. The obligation to provide data must be fulfilled at the latest by the third working day following the date of commencement of the training or, in the case of a change in the data, by the third working day

following the date of the change, or, in the case of in-house training, by the last day of the quarter in which the in-house training is completed.

VII. Data processing relating to the protection of persons and property

For the purpose of protecting its own property and the legitimate interest of protecting the person and property of its students and persons employed by the University [GDPR Article 6 (1) (f)], the University operates an electronic camera system on its premises and in certain buildings of the University, which involves the processing of images (facial images) as personal data of natural persons on University premises, including in particular the recording, storage, retrieval, blocking and deletion of personal data. The purpose of the processing is the prevention, detection, detection of offences, tracing of offenders and proof of offences in order to protect human life, bodily integrity and property. The system is not suitable for audio recording.

The identity of the processor and the place of processing:

The processing of personal data of natural persons in connection with the above purpose may be carried out on the University premises and in the University buildings by means of an electronic camera system operated by the University of Miskolc Directorate of Operations, Sports and Dormitories (hereinafter referred to as the Directorate) or by means of a camera system operated by the departments under their own authority and registered to the law enforcement officer pursuant to Section 9 (1) e) of the Property Protection and Law Enforcement Code. The University shall not use a data processing service provider for the processing of data. The duration of data processing shall not exceed three working days, in accordance with Section 31 (2) to (6) of the Act on the Protection of Personal Data.

The data may only be accessed by the staff of the Directorate whose duties include the processing of data for this purpose, in particular by employees holding the position of security guard.

The transmission of the recorded data may only take place in cases specified in the Szvtv. (e.g. police, labor protection authority) or other laws.

Place of data processing: 3515 Miskolc - Egyetemváros, building A/4. Call Centre.

VIII. Rights of the data subject and their enforcement

The University unconditionally ensures that data subjects have the following rights in the processing of their data:

- the right to transparent information [Articles 12-14 GDPR]: the data subject shall have the right to be informed of the processing of his or her personal data and of any information relating to it before the processing starts. By publishing this notice electronically, the controller ensures that the data subject has the possibility to acquaint himself/herself with its contents at any time and to request and obtain a printed copy of the notice from the representative of the controller throughout the adult education course. The data subject shall be informed of the availability of the information notice on the application form.
- the right of access to personal data [Article 15 GDPR]: the data subject may request in writing, including by electronic means, information about and access to the processing of his or her personal data. At the request of the data subject, the processor shall at any time provide information on the data relating to the data subject which it processes, the source of the data, the purposes, legal basis and duration of the processing, the circumstances of any personal data breach, its effects and the measures taken to respond to it, and, in the case of a transfer of personal data relating to the data subject, the legal basis and the recipient of the transfer. The Processor facilitates the exercise of this right by the data subject by publishing a document entitled "Request for information on the processing of personal data" on the website of the Processor under the tab Public Interest/Controlling/Controlling Documents (<http://www.unimiskolc.hu/adatkezeles-sel-kapcsolatos-dokumentumok>), in order to enable the data subject to submit a request with appropriate content when exercising this right. The Data Processor will also accept any request which contains a content which allows the data subject to request the exercise of this right and to be identified beyond reasonable doubt.
- the right to rectification of personal data [Article 16 GDPR]: the data subject may request the rectification of his or her personal data without undue delay where inaccurate data are contained and, having regard to the purposes of the processing, the integration of his or her personal data.
- the right to erasure of personal data [Article 17 GDPR]: the data subject has the right to obtain the erasure of personal data relating to him or her by the processor without undue delay, except for mandatory processing, where one of the conditions set out in Article 17(1) GDPR is met. In the event of erasure of personal data, the processor shall take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform any other controllers or processors that process the data that the data

subject has requested them to delete the links to or copies or replicas of the personal data in question. The controller has the right to restrict the right to erasure and to refuse or not to carry out the erasure of the data where one of the conditions set out in Article 17(3) of the GDPR is met, such that the personal data are no longer necessary for the purposes for which they were collected or otherwise processed; the data subject has the right to obtain the erasure of personal data in accordance with Article 21 (1) and there is no overriding legitimate ground for the processing or the data subject objects to the processing on the basis of Article 21(2); the personal data have been unlawfully processed; the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;

- the right to restriction of processing [Article 18 GDPR]: the data subject may request the restriction of his or her personal data where.

(a) the data subject contests the accuracy of the personal data, in which case the restriction shall apply for the period of time necessary to allow the processor to verify the accuracy of the personal data;

(b) the processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;

(c) the processor no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defense of legal claims; or

(d) the data subject has objected to the processing; in this case, the restriction shall apply for a period of time until it is established whether the legitimate grounds of the controller override the legitimate grounds of the data subject.

Where processing is subject to restriction, such personal data may be processed, except for storage, only with the consent of the data subject or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the Union or of a Member State.

- right to object [Article 21 GDPR]: the data subject has the right to object to the processing of his or her personal data at any time on grounds relating to his or her particular situation. In such a case, the processor may no longer process the personal data, unless the processor demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

- Right of recourse to a supervisory authority, right to apply to the courts and right to lodge a complaint [Article 77 GDPR]: if any data subject has a concern about the processing of his or her data by the University or feels that your data is being processed unlawfully, please contact our Data Protection Officer in the first instance. In the event of a breach of rights, you may also take legal action (at your choice, you may also bring the action before the competent court of law of your place of residence or domicile) or contact the National Authority for Data Protection and Freedom of Information (headquarters: 1055 Budapest, Falk Miksa str. 9-11., mailing address: 1363 Budapest, Pf. 9.; 06-1-391-1400, website: <http://naih.hu>; e-mail: ugyfelszolgalat@naih.hu).

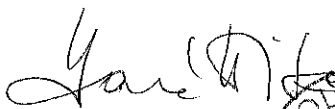
The data subject's request to exercise his or her rights should be sent to the postal address of the processor or by e-mail to adatvedelem@uni-miskolc.hu. The processor will provide written feedback as soon as possible, but within a maximum of 25 days (15 days in the event of a complaint).

IX. Miscellaneous provisions

This Privacy Notice shall be read in accordance with the Data Protection and Privacy Policy in force at any given time.

All employees of the University of Miskolc, acting on behalf of the Data Processor, are bound by confidentiality obligations with regard to personal data that they become aware of in the course of their employment. Persons acting in this capacity shall act only in accordance with the instructions of the University in the processing of data, unless they are required to act otherwise by Union or Member State law.

Miskolc, 1 September 2023.


Prof. Dr. Zita Horváth
rector
