



Reg. number: NKE/1795-1/2023.

INFORMATION ON DATA PROCESSING at University of Public Service related to the Erasmus+ Program

1. Name of Data Controller

University of Public Service
Address: 1083 Budapest, Ludovika tér 2.
Telephone number: +36 1 432 9000
E-mail address: nke@uni-nke.hu
Website: <https://www.uni-nke.hu/>
Represented by Dr. Gergely Deli Rector

2. Name and contact details of the Data Protection Officer

University Data Protection Officer:
Veronika Deák Debreceniné Dr.
Direct contact: adatvedelem@uni-nke.hu
Telephone number: +36 1 432 9000 / extension: 29833

3. Information on personal data processed for data subjects involved in the Erasmus + Program, in the event when the data subject provides personal data directly

3.1. Personal data provided during registration

Categories for Data Subjects	Categories of processed personal data	Purpose of data processing	Legal basis	Consequences of not providing data
Persons with student status at the data controller	First name; last name; birth name; place and time of birth; phone number; e-mail address; faculty; department; position, language skills; type and level of language exam.	To enable the assessment and implementation of the applications submitted by Erasmus + applicants..	Under Article 6 (1) (a) GDPR ¹ , the consent of the Data Subject.	Lack of data makes it impossible to apply for the program.
Teachers and employees of the data controller				
Persons with student status at a foreign partner institution (in EU and non-EU countries)				

¹ 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)

Teachers and employees of a foreign partner institution (for EU and non-EU countries)				
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3.2. Personal data provided during application

Categories for Data Subjects	Categories of processed personal data	Purpose of data processing	Legal basis	Consequences of not providing data
Persons with student status at the data controller Teachers and employees of the data controller Persons with student status at a partner institution (in EU and non-EU countries) Teachers and employees of a partner institution (for EU and non-EU countries)	Personal data provided by the applicant in addition to registration data: type of mobility; planned partner institution (name, country, location, department); details of the planned activity (short description of the planned activity; planned duration, date of the activity; field of education/training, language); information on motivation; previous participation in an Erasmus programme; description of the previous programme; other experience abroad; personal data content of documents to be attached: CV, declarations of the applicant.	To enable the assessment and implementation of the applications submitted by Erasmus + applicants.	GDPR Section 6 (1) b) for the conclusion of a contract and e) for the performance of the tasks of the Data Controller.	It makes it impossible to assess and implement the application.
Students	Personal data content of motivational interview.	Conducting a motivational interview in person (required to apply for an Erasmus+ grant).		The application cannot be successful without the interview.

	Image- and audio recording (video).	Conducting a motivational interview via video recording (required to apply for an Erasmus+ grant).	Under Article 6 (1) (a) GDPR, the consent of the Data Subject.	
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3.3. Personal data required for the conclusion of a contract

Categories for Data Subjects	Categories of processed personal data	Purpose of data processing	Legal basis	Consequences of not providing data
Persons with student status at the data controller (hereinafter: Students) Teachers and employees of the data controller Persons with student status at a partner institution (in EU and non-EU countries) Teachers and employees of a partner institution (for EU and non-EU countries)	In addition to the information provided during the registration and application process: bank account number; financial institution holding the account; IBAN; tax identification number.	<p>To enable participation in the Erasmus + programme by establishing the terms and conditions in a contract.</p> <p>To upload data to the Mobility Tool database to enable the monitoring of the implementation.</p>	GDPR Section 6 (1) b) for the conclusion of a contract and e) for the performance of the tasks of the Data Controller.	It makes it impossible to assess and implement the application and to monitor its implementation.

4. Data processing by processing the personal data of third parties in the application

Data Subject	Scope of processed data	Purpose of data processing	Legal basis	Source of personal data
Direct labour manager of teachers and employees of the data controller, supervisor (approving) manager	Name, department, position, signature.	Verification of the applicant's employment status, verification of eligibility for the application, authorisation (approval) of application.	Under Article 6 (1) (f) GDPR, processing is necessary for the legitimate	The applicant submits it together with the complete application package.

The person making the recommendation in support of the applicant	Data and contact details necessary to identify the person making the recommendation.	To provide a recommendation to the applicant for a successful and efficient application evaluation.	e interest of the controlle r.	
The person specified by the applicant, who can be notified by the Data Controller in case of emergency	Home address, residence address, email address, telephone number, name.	Communication with a relative is necessary for the health and safety of the Student. The purpose of the communication is to ensure that the student receives all assistance as needed.		

5. Recipients of personal data and categories for recipients

- *The following organizational units of the Data Controller: International Directorate, Legal Directorate, Economic Office, Human Resources Office.*
- *Other employees of the Data Controller who due to their employment relationship, are required to access the personal data..*
- *As well as the bodies defined by law that are empowered by law to inspect.*
- *Successful application package for the host university*
- *European Commission (Rue de la Loi / Wetstraat 170 B-1049 Brussels / Brussels Belgique / België, website in Hungarian: https://ec.europa.eu/info/index_en)*
- *Institutional organization of the European Student Network (headquarters: Rue Joseph II / Jozef II-sztraat 120 1000 Brussels, Belgium, regional website address: <http://nups.esn.hu/>)*

6. Duration of data processing

In case of a successful and efficient application, if the applicant establishes student status at the Data Controller: 80 years.

In the case of a successful and successful application, a record of the motivational video and the motivational interview with personal presence will be kept. These records will be considered as student material and will be kept for a period of 80 years from the date of the student's enrolment until the date of the decision, while the motivation video will be deleted within 30 days of the decision.

Rejected application package: In case of rejected application package, the applicant will be placed on a waiting list. Personal data will be deleted by the Data Controller at the end of the implementation period if the application is rejected.

7. The conceptual implementation of data management

The University provides opportunity for students and employees to gain experience abroad through mobility for study, employment, teaching and training purposes. In order to facilitate the application process, applications to the Erasmus+ programme are made through an online application portal (Erasmus+ application portal). Registration is required to use the application portal. Students can enter their personal data required to apply during registration, on the application form and in the application attachments. Students' applications include a motivational interview, which can be either a personal interview or a motivational video. Personal data obtained and transmitted to the University in connection with the application will be stored on the University's servers. The Data Controller will process personal data exclusively for the purposes and under the conditions

specified above. The data processing activities shall be carried out in full compliance with the University's regulations on the protection and security of personal data and the University's IT Security Policy.

7. Data protection

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the University shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk.

The University shall take all reasonable measures to ensure that the data it processes are not accessible to unauthorized persons. Access to data is limited, password protection is in place. Reading, writing and editing access on the central interfaces of the Data Controller varies from job to job, depending on the need for data processing.

The University has regulations on the protection and security of personal data and data of public interest. The University also has an IT Security Policy.

Part of the data processing for intra-EU mobility takes place on the Erasmus Application Portal maintained by the Data Controller. The portal has password protection based on limited access.

Reading, writing and editing access on the central interfaces of the Data Controller varies from job to job, depending on the need for data processing.

8. Automated data processing (including profiling)

The University does not use automated data processing for decision-making.

9. Transfer of data to a third country or an international organization

Data may be transferred to a partner institution in a third country and the data will be uploaded to the Mobility Tool system maintained by the European Commission to monitor the implementation of institutional projects.

10. Exercise of rights, remedy

The data subject may exercise the rights provided for in the GDPR for the entire duration of the data processing, which he may do at any time at the contact details specified in points 1 and 2.

The data subject may request

- *access to personal data* (the data subject has the right to obtain confirmation from the data controller as to whether or not personal data concerning him or her are being processed, and where that is the case, the right to access personal data and information specified in the GDPR) (Article 15 GDPR),
- *rectification of personal data* (the data subject has the right to obtain the rectification of inaccurate personal data concerning him or her, at his or her request, without undue delay. Taking into account the purpose of the data processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.) (Article 16 GDPR),
- *erasure of personal data* (the data subject has the right to obtain from the data controller the erasure of personal data concerning him or her, at his or her request, without undue delay and the data controller shall have the obligation to erase the personal data of the data subject without undue delay on the grounds specified in the GDPR; in case of data processing for compliance with a legal obligation the erasure request shall be declined) (Article 17 GDPR),
- *restrictions on the processing of personal data* (the data subject has the right to obtain from the data controller restriction of processing if the conditions set out in the GDPR are met) (Article 18 GDPR),

- *exercise the right to personal data portability* (The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the data controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the data controller to which the personal data have been provided, as long as the conditions set out in the GDPR are met) (Article 20 GDPR),
- *may object to the processing of personal data* (shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6 (1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims; in case of data processing for compliance with a legal obligation the objection request shall be declined) (Article 21 GDPR),
- *withdrawal of the abovementioned consent* to processing of personal data, the data subject may withdraw his or her consent at any time by sending an e-mail to adatvedelem@uni.nke.hu, without affecting the lawfulness of the processing carried out on the basis of consent prior to its withdrawal.

The application must be submitted to the postal address of the data controller or to the following e-mail address: adatvedelem@uni-nke.hu. The data controller shall provide written notice as soon as possible, within a maximum of 1 month (within 15 days in the event of an objection) (this deadline may be extended by a further 2 months due to the complexity of the request). In addition, in the event of injury, the data subject may apply to a court (the data subject may, at his or her choice, initiate a proceeding before the court competent according to his or her place of residence or stay) and to the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11., phone: 06-1-391-1400, website URL: <http://naih.hu>, e-mail address: ugyfelszolgalat@naih.hu).

Budapest, 24th January 2023

