



Reg. number: NKE/470/2023

INFORMATION ON DATA PROCESSING
regarding the application to educational programmes of the University of Public Service through the service of DreamApply

1. Name of Data Controller

University of Public Service
Address: 1083 Budapest, Ludovika tér 2.
Phone: +36 1 432 9000,
E-mail: 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

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

3. Information on data subjects regarding their application to educational programmes of the Data Controller through DreamApply, when the personal data is collected directly from the data subjects

3.1 Data processing related to the application and assessment

Categories of data subjects	Scope of processed data	Purpose of data processing	Legal basis	Consequences of failure to provide such data
Natural persons applying to educational programmes	Name; birth name; place and time of birth; mother's maiden name; e-mail address; telephone and cell number; data regarding previous education.	Submission and assessment of applications, implementation and delivery of the programme.	Pursuant to Article 6 (1) a) of the GDPR ¹ , the consent of the data subject.	This information is required for the successful submission of an application. In lack of the required data, the applicant can't participate in the programme.

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)

	Bank account number, name of the account holder, personal data content of transfer notice	Payment of the programme's fee, identification of the applicant	Processing is necessary in the exercise of official authority vested in the controller based on Article (1) e) of the GDPR.	The applicant who paid the fee can not be identified.
Administrator managing the Dreamapply interface appointed by the Data Controller	Name, e-mail address, position, level of authorisation, operations performed using DreamApply system	Administering the application procedure.	Processing is necessary in the exercise of official authority vested in the controller based on Article (1) e) of the GDPR.	The University is unable to process applications received via Dreamapply without a member of staff having admin rights.
Advisor employed by the partner institute	Name, territory, tracker-related data, e-mail address, mail address, login code, validity of the contract (and date of signature), group, notes, annexes, authorisation	Administering the application procedure (On side of the partner institute).	Processing is necessary in the exercise of official authority vested in the controller based on Article (1) e) of the GDPR.	Partner institutions cannot administer submissions of application

4. Information on data subjects regarding application for educational programmes, when personal data have not been obtained from the data subject

Categories of data subjects	Scope of processed data	Purpose of data processing	Legal basis	Source of data
The person provided by the applicant who the Data Controller may get in contact with in case of emergency	Name, e-mail address, telephone number, mail address, relation to applicant (parent, sibling, spouse, etc.)	For the health and safety of the student, the ability to contact a relative is necessary. The purpose of this contact is to ensure that the Student will receive all the	Pursuant to Article 6 (1) d) of the GDPR, processing is necessary in order to protect the vital interests of the data subject.	The applicant provides data during application.

		help he/she needs.		
Reference person provided by the applicant	Name, e-mail address, work position	Evidence of the applicant's professional qualities	Pursuant to Article 6 (1) a) of the GDPR, the consent of the data subject	

5. Recipients of personal data (categories of recipients)

The following departments and employees of the Data Controller:

- a) a Gazdasági Hivatal (Financial Department, address: 1083 Budapest, Ludovika tér 2.; e-mail address: gazdasagi.foigazgato@uni-nke.hu, telephone number: +36 1 432-9000, website: <https://www.uni-nke.hu>);
- b) az Informatikai Igazgatóság (IT Directorate, address: 1083 Budapest, Ludovika tér 2.; e-mail address: ini@uni-nke.hu, telephone number: +36 1 432-9000, website: <https://www.uni-nke.hu>);
- c) az Oktatási és Tanulmányi Iroda (Office for Education and Studies, address: 1083 Budapest, Ludovika tér 2.; e-mail address: tanulmanyi@uni-nke.hu, telephone number: +36 1 432-9000, website: <https://www.uni-nke.hu>);
- d) other employees of the Data Controller, who are required to access the concerned personal data based on their employment relationship.

The University uses the services of DreamApply OÜ (Harju County, Tallinn, Tatari 64, 10134, Estonia) as its data processor. Privacy policy of the Company is available at <https://dreamapply.com/privacy-policy>, the Company DPO can be contacted via e-mail at gdpr@dreamapply.com.

6. Duration of data processing

- a) In cases of processing data on the legal basis of the data subjects' consent, the personal data shall be processed by the University until the abovementioned consent is withdrawn. The consent can be withdrawn at any time by sending an e-mail to adatvedelem@uni.nke.hu, but this withdrawal shall not affect the lawfulness of the processing based on consent, executed before the withdrawal of the consent. In lack of the data subjects' withdrawal of consent, the Data Processor deletes the data 30 days after the assessment of the application.
- b) In case of incomplete or incorrect data or application, the data provided on the application form will be deleted within 30 days.
- c) As regards the processing of the personal data of the administrator involved in the management of the Dreamapply platform and the consultant employed by the partner institution, the period of data processing lasts until the end of the application procedure.
- d) With regard to the processing of personal data of the person who pays the training fee and of the person to be notified in case of danger, the processing period lasts until the end of the student's status.

7. Activities of processing data

Certain educational programmes arranged by the University are available via application through DreamApply's services. After completing and submitting the application form, the University will verify eligibility for the course and notify the applicant by e-mail of the steps required to conclude a contract. The programme's fees can be paid by bank transfer.

The University will process the concerned personal data only for the purposes and under the conditions set out above. The data processing activities will be carried out in full compliance with the University's regulations on the protection and security of personal data and data of public interest and the University's IT Security Policy.

8. 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 data security appropriate to the risk.

The University shall take all reasonable measures to ensure that the data processed by it do not become accessible to unauthorised parties. Access to data is limited, password protection is in place.

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

9. Automated data processing (including profiling)

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

10. Data transfers to third countries and international organisations

There is no aimed data transfer to any third country or international organisation regarding the abovementioned data processing.

11. Exercise of rights, legal remedies

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 Section 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 information 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). If any rights of the data subject have been violated, 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) or may turn 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, 19th December 2022

