



Reg. number: 34000/815/2021

**INFORMATION ON DATA PROCESSING**  
**related to the foreign guests at the University of Public Service**  
**visiting Hungary**

**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](mailto:nke@uni-nke.hu);  
Website: <https://www.uni-nke.hu/>.  
Represented by Dr. András Koltay, Rector

**2. Name and contact details of the Data Protection Officer**

University Data Protection Officer:  
Veronika Deák  
Direct contact: [adatvedelem@uni-nke.hu](mailto:adatvedelem@uni-nke.hu)  
Telephone number: +36 1 432 9000 / 29833

**3. Information for data subjects when personal data are provided directly by the data subject (content according to Article 13 GDPR)**

**3.1. Data processing related to organizational issues**

Categories of data subjects	Categories of data	Purpose of data processing	Legal basis	Consequences of not processing data
<b>Foreign guests at the University of Public Service visiting Hungary.</b>	Name, contact details (e-mail, mobile phone).	The purpose of data processing is - to provide the guest with accurate information about the program organized to him/her by the University, as well as about travel and accommodation arrangements provided to him/her by the University, - to keep in contact with the guest during the organization of the visit, as well as during the stay of the guest in Hungary.	Under GDPR Article 6 (1) (a), the consent of the data subject.	Program details, as well as travel and accommodation arrangements cannot be communicated to the guest.

<b>Foreign guests at the University of Public Service visiting Hungary.</b>	Information about food intolerances.	The purpose of data processing is to be able to take special dietary requirements into account, while providing meals for the guest by the University while the guest is in Hungary.	Under GDPR Article 6 (1) (a), the consent of the data subject.	Special dietary requirements cannot be taken into account during the visit.
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### 3.2. Data processing related to travel and accommodation arrangements provided by NUPS

Categories of data subjects	Categories of data	Purpose of data processing	Legal basis	Source of personal data
<b>Foreign guests of the University of Public Service visiting Hungary.</b>	Nationality	The purpose of data processing is to enable the University to book and buy flight / train ticket, as well as hotel accommodation in Hungary for the guest through the Centralized Governmental Travel Portal.	Under GDPR Article 6 (1) (a), the consent of the data subject, and b) the performance of a contract.	Booking of flight/train ticket and hotel accommodation cannot be completed through the Centralized Governmental Travel Portal.
	Place of birth, date of birth			
	Data contained in the travel document (ID card or passport) of the guest (Passport / ID card number, date of issue, place of issue, date of expiry)			
	Copy of the travel document (ID card or passport)	The purpose of data processing is to verify that the flight ticket purchased by the University is issued to the appropriate name. After the completion of the purchase of the flight ticket, the copy of the travel document shall be erased immediately. The guest shall be entitled to cover all data not necessary for the flight ticket purchase on the copy of the travel document.	Under GDPR Article 6 (1) (a), the consent of the data subject.	If the name in the passport/ID card of the guest does not exactly matches with the name on the flight ticket, the guest will not be able to use the flight ticket, thus the travel of the guest to Hungary shall miscarry.

#### 4. Information for data subjects when personal data have not been obtained from the data subject (content according to Article 13 GDPR)

##### 4.1. Data processing related to entering the University Campus

Categories of data subjects	Categories of data	Purpose of data processing	Legal basis
<b>Foreign guests of the University of Public Service visiting Hungary.</b>	Electric surveillance system.	The University uses an electric surveillance system with the aim of protecting life, the physical well-being and freedom of the visitors as well as to guard dangerous goods, to maintain critical infrastructure and to protect assets. The system captures and stores images.	Under GDPR Article 6 (1) (f), the legitimate interests pursued by the controller or by a third party.

##### 4.2. Data processing related to recordings on participants of UPS events (when applicable)

Categories of data subjects	Categories of data	Purpose of data processing	Legal basis
<b>Foreign guests of the University of Public Service visiting Hungary.</b>	Crowd scenes <sup>1</sup> .	The purpose of the recording is to record events organized at the University and to prove that these events have taken place. The records may be published on the University's website, magazines or social media platforms (for instance: Facebook, Instagram and Youtube).	Under GDPR Article 6 (1) (e), and Article 2:48 (2) of Civil Code which states that the consent of the person concerned shall not be required for recording his image or voice and for the use of such a recording if the recording was made of a crowd or of an appearance in public life.
	Recording of participants and presenters of the event. <sup>2</sup>		
	Recording a person.		Under GDPR Article 6 (1) (f), the legitimate interests pursued by the controller or by a third party.

<sup>1</sup>Crowd scenes show a multitude of people, as parts of the mass. If the image captures a crowd and not individually a person, the definition is crowd scene.

<sup>2</sup>An event that influences the life of the society, the local or national relations is considered a public appearance. Public appearance is based on public speaking and social responsibility. For instance, public speaking at different cultural, social events or public social role. Anyone can become a public character, therefore this rank does not require formal social or legal engagement.

## 5. Recipients of personal data and categories of recipients

In connection with the data processing referred in section 3.1. and 3.2., within the University the competent employees of the following institutional units are entitled to data processing:

### a) faculty or research center/institute responsible for the coordination of the visit of the guest to Hungary:

- **Faculty of Public Governance and International Studies** (address: 1083 Budapest, Üllői út 82., e-mail: antk@uni-nke.hu, telephone: +36 1 432-9000, website: <https://www.uni-nke.hu/>);
- **Faculty of Military Science and Officer Training** (address: 1101 Budapest, Hungária krt. 9-11., telephone: + 36 1 432-9000, website: <https://www.uni-nke.hu/>);
- **Faculty of Law Enforcement** (address: 1083 Budapest, Üllői út. 82., telephone: + 36 1 432-9000, e-mail: rtk@uni-nke.hu, website: <https://www.uni-nke.hu/>);
- **Faculty of Water Sciences** (address: 6500 Baja, Bajcsy-Zsilinszky utca 12-14., telephone: +36 79 523-900, e-mail: vtk@uni-nke.hu, website: <https://www.uni-nke.hu/>);
- **Eötvös József Research Center** (address: 1083 Budapest, Ludovika tér 2., telephone: + 36 1 432-9000, ext. 29792, e-mail: ejkk@uni-nke.hu, website: <https://ejkk.uni-nke.hu/>) and its research institutes;
- **Institute of Strategic Studies** (address: 1083 Budapest, Ludovika tér 2., telephone: + 36 1 432-9000, e-mail: sti@uni-nke.hu, website: <https://sti.uni-nke.hu/>).

### b) Foreign Travel Department, International Directorate, Vice-Rector for International Affairs

(address: 1089 Budapest, Diószegi Sámuel utca 23., Tópart bldg., e-mail: kuo@uni-nke.hu, telephone: +36 1 432-9000, website: <https://www.uni-nke.hu/>).

### c) Financial Office

(address: 1083 Budapest, Ludovika tér 2.; e-mail: gazdasagi.foigazgato@uni-nke.hu, telephone: +36 1 432-9000, website: <https://www.uni-nke.hu/>).

In connection with the data processing referred in section 3.1. and 3.2., the University resorts the services of the following travel agencies that are part of the **Centralized Public Procurement System**, and as such are entitled to data processing through the **Centralized Governmental Travel Portal** with the obligation of professional secrecy, only in case of giving the winning offer for the call for proposal of the University for buying flight/train ticket, accommodation or other services in connection with the visit of the guest to Hungary:

- **IBUSZ Travel Agencies Ltd.** (registered seat: 1118 Budapest, Dayka Gábor utca 3., company registration number: 01 09 266780, tax number: 10871403 2 43, website: [www.ibusz.hu](http://www.ibusz.hu));
- **Jet Travel Ltd.** (registered seat: 1113 Budapest, Bocskai út 77-79/B 3. em., company registration number: 01-09-063771, tax number: 10274837-2-43, website: <https://www.jettravel.hu>);
- **OTP Travel Ltd.** (registered seat: 1051 Budapest, Nádor utca 21., company registration number: 01-09-060469, tax number: 10174902-2-41, website: <https://www.otptravel.hu/>);

- **United 4 Bonafini Bindair Ltd.** (registered seat: 1016 Budapest, Mészáros u. 58/B., company registration number: 01-09-362306, tax number: 10942806-2-41, website: <http://www.bonafini.hu/#>);
- **Weco-Travel Ltd.** (registered seat: 1053 Budapest, Szép u. 2., 9. em., company registration number: 01-09-065625, tax number: 10331615-2-41, website: <https://www.wecotravel.hu/>).

In connection with the data processing in section 4.1., the employees of the Data Controller who due to their employment relationship, need to know the personal data and the **NKE Campus XXI. Service Provider Non-profit Ltd.** (registered seat: HU-1089 Budapest, Orczy út 1., company registration number: 01-09-350854, tax number: 27125900-2-42, represented by: Rósa Henrik, website: <https://campus21.uni-nke.hu/>) as data processor.

In connection with the data processing referred in section 4.2., the University resorts the services of

- the **OPA Service Provider Limited Partnership** (registered seat: HU-1182 Budapest, Vércse utca 45/B., company registration number: 01 06 416126, represented by: Szilágyi Dénes) as data processor; and
- the **Ludovika University Publishing Cultural and Commercial Non-profit Ltd.** (registered seat: HU-1089 Budapest, Orczy út 1., represented by: Koltányi Gergely, company registration number: 01-09-690253, tax number: 10413544-2-42, website: <https://ludovika.hu/>) in case of the printed publications; and the
- the **SDA Information Technology Co.Ltd.** (registered seat: HU-1111 Budapest, Budafoki út 59., represented by: Fehér István, company registration number: 01-10-140314, tax number: 11684057-2-43, website: <https://www.sdadms.hu/>).
- the **NKE Campus XXI. Service Provider Non-profit Ltd.** (registered seat: HU-1089 Budapest, Orczy út 1., company registration number: 01-09-350854, tax number: 27125900-2-42, represented by: Rósa Henrik, website: <https://campus21.uni-nke.hu/>) as data processor.

## 6. Duration of data processing

Referring to section 3.1. and 3.2., the University retains personal data of the guest until the withdrawal of consent, or if the purpose of the data processing is completed. The copy of the travel document of the guest will be erased immediately after the completion of the purchase of the flight ticket. After the completion of the visit of the guest to Hungary, the University will delete all personal data of the guest, except for those that it needs to fulfill its legal obligations. The guest may revoke the consent at any time in an e-mail sent to [adatvedelem@uni-nke.hu](mailto:adatvedelem@uni-nke.hu). The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Referring to section 4.1. the University shall store the recorded images of the persons concerned for a maximum of 24 days from the recording, except for those that it needs to fulfill its legal obligations.

Referring to section 4.2. the University keeps records of the guest for promoting the University and for scientific and historical purposes. The records are kept until the duration of the public information article. In case it is archived, records are preserved until a specific time indicated by the retention period. The retention period is defined by potential future use of the records for articles and university publications.

## 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.

## **8. Automated data processing (including profiling)**

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

## **9. Rights of the data subject, 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 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).

The application must be submitted to the postal address of the data controller or the following e-mail address: [adatvedelem@uni-nke.hu](mailto: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](mailto:ugyfelszolgalat@naih.hu)).

