

PRIVACY NOTICE

I. INTRODUCTION OF THE CONTROLLER

Obuda University (hereinafter: the “University”, the “Controller”, or “we/us”) issues this privacy notice to ensure the lawfulness of its internal data-processing activities and to protect the rights of data subjects.

Name of Controller: Obuda University

Institution ID: FI12904

Registered seat: H-1034 Budapest, Bécsi út 96/B.

E-mail: jog@uni-obuda.hu

Representative: Prof. Dr. Levente Kovács, Rector

Data Protection Officer: Bovard Kft. (info@bovard.hu)

As a higher education institution, the University is established to carry out its core activities—education, scientific research and artistic creation—in accordance with Act CCIV of 2011 on National Higher Education (“Nftv.”). In performing its public tasks, the processing of personal data is necessarily involved.

The University processes personal data in compliance with all applicable laws, in particular:

- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (“Infotv.”),
- Regulation (EU) 2016/679 of the European Parliament and of the Council 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”, “GDPR”).

The University treats personal data as confidential and implements all necessary technical and organisational measures to ensure secure storage and processing.

Definitions

The conceptual structure of this information coincides with the interpretative definitions specified in Article 4 of the Regulation, supplemented at some points by the interpretative provisions of Infotv. Section 3.

When this information sets out provisions on data or data processing, they should be interpreted as personal data and the processing thereof.

II. PURPOSE OF DATA PROCESSING: Participation in the ALUMNI Programme

The University operates an ALUMNI (graduates’) programme open to any former student who has graduated from the University. Participation is voluntary and entails no obligations, however, members of the Alumni may attend ALUMNI events (including as speakers), and may receive information on ALUMNI activities and University news via newsletters.

Joining the ALUMNI programme requires completing a declaration of consent confirming that the data subject has read this notice and consents to the processing of their data. The University processes the personal data of ALUMNI participants as set out in this Notice.

The purpose of data processing

The purpose of the data processing is to operate the ALUMNI programme and, within this, to maintain contact with former students, in particular to:

- send newsletters about the University and the ALUMNI programme,
- organise ALUMNI events with their participation,
- conduct potential interviews about their university experience and professional career,
- collect feedback on university education and student programmes.

Processed personal data

The University processes the data subject's name and e-mail address, as well as data necessary to verify eligibility to participate in the ALUMNI Programme (e.g., confirmation of graduation from the University), and data relating to the granting of consent.

To better understand participants in the ALUMNI Programme and for the better tailoring of communications and programmes, the University may also process additional, voluntarily provided data concerning the alumnus' qualification(s) and professional career.

Where relevant (e.g., if inviting an alumnus to speak at an event or for an interview), the University may request further voluntary data. In such cases, specific information on the related processing (e.g., recording and publishing an interview) will be provided on a case-by-case basis by the Controller.

The University may also invite participants to voluntarily submit suggestions/observations to improve the ALUMNI programme, university education and student life. Data provided in this context will also be processed.

The legal basis of the data processing

The data processing is based on the data subject's prior consent (GDPR Article 6(1)(a)). Consent may be withdrawn at any time, including opting out of the ALUMNI programme and unsubscribing from ALUMNI e-mails.

The source of personal data

Personal data are obtained from the data subject.

Access to personal data

Personal data are accessible only to University employees whose duties require such access.

At ALUMNI events, the University may make photo/video recordings or conduct interviews and publish them on its public platforms; in such cases, online content may be accessible to anyone. Publication occurs only under lawful authorisation and with case-specific information provided to the data subject.

Transfer of personal data to a third country or international organisation

Personal data are not transferred to third countries or international organisations.

Time period of processing personal data

Personal data are processed until consent is withdrawn by the data subject.

Automated decision-making and profiling

Additional voluntarily provided career/qualification data may be used to profile interests to tailor ALUMNI content; however, no automated decision-making is performed on this basis.

Provision of personal data

Providing personal data is voluntary but necessary for participation. Without the required data, the University cannot send newsletters or ensure participation in the programme.

III. THE RIGHTS OF THE DATA SUBJECT

Right to be informed

The data subject has the right to be informed about processing; this notice is provided for that purpose.

Data processing based on consent

In case the legal basis for any data processing is the consent of the data subject, they have the right to withdraw their consent to the data processing at any time. However, it is important to note that withdrawing the consent involves only the data whose processing has no other legal basis. In case there are no other legal bases, we delete the personal data finally and irrevocably after the consent is revoked.

The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Right of access by the data subject

Upon request, the University will confirm whether it processes the data subject's personal data and, if so, provide access to the data and the following information:

- a) purposes of processing;
- b) categories of data;
- c) recipients/recipient categories to whom personal data have been or will be disclosed (including third-country/international organisational recipients);
- d) envisaged retention period or criteria;
- e) rights to rectification, erasure, restriction and to object;
- f) the right to lodge a complaint with a supervisory authority and seek judicial remedy;
- g) the source of data (if not collected from the data subject);
- h) the existence of automated decision-making, including profiling, and information about the logic involved and potential consequences.

Right to rectification

The data subjects shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning them. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a request is made to rectify (modify) personal data then the data subject needs to prove the authenticity of the data to be modified. Additionally, the data subject must verify that the person

requesting rectification is authorised to do so. This is the only way for the data controller to verify the authenticity of the new data before modifying it.

Please report any changes in your personal data to the Controller as soon as possible, facilitating the legality of data processing and the enforcement of your rights.

Right to erasure ('right to be forgotten')

The University shall erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing of personal data for direct marketing purposes;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f) the personal data have been collected in relation to the offer of information society services.

Right to restriction of processing

Restriction may be requested where one of the following applies:

- a) accuracy of data is contested (for the period of verification);
- b) processing is unlawful and restriction is requested instead of erasure;
- c) the University no longer needs the data but they are required for legal claims;
- d) the data subject has objected pending the verification whether the legitimate grounds of the Controller override those of the data subject.

Right to object

Where processing is based on the **University's legitimate interests** (GDPR Art. 6(1)(f)) or is necessary for a task carried out in the **public interest/exercise of official authority** (Art. 6(1)(e)), the data subject may **object at any time** on grounds relating to their particular situation, including profiling based on those provisions.

If personal data are processed for **direct marketing** (e.g., sending informational letters), the data subject may **object at any time**, including to related profiling. In such case, data will **no longer** be processed for direct marketing.

Right to data portability

The data subjects shall have the right to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- a) the processing is based on consent of the data subject or on a contract according to Article 6 Paragraph (1) Point b) of the GDPR; and
- b) the processing is carried out by automated means.

PROCEDURES FOR ENFORCING THE RIGHTS OF DATA SUBJECTS

The above rights can be exercised by data subject by sending an electronic mail to this e-mail address: jog@uni-obuda.hu, or regular mail to the seat of the Data Controller or in person at the seat of the Data Controller. The data subject shall be informed about the measure taken in response to the request within 1 month. If we are unable to fulfil the request, we inform the data subject in 1 month about the reasons of the rejection and the administrative and judicial redress rights of the data subject.

The rights of the deceased data subject may be enforced within five (5) years by an authorized person who possesses administrative provisions, or a statement towards the Data Controller included in a public document or full probative private document. If multiple such statements exist at the same Data Controller, then the statement made the latest will prevail. If the data subject has made no such legal statement, then a close relative – as defined in Act V of 2013 on the Civil Code – is still able to enforce certain rights of the deceased within five (5) years of death. These rights are defined in Article 16 (right to rectification) and Article 21 (right to object), as well as – if the data processing was unlawful during the life of the data subject, or the purpose of data processing has ceased with the death of the data subject – Articles 17 (right to erasure) and 18 (right to restriction of processing) of the GDPR. The close relative who exercises their right first will be entitled to enforce rights of the data subject as set forth in this Paragraph.

IV. THE RIGHT TO LODGE A COMPLAINT AND TO AN EFFECTIVE JUDICIAL REMEDY

In order to enforce their right to judicial remedy, the data subjects may take legal action against the Controller if they consider that the Data Controller or a data processor acting on behalf of or under the instructions of the Data Controller is processing their personal data in breach of the provisions of laws on the processing of personal data or of binding legal acts of the European Union. According to Article 79 (2) of the GDPR proceedings against the data controller shall be brought before the courts of the Member State where the data controller has an establishment, i.e., before the Budapest-Capital Regional Court (Hungary). The court shall deal with the case as a matter of priority. Alternatively, such proceedings may be brought before the courts of the Member State where the data subject has habitual residence. Court application: <https://birosag.hu/birosag-kereso>.

Without prejudice to judicial remedy, according to Article 77 (1) of the GDPR every data subject shall have the right to lodge a complaint with the supervisory authority, in particular in the Member State of data subject's habitual residence, place of work or place of the alleged infringement (i.e. in Hungary), alleging that the processing of personal data by the Data Controller has resulted in a violation of rights or an imminent threat thereof, or that the Data Controller is restricting the exercise of rights related to the processing of personal data or is refusing to exercise such rights.

The claim can be filed at the Hungarian supervisory authority at one of the below addresses:

National Authority for Data Protection and Freedom of Information (NAIH)

Postal address: 1363 Budapest, Pf. 9.

Address: 1055 Budapest, Falk Miksa utca 9–11.

Tel.: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

URL: <http://naih.hu>

Budapest, 23 September 2025