PRIVACY POLICY

ON THE PROCESSING OF PERSONAL DATA RELATING TO THE "STUDENT CONTENT CREATOR" PROGRAMME ORGANISED BY THE UNIVERSITY OF PÉCS

The University of Pécs (hereinafter: the University) pays special attention to ensuring that, during the course of its data processing activities, it acts in compliance with Regulation (EU) 2016/679 (hereinafter: the General Data Protection Regulation), 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, Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: the Infotv.), other relevant legislation, as well as the data protection practices developed in the course of the activities of the National Authority for Data Protection and Freedom of Information (hereinafter: NAIH).

1. THE DATA CONTROLLER

Name: University of Pécs

Seat and Postal address: 7622 Pécs, Vasvári Pál u. 4. (Hungary)

Represented by: Dr. Attila Miseta - Rector and István Decsi - Chancellor

Organizational unit responsible for data processing: UP International Centre

Represented by: Prof. Dr. István Tarrósy

Contact: Katalin Sümegi – Head of Office – International Marketing Office

Phone number: 06 72/501-500/12422 E-mail adress: sumegi.kata@pte.hu

Data prtotection officer: Dr. Roland Bernát

Contact: adatvedelem@pte.hu, https://pte.hu/hu/adatvedelem

2. THE SCOPE AND THE SOURCE OF THE PROCESSED DATA

The scope of the processed data includes the data provided by the data subject during registration.

The source of the data is the registration form completed by you.

If any modification or change occurs in the processed personal data during the data processing period, please notify the contact person specified in point 1 without delay.

3. THE PURPOSE AND LEGAL GROUND OF THE DATA PROCESSING

3.1. Based on the data subject's explicit and voluntary consent (Article 6 paragraph 1(a) of the General Data Protection Regulation), the University processes the data subject's identification data (name, contact details, student status), as well as image and audio recording data, for the purposes of enabling participation in the Student Content Creator Program, creating and publishing content, and supporting the University's marketing and communication activities. The provision of data is voluntary; however, in the absence of such data or consent, the data subject cannot participate in the program, and the University will be unable to use the content.

4. THE DURATION OF DATA PROCESSING

The University processes the student's personal data (name, contact details, student status) for the duration of the program (from 1 October 2025 to 30 September 2026) and for a maximum of 5 years

thereafter, for the purposes of documenting the program and fulfilling administrative obligations, or until the data subject withdraws their consent.

The photographs, videos, and other content created during the program may be used by the University for its marketing and communication activities without any time limitation, based on the data subject's consent under copyright law.

5. THE SCOPE OF THE PERSONNEL WHO CAN ACCESS THE PERSONAL DATA, DATA TRANSFER, DATA PROCESSING

Access to the data is granted only to the staff members of those organizational units of the University that require the data for the performance of their duties. The staff members are bound by a confidentiality obligation with respect to any personal data they become aware of.

The University does not engage any data processor for the purposes of data processing.

The University does not transfer or disclose personal data to any other recipient.

6. DATA SECURITY

Taking into account the state of technological development, the University ensures the appropriate security of the data subject's personal data by implementing suitable technical and organizational measures that provide a level of protection appropriate to the risks associated with data processing. This includes protection against unauthorized or unlawful processing, as well as accidental loss, destruction, or damage of data. Further information on the data security measures applied by the University can be found in Sections 20–22 of the <u>Data Protection Policy</u> of the University of Pécs and in its <u>Information Security Policy</u>.

7. THE RIGHTS OF THE DATA SUBJECTS AND THE EXERCISE THEREOF

- 7.1. The data subject has the right to access the information specified in Article 15 of the General Data Protection Regulation (right of access) in relation to the processing of their personal data. In particular, the University shall inform the data subject about:
 - which of their personal data are being processed,
 - for what purpose and on what legal basis,
 - from what source the data were collected,
 - the planned duration of storage or the criteria used to determine that duration,
 - to whom, when, and which of their personal data the University has granted access or to whom it has transferred the data, and
 - what rights, complaint, and remedy options the data subject has in relation to the data processing.
- 7.2. The data subject has the right to the rectification or correction of inaccurate (incorrect or incomplete) personal data concerning them, in accordance with Article 16 of the General Data Protection Regulation (right to rectification).
- 7.3. In accordance with Article 17 of the General Data Protection Regulation, the data subject has the right to request the erasure of their personal data (right to erasure) if:
 - the personal data are no longer necessary for the purpose for which they were collected or otherwise processed;

- the data processing is based on consent, and the data subject withdraws their consent, and there is no other legal basis for the processing;
- the personal data have been processed unlawfully; or
- the personal data must be erased in order to comply with a legal obligation.

Data shall not be erased where processing is necessary:

- for compliance with a legal obligation or for the performance of a task carried out in the public interest or in the exercise of official authority;
- for the establishment, exercise, or defence of legal claims;
- for the exercise of the right to freedom of expression and information;
- for reasons of public interest in the area of public health; or
- for archiving purposes in the public interest, or for scientific, historical, or statistical research purposes, insofar as the exercise of the right to erasure is likely to render such processing impossible or seriously jeopardize it.
- 7.4. The data subject has the right to request the restriction of the processing of their personal data in accordance with Article 18 of the General Data Protection Regulation (right to restriction of processing) if:
 - the data subject contests the accuracy of the personal data; in this case, the restriction applies for a period enabling the University to verify the accuracy of the personal data;
 - the processing is unlawful, and the data subject opposes the erasure of the data and requests the restriction of their use instead; or
 - the University no longer needs the personal data for the purposes of processing, but the data are required by the data subject for the establishment, exercise, or defence of legal claims.

Personal data subject to restriction may, with the exception of storage, be processed only with the data subject's consent, or for the establishment, exercise, or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.

- 7.5. In the case of data processing based on consent, the data subject has the right to withdraw their consent at any time, without providing justification, in accordance with Article 7 paragraph (3) of the General Data Protection Regulation (right to withdraw consent). The withdrawal must be made in writing or in the same form in which the consent was given. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
- 7.6. In the case of automated (electronic) data processing based on consent or carried out for the performance of a contract, the data subject has the right, in accordance with Article 20 of the General Data Protection Regulation (right to data portability), to receive the personal data concerning them, which they have provided, in a commonly used electronic format, or to request the University to transmit those data to another data controller.
- 7.7. The data subject may exercise their rights free of charge through the contact person indicated in point 1 or via the contact details of the Data Protection Officer. In most cases, the exercise of data subject rights requires the identification of the data subject, while in certain cases (e.g. exercising the right to rectification) additional verification of specific data may be necessary. The University shall assess the request related to the exercise of data subject rights within one month at the latest. Where necessary, taking into account the complexity of the request and the number of requests, this period may be extended by a further two months. The data subject shall be informed of any such extension within one month.

8. COMPLAINTS AND REMEDIES

You may submit any complaints related to data processing through the contact details of the contact person indicated in point 1, or you may also contact the University's Data Protection Officer at adatvedelem@pte.hu. If you wish to submit a complaint by post, it may be sent to 7622 Pécs, Vasvári Pál u. 4., addressed to the contact person indicated in point 1 or to the Data Protection Officer.

If you believe that a violation of your rights has occurred or there is an imminent risk thereof in connection with the processing of your personal data, you may lodge a complaint with the National Authority for Data Protection and Freedom of Information (mailing address: 1363 Budapest, Pf. 9; telephone: +36 (1) 391-1400; email: ugyfelszolgalat@naih.hu; website: https://naih.hu).

In the event of a violation of your data protection rights, you may also seek remedy before a court of law. You may, at your choice, bring the action before the competent tribunal according to your place of residence or habitual residence.