

# PRIVACY NOTICE

## ON THE PROCESSING OF PERSONAL DATA CARRIED OUT IN THE COURSE OF THE STIPENDIUM HUNGARICUM GALA STUDENT SURVEY OF THE UNIVERSITY OF PÉCS

The University of Pécs (hereinafter: the “University”) pays special attention to ensuring that its data processing activities comply with 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 (hereinafter: the “General Data Protection Regulation” or “GDPR”), Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: the “Infotv.”), other applicable legislation, as well as the data protection practices developed by the National Authority for Data Protection and Freedom of Information (hereinafter: “NAIH”).

### 1. IDENTIFICATION OF THE DATA CONTROLLER

Name: University of Pécs (Pécsi Tudományegyetem)

Registered seat and mailing address: H-7622 Pécs, Vasvári Pál Street 4, Hungary

Representatives: Dr. Attila Miseta, Rector, and István Decsi, Chancellor

Organisational unit carrying out the data processing and its representative: International Centre, Dr. István Tarrósy

Contact person(s): Áron Bánáti

Telephone number of contact person: +36 (72) 501-500/12422

E-mail address: [banati.aron@pte.hu](mailto:banati.aron@pte.hu)

Data Protection Officer and contact details: Dr. Roland Bernát, [adatvedelem@pte.hu](mailto:adatvedelem@pte.hu); +36 (30) 074 66 37

### 2. SCOPE OF PROCESSED DATA AND SOURCE OF DATA

The scope of the processed data includes all data provided by the Respondent to the Data Controller in the course of completing the online questionnaire survey.

The source of the data is the questionnaire completed by you, the information provided by you, as well as, based on your consent, the data supplied by the Educational Directorate.

Should any modification or change occur in the personal data processed concerning you during the period of data processing, you are kindly requested to notify without undue delay the contact person specified in Section 1.

### 3. PURPOSE OF DATA PROCESSING AND LEGAL BASIS FOR DATA PROCESSING

3.1. The purpose of the data processing is to assess the opinions of the University’s SH/DFP/ÖKF scholarship students regarding the Stipendium Hungaricum Gala event held on 17 April 2026.

3.2. The data provided during the survey shall be processed on the basis of the Respondent’s consent - pursuant to Article 6(1)(a) of the General Data Protection Regulation - for the following purposes:

Purpose of data processing	Legal basis for data processing	Scope of processed data	Source of data
Conducting a student survey (as detailed in Section 3.1)	Article 6(1)(a) GDPR	field of study, faculty, year of study, form of training, email address,	On the one hand, the information provided by the respondent. On

Purpose of data processing	Legal basis for data processing	Scope of processed data	Source of data
		Neptun code, student's gender, nationality	the other hand, based on the consent of the student of the University of Pécs, the researchers retrieve the data from the NEPTUN database maintained by the Educational Directorate

#### 4. DURATION OF DATA PROCESSING

In connection with the survey, the processing of personal data shall continue until the purpose of the data processing ceases to exist or until consent is withdrawn, but no later than the anonymisation process carried out prior to the commencement of data analysis. Following this, it shall no longer be possible to link individual responses to the identity of the respondent. The anonymisation process includes, following data linkage, the deletion of unique identifiers suitable for linking and identifying individuals, as well as the deletion of raw data and the resetting of the survey dataset.

#### 5. PERSONS HAVING ACCESS TO THE DATA, DATA PROCESSING, DATA TRANSFER

Personal data may only be accessed by employees of such organisational units of the University whose duties require access to the data. Such employees shall be bound by confidentiality obligations with regard to any personal data they become aware of.

The data shall be processed by the International Centre with the utmost care, in a strictly confidential manner, only to the extent necessary and on a temporary basis, and all lawful measures shall be taken to prevent unauthorised access to the data.

The International Centre of the University of Pécs shall not disclose the data that come to its knowledge to any third party under any circumstances.

The Data Controller shall store the personal data in the Microsoft Office 365 system until the anonymisation process is completed, and data processing shall be carried out using Microsoft Office 365 or IBM SPSS software.

#### 6. DATA SECURITY

The University ensures an appropriate level of security of the personal data of data subjects by implementing suitable technical and organisational measures, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage. Further information on the data security measures applied by the University can be found in Sections 20–22 of the [Data Protection Policy](#) of the University of Pécs, as well as in its [IT Security Policy](#).

#### 7. RIGHTS OF DATA SUBJECTS AND THEIR EXERCISE

7.1. The data subject shall have the right to access information relating to the processing of his or her personal data in accordance with Article 15 of the General Data Protection Regulation (right of access), including in particular the right to obtain confirmation from the University as to:

- which of his or her 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 such duration;
- to whom, when, and in respect of which personal data the University has granted access or to whom the personal data have been transferred; and
- what rights, complaint mechanisms, and legal remedies are available to the data subject in relation to the processing.

7.2. The data subject shall have the right to obtain the rectification or correction of inaccurate (incorrect or incomplete) personal data concerning him or her pursuant to Article 16 of the General Data Protection Regulation (right to rectification).

7.3. The data subject shall have the right to obtain the erasure of personal data concerning him or her pursuant to Article 17 of the General Data Protection Regulation (right to erasure) where:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- in the case of processing based on consent, the data subject withdraws his or her consent and there is no other legal ground for the processing;
- the personal data have been unlawfully processed;
- the personal data must be erased in order to comply with a legal obligation.

Erasure shall not take place 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 archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, where the right to erasure would likely render impossible or seriously impair such processing.

7.4. The data subject shall have the right to obtain restriction of processing of personal data concerning him or her in accordance with Article 18 of the General Data Protection Regulation (right to restriction of processing) where:

- the accuracy of the personal data is contested by the data subject, 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 the 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, only be processed with the consent of the data subject 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 important public interest reasons of the Union or of a Member State.

7.5. In the case of data processing based on consent, the data subject shall have the right to withdraw his or her consent at any time without providing reasons, pursuant to Article 7(3) of the General Data Protection Regulation (right to withdraw consent). Withdrawal shall be made in writing or in the same manner as the consent was given. The withdrawal shall 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 shall have the right, in accordance with Article 20 of the General Data Protection Regulation, to receive the personal data concerning him or her, which he or she has provided, in a commonly used electronic format, or to request that such data be transmitted by the University to another data controller (right to data portability).

7.7. In the case of data processing carried out for the performance of a task in the public interest or in the exercise of official authority, as well as processing based on a balancing of interests, the data subject shall have the right to object, on grounds relating to his or her particular situation, to the processing of personal data (right to object). Pursuant to Article 21 of the General Data Protection Regulation, the University shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject, or which are related to the establishment, exercise, or defence of legal claims.

7.8. The data subject may exercise his or her rights free of charge via the contact details of the contact person indicated in Section 1 or the data protection officer. In most cases, the exercise of data subject rights requires the identification of the data subject, and in certain cases (e.g. exercising the right to rectification), the provision of additional information may be necessary. The University shall assess the request without undue delay and, in any event, within one month of receipt. 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, of which the data subject shall be informed within one month of receipt of the request.

## **8. COMPLAINTS AND LEGAL REMEDIES**

Any complaints related to data processing may be submitted via the contact details of the contact person indicated in Section 1., or the data subject may contact the University's Data Protection Officer (adatvedelem@pte.hu). If the complaint is submitted by post, it may be sent to H-7622 Pécs, Vasvári Pál Street 4, addressed to the contact person indicated in Section 1. or to the Data Protection Officer.

If the data subject considers that their rights have been violated or there is an imminent risk of such violation in relation to the processing of their personal data, they may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (mailing address: H-1363 Budapest, P.O. Box 9, Hungary; phone: +36 (1) 391-1400; email: ugyfelszolgalat@naih.hu; website: <https://naih.hu>).

In the event of a violation of their data protection rights, the data subject may also seek judicial remedy. Proceedings may be initiated - at the data subject's choice - before the competent court of their place of residence or place of stay.