Privacy Policy

Last revision: May 9, 2018

# The purpose and scope of this Information

The present Privacy Policy (hereinafter: Policy) pertains to the personal data that Pázmány Péter Catholic University (hereinafter: University or Controller) collects and processes about you.

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Legislation governing data processing

* + Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: Regulation)
	+ Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter: Information Act)
	+ Act CCIV of 2011 on National Higher Education (hereinafter: Higher Education Act)

Unless specific information is provided to the contrary, the scope of the Privacy Policy does not extend to the services and data processing in connection with the promotions, lottery games, services, and other campaigns of, including any content published by, third parties outside of the Controller that advertise or display such content on the website referred to in the Privacy Policy.

Unless specific information is provided to the contrary, the scope of the Privacy Policy also does not extend to the services and data processing of websites and service providers that are accessible via links on the website subject to the present Privacy Policy. Such services are governed by the provisions of the privacy policies of the third parties providing these services; the Controller shall not in any way by liable for such data processing.

# Data processing principles

Personal data shall be processed lawfully and in a transparent manner, ensuring that the personal data concerning natural persons are processed in a fair manner (*“lawfulness, fairness and transparency”*).

Personal data may be processed only for specific and explicit lawful purposes where necessary for the exercising of certain rights and fulfilment of obligations. The purpose of processing must be satisfied in all stages of data processing operations; recording of personal data shall be done under the principle of lawfulness and fairness (*“purpose limitation”*).

The personal data processed must be essential for the purpose of processing and it must be suitable to achieve that purpose. Personal data may be processed to the extent and for the duration necessary to achieve its purpose (*“data minimisation”* and *“storage limitation”*).

The University shall ensure that the data are accurate and up to date and that any inaccurate personal data are rectified (*“accuracy”*).

The University shall process personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (*“availability, integrity, and confidentiality”*).

# Definitions

*Processing*: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

*Personal data breach*: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

*Website:* the [www.ppke.hu](http://www.ppke.hu/) website operated by the Controller.

*Service(s)*: the services operated and provided by the Controller and accessible on the Website.

*User*: the natural person who has registered for the Services and provides the personal data specified below as part of such registration process.

*Privacy Policy:* the Controller's present Privacy Policy.

*Personal data*: any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

*Special data:*

1. personal data revealing racial origin or nationality, political opinions and any affiliation with political parties, religious or philosophical beliefs or trade-union membership, and personal data concerning sex life;
2. personal data concerning health, pathological addictions, or criminal record.

*Consent of the data subject*: any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

*Information*: the Controller shall be obliged to respond to requests from the data subject without undue delay and at the latest within one month as to whether or not personal data concerning the data subject are being processed, and, where that is the case, to provide access to the personal data and the following information:

* + the purposes of the processing;
	+ the categories of personal data concerned;
	+ the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
	+ where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period.

*Rectification*: the data subject shall have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him or her.

*Erasure:* The data subject shall have the right to obtain from the Controller the erasure of personal data concerning him or her without undue delay and the Controller shall have the obligation to erase personal data without undue delay where:

* + the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
	+ the data subject withdraws consent and there is no other legal grounds for the processing;
	+ the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
	+ the personal data have been unlawfully processed;
	+ 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.

*Restriction:* the data subject shall have the right to obtain from the Controller restriction of processing, meaning the marking of stored personal data with the aim of limiting their processing in the future.

*Objection:* the data subject’s declaration objecting to the processing of his/her personal data and requesting the termination of data processing, as well as the erasure of the data processed.

*Data subject:* any natural person directly or indirectly identifiable by reference to specific personal data.

*Controller:* the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

*Processor:* any natural or legal person or organisation without legal personality processing the data on the grounds of a contract concluded with the controller, including contracts concluded pursuant to legislative provisions.

*Third party:* any natural or legal person, or organisation without legal personality other than the data subject, the controller, and the processor.

*Data processing:* any operation or the totality of operations performed on the data, irrespective of the procedure applied; in particular, collecting, recording, registering, classifying, storing, modifying, using, querying, transferring, disclosing, synchronising or connecting, blocking, erasing and destructing the data, as well as preventing their further use, taking photos, making audio or visual recordings, as well as registering physical characteristics suitable for personal identification (such as fingerprints or palm prints, DNA samples, iris scans).

*Data transfer:* ensuring access to the data for specific third parties. *Disclosure:* providing open access to the data.

*Data erasure:* making data unrecognisable in a way that it can never again be restored.

*Data destruction:* complete physical destruction of the data carrier recording the data. *Data processing:* performing technical tasks in connection with data processing operations, irrespective of the method and means used for executing the operations, as well as the place of execution, provided that the technical task is performed on the data.

*Pseudonymisation:* the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

# Processing visitor data

The following visitor data are collected.

## The scope of processed data and the purpose of data processing

**Personal data categories The purpose of data processing The legal grounds for data processing**

IP address Information for operating, troubleshooting, and safety audits
Preparing traffic statistics

legitimate interest

## The term of managing data

The University stores collected data for 365 days.

## Persons with access to the data; processors

The personal data are processed by the IT Department staff. The University’s other organisational units receive the collected data only in the form of summary data.

The University does not involve any external processors for data processing.

## Data disclosure and transfer

There is no transfer of data.

# Data processing on teachers’ sites

The Website provides an opportunity for teachers to create their own subpages where they can freely upload content.

Teachers need to enter their Shibboleth IDs and passwords to create such pages. The technology used by the Website ensures that passwords are not stored, even temporarily, on the Website.

## The scope of processed data and the purpose of data processing

The scope of processed data is determined by the teacher, and thus the legal grounds therefor is the teacher’s consent and the data content is not restricted.

## The term of managing data

Data processing takes place until the data are erased by their creator.

## Persons with access to the data; processors

Visitors to the Website can access the personal data. The University does not involve any external processors for data processing.

## Data disclosure and transfer

Visitors to the Website can access the data. There is no transfer of data.

# The use of cookies on the Website

In the interest of ensuring smooth operation, the Website uses cookies, which it stores on user computers.

You can disable the use of cookies in your browser, which may cause the Website not to function properly.

## The scope of processed data and the purpose of data processing

Cookies do not process any personal data.

## The term of managing data

Data processing takes place for the duration of the user’s visit to the Website, after which the data are erased from the user’s computer.

## Persons with access to the data; processors

Cookies do not transfer personal data to the Controller, so no personal data is processed.

## Data disclosure and transfer

There is no transfer of data.

# Protected documents

The Website provides an opportunity to upload documents that can be accessed only with a Shibboleth ID.

Teachers need to enter their Shibboleth IDs and passwords to create such pages. The technology used by the Website ensures that passwords are not stored, even temporarily, on the Website.

## The scope of processed data and the purpose of data processing

Only the user ID is stored and only temporarily, for the term of the user’s visit to the page.

## The term of managing data

Data processing takes place until the data are erased by their creator.

## Persons with access to the data; processors

Visitors to the Website can access the personal data. The University does not involve any external processors for data processing.

## Data disclosure and transfer

There is no transfer of data.

# Contact with visitors and the processing of other data

Visitors to the Website can contact the University’s various organisational units and employees by way of the email addresses on the Website.

## The scope of processed data and the purpose of data processing

|  |  |  |  |
| --- | --- | --- | --- |
| **Personal data categories** |  | **The purpose of data processing** | **The legal grounds for data processing** |
| Email address | Contact and requests for information | consent |
| The data provided by the sender or interested party | Contact and requests for information | consent |

* 1. The term of managing data

The University does not store the data at a central address; requests and emails are delivered only to the addressee’s mailbox.

## Persons with access to the data; processors

The personal data are processed by the addressee. The University does not involve any external processors for data processing.

## Data disclosure and transfer

There is no transfer of data.

# Sending emails for marketing purposes

Interested parties can regularly receive information on the trainings, courses, and other events organised by the University.

## The scope of processed data and the purpose of data processing

|  |  |  |
| --- | --- | --- |
| **Personal data categories** | **The purpose of data processing** | **The legal grounds for data processing** |
| Email address | Contact and requests for information | consent |
| Name, position, workplace | Contact and requests for information | consent |

* 1. The term of managing data

The University stores the data until the data subject withdraws its consent.

## Persons with access to the data; processors

The personal data are processed by the University’s employees dealing with the organisation of events and training. The University does not involve any external processors for data processing.

## Data disclosure and transfer

There is no transfer of data.

# Data security measures

The Controller will take all measures necessary to ensure that the data processing and storage is secure. The processed data are kept in a reliable, dedicated server environment with a high level of availability. Physical protection is ensured by round-the-clock protection, an electronic access control system, controlled key access, and a camera surveillance system.

Backups of the Website are made monthly to an offsite location.

The detailed description of the data security measures are laid out in the University’s Data Protection and Data Security Policy.

# Data processing

The Controller uses the services of the Processors named above in the present Privacy Policy for the performance of its activity.

Processors may not make any independent decisions and are authorised only to proceed according to the contract concluded with the Controller and the provided instructions.

The Controller checks the work of the Processors.

Processors may utilise the services of other processors only with the Controller’s consent.

By accepting the present Privacy Policy, the User expressly accepts and grants its consent for the Controller to transfer his or her personal data to the Processors.

# Possibility of data transfer

Data may be transferred to the Processors specified in the present Privacy Policy without the User’s express, ad hoc consent, as the User grants its express and clear consent for such transfer with the acceptance of the present Privacy Policy. Unless provided for otherwise by relevant legislation, personal data may be disclosed to third parties or authorities only on the basis of an official decision or with the User’s prior, express consent.

The Controller is authorised and obligated to transfer all Personal Data lawfully stored and available to it to the competent authorities if it is obligated by law or a final official decision to transfer such Personal Data. The Controller may not be held liable for such data transfer and the consequences arising therefrom.

To check the legality of the data transfer and to ensure that the User has the necessary information, the Controller keeps a record of data transfers.

# Rights in connection with the processing of personal data

## The right to request information

By way of the contacts specified in point 1, you may request information from the University as regards

* + - the personal data it processes,
		- the legal grounds for processing, and
		- the purpose,
		- sources,
		- and duration of processing,
		- as well as the persons to whom, at what time, on the basis of which pieces of legislation, and to which personal data the University grants access or transferred such data.

The University shall fulfil your request within 30 days at latest by way of a letter sent to the address you specify.

## Right to rectification

By way of the contacts specified in point 1, you can request, in writing, that the University rectify your personal data (e.g. you can change your email or mailing address at any time). The University shall fulfil your request within 30 days at latest and shall inform you of having done so by way of a letter sent to the address you specify.

## Right to erasure

By way of the contacts specified in point 1, you may request, in writing, that the University erase your personal data.

The University shall deny the request for erasure if the University is bound by law or an internal regulation to continue storing the personal data in question. Such may be the case where the time limit specified by internal regulations pertaining to archiving has not yet expired.

However, if there is no such obligation, the University shall fulfil your request within 30 days at latest and shall inform you of having done so by way of a letter sent to the address you specify.

## Right to blocking

By way of the contacts specified in point 1, you may request, in writing, that the University block your personal data. Such block shall remain in effect for the term for which storage is required according to the reason you provided.

For example, you may request that your data be blocked if you feel that your submission was handled by the University in an unlawful manner; however, the official or judicial procedure you initiate require the University to not erase the submission. In such case, the University will continue to store the personal data (e.g. your submission) until contacted by the authorities or the court, after which the data will be erased.

## Right to object

By way of the contacts specified in point 1, you may object, in writing, against the processing of your data should the University transfer or use personal data for purposes of direct marketing, public opinion polling or scientific research. For example, you may object if the University uses your personal data for scientific research without your consent.

You may also object to processing if you feel that processing is required only for the University’s legal obligation or legitimate interest, with the expectation of data processing based on authorisation granted by law. For example, you may not object if your submission containing your personal data are, based on the University’s internal archiving regulations, handed over to the Archives together with the documents of the case.

# Possibilities for enforcement in connection with processing

## Initiation of judicial proceedings

If you experience unlawful data processing, you can launch a civil action against the University. The regional court shall be competent in adjudging the case. You may choose to launch the action at the court of first instance with jurisdiction at your place of residence (a list of courts of first instance and their contact information is available at the following link: <http://birosag.hu/torvenyszekek>).

## Official notifications

Anyone is authorised to initiate proceedings at the National Authority for Data Protection and Freedom of Information ([www.naih.hu;](http://www.naih.hu/) 1530 Budapest, Pf.: 5.; phone: +36-1-391-1400; fax: +36-1-391-1410; email: ugyfelszolgalat@naih.hu) by filing a report alleging that rights related to the management of personal rights or to the access to data of public interest or data public on grounds of public interest have been infringed, or if there is an immediate danger of such.

# Amending the Privacy Policy

The Controller maintains the right to amend the Privacy Policy. This may especially take place if required by law. Changes to data processing may not result in the processing of personal data for purposes other than those set out herein. The Controller shall publish the relevant information on its website 15 days prior.