DATA PROTECTION AND PROCESSING INFORMATION REGARDING DATA PROCESSING RELATED TO THE EDUCATIONAL ACTIVITIES OF UNIVERSITY OF NYÍREGYHÁZA

The University of Nyíregyháza (hereinafter: University) – Within the framework prescribed by the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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: General Data Protection Regulation, GDPR), Act CXII of 2011 on the right to information self-determination and ont he freedom of information (hereinafter: the Act CXII of 2011), on the implementation of certain provisions of the Act on National Higher Education to the rules of the Government Regulation 87/2015 (9. IV) and to the provisions of other relevant legislation, in accordance with the Data Protection, Processing and Access to Public Interest Regulations of the University of Nyíregyháza (hereinafter: Data Protection and Processing Regulations) – **provides information as follows on the processing carried out by the University and any of its organizational units during and for the purpose of conducting higher education training activities as a task of public interest.**

I. The purpose of the data processing information

The purpose of this data protection and processing information sheet (hereinafter: information sheet) is to provide comprehensive and transparent information for:

a) the person applying to the University (hereinafter: applicant),
b) a student who has been accepted and enrolled in one of the University's courses, i.e. establishing a student relationship (hereinafter: student), and
c) the former student (hereinafter: former student)

on the processing of the personal data of the natural persons listed in points a-c) carried out by the University (hereinafter referred to as the data subject), the legal basis and purpose of the processing of the personal data, the duration of the data processing, the person and contact information of the data controller, the person and contact information of the data protection officer, the data subject rights, how to enforce them and legal remedies.

II. The identity and contact information of the data controller and the data protection officer

The data controller and its representative: University of Nyíregyháza (4400, 31/b Sóstói Street Nyíregyháza; Phone: (36) 42/599-400, www.nye.hu); It represents:

Dr. György Szabó PhD rector; E-mail: rektor@nye.hu; Phone: (36) 42/599-400/2020

Data Protection Officer: Dr. Tímea Györgyné Makszim Nagy PhD (4400, 31/b Sóstói Street Nyíregyháza, Campus A, 2nd floor 217); Phone: (36) 42/599-400/2460; E-mail: makszim.gyorgyne@nye.hu

III. Processing and their legal basis, purpose, scope and duration of managed data

1. Applicant-, student- and former student-related processing

Legal basis for processing: The processing of the personal data of natural persons who have a student legal relationship with the University for the performance of tasks carried out in the context of the exercise of the public interest license pursuant to Article 6 (1) point e) of the GDPR, as well as Article 6 (1) point c) of the GDPR and the Act CXII of 2011. Mandatory data processing based on the law required to fulfill the legal obligation according to §5(1) b), which data processing is regulated by the Act on National Higher Education(hereinafter Act NHE) Annex No. 3 I/B. point prescribes. Processing beyond the mandatory data or other than the purpose of processing can only be done with the consent of the data subject.

Purpose of processing: Act NHE as stipulated in Section 18 (1). The higher education institution may process personal and special data only in connection with the legal relationship, the establishment and fulfillment of benefits, discounts, and obligations, for reasons of national security, for the purpose of managing the records specified in the Act NHE.

Duration of processing: eighty years from the notification of the termination of the student relationship.

The scope of personal data handled: personal data defined in Annex I of this Notice.

2. Processing of special data concerning students and former students

Legal basis for data processing: The processing of special data of students is data processing based on consent in accordance with Article 9 (2) point a) of the GDPR, which consent the University must obtain before starting data processing, and Article 9 (2) point f) of the GDPR according to data processing, which is the data processing necessary to enforce the legal claims submitted by the data subject.

Purpose of data processing: Act NHE as stipulated in Section 18 (1). The higher education institution may process personal and special data only in connection with the legal relationship, the establishment and fulfillment of benefits, discounts, and obligations, for reasons of national security, for the purpose of managing the records specified in the Nftv.

Duration of data processing: in the case of data processing defined in point 1 of the annex II, eighty years from the notification of the termination of the student relationship. In the case of data processing specified in point 2 of the annex II, the same time as the duration of the data storage obligation prescribed by the laws in force at all times, otherwise only for the absolutely necessary time.

Scope of personal data processed: the data specified in Annex II.

IV. Place of processing

1. The place of data processing in the case of data processing concerning the applicant, student and former student

The University of Nyíregyháza, 4400 Nyíregyháza. All organizational units of the University. The University performs electronic data processing in the database maintained in the Neptun system, in the student register, while in the case of paper-based data processing:

a) the student's personal material is managed and stored by the Student Services Center,

b) other paper-based documents relating to the student's studies and education-related activities are managed and stored by individual organizational units.

2. Place of data processing in the case of special data relating to students and former students

The University of Nyíregyháza, 4400 Nyíregyháza. Automated (electronic) and non-automated (paper-based) data processing is carried out by the following organizational units:

a) the Secretariat of the Deputy Rector of Education,

b) the Student Services Center,

c) the Mental Health and Equality Center,

d) the relevant organizational units,

e) the Student Self-Government Board of the University of Nyíregyháza and its individual committees,

f) some councils of the University of Nyíregyháza,

g) certain committees and sub-committees of the University of Nyíregyháza.

V. The use of processor

The University uses a data processor acting on behalf of the University - in accordance with Article 28 of the GDPR - to manage data for students, which operates the Neptun system required for data processing. The University concluded a data processing contract with the Data Processor, in which the data processor undertook a guarantee to comply with data protection and data security provisions.

VI. Data transfer

Personal data will only be transferred to international agencies commissioned by the student in accordance with the establishment of the student's legal relationship, in accordance with the principle of data minimization.

VII. Rights of the data subject and their enforcement

In the course of its processing, the University unconditionally ensures that data subjects have the following rights:

– **right to transparent information** (GDPR Articles 12-14): the data subject has the right to receive information about the processing of his personal data and all related information before the data processing begins. By publishing this information electronically, the data controller provides the opportunity for the data subject to learn about its content at any time, as well as to request and learn about a printed copy of the information from the representative of the data controller during the entire duration of the training. The information on data processing is continuously available on the www.nye.hu/adatvedelem interface, and the data subject must read and accept it when entering the Neptun system. The person concerned can request information about the processing of his personal data and can view it with his request submitted

in writing, including the electronic way. At the request of the data subject, the data controller is obliged at any time to provide information about the data it manages, concerning the data subject, its source, the purpose of the data processing, the legal basis, its duration, the circumstances and effects of any data protection incident and the measures taken to prevent it, and - in the case of forwarding the personal data of the data subject - on the legal basis and recipient of the data transfer. The data controller promotes the assertion and enforcement of this right of the data subject by publishing the document *"Requesting information on the processing of personal data"* on the data controller's website under the tab www.nye.hu/adatvedelem in order to enable the data subject to submit a request with appropriate content when asserting your right. In addition, the data controller accepts all requests from the content of which the data subject's request to enforce this right can be established and the data subject can be identified beyond doubt.

– **the data subject's right of access** (GDPR Article 15): The data subject has the right to receive feedback from the data controller as to whether his personal data is being processed. The data controller provides a copy of the personal data that is the subject of data processing to the data subject.

– **right to rectification** (GDPR Article 16): the data subject may request the correction of his personal data without undue delay, if it contains inaccurate data, and - taking into account the purpose of the data processing - he may request the addition of his personal data.

– **right to erasure** (GDPR Article 17): the data subject has the right to have the data controller – with the exception of mandatory data processing – delete personal data relating to him without undue delay, if one of the conditions set out in Article 17 (1) of the GDPR is met. In the case of erasure of personal data, the data controller shall, taking into account the available technology and implementation costs, take the reasonably expected steps - including technical measures - in order to inform any additional data controllers or data processors handling the data that the data subject has requested from them the personal data in question deleting links to data or copies or duplicates of these personal data. The data controller has the right to limit the right to deletion and to refuse to delete the data, or not to implement it if any of the conditions stated in Article 17 (3) of the GDPR exist.

– **right to restriction of data processing** (GDPR Article 18): the data subject may request the restriction of his personal data if a) the data subject disputes the accuracy of the personal data, in which case the restriction applies to the period that allows the data controller to verify the

personal data accuracy; b) the data processing is illegal and the data subject opposes the deletion of the data and instead requests the restriction of their use; c) the data controller no longer needs the personal data for the purpose of data processing, but the data subject requires them to present, enforce or defend legal claims; or d) the data subject objected to data processing; in this case, the restriction applies to the period until it is established whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the data subject. If data processing is subject to restrictions, such personal data may only be processed with the consent of the data subject, with the exception of storage, or to submit, enforce or defend legal claims, or to protect the rights of another natural or legal person, or in the important public interest of the Union or a member state.

– **right to data portability** (GDPR Article 20): The data subject has the right to receive the personal data concerning him/her provided to a data controller in a segmented, widely used, machine-readable format, and is also entitled to transmit this data to another data controller without being hindered by the data controller to whom the personal data was made available.

– **right to object** (GDPR Article 21): The data subject has the right to object to the processing of his personal data at any time for reasons related to his own situation. In this case, the data controller may no longer process the personal data, unless the data controller proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the data subject, or that are necessary for the presentation, enforcement or defense of legal claims. are connected.

– **the right to appeal to a supervisory authority, the right to appeal to a court and the right to file a complaint** (GDPR Articles 77-79): if any person concerned has any comments in connection with the University's data processing, or feels that the management of their data is unlawful, please contact our data protection officer first. The data subject's request to enforce their rights must be submitted to the postal address of the data controller or to the e-mail address makszim.gyorgyne@nye.hu. The data controller will provide information in writing as soon as possible, but within 25 days at most (in case of objection, within 15 days). In case of infringement, to the National Authority for Data Protection and Freedom of Information (headquarters: 1055 Budapest, 9-11 Falk Miksa Street, mailing address: 1363 Budapest, Mailbox 9; phone: 06-1-391-1400, central email address: ugyfelszolgalat@ naih.hu, website URL address: http://www.naih.hu), and you can also go to court (the person concerned can - at his or her choice - initiate the case before the competent court according to his place of residence or residence).

VIII. Data transmission and mandatory data provision

1. The Act NHE Annex No. 3 I/B. chapter and the data specified in Annex I of this Information Sheet are Nftv. No. 3 annex I/B. can be forwarded based on point 4 of chapter:

a) all data for the maintainer, for the performance of tasks related to maintainer management;

b) data necessary for the court, the police, the prosecutor's office, the bailiff, the state administrative body to decide the specific case;

c) all data necessary for the national security service to perform the tasks specified in the Act CXXV of 1995;

d) all data for the body responsible for the operation of the higher education information system;

e) (invalid)

f) the body responsible for recording the fulfillment of the conditions of the Hungarian state scholarship regarding the training and the student relationship.

2. The University transmits the data required for data processing in accordance with Chapter V exclusively for the purpose of data processing to the data processor specified in Chapter V. In order to guarantee the security of data processing during data processing, the University and the data processor have entered into a data processing contract in accordance with Article 28 of the GDPR.

IX. Other provisions

The information sheet must be interpreted in accordance with the Data Protection and Data Processing Policy of the University of Nyíregyháza in force at all times.

All employees acting under the direction of the University of Nyíregyháza, as a data controller, are bound by an obligation of confidentiality with regard to the personal data they come to know in the course of their employment. Persons acting in this way may only act in accordance with the University's instructions during data processing, unless they are required to deviate from the instructions by EU or member state law.

Nyíregyháza, 25 October 2025

Dr. György Szabó PhD *OH*

rector

Annex I

The University of Nyíregyháza processes the following personal data pursuant to Annex 3, point I/B. of the Act NHE:

Student data recorded and processed in the neptun system

a) data related to the recording:

aa) the applicant's name and surname, sex, maiden name and surname, mother's maiden name and surname, place and date of birth, nationality, place of residence, place of stay, notification address and telephone number, in the case of non-Hungarian citizens, the title of residence in Hungary and the document entitling to residence - in the case of persons with the right of free movement and residence according to a special law, the document certifying the right of residence - the Hungarian identity card, Hungarian family member's identity card, international insurance document,

ab) details of the school leaving examination,

ac) details of secondary school,

ad) data necessary for the assessment of the application for admission,

ae) details of the admission procedure, admission number,

af) the identification number of the declaration pursuant to § 48/D(2);

b) data relating to the student status:

ba) the student's name, gender, name at birth, mother's name, place and date of birth, nationality, place of residence, place of stay, notification address and telephone number, e-mail address, in the case of non-Hungarian citizens, the title of residence in Hungary and the name and number of the document entitling the student to stay - in the case of persons with the right of free movement and residence, the document certifying the right of residence according to a special law,

bb) the type of student (visiting student) legal relationship, the date and manner of its establishment and termination, the name of the course of study pursued by the student, its state funding and work schedule, the expected date of completion of the course, the student's academic evaluation, examination results, semesters started, the period of funding used, the termination of the student's legal relationship,

bc) the place and duration of study abroad,

bd) the credits acquired and recognised during the course of the training, and the credits and credits awarded,

be) details of student allowances, data necessary for the assessment of entitlement to allowances (social status, parental data, maintenance data),

bf) details of the student's employment,

bg) data on student disciplinary and compensation cases,

bh) data necessary for the assessment of special treatment of disabled students,

bi) data relating to student accidents,

bj) the student's student card number, the student card identification number,

bk) the student's educational identification number, identity document number, photograph, social security number,

bl) the electronic copy of the thesis (degree thesis) and the degree supplement, data on the completion of the internship, the degree, the final examination (doctoral thesis), the language examination, the degree, degree supplement,

bm) the data necessary to fulfil the rights and obligations arising from the student status;

c) data relating to student tracking;

d) the student's tax identification number;

(e) data for the identification of the supporting documents;

(f) data on fees and reimbursements paid by the student, such as instalment rebates, deferrals and exemptions from obligations;

(g) in the case of student or housing support, where it is provided on the basis of receipt of an infant care allowance, childcare allowance, child-raising allowance, childcare allowance, regular child protection allowance or on the basis of disadvantage, details of such fees or allowances;

h) the details of scholarships paid in support of the student's studies in respect of the student's legal status, established by the Government by decree pursuant to paragraphs (1) and (2) of Article 85.

Annex II

1.

The University of Nyíregyháza in order to facilitate the enforcement of the rights of students with disabilities as set out in Section 43 (1) of the Nftv. in accordance with the data management objectives set out in Section 18 (1) of the Nftv., the University shall in particular process the following special (health) data in connection with the student's disability in accordance with the Regulations for the Promotion of Equal Opportunities for Students with Disabilities:

a) specific data relating to disability;

b) specific data concerning hearing impairment (deaf, hard of hearing);

c) specific data concerning visual impairment;

d) specific data relating to speech impairment (dysphasia, dyslexia, dysphonia, stuttering, babbling, aphasia, nasal dysphonia, dysarthria, mutism, severe speech reading and comprehension disorder, central retardation, delayed speech development)

e) specific data on mental retardation (dyslexia, dysgraphia, dysorthography, hyperactivity, attention deficit disorder, conduct disorder)

f) specific data relating to autism.

2.

The University of Nyíregyháza processes the following personal and special data in order to enforce the student's entitlements set out in Government Decree 51/2007 (III. 26.) on the benefits and certain reimbursements payable to students participating in higher education:

a) data necessary to identify the applicant student, such as the applicant's name and Neptun code;

b) the nationality, date of birth and permanent residence of the applicant student;

c) the name of the Faculty, course and year in which the applicant is studying and the type of course;

d) data on academic achievements, such as the applicant's index average and financial status;

e) the names of the applicant's relatives (living in the same household), the degree of relationship, the relative's occupation and income, the relative's other occupation and other income, the relative's disability;

f) whether the student is disabled or suffers from a long-term illness;

g) the student is a student with a multiple disadvantage; d) the student is a parent or a breadwinner;

h) the student has a large family;

i) the student is an orphan;

j) the student is a disadvantaged person;

k) the student is a half-orphan;

l) the student's guardianship has ceased because of his or her majority;

m) details of status in life;

n) information on the marital status of parents;

o) data on housing circumstances;

p) other data (e.g. reasons for the data provided by the applicant student, etc.).