

# PRIVACY POLICY

## IN CONNECTION WITH THE POTECHO PLATFORM OF THE UNIVERSITY OF PÉCS

The University of Pécs (University) is committed to adhere in its data processing activities to 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 (GDPR), to Act CXII of 2011 on the Right of Informational Self Determination and the Freedom of Information (hereinafter: Privacy Act), and to Act XLVII of 1997 (Medical Privacy Act), and to the good practices developed by the Hungarian National Authority for Data Protection and Freedom of Information (NAIH).

### 1. THE DATA CONTROLLER

Name: University of Pécs

Seat and Postal Address: 7622 Pécs, Vasvári Pál u. 4.

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

Controller organisational unit: Medical School, University of Pécs

Represented by: Dr. Miklós Nyitrai, Dean

Contact person: Dr. Gergely József Csaba

Telephone: +36 (30) 4004386

E-mail: [csaba.gergely@pte.hu](mailto:csaba.gergely@pte.hu)

Name of the data protection officer: Dr. Gergely László Szőke, PhD

Contact: [adatvedelem@pte.hu](mailto:adatvedelem@pte.hu); +36 (30) 179 5672

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

The scope of the controlled data covers the data provided when logging in to use POTEcho, in particular the data subject's NEPTUN code (for guest user an individual code is used), email address, surname, first name and details of the courses taken.

The general provisions of Section 2 of Annex 11 of the Organisational and Operational Regulations of the University of Pécs ("[Regulations on the Procedure for the Evaluation of Student Opinions on Teaching Work](#)") apply to the data provided when filling in the surveys in the POTEcho system, so students fill in the surveys without their names, and the system does not allow for personal identification. Nevertheless, when filling in the surveys, you may provide information in the free-text windows that can identify you (e.g. your email address) or the aggregate content of your answers in certain optional fields may make your identification likely. The scope of the data processed includes all personal data you provide when completing a survey. Should you be identified, the University will subsequently anonymise your data for statistical purposes.

The source of your data is the data you provide.

In case of any changes in your personal data during the duration of the data processing, please be kind to inform us via one of the e-mail addresses set forth in point 1. at the earliest convenient time.

### 3. THE PURPOSE AND LEGAL GROUND OF THE DATA PROCESSING

3.1. The University processes your personal data indicated in Section 2 for the purpose of determining the right of access of the student concerned in order to carry out its public tasks of the proper functioning

of the institution and the organisation of training [Article 18 (1) a) and c) of the Higher Education Act (HEA)].

3.2 The University will process any data provided by the data subject when completing the questionnaire on the basis of the data subject's explicit and voluntary consent (Article 6(1)(a) of the General Data Protection Regulation).

#### **4. THE DURATION OF THE DATA PROCESSING**

In the case of point 3.1, data processing lasts for a period of eighty years from the notification of the termination of the student status, as stipulated in the Higher Education Act (HEA), and in the case of point 3.2, if the data subject becomes identifiable, until the implementation of anonymisation at the latest.

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

The data can only be accessed by the employees of the organizational units of the University, which organizational units need the data to perform their tasks. Employees are bound by the obligation of confidentiality regarding the personal data they learn.

The University does not use a data processor for this processing.

The University does not transfer or disclose your personal data to other recipients.

#### **6. DATA SECURITY**

The University shall process the 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. You can find more information in Articles 20-22. of the [University's Data Protection Regulation](#), and in Chapter IV. of the University's [IT Policy](#).

#### **7. THE RIGHTS OF THE DATA SUBJECTS**

7.1. You have the right to access the information in relation with the data processing related to you defined in Article 15 of the GDPR (right of access), including in particular, information by the University about

- the types of personal data,
- the purpose and legal ground,
- the source,
- the duration of the processing or the criteria for determining the duration,
- who, when, on what legal basis, to which personal data was granted access to by the University or to whom did it transfer the data,
- the rights and possible legal remedies of the data subject during the data processing.

7.2. You shall have the right to rectification of inaccurate (false or incomplete) personal data about you pursuant to Article 16 of the GDPR.

7.3. According to Article 17 of the GDPR, you have the right to erasure ('right to be forgotten'), if

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent on which the data processing is based and there is no other legal ground for the data processing;
- you have successfully objected against the processing of the data pursuant to point 7.7;
- the personal data have been unlawfully processed;

- the personal data have to be erased for compliance with a legal obligation.

The data will not be erased if the data processing is necessary:

- for compliance with a legal obligation which requires the data processing or to which the University is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the University;
- for the establishment, exercise or defence of legal claims;
- for exercising the right of freedom of expression and information;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as practicing the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that data processing.

7.4. According to Article 18 of the GDPR, you have the right to restriction of processing, if

- you contest the accuracy of the personal data, for a period enabling the University to verify the accuracy of the personal data;
- the processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead;
- the University no longer needs the personal data for the purposes of the processing, but you require it for the establishment, exercise or defence of legal claims;
- you have objected to the processing pursuant to point 7.7, pending the verification whether the legitimate grounds of the University override those of yours.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your 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. According to GDPR Article 7 (3), you shall have the right to withdraw your consent at any time (right to withdraw the consent). The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, you shall be informed thereof. It shall be as easy to withdraw as to give consent.

7.6. You shall have the right to receive the personal data, which you provided to the University, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the University, where the processing is based on consent or on a contract (right to data portability).

7.7. You shall have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on a balance of interest, or necessary for a task carried out in the public interest or in the exercise of official authority, including profiling based on those provisions (the right to object). According to Article 21 of the GDPR, 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 for the establishment, exercise or defence of legal claims.

7.8. You can exercise your rights free of charge via the contacts (the contact persons or the data protection officer) listed in point 1. The exercise of your rights may in most cases require identifying you, while in some cases (e.g. the exercise of the right to rectification) additional information may be required. The application for the exercise of your rights shall be assessed by the University within one month at the latest. If necessary, taking into account the complexity of the application and the number of applications, this period may be extended by a further two months, the extension being notified to the person concerned within 1 month.

## **8. COMPLAINTS AND REMEDIES**

You can make any complaints about data processing at the contact details of the contact persons indicated in point 1., or you can contact the University's data protection officer (adatvedelem@pte.hu). If you wish to make a complaint by post, you can send a mail to 7622 Pécs Vasvári Pál u. 4. addressed to the contact persons indicated in point 1. or to the data protection officer.

You may seek remedy at the Hungarian National Authority for Data Protection and Freedom of Information (contact address: H-1363 Budapest Pf.:9, Tel.: +36-1-391-1400, e-mail: ugyfelszolgalat@naih.hu, website: <https://www.naih.hu/general-information.html>), if you deem it necessary due to a supposed legal violation or in direct hazard of it.

You may file a civil action of law in case of unlawful processing at the competent or chosen Regional Court.