**Privacy policy regarding data processing carried out by the University of Miskolc**

**in connection with the application process for the National Higher Education Scholarship**

The University of Miskolc (hereinafter „University/Controller”) applies the following legislation and internal standards in its data procession covered by this privacy policy.

(a) Regulation (EU) 2016/679 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 (General Data Protection Regulation) (hereinafter „GDPR”);

b) Act CXII of 2011 on the right to self-determination of information and freedom of information (hereinafter „Privacy Act”);

c) a Act CCIV of 2011 on National Higher Education (hereinafter „Nftv.”);

d) Volume III of the Organisational and Operational Regulations of the University of Miskolc, entitled Requirements for Students (hereinafter „HKR”);

e) Regulation on data protection, data processing as well as access to and publication of data of public interest of the University of Miskolc (hereinafter „Data protection and data processing regulation”).

*Purpose of the privacy policy:* The purpose of this privacy policy is to provide information to the students of the University of Miskolc (hereinafter „ME”) prior to the commencement of data processing by ME regarding the award of the National Higher Education Scholarship pursuant to the provisions of Section 85/C(a)(ab) of Nftv. (hereinafter „Application”) and the processing of data in connection with the award of the aforementioned National Higher Education Scholarship (hereinafter „National Higher Education Scholarship”).

*Controller and its representative:* University of Miskolc (3515 Miskolc-Egyetemváros, Institutional registration number: FI87515, Tel: 46/565-111, Website: www.uni-miskolc.hu), Represented by: Prof. Zita Horváth, rector, E-mail: rektor@uni-miskolc.hu, A/4. Room 145., Tel.: 46/565-111/10-32

*Contact data protection officer:* Dr. Dóra Salamon-Somlyai, data protection officer, Legal and Compliance Centre, 3515 Miskolc-Egyetemváros, A/4. I. floor 124. 46/565-111/1785, adatvedelem@uni-miskolc.hu, dora.salamon-somlyai@uni-miskolc.hu.

*Data processing information*

*regarding National Higher Education Scholarship Application*

*Definition of data subjects:* A data subject means any natural person who is a student of ME and who has submitted an application in response to the call for applications for the award of the National Higher Education Scholarship (hereinafter „data subject/applicant” for the purposes of this subsection).

*Brief description of data processing*: the data subjects may submit their applications for the National Higher Education Scholarship electronically to the e-mail address dedicated by their educational unit to scholarship application management indicated in the call for applications, in accordance with the detailed information accompanying the call for applications, during the period specified in the call for applications. The Controller will assess applications received by the deadline. After the deadline for submitting applications has expired, no application or, if the applicant has been invited to remedy deficiencies, no deficiency may be submitted.

Applications will be assessed by a committee appointed by the Faculty concerned (hereinafter „assessment committee”). Data subjects may lodge an appeal against the decision of the assessment committee. Appeals will be considered by the Director for Education and Quality Assurance of the University. Within 30 days after the assessment of the application, the complete application file will be deleted.

*Scope of personal data processed:* the scope of each personal data relating to the data subject processed in the application procedure, the specific purposes for which such data are processed and the legal basis for the processing of each data are set out in Annex 1.

*General purpose of the processing* is to establish eligibility for the National Higher Education Scholarship and, if eligibility is established, to disburse the scholarship.

*Legal basis for the processing of personal data:* Data processing is necessary for performance of a task carried out in the exercise of official authority vested in the Controller pursuant to Article 6(1)(e) GDPR. The legal basis for the exercise of of official authority vested in the Controller is the Nftv. and its authorisation in the ME-HKR.

*Duration of data processing:* with regard to data set out in Section I/B.(1)(h) of Annex 3 of the Nftv. 80 years from the notification of the termination of the student's student status pursuant to Section I/B.3. of Annex 3 of the Nftv.

*Persons entitled to access the data:* the staff member who downloads and receives the applications, the members of the assessment committee, the Director of Education and Quality Assurance, the staff member of the Student Services Department in charge of the scholarship payments.

*Data processor:* the controller uses the following data processor for the operation of the Neptun system: SDA Informatika Zrt. (registered office: 1111 Budapest, Budafoki út 59. 123, Cg.: 01-10-140314). A data processing contract has been concluded between the controller and the data processor, containing the details of data processing pursuant to Article 28(3) GDPR.

Other than this, the controller will not transfer personal data to third parties, unless required to do so by Union or Member State law, the latter of which includes the following provision.

Data may be transmitted pursuant to Section I/B.4 of Annex 3 of the Nftv:

a) to the maintainer all data as necessitated by the exercise of maintainer’s rights;

b) to the court, the police, the public prosecutor’s office, the bailiff, the public administration body the data required for judging the specific case;

c) to the national security service all data necessary for the exercise of the task defined in the Act CXXV of 1995 on the National Security Services (hereinafter „National Security Services Act”);

d) to the body in charge of the operation of the information system all data;

e) the authority responsible for the registration of the state grants with regard to the training and the student status.

*Source of data:* Submission of the application is voluntary and the data is provided by the data subject.

*Legal consequence of failure to provide data:* if the data subject does not provide the data or does not provide the data correctly (including by not providing the documents to prove the data correctly), the Controller cannot assess the applications in accordance with the call for applications.

*Information on the data processing carried out regarding*

*the award of National Higher Education Scholarship*

*Definition of data subject:* A data subject means any natural person who is a student and who fulfils the conditions for National Higher Education Scholarship (hereinafter „data subject" for the purposes of this subsection).

*Brief description of the data processing:* the Minister responsible for education awards national higher education scholarships to outstanding students of higher education institutions on the basis of the relevant provisions of the Nftv. and other related legislation. Applications are assessed by the committees of each educational unit (faculty/institute). The scholarships are disbursed by the Student Services Department of the University of Miskolc through the computerised study system (hereinafter „Neptun system”).

*Scope of personal data processed:* the following personal data are processed by the controller during the application procedure:

* the name and Neptun code of the data subject,
* the grade point average earned by the data subject in the last completed semester,
* proof of the professional, community, sports, cultural and other activities of the data subject,
* official proof of foreign language proficiency of the data subject,
* proof of the professional and scientific activity of the data subject,
* a brief description of the professional and scientific publications of the data subject,
* a description of the outstanding cultural, sports, public and social activities of the data subject.

*General purpose of the processing* is to establish eligibility for the National Higher Education Scholarship and, if eligibility is established, to disburse the scholarship.

*Legal grounds for personal data processing:* Data processing is necessary for performance of a task carried out in the exercise of official authority vested in the Controller pursuant to Article 6(1)(e) GDPR. The legal grounds for the exercise of official authority vested in the Controller is the Nftv. and its authorisation in the ME-HKR.

*Duration of data processing:* with regard to data set out in Section I/B.(1)(h) of Annex 3 of the Nftv. 80 years from the notification of the termination of the student's student status pursuant to Section I/B.3. of Annex 3 of the Nftv.

*Persons entitled to access the data:* the designated staff member of the educational unit, the members of the assessment committee, the staff member responsible for the disbursement of student social scholarships, the Director of Education and Quality Assurance, and, if necessary, the data processing system administrator.

*Data processor:* the controller uses the following data processor for the operation of the Neptun system: SDA Informatika Zrt. (registered office: 1111 Budapest, Budafoki út 59. 123, Cg.: 01-10-140314). A data processing contract has been concluded between the data controller and the data processor, containing the details of data processing pursuant to Article 28(3) GDPR.

Other than this, the controller will not transfer personal data to third parties, unless required to do so by EU or national law, the latter of which includes the following provision.

Data may be transmitted pursuant to Section I/B.4 of Annex 3 of the Nftv:

a) to the maintainer all data as necessitated by the exercise of maintainer’s rights;

b) to the court, the police, the public prosecutor’s office, the bailiff, the public administration body the data required for judging the specific case;

c) to the national security service all data necessary for the exercise of the task defined in the Act CXXV of 1995 on the National Security Services (hereinafter „National Security Services Act”);

d) to the body in charge of the operation of the information system all data;

e) the authority responsible for the registration of the state grants with regard to the training and the student status.

*Data source:* the Controller obtains the data necessary to establish eligibility for the scholarship from the Neptun system.

*Rights of data subjects*

In its data processing, the University provides the data subjects unconditionally with the following rights to exercise:

– Right to prior information [Article 13 GDPR]: the data subject has the right to be informed about the processing of his or her personal data and any information relating to it before the processing starts. The controller shall publish this privacy policy on its central website (<https://www.uni-miskolc.hu/adatkezelesi-tajekoztatok>) and shall provide continuous access to it. The controller shall publish the contact details of the privacy policy in the application notice for the submission of applications.

– Right of access [Article 15 GDPR]: the data subject may request information about and have access to the processing of his or her personal data by submitting a request in writing, including by electronic means. At the request of the data subject, the controller shall at any time provide information on the data relating to him or her, their source, the purpose of the data processing, its legal basis, duration, the circumstances of the possible personal data breach, its effects and the measures taken to manage it, and - in case of transfer of the personal data of the data subject - on the legal basis and recipient of the transfer. The controller has made available on its central website a form facilitating the exercise of the right of access, which the data subject may use to exercise his or her right of access by duly completing and submitting the form. In addition to this, the controller will accept any other request whose content clearly indicates that the data subject is exercising his or her right of access. The controller may, however, refuse to comply with a request to exercise the right of access until it can identify the data subject beyond reasonable doubt.

– Right to rectification [Article 16 GDPR]: the data subject may request the rectification of his or her personal data without undue delay where inaccurate, and, having regard to the purposes of the processing, the completion of his or her personal data. Please note that the right to rectification does not extend to supplementing the content of the documents attached to the application outside the period for submitting an application or to attaching a new document to the application.

– Right to erasure [Article 17 GDPR]: The data subject has the right to obtain from the controller the erasure of personal data relating to him or her without undue delay, except for mandatory processing, where one of the grounds set out in Article 17(1) GDPR applies. In the event of erasure of personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data. The controller shall have the right to restrict the right to erasure and to refuse or not to carry out the erasure of the data where one of the grounds set out in Article 17(3) GDPR applies. In relation to the present processing, the exercise of the right of erasure may be refused pursuant to Article 17(3)(b) GDPR, where processing is necessary for compliance with a legal obligation which requires processing by Member State law to which the controller 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 controller. The provisions of the Nftv. and the Government Decree referred to above constitute such legal obligations of Member States.

– Right to data portability [Article 20 GDPR]: given that the lawfulness of the processing is not based on Article 6(1)(a) or (b) GDPR, the data subject does not have the right to data portability.

– *Right to lodge a complaint and to an effective judicial remedy [Articles 77-79 GDPR]:* if a data subject has a complaint about the processing of his or her data by the Controller or if he or she believes that his or her data are being processed unlawfully, please contact our Data Protection Officer atadatvedelem@uni-miskolc.hu in the first instance. In the event of an infringement, proceedings may be brought before the court (or, at the data subject’s choice, where he or she has his or her habitual residence) or the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11., tel.: 06-1-391-1400, website: <http://naih.hu>; e-mail: ugyfelszolgalat@naih.hu, postal address: 1363 Budapest, PO box 9).

Requests to exercise the rights of the data subject must be sent to the postal address of the data controller or to the e-mail address adatvedelem@uni-miskolc.hu, or be made in person. The controller shall provide information in writing as soon as possible, but within one month at the latest.

A detailed description of the rights of data subjects and how to exercise them is published on the Controller's central website (<https://www.uni-miskolc.hu/adatkezelessel-kapcsolatos-dokumentumok>), which can be accessed, viewed and downloaded at any time.

Miskolc, 22 May 2024

Prof. Dr. Zita Horváth

rector

Annex 1

The controller processes the data subject’s following personal data in the data management process of the National Higher Education Scholarship, for the following purposes and on the following legal grounds:

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| *Scope of data processed* | *Legal grounds for data processing*  | *Purpose of data processing* |
| A request from the data subject, including the name and Neptun code of the data subject  | Article 6(1)(e) GDPRcarrying out the University's tasks in the public interest | Identification of the data subject necessary for the processing of the application. |
| Information on the data subject’s training, such as the year attended, the form of financing of the training  | Article 6(1)(e) GDPR | For the purpose of determining eligibility for the scholarship |
| E-mail address of the data subject | Article 6(1)(e) GDPR | Communication with the data subject, in particular of the outcome of the application |
| Data subject’s grade point average in the last completed semester of the training | Article 6(1)(e) GDPR | For the purpose of determining eligibility for the scholarship and the number of points to be awarded depending on the grade point average |
| Details of the type and level of the language proficiency examination and a copy of the language proficiency certificate proving it | Article 6(1)(e) GDPR | For the purposes of determining eligibility for the scholarship and the number of points to be awarded depending on the type and level of the language proficiency examination |
| Documentary proof of the data subject’s scientific activity (proof of participation in TDK and OTDK) | Article 6(1)(e) GDPR | For the purpose of determining eligibility for the scholarship and the number of points to be awarded depending on the academic activity carried out by the data subject |
| Documentary proof of data subject’s participation in academic competitions (e.g. moot court and other competitions) in the semester covered by the application | Article 6(1)(e) GDPR | For the purposes of determining eligibility for the scholarship and the number of points to be awarded depending on data subject’s participation in academic competitions |
| Documentary proof of the data subject’s publication activity during the semester covered by the application | Article 6(1)(e) GDPR | For the purpose of determining eligibility for the scholarship and the number of points to be awarded on the basis of the data subject’s publication activity |
| Storage of data relating to the award of the scholarship in the Neptun system | Article 6(1)(c) GDPR | For the purpose of fulfilling the legal obligation, in view of the fact that Section I/B(1)(h) of Annex 3 of the Nftv. requires the processing of data on scholarships paid to students by higher education institutions. |