Pannon Egyetem
University of Pannonia

# Research Ethics Policy of the University of Pannonia

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The Research Ethics Policy of the University of Pannonia (hereinafter referred to as the "**Policy**") issued by the University of Pannonia (hereinafter referred to as the "**University**") to formulate positions on disputed issues of ethics in science and to make decisions concerning research ethics approvals, on the basis of the University's Organisational and Operational Rules (hereinafter referred to as the "**OOR**"), Part I Organisational and Operational Rules of Procedure (hereinafter referred to as the "**OORP**") approved by the Senate of the University of Pannonia and adopted by the Foundation for the University of Pannonia acting as the operator exercising founders' and ownership rights (hereinafter referred to as the "**Operator**") and on the basis of the resolution by the Board of Trustees on the rules of procedure for adopting the regulations of the University of Pannonia by the Board of Trustees is as follows.

## CHAPTER ONE

## GENERAL PROVISIONS

### 1. §

### Purpose of the Policy

The purpose of this Research Ethics Policy is to establish the general rules and principles applicable to researchers, research activities, and the publication of research results, as well as to set out the procedures and requirements for obtaining research ethics approval. The Annexes contain the template documents to be completed for the purposes of obtaining research ethics approval and conducting research.

### 2. §

### Scope of the Policy

(1) The personal scope of this Policy extends to:

a) academic staff and researchers employed by, or otherwise engaged in a work-related legal relationship with, the University and carrying out their activities within the institutional framework of the University;

b) persons participating in scientific research or educational activities conducted in cooperation with the University;

c) visiting researchers and lecturers conducting research at the University;

d) persons holding student status at the University, as well as participants in doctoral programmes and doctoral degree-awarding procedures (hereinafter collectively referred to as "students").

(2) The material scope of this Policy extends to scientific research and development activities carried out at the University of Pannonia, including basic research, applied research and experimental development activities.

### 3. §

### Legal framework and related regulations

(1) Pursuant to Section 49 of the Organisational and Operational Rules of the University of Pannonia, the Senate establishes standing committees and bodies to support its operation. These committees and bodies review submissions falling within their respective fields of competence, make proposals for submissions, and monitor the implementation of decisions within their areas of responsibility.

(2) The standing committees and bodies of the Senate are:

- Equal Opportunities Committee,
- Student Appeals Board,
- Education and Credit Transfer Committee,
- Research Ethics Committee.

(3) With regard to research and publication principles, the applicable framework is the Code of Scientific Ethics of the Hungarian Academy of Sciences, adopted by Resolution No. 25/2010 (V.4.) of the General Assembly of the Hungarian Academy of Sciences.

The following legislation applies to experimental research.

(4) Regarding animal experiments:

Government Decree No. 40/2013 (II.14.) on animal experimentation

(5) Legislation applicable to research involving human participants:

Act CLIV of 1997 on Health Care – Medical Research Involving Human Subjects;

Act XXI of 2008 on the Protection of Human Genetic Data, the Regulation of Human Genetic Testing and Research, and the Operation of Biobanks;

Amendments to Chapter VIII (Medical Research Involving Human Subjects) of Act CLIV of 1997 on Health Care;

Decree No. 23/2002 (V.9.) issued by the Ministry of Health on Medical Research Involving Human Subjects;

Amendment of Annex 1 to Decree No. 23/2002 (V.9.) issued by the Ministry of Health, effective from 31st January 2022;

Government Decree No. 235/2009 (X.20.) on the Rules Governing the Authorisation Procedures for Medical Research Involving Human Subjects, Clinical Trials of Investigational Medicinal Products Intended for Human Use, and Clinical Investigations of Medical Devices Intended for Human Application;

Decree No. 32/2009 (X.20.) issued by the Ministry of Health;

Decree No. 31/2009 (X.20.) issued by the Ministry of Health;

Decree No. 35/2005 (VIII.26.) issued by the Ministry of Health;

Decree No. 33/2009 (X.20.) issued by the Ministry of Health;

Decree No. 34/2009 (X.20.) issued by the Ministry of Health;

The Declaration of Helsinki of the World Medical Association (WMA) – Ethical Principles for Medical Research Involving Human Subjects;

The Code of Ethics for Psychologists issued by the Hungarian Psychological Association.

4. §

## General provisions governing the procedures of the Research Ethics Committee

(1) The Research Ethics Committee (hereinafter referred to as the "**REC**"), operating as a standing committee of the University of Pannonia, formulates positions on disputed matters relating to ethics in science, including cases involving suspected plagiarism, and decides on applications for research ethics approval.

(2) All other ethical matters that do not fall within the scope of the ethics of science shall continue to be decided by the Ethics Committee of the University of Pannonia.

(3) The REC is a standing committee of the Senate. Its Chair is elected by the Senate in accordance with the Organisational and Operational Rules of the University of Pannonia and is appointed and dismissed by the Rector.

(4) The composition of the REC, its decision-making procedures, and its rules concerning documentation and operation are set out in its Rules of Procedure.

(5) The REC is responsible for considering ethical issues relating to scientific research involving the University's academic staff, researchers and students, in connection with research conducted within the University of Pannonia or within the framework of research projects implemented at the University in cooperation with other institutions. Upon request, it may also provide opinions on ethical issues arising in scientific research activities.

(6) Proceedings before the REC may be initiated in relation to two subject areas:

a, ethics of science proceedings,

b, research ethics approval proceedings.

Within its competence, the REC shall, upon request, issue an opinion in ethics of science proceedings and shall, upon request, adopt a formal decision in research ethics approval proceedings. Requests for consideration may be submitted in either Hungarian or English, and the proceedings shall thereafter be conducted in the language in which the application was submitted.

(7) The REC shall decide on the application or issue its opinion within 10 working days of receipt of the request. The REC may extend this administrative deadline on two occasions, provided that the requestor is informed accordingly. Any extension shall be decided by the REC. Where the assessment of a request requires the involvement or opinion of external expert(s), the REC's

administrative deadline shall commence on the date the expert opinion is received. The requestor shall be informed of this in writing by the REC.

(8) In order to make a well-founded decision, the REC may ask the requestor to supplement the request. The period required for the requestor to provide additional information or documentation shall not be included in the REC's administrative deadline.

(9) If the REC does not possess the necessary expertise to reach a decision, it may appoint external expert(s) and/or refer the request to the competent organisation or committee having the appropriate authority and jurisdiction.

(10) Members of the Committee may attach a dissenting opinion to the decision or opinion adopted by the REC, alongside the majority position of the Committee.

5. §

## Ethics of science proceedings

(1) In the event of an issue of ethics in science, a member of academic staff or a researcher employed by, or otherwise engaged in a work-related legal relationship with, the University may request an opinion from the REC by submitting a request from their university email account, providing all details that may be necessary for a well-founded decision. In the case of a student, the request shall be submitted from the university email account of the lecturer or researcher acting as the student's thesis supervisor and/or research supervisor.

(2) Decisions containing opinions on issues of ethics in science shall be adopted by the REC and returned electronically to the lecturer or researcher who submitted the request and, through them, to the student concerned.

6. §

## Research ethics approval

(1) Submission of an application for research ethics approval is mandatory in the following cases:

a) For all research involving animals or the analysis of data obtained from animals, research ethics approval must be obtained.

b) For all research involving the analysis of data obtained from or about human subjects, research ethics approval must be obtained.

(2) Procedures for submitting applications and competent organisations:

a) The issuance of approvals for animal experiments does not fall within the competence of the REC. In such cases, applications for research ethics approval shall be submitted to the Scientific Ethical Council on Animal Experimentation (SECAE).

b) The issuance of approvals for medical research involving human subjects does not fall within the competence of the REC. In such cases, applications for

research ethics approval shall be submitted to the Scientific and Research Ethics Committee (SREC) of the Medical Research Council (MRC).

c) In the case of psychological studies, consultation with the United Ethical Review Committee for Research in Psychology (UERCRP) may be required. Determining whether such consultation is necessary falls within the professional responsibility of the research/thesis supervisor.

(3) Applications for research ethics approval shall be submitted before the commencement of the research by the research/thesis supervisor or academic consultant, by completing the relevant form through the designated online platform and submitting the online questionnaire created for this purpose.

(4) It is the responsibility of the supervising researcher or lecturer to determine whether the research requires research ethics approval.

(5) The information required for the REC's decision shall be provided through completion of the relevant sections of the application form applicable to the research concerned.

(6) Where the research involves the collection or processing of personal data, i.e. data relating to an identified or identifiable living individual and the collection or processing of which may lead to the identification of a specific person, the application must be accompanied by a duly completed Privacy Notice, the document entitled Information Sheet and Declaration on the Research and Data Processing, and a Consent Form (Annexes 4, 5 and 6).

(7) If the application does not comply with the requirements set out in this Policy, i.e. it has not been submitted using the prescribed electronic form and platform, or its content is incomplete, the REC shall request the applicant, on one occasion and within a specified deadline, to remedy the deficiencies. Failure to comply with the request for rectification shall result in the application being rejected by the REC without substantive examination.

(8) In its decision, the REC may:

a) approve the research; or

b) refuse permission for the commencement of the research (see Annex 2).

(9) The REC shall issue its decision on research ethics approval in the form of a formal resolution and shall return it electronically to the lecturer/researcher who submitted the application, using the official email address provided in the application.

## CHAPTER TWO

## RULES APPLICABLE TO RESEARCHERS AND LECTURERS

### 7. §

### Rights of researchers and lecturers

(1) In accordance with the relevant regulations of the University in force, researchers and lecturers shall have the right to:

a) have their human dignity and personality rights respected, and have their research activities recognised and acknowledged;

b) obtain access to the knowledge and information necessary for the performance of their work;

c) use the University's facilities, equipment and infrastructure within the scope specified in a separate agreement;

d) submit applications for research funding and scientific grants;

e) pursue research activities in scientific fields of their own choice in addition to the research duties arising from their position;

f) initiate and develop research projects with internal and external partners;

g) publish their research results where justified, following the implementation of appropriate intellectual property protection measures.

8. §

## Obligations of researchers and lecturers

(1) Researchers and lecturers shall:

a) comply with all applicable laws and University regulations, in particular the Regulation on the Management of Intellectual Property and the Privacy and Data Protection Policy;

b) perform their duties personally, with the professional competence and diligence reasonably expected, in accordance with their job description and all applicable rules, regulations and instructions governing their work;

c) carry out their work to a standard consistent with the professional reputation and prestige of the University;

d) keep the University's business secrets, particularly in relation to any additional employment or contractual relationship through which information or solutions constituting the University's confidential business information may be used;

e) fully perform all activities assigned to them under research contracts concluded with their professional participation, in accordance with the terms of such contracts;

f) when publishing the results of research conducted at the University, as a visiting researcher, or within the framework of cooperation between the University and another institution, organisation or business entity – whether independently or in collaboration with other researchers – indicate the name of the University and the relevant disciplinary affiliation associated with the publication. The provision of an appropriate institutional affiliation is mandatory for both full-time and part-

time employees in publications relating to various project activities and research results produced across different subject areas.

9. §

General rules applicable to research

(1) During the term of their employment or other contractual relationship with the University, researchers and lecturers shall not, unless authorised by law, engage in any conduct that would harm or jeopardise the legitimate economic interests of their employer, with particular regard to their obligation under the Regulation on the Management of Intellectual Property to disclose intellectual creations arising from their research activities.

(2) Every research project must be accompanied by a Privacy Notice.

(3) In the case of research conducted within the Focus Laboratory, those conducting the research shall also comply with the Focus Laboratory's data management regulation.

(4) Researchers and lecturers shall keep any business secrets and any information of fundamental importance relating to the University or its activities that come to their knowledge in the course of their work. Furthermore, they shall not disclose to unauthorised persons any data or information obtained in connection with their duties where such disclosure could be detrimental to the employer or to any other person.

(5) The duty of confidentiality shall not extend to the disclosure of public-interest data or data made public on grounds of public interest, nor to any statutory obligations relating to the provision of information or disclosure of data.

(6) Research activities carried out under a contract shall not infringe the economic interests of the University and shall not be aimed at causing loss or damage to the University or to the client/customer.

(7) The University's management may request University employees to provide data in connection with their research activities, and researchers and lecturers shall be obliged to comply with such requests.

(8) University employees and students shall disclose intellectual creations produced within the scope of their employment or academic obligations in accordance with the provisions of the Regulation on the Management of Intellectual Property.

(9) The management and protection of research results and intellectual creations produced by researchers and lecturers shall be governed by the provisions of the Regulation on the Management of Intellectual Property.

## CHAPTER THREE

## RULES ON SCIENTIFIC PUBLICATION

10. §

(1) Researchers and lecturers shall always strive for accurate and reliable scholarly communication.

(2) A scientific publication is an original intellectual work describing scientific result(s) achieved by the author(s), for which the author(s) assume professional responsibility. Scientific publications include, in particular, articles, studies, book chapters and books. Their purpose is to disseminate research findings and facilitate their use by others.

(3) It is both a copyright and an ethical requirement that, instead of repeating previously published material, authors refer to their own and others' earlier published results through clearly identifiable citations.

(4) Authors shall be responsible for the content of their published works.

(5) Any person who has made a substantial contribution to the research through their scientific work shall be recognised as an author of the scientific publication.

(6) The determination of the order of authors shall be the responsibility and prerogative of those involved in the research.

(7) Authors shall not submit substantially identical manuscripts to more than one publication venue for the purpose of primary publication.

(8) It is permissible, however, to resubmit a preliminary communication originally published in abbreviated form as a complete, expanded publication, or – taking into account publication practices in the field of social sciences – to submit a publication based on a previously circulated working paper of greater length, provided that the prior publication is properly cited. In studies involving extensive datasets and overlapping samples, explicit reference shall be made to preceding publications.

(9) The ethical requirements applicable to popular science publications are fundamentally the same as those governing scientific publications. Although the standards of scientific rigour cannot always be fully applied in works intended for a non-specialist audience, authors shall strive for language that is both accessible and scientifically accurate.

(10) If plagiarism, deliberate data manipulation, intentional misrepresentation or any other form of academic misconduct is suspected in connection with a scientific publication, the head of the competent organisational unit shall be required to initiate an ethical investigation, as such conduct constitutes prohibited behaviour.

(11) Sanctions for plagiarism shall also apply to student work (see Paragraph (5) of Section 63 of the Student Requirement System). The REC may recommend mandatory and detailed information sessions for newly enrolled students in order to reduce the incidence of future violations.

(12) Prior to publishing or otherwise disclosing research results, authors shall comply with the provisions of the Regulation on the Management of Intellectual Property and take into account the University's rights relating to the legal protection of intellectual creations.

(13) The following practices are prohibited in the course of research activities:

a) the arbitrary modification, falsification or improper handling of data, and plagiarism;
b) failure to acknowledge authorship and/or the substantial contributions of others (including students), or the use of information, ideas or data obtained through confidential manuscripts, grant applications, collegial exchanges of information, or the improper use of archival materials;
c) violation of laws, University regulations or other requirements intended to protect the health and safety of researchers, research participants, lecturers or other persons, as well as any legal provisions applicable to research activities;
d) misconduct relating to peer-review, editorial or publishing procedures established by publishers, as well as conflicts of interest in the review process;
e) fabrication: the reporting of entirely unfounded or fictitious results;
f) undue personal influence (intended to secure favourable decisions for the influencer, to obtain unfavourable decisions concerning third parties, or to solicit consideration in return for influence);
g) violations of personality rights, including (e.g. infringements of the dignity or freedom of persons participating as research subjects).

(14) Notwithstanding Paragraph (13) herein, conduct inherent in the normal research process shall be permissible, including good-faith error, differing interpretations, differing assessments of data, or differences in experimental design.

(15) Publications reporting the results of research, scientific work or creative activity shall properly acknowledge any use of the results, wording, visual material or oral contributions of others, whether through direct quotation, reproduction or paraphrasing. This requirement applies equally to both published and unpublished original works.

## CHAPTER FOUR

## PRINCIPLES OF RESEARCH ETHICS

11. §

(1) In conducting research activities, the organisations and individuals falling within the scope of this Policy shall recognise as binding upon themselves the University's Research and Publication Principles (see Annex 6: Research and Publication Principles Applicable at the University of Pannonia), as well as the principles set out in the *Code of Ethics of the Hungarian Academy of Sciences* (HAS) and the *European Code of Conduct for Research Integrity* (ALLEA).

(2) Researchers and lecturers shall conduct their research activities in accordance with the above principles.

(3) Researchers involved in supervising student research work shall also bear responsibility for the ethical aspects of the work carried out by the students

under their supervision. The supervising researcher shall clearly communicate their expectations to the student participating in the research and shall provide detailed information regarding the objectives of the research, the work expected from the student, and the student's responsibilities. The supervisor shall be regularly available for consultation and, within that framework, shall provide guidance, support the research process, and evaluate the student's work in a reasoned and substantiated manner.[1]

12. §

**Use of research funding**

(1) Researchers, lecturers, scholars and individuals engaged in creative activities shall strictly comply with the requirements of the funding body providing research support, as well as with the relevant University regulations.

(2) The source of any direct funding used for research, scholarly activities or creative work shall be acknowledged in publications and in any other presentation or dissemination of the results.

13. §

**Implementation provisions**

(1) The procedures set out in this Policy shall apply to research activities and publications from the date on which the Policy enters into force.

(2) This Policy was adopted by the Senate at its meeting of 3rd October 2024 by Senate Resolution No. 193/2024 (X.03.).

(3) This Policy shall enter into force on 14th October 2024.

Dated in Veszprém, on 3rd October 2024

| | |
|---|---|
| Dr. János Abonyi<br>Rector | Zsolt Csillag<br>Chancellor |

Approved in the name of the Foundation for the University of Pannonia, acting as Operator:

[1] Data collection carried out as part of course requirements does not constitute student research. Students must be informed at faculty level, at the beginning of each semester, about the ethical aspects of data collection conducted for study purposes.

Dated in Veszprém, on 3rd October 2024

Dr. Péter Bartus
Executive Director

Annexes to this Policy:
Annex 1: Application for Research Ethics Approval
Annex 2: Approval of Application / Request for Additional Information / Rejection of Application
Annex 3: Privacy Notice
Annex 4: Information Notice on Data Processing and Consent Form
Annex 5: Declaration of Consent
Annex 6: Research and Publication Principles Applicable at the University of Pannonia

## Annex 1

## Application for Research Ethics Approval

The application must in all cases be submitted from the official University e-mail address of the research supervisor. The Research Ethics Committee cannot process applications submitted from a student e-mail address.

1. Name of the applicant (research supervisor)[1*]:

[1] The applicant (research supervisor) may only be a researcher holding a scientific degree (PhD, DSc or CSc). If the application is submitted by a student (BA, MA or PhD), the name of the degree-holding supervisor must be provided.

2. Academic degree*:

3. Do you have any legal relationships with the University of Pannonia[2*]:

- Yes
- No

[2] If the answer is "No", by completing this application you consent to the processing of your personal data contained in this form by the Research Ethics Committee.

4. E-mail address*:

5. Title of the research project*:

6. Title of the research project in English*:

7. Field(s) of research / scientific discipline(s)*:

8. Other researchers and students participating in the research (it is not necessary to identify individuals who will only assist with data processing or evaluation at a later stage. In such cases, the research supervisor remains responsible for data management.)*:

9. Expected start date of the research*:

10. Expected completion date of the research*:

11. Source of funding for the research (if none, please indicate this)*:

12. Purpose of the research (minimum 100, maximum 200 words)*:

13. If applicable, age group(s) of the research participants:

- Under 3 years of age
- Between 3 and 14 years of age
- Between 14 and 18 years of age
- Over 18 years of age.

14. The ability to provide consent depends on the participant's age. Please indicate below which documents are attached to the application:

Participants under 3 years of age – Where the participant is a child under the age of 3, information about the research must be provided in writing to the child's legal representative/parent/person exercising parental responsibility (hereinafter referred to as the "parent"; this term shall apply to all age groups below). The parent must provide written consent for the child's participation in the study. Please attach the Information Sheet and Consent Form intended for parents to the ethics application. If the study or participant recruitment takes place within an institution (typically a nursery), the ethics approval shall only be valid together with the written consent of the head of the host institution.

Participants aged 3–14 years – Where the participant is a child between 3 and 14 years of age, written consent shall be provided by the parent as described above, while the child shall provide verbal assent. Please attach the information and consent document intended for parents, as well as the content of the verbal or written information intended for the child. If the study or participant recruitment takes place within an institution (typically a nursery school or school), the ethics approval shall only be valid together with the written consent of the head of the host institution.

Participants aged 14–18 years – Where the participant is a minor between 14 and 18 years of age, written consent shall be provided by the parent as described above, while the minor shall provide verbal assent. Please attach the information and consent document intended for parents, as well as the content of the verbal or written information intended for the participant. If the study or participant recruitment takes place within an institution (typically a school), the ethics approval shall only be valid together with the written consent of the head of the host institution.

Participants over 18 years of age – Where participants are over the age of 18, they must be provided with written information regarding the research and its objectives and must consent to participation. If a participant is over 18 years of age but is subject to

legal proceedings affecting their capacity to act, the consent of their legal representative shall be mandatory.

Upload the Information Sheet (research information) intended for parents

Upload the Information Sheet (research information) intended for the head of the institution

Upload the Information Sheet intended for participants, or, in the case of participants aged 3–14 years, the content of the verbal information provided to the child

Upload the Privacy Notice (Annex 4)

Upload the Information Notice on Data Processing and Consent Form (Annex 5)

Upload the Declaration of Consent intended for the participant and/or parent (Annex 6)

15. How will participants be selected and recruited?

16. Location(s) of data collection*:

- Educational institution
- Archive
- Laboratory
- Public space
- Healthcare institution
- Online
- Museum collection
- Private residence/private home
- In the case of fieldwork: settlement(s)/municipality(ies)
- Other

17. Brief summary of the research procedure (maximum 200 words) (please provide a concise description of the planned data collection method rather than the theoretical background of the research.)

18. Do you intend to collect personal data during the research?*
- Yes
- No

19. Will the data collected during the research enable the identification of individuals?[3*]

- Yes
- No

[3] If you select "No", this means that the data will be collected anonymously and that no other personal data will be processed (e.g. Neptun code, image or audio recordings, e-mail address, home address, social security number, etc.). If you select "Yes", the generally applicable rules governing data processing (see Consent to Data Processing and its annexes) shall apply.

20. Which established questionnaires, tests, scales, or other measurement instruments do you intend to use (if any)?

Please upload the questionnaires and tests here (for online instruments, please provide the relevant links):

21. Will you conduct participant observation and/or experimental research?*

- Yes
- No

22. Will you conduct non-participant observation and/or experimental research?*

- Yes
- No

23. Will you conduct covert (mystery) observation research?*

- Yes
- No

24. If you answered "Yes" to one or more of the previous three questions, how will you document your observations and where will the documentation be stored?

25. What measures will you take to ensure that research participants do not suffer any disadvantage as a result of their participation?[4*]

[4] Disadvantage may be direct or indirect (ultimately financial or social/psychological in nature) and may arise from participation in the research. For example, where participants are recruited during classes or courses, it is important to clarify that refusal to participate will not place students at a disadvantage (e.g. whether they can still obtain an appropriate grade without participating in the research; if participation in research is linked to a course

requirement, whether students can choose an alternative course where participation is not required, or whether they may choose among different research projects to fulfil the relevant academic requirements).

26. Will participants receive any compensation? If yes, please specify the nature of the compensation.

27. If the results are published, how will you ensure the anonymity of participants/respondents?*

28. Will the research result in the creation of a database or archive containing personal and/or sensitive data that may be used for future research purposes or made accessible to others?*

- Yes
- No

29. If yes, how will you ensure the anonymisation of the data in the future?

30. If the data are not anonymous and participants can be identified (e.g. through archived audio or video recordings), how will you ensure the protection of personal and sensitive data in future research activities?

31. What equipment, devices or instruments will be used in the research?*

32. Please attach the relevant documentation if the research involves any health-related or other risks to participants.

33. Please describe how you will ensure the confidential handling, storage, archiving, and short- and long-term management of the collected data, and how you will prevent participants from being identifiable from the data. If participants have agreed to take part under their own names, please explain how you will ensure the protection of both the participants and their personal data. For how long, where and in what format will the collected and processed (anonymised) data be stored?*

34. Does the study involve the presentation of unpleasant or distressing stimuli?*

- Yes
- No

35. If yes, please explain how you will ensure that participants do not suffer physical or psychological harm during the study.

36. Does the study involve placing participants in uncomfortable or distressing situations?*
- Yes
- No

37. If yes, please explain how you will ensure that participants do not suffer physical or psychological harm during the study.

38. Does the study involve pain or physical discomfort?*
- Yes
- No

39. If yes, please explain how you will ensure that participants do not suffer physical or psychological harm during the study.

40. Does the study involve the participation of persons with disabilities?*
- Yes
- No

41. If yes, please explain how you will ensure that participants do not suffer physical or psychological harm during the study.

42. Does the study involve the participation of individuals with mental health conditions or individuals who may be psychologically vulnerable?*
- Yes
- No

43. If yes, please explain how you will ensure that participants do not suffer physical or psychological harm during the study.

44. Does the study involve members of social minorities (or other vulnerable groups)?*
- Yes
- No

45. If yes, please explain how you will ensure that participants do not suffer physical or psychological harm during the study.!

46. Does the study involve any risk of physical injury?*

- Yes
- No

47. If yes, please explain how you will ensure that participants do not suffer physical or psychological harm during the study.

48. Does the study involve any form of deception of participants or the partial concealment of the research objectives?*

- Yes
- No

49. If yes, please explain how you will ensure that participants do not suffer physical or psychological harm during the study.

50. Does the study involve any procedure that may, even unintentionally, cause anxiety, distress or suffering (e.g. an in-depth interview)?*

- Yes
- No

51. If yes, please explain how you will ensure that participants do not suffer physical or psychological harm during the study.

52. Special cases: Please complete this section only if the questions are relevant to your research.

    52a. If obtaining participants' prior consent is difficult (e.g. research conducted in public spaces), how do you justify the absence of prior information, and how will you ensure participants' protection, ongoing or subsequent information, and involvement?

    52b. If the research is not directly focused on individuals (e.g. document analysis, historical or archival research, research in public spaces) but involves indirectly affected persons whose personal data may be included, what ethical issues may arise (e.g. identifiability, right to respond), and how will these be addressed? If both directly and indirectly affected persons are involved, how will they be distinguished within the research?

52c. If the project is a participatory action research, briefly explain how active participant involvement will be ensured, what impact the research may have on the individuals, groups, communities, or locations involved, and whether participants will have an opportunity to comment on the research findings. If not, please explain why.

52d. Does the research have any (direct or indirect) educational implications? Does it intervene in educational processes? How might these effects influence participants (particularly children)?

52e. If archival research is conducted, how will the protection of personal data be ensured during the research and dissemination of findings? Please take into account Section 24 of Act LXVI of 1995 on Public Records, Public Archives and the Protection of Private Archival Materials.

52f. Please confirm that you acknowledge that if you intend to create a database or archive from the collected data for future research purposes (including personal and/or sensitive data), participants' specific consent must also be obtained for this purpose. Participants must be informed about the anticipated duration of data processing and the measures taken to protect personal and sensitive data.

52g. Please confirm that you acknowledge that if future research conducted on stored databases or archives involves the processing of personal or sensitive data, participants' consent must be obtained again for the subsequent research. This consent is separate from consent for storing the data. Where stored data are fully anonymised and no longer permit identification, renewed consent is not required, but ethical approval must still be obtained.

52h. Are there any additional ethical aspects of the study not covered by the questions above? If yes, please describe them briefly. If not, please indicate that there are none.*

Other requests or comments:

Thank you for completing the form.

E-mail:

## Annex 2
## Approval of Application / Request for Additional Information / Rejection of Application

The Research Ethics Application submitted on ..... (day, month, year) from the e-mail address ..... and entitled ..... is hereby approved by the REC.

Date Signature (Chair or the delegated person in the event of the Chair's absence)

In the case of the Research Ethics Application submitted on ..... (day, month, year) from the e-mail address ..... and entitled ....., the REC requests the following additions and/or clarifications:

Date Signature (Chair or the delegated person in the event of the Chair's absence)

The Research Ethics Application submitted on ..... (day, month, year) from the e-mail address ..... and entitled ..... is hereby rejected by the REC for the following reason(s):

Date Signature (Chair or the delegated person in the event of the Chair's absence)

Annex 3
Privacy Notice

Pursuant to Paragraph (1) of Article 12 of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter referred to as the GDPR), the University of Pannonia hereby provides information to data subjects regarding the processing of personal data in connection with the research project[2] entitled ...

Who will be authorised to manage/process your data?

Data controller: *(Please specify the organisational unit acting as the data controller, together with its address and, where possible, its e-mail address and telephone number. If the data are processed solely within a faculty of ..... at the University of Pannonia, it is sufficient to indicate the contact person and their contact details here. In that case, under "Data processor" below, only the software or platform used for collecting and storing the data should be specified, together with any external data processor, if applicable, who processes personal data exclusively on behalf of the data controller.)*

University of Pannonia
Registered office: 8200 Veszprém, Egyetem utca 10.
Tax number: 19310321-2-19
Institutional identification number: FI 80554

Organisational unit involved in the research:
Name of organisational unit:
Name of contact person, contact details (phone, e-mail):

Data Processor[3]:
*Please indicate here the software or platform used for the collection and/or storage of personal data.*
*Examples (please specify the platform actually used):*

*The following software or platform is used for the collection and/or storage of personal data:*
*Where Qualtrics is (also) used for the research:*
Qualtrics: for registration and/or conducting the research
address: Qualtrics LLC
333 W. River Park Drive
Provo, Utah 84604
United States of America

*Where Microsoft Office applications are (also) used for the research (e.g. Microsoft Teams, Forms, etc.):*
Microsoft: for registration and/or conducting the research
Microsoft EU Data Protection Officer
One Microsoft Place
South County Business Park

[2] THE SECTIONS HIGHLIGHTED IN GREY ARE TO BE COMPLETED BY THE DATA CONTROLLER

Leopardstown
Dublin 18
D18 P521
Ireland

*Where participants are asked to complete a questionnaire via a service provider's platform:*
In the case of Google Forms surveys:

Google LLC
1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
Platform: Google Forms (docs.google.com)
Activity: Technology company

For users of Google services residing in the European Economic Area or Switzerland, the service provider is:
Google Ireland Limited
Gordon House
Barrow Street
Dublin 4
Ireland

For users of Google services residing in the United Kingdom, the service provider is:
Google LLC
1600 Amphitheatre Parkway
Mountain View, California 94043
USA

*Where staff of another external institution or organisation are also involved in conducting the research (e.g. collecting or analysing non-anonymised data), this must be specified here.*

*Where no external software or partner is used for data collection:*
No data processor is engaged.

What will we use your data for?
The purpose of the data processing is to enable your participation in the research project entitled … conducted by the data controller, including the transfer of data following anonymisation, statistical analysis, publication of the results, and dissemination activities.

What personal data will we process? *(Please list the data to be processed. Only data that are necessary, relevant and proportionate for achieving the purpose of the processing may be collected. Examples are provided below:)*

1. full name;
2. intention to participate in the research;
3. home address;
4. an identifier selected by the participant (e.g. date of birth, mother's name, ID card number, etc.);

5. audio recording;
6. Neptun code;
7. a declaration confirming that the participant is not currently receiving treatment for a neurological or psychiatric condition and has not previously received such treatment;
8. *Please list any other relevant data to be collected (e.g. audio recordings, video recordings, etc.)*

On what legal basis do we process your data?
Your personal data are processed on the basis of your consent pursuant to Article 6(1)(a) and, where special categories of personal data are concerned, Article 9(2)(a) of the GDPR. You may withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Consent may be withdrawn by sending an e-mail to the REC.
In the case of data transfer, the recipients of the data[4]/recipient categories: No data transfer will take place.

Transfer of data to a third country[5]/international organisation: No data transfer will take place.

How long will we process your data? *(Personal data may be processed only for as long as necessary to achieve the purpose of the processing.)*
*E.g. for 1 year, 5 years, etc. following the completion of data collection.*

Your rights as a data subject (A detailed description is provided in the annex to this Notice):
1. Right to transparent information – Through this Notice, the data controller provides information about the circumstances of the processing of your personal data, including who processes your data, for what purpose, on what legal basis, for how long, what rights you have in relation to the processing, and whom you may contact with questions or complaints.
2. Right of access to your personal data – You may at any time ask the data controller whether your personal data are being processed, request comprehensive information about the processing, and obtain a copy of your personal data.
3. Right to rectification of your personal data – You may request that inaccurate personal data concerning you be corrected or that incomplete personal data be completed.
4. Right to erasure of your personal data – You may request that the data controller erase your personal data.
5. Right to restriction of processing – You may request that the data controller restrict processing of your personal data to storage only (e.g. for the establishment, exercise or defence of legal claims).
6. Right to information regarding recipients notified of rectification, erasure or restriction of processing – Upon request, you will be informed of such recipients.

[4] recipient: a natural or legal person, public authority, agency or any other body to which personal data are disclosed. Public authorities that may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients.
[5] third country: any country that is not an EEA member state. A list of EEA Member States is available at: http://konzuliszolgalat.kormany.hu/egt-tagallamok

7. Right to data portability – You may request to receive the personal data you have provided to the data controller in a structured, commonly used and machine-readable format, or, where technically feasible, request that those data be transmitted directly to another data controller. This right applies to you only in relation to data processed on the basis of consent or a contract, provided that processing is done using automated means.
8. Right to object – You may object at any time to the processing of your personal data where the legal basis for processing is a legitimate interest, the processing is done in the public interest, or it is required for the performance of a task within the context of exercising official authority vested in the data controller.
9. Right not to be subject to automated decision-making – You may request not to be subject to such a decision. Please notify us if you believe that such decision-making has occurred. If this Privacy Notice does not contain any information on automated decision-making, this right is, by its nature, not applicable.
10. Right to an effective remedy – If your rights have been infringed, you may contact the Data Protection Officer of the University of Pannonia, lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information, or seek judicial remedy before a court.

Where can you turn if you wish to exercise your rights or have questions?

To the University's Data Protection Officer

The Data Protection Officer of the University of Pannonia:
EU-Tender Gazdasági Szaktanácsadó Kft.
Company registration number: 01-09-980262
Tax number: 23830619-2-41
Registered office: 1024 Budapest, Retek utca 20.
Contact: adatvedelem@uni-pannon.hu

The Data Protection Contact Person of the University of Pannonia:
dr. Adrienn Zsargó - Legal Officer and Administrative Expert
Address: 8200 Veszprém, Egyetem utca 10.
Phone: +36 88 623 - 744
E-mail: adatvedelem@uni-pannon.hu

Further avenues of redress:

Hungarian National Authority for Data Protection and Freedom of Information

1363 Budapest, Pf. 9.
Website: www.naih.hu
Tel.: +36-1-391-1400

Judicial remedy

In Hungary, you may also bring legal proceedings before the competent Regional Court having jurisdiction over your place of residence or habitual residence, at your choice.

APPENDIX

Detailed Information on the Data Subjects' Rights and Available Remedies in Relation to Data Processing

It is important for **data subjects (hereinafter referred to as the "data subject")** to be aware of their rights and available remedies in connection with data processing, as the data controller processes personal data. **Personal data means** any information relating to an identified or identifiable natural person. Accordingly, personal data include not only a data subject's name or identification number, but also any information relating to their physical, mental or other characteristics that may enable their identification[6].

In order to exercise their rights relating to data processing, the data subject may contact the data controller, **who shall provide information** on the measures taken in response to the request without undue delay and, in any event, **within one month of receipt of the request**. Where necessary, this period may be extended by a further two months, taking into account the complexity of the request and the number of requests submitted. The data controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the request was submitted electronically, the information shall, where possible, be provided by electronic means unless the data subject requests otherwise.

## LEGISLATION USED AS A LEGAL BASIS FOR PROCESSING, PRINCIPLES AND KEY CONCEPTS

### 1. Legislation

- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter referred to as the "Info Act");
- Regulation (EU) 2016/679 of the European Parliament and of the Council (27th 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 (General Data Protection Regulation);
- Act CCIV of 2011 on National Higher Education (NHEAct).

### 2. Principles of data processing

Personal data shall be processed lawfully and transparently, ensuring fairness in the processing of personal data relating to natural persons ("lawfulness, fairness and transparency").

Personal data may be processed only for specified lawful purposes, for the exercise of rights and the fulfilment of obligations. At every stage, data processing must comply with its purpose, and the collection and processing of data must be fair and lawful ("purpose limitation").

[6] **personal data**: Article 4(1) of the GDPR: 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.

Only personal data that are indispensable and suitable for achieving the purpose of processing may be processed. Personal data may be processed only to the extent and for the duration necessary to achieve that purpose ("data minimisation" and "storage limitation").
The University shall ensure that personal data are accurate and kept up to date, taking all reasonable steps to rectify inaccurate personal data ("accuracy").
The University shall process personal data in a manner that ensures appropriate security through suitable technical and organisational measures, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage ("availability, integrity and confidentiality").

## 3. Definitions

**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, number, location data, 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 category data:**

- personal data revealing racial or ethnic origin, political opinions or political affiliation, religious or other philosophical beliefs, membership of an interest-representation organisation, or information concerning a person's sex life;
- personal data concerning health, pathological addictions, and criminal personal data.

**Consent of the data subject:** any freely given, specific, informed and unambiguous indication of the data subject's wishes by which the data subject, 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, without undue delay and in any event within one month of receipt of the request, inform the data subject whether personal data concerning him or her are being processed and, where that is the case, 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 recipients 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 ground 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 must be erased for compliance with a legal obligation under Union or Member State law applicable to the controller.

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

**Objection:** a statement by the data subject contesting the processing of his or her personal data and requesting the termination of the processing and/or the erasure of the data concerned.

**Data subject:** any identified or identifiable natural person who can be identified, directly or indirectly, on the basis of 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 designation may be provided for by Union or Member State law.

**Processor:** a natural or legal person, or an organisation without legal personality, which processes personal data on behalf of the controller under a contract concluded with the controller, including contracts required by law.

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

**Processing:** any operation or set of operations performed on personal data, regardless of the procedure applied, including in particular collection, recording, organisation, storage, alteration, use, retrieval, transmission, disclosure, alignment or combination, blocking, erasure or destruction, as well as preventing further use of the data; this also includes the making of photographs, audio or video recordings, and the recording of physical characteristics suitable for identifying a person (e.g. fingerprints, palm prints, DNA samples, iris images).

**Data transfer:** making data accessible to a specified third party.

**Disclosure:** making data accessible to anyone.

**Erasure of data:** rendering data unrecognisable in such a way that their restoration is no longer possible.

**Destruction of data:** the complete physical destruction of the data carrier containing the data.

**Data processing:** the performance of technical tasks associated with data-processing operations, irrespective of the method and tools used for carrying them out and irrespective of where they are performed, provided that the technical tasks are carried out 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 ensuring that the personal data are not attributed to an identified or identifiable natural person.

DATA SECURITY AND RIGHTS RELATING TO THE PROCESSING OF PERSONAL DATA

Right to information: The data subject may request information in writing from the controller regarding the processing of their personal data, including:
- the categories of data being processed;
- the legal basis for the processing;
- the purpose of the processing;
- the source of the data processed;
- the duration of the processing;
- the categories of persons who have had access to the data and to whom the data have been disclosed.

Right to rectification: The data subject may request in writing that the controller amend any of their personal data (for example, an email address or postal address). The controller shall comply with the request within a maximum of 30 days and shall notify the data subject in writing, using the contact details provided by the data subject.

Right to erasure: The data subject may request that the controller erase their personal data. The controller shall comply with the request within a maximum of 25 days of receipt and shall notify the data subject through the contact details provided. The controller may refuse the request if the retention of the data is required by law or by the University's internal regulations (for example, where the retention period specified in the University's records management policy has not yet expired).

Right to restriction: The data subject may request in writing that the controller restrict the processing of their personal data. Such a request may be made, for example, where the data subject believes that the controller has processed the data unlawfully, but the retention of the data is necessary for administrative or judicial proceedings initiated by the data subject. In such cases, the controller shall continue to store the personal data until requested by the relevant authority or court, after which the data shall be erased.

Right to object: The data subject may object in writing to the processing of their personal data where the processing involves disclosure or use for the purposes of direct marketing, public opinion polling, or scientific research.

Data security measures: The controller shall take all necessary measures to ensure the secure processing and storage of personal data. The processed data are stored in a highly available and reliable dedicated server environment. Physical security is ensured through 24-hour security services, an electronic access control system, and a video surveillance system.

A detailed description of the data security measures is set out in the University's Privacy and Data Protection Policy.

A more detailed explanation of the rights available to the data subject is provided below.

1. Right to transparent information (Articles 12–14 of the GDPR)
   By means of this document, the controller fulfils its obligation to provide information regarding the controller, the data protection officer, the purpose and legal basis of the processing, the duration of the processing, the rights of the data subject, and the available remedies. Where the data have not been obtained from the data subject, the controller also fulfils its obligation to provide information on the source of the data.

Upon the data subject's request, information may also be provided orally, provided that the data subject proves his or her identity.

2. Right of access by the data subject (Article 15 of the GDPR)
   The data subject may request access from the controller to the personal data relating to him or her, including a copy of the personal data undergoing processing. The data subject has the right to obtain confirmation from the controller as to whether personal data concerning him or her are being processed and, where that is the case, 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 recipients 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 this is not possible, the criteria used to determine that period;

   the right of the data subject to request from the controller the rectification or erasure of personal data concerning him or her, the restriction of processing of such personal data, or to object to such processing;

   the right to lodge a complaint with a supervisory authority;

   where the personal data are not collected from the data subject, any available information as to their source;

   the existence of automated decision-making, including profiling, and, at least in such cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

3. Right to rectification (Article 16 of the GDPR)
   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. Taking into account the purposes of the processing, the data subject shall also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

4. Right to erasure – "right to be forgotten" (Article 17 of the GDPR)
   Personal data must be erased where:
   1. the purpose of the processing no longer exists;

2. the data subject withdraws his or her consent and there is no other legal basis for the processing;
3. the processing is based on legitimate interests, or is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, and the data subject objects to the processing;
4. the processing is unlawful;
5. the personal data must be erased in order to comply with a legal obligation under Union or Member State law applicable to the controller;
6. the data were collected in relation to the offer of information society services directly to children.

5. Right to restriction of processing (Article 18 of the GDPR)
   The controller shall restrict processing at the request of the data subject where:
   1. the data subject contests the accuracy of the personal data;
   2. the processing is unlawful and the data subject opposes the erasure of the data;
   3. the controller no longer needs the personal data for the purposes of processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
   4. the processing is based on legitimate interests, or is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, and the data subject has objected to the processing.

6. Notification obligation regarding rectification, erasure or restriction of processing (Article 19 of the GDPR)
   The controller shall communicate any rectification, erasure or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. Upon request, the controller shall inform the data subject about those recipients.

7. Right to data portability (Article 20 of the GDPR)
   The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format. The data subject shall also have the right to transmit those data to another controller without hindrance from the controller to which the personal data were originally provided, where the processing is based on consent or on a contract and is carried out by automated means.
   In exercising the right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
   The exercise of this right shall not adversely affect the “right to be forgotten”.

8. Right to object (Article 21 of the GDPR)
   The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to the processing of personal data concerning him or her where such processing is based on legitimate interests, or is necessary for the performance of

a task carried out in the public interest or in the exercise of official authority vested in the controller, including profiling[7] based on those grounds. In such cases, the controller shall no longer process the personal data unless the controller 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.

9. Rights of the data subject in relation to automated decision-making (Article 22 of the GDPR)

The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

This provision shall not apply if the decision:

is necessary for entering into, or the performance of, a contract between the data subject and the controller;

is authorised by Union or Member State law applicable to the controller, which also lays down suitable measures to safeguard the data subject's rights, freedoms and legitimate interests; or

is based on the data subject's explicit consent.

In such cases, the controller shall ensure, at a minimum, the data subject's right to obtain human intervention on the part of the controller, to express their point of view, and to contest the decision.

10. Exercising legal remedies – alternative avenues available

10.1. Data Protection Officer (Articles 38–39 of the GDPR)

Data subjects may contact the Data Protection Officer regarding all matters relating to the processing of their personal data and the exercise of their rights under the GDPR (Article 38(4) of the GDPR).

Where the controller does not take action on a request submitted by the data subject, it shall inform the data subject without undue delay and, in any event, within one month of receipt of the request, of the reasons for not taking action and of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy (Article 12(4) of the GDPR).

10.2. Procedures before the National Authority for Data Protection and Freedom of Information (Articles 57–58 and 77 of the GDPR; Section 51/A(1), Sections 52–54, Section 55(1)–(2), Sections 56–58 and Sections 60–61 of the Info Act[8])

**Any person (not only the data subject) may initiate an investigation** by the National Authority for Data Protection and Freedom of Information (hereinafter referred to as the „Authority") by alleging that an infringement relating to the processing of personal data has occurred or that there is a direct risk thereof.

[7] GDPR Article 4(4) – **"Profiling"**: "Profiling" means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

[8] Info Act: Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

It is important that the notification is not submitted anonymously, otherwise the Authority may *reject* it without substantive examination. Additional grounds for rejection are set out in Section 53 of the Info Act.

The Authority's investigation is **free of charge**; the costs of the investigation are advanced and borne by the Authority. Detailed procedural rules are contained in Section 54, Section 55(1)–(2), and Sections 56–58 of the Act.

For the purpose of enforcing the right to the protection of personal data, the Authority shall, upon the request of the data subject, initiate a data protection authority procedure pursuant to Sections 60–61 of the Info Act.

10.3. Judicial remedies (Article 79 of the GDPR; Section 23 of the Info Act)

If their rights have been infringed, the data subject may bring legal proceedings against the controller. Every data subject has the right to an effective judicial remedy where they consider that their rights under the GDPR have been infringed as a result of the processing of their personal data in breach of the GDPR (see above).

Proceedings against a controller or processor shall be brought before the courts of the Member State where the controller or processor has an establishment. Such proceedings may also be brought before the courts of the Member State where the data subject has their habitual residence, unless the controller or processor is a public authority of a Member State acting in the exercise of its public powers.

In Hungary, proceedings may also be initiated, at the choice of the data subject, before the competent regional court of the data subject's place of residence or habitual residence.

In such proceedings, the data subject may claim damages and/or compensation for non-material harm from the controller:

- if the controller causes damage to another person through unlawful processing of the data subject's personal data or by breaching data security requirements, the controller shall be liable for such damage;
- if the controller infringes the data subject's personality rights through unlawful processing of personal data or by breaching data security requirements (e.g. by disclosing personal data to an unauthorised person or making it public), the data subject may claim compensation for non-material harm from the controller.

**Annex 4**

Information Sheet and Declaration on the Research and Data Processing

| | |
|---|---|
| Research project title (code): | |
| Title of the specific research topic: | |

General information about the research

| | |
|---|---|
| Name and contact details of the researcher and/or person responsible for the research (thesis supervisor/research supervisor): | |
| Organiser and funding body of the research: | |
| Purpose of the research: | |
| Method of participant selection/recruitment: | |
| Form/mode of participation: | |
| Description and explanation of the procedures; expected duration: | |
| Expected risks (inconveniences) and benefits of participation: | |

Privacy Notice

| | |
|---|---|
| General provisions | To be completed with the details of the research |
| Categories of data processed: | |
| Purpose of data processing: Personal data collected for scientific research purposes may only be used for scientific research purposes. | |
| Legal basis for data processing: | Consent of the data subject (or legal guardian). |
| Persons carrying out data processing/data handling: University staff involved in data processing shall handle, store | (Who will have access to the data?) |

| | |
|---|---|
| and destroy the data concerned in accordance with applicable legislation and the University's data protection regulations. | |
| Method of data processing:<br>The University of Pannonia conducts data processing for scientific purposes lawfully, fairly and transparently, while ensuring the rights of natural persons and limiting data retention to the period strictly necessary, thereby preventing data protection incidents.<br><br>The Data Controller shall process personal data provided in connection with the research activity exclusively for the purposes of facilitating the research and may transfer such data to third parties only with the consent of the Data Subject.<br><br>Responses provided by participants during the research will be processed in such a way that they lose their personal nature and can no longer be linked to the Data Subject.<br><br>The University stores personal data exclusively on servers under its direct physical control. Processed data may only be stored on the University's central servers, access to which is restricted to authorised staff participating in the data processing and protected by passwords. All access is logged. | How are confidentiality, data protection and privacy ensured (are there any potential limitations)?<br><br>How is participant identifiability prevented, if at all?<br><br>How and when are the data used (are they disclosed or sold to third parties)?<br><br>Is the information provided by participants subject to subsequent approval by them?<br><br>In what form are the collected data and their analysis published or disclosed to third parties (who, public audience, thesis, reviewers)?<br><br>What happens to the research results, e.g. will they be published (declaration as to whether publication with name or anonymously is permitted)?<br><br>Is paper-based data storage also used during data processing? / Is paper-based data storage not used? |

| | |
|---|---|
| Duration of data processing:<br>The possibility of linking personal data to the Data Subject must be permanently eliminated as soon as the research purpose permits. Until this occurs, data capable of identifying a specific or identifiable natural person must be stored separately. Such data may only be linked with other data where necessary for the purposes of the research. | Is retention of the research results/data planned, and what exactly does this involve (format/method and retention period)?<br><br>How and when will the data be destroyed in the future (how long must they be retained)?<br><br>The data will be retained until completion of the research / for ... years. |

Rights of the data subject and safeguards ensuring those rights

Throughout the entire period of data processing, the data subject may request information, object to the processing or transfer of their data, request the rectification or modification of their data, and may also request the restriction or deletion of their data by contacting the University's Data Protection Officer.
Name of the Data Protection Officer:
e-mail address:

Exercising legal remedies:

In the event of a complaint relating to data processing, you may contact the Hungarian National Authority for Data Protection and Freedom of Information (www.naih.hu). In cases of unlawful data processing, civil proceedings may also be initiated before the competent court (http://birosag.hu/torvenyszekek).

If the research is connected to a service provided to the participant (e.g. education or social work) and/or to their employment (e.g. workplace), the researcher must assure participants that their decision whether or not to take part in the research will have no effect on the service they receive or on their employment status.

Dated in Veszprém, on ..... 20...

.....
Signature of the researcher or research supervisor/thesis supervisor completing this Notice

I have read the Privacy Notice relating to this research project and acknowledge its contents. By signing this document, I consent to the processing of my personal data in accordance with the provisions set out in this Notice.

Dated in Veszprém, on ..... 20...

| Name(s) of the researcher(s) conducting the study[9] | Signature |
|---|---|
| | |

[9] All participants in the specific study must sign here. Additional rows may be added as required.

## Annex 5

## Consent Form

a) Consent Form for participation in research[10] (sample)

| | |
|---|---|
| Title (code) of the research project: | |
| Title of the specific research topic: | |
| Name of the researcher: | |

1. **By signing this Form, I confirm that I have read and understood the information sheet dated ..... concerning the above project/research and the related data processing.**
2. **I have been given the opportunity to consider the information provided and to ask any questions I may have had.**
3. **I understand that my participation is voluntary and that I am free to withdraw from the research at any time without giving any reason. In such a case, I may request the deletion of any data collected about me up to that point.**
4. *I understand that my data will be presented in an anonymous / non-anonymous form in any publications arising from the research.*
5. *I understand that an audio and/or video recording will be made of the interview/focus group, that the recording will be stored securely, and that it will be destroyed within ..... after the completion of the research.*
6. *I understand that my data will be accessible only to those working on the project/research; or*

   *I consent to my anonymous / non-anonymous data being stored/archived and used by other researchers (further details regarding confidentiality to be provided here).*
7. *I consent to the publication of my verbal statements and/or photographs with my name indicated / without my name being indicated.*
8. *I agree to be contacted in the future in connection with this research and/or other future research projects.*

[10] The mandatory text (shown in bold) forms the basis of the consent Form; the optional sections (shown in italics) may be amended, deleted or supplemented as appropriate.

I consent to participate in the above project/research.[11]

Dated in ....., on .....

| Participant's name | Date of birth | Signature |
|---|---|---|
| | | |

I confirm that I have provided full information about the research and have received the Declaration.
Dated in ....., on .....

| Researcher's name | Signature |
|---|---|
| | |

b) Parent/Guardian Consent Form

| | |
|---|---|
| Title (code) of the research project: | |
| Title of the specific research topic: | |
| Name of the researcher: | |

By signing this Form, I confirm that I have read and understood the Privacy Notice, that I have received adequate information regarding the purpose and procedures of the research, and that I have been given the opportunity to consider the information provided and to ask any questions I may have had.

Should you have any further questions concerning the study, please contact the researcher or the designated representative of the organisation conducting the research using the contact details provided below (e.g. e-mail address).

Please indicate whether you consent to your child participating in the research programme and kindly return this declaration to the researcher or to the designated representative of the organisation conducting the research (e.g. your child's class teacher).

[11] If the participant does not have full legal capacity (e.g. is under 18 years of age), the declaration of the parent or legal guardian is also required. Please ensure that this section is completed as well.

☐ I consent to my child / the person under my guardianship named ..... participating in the research programme.

☐ I do not consent to my child / the person under my guardianship named ..... participating in the research programme.

Dated in ....., on .....

| Name of parent/guardian | Signature |
|---|---|
| | |

## Annex 6

## Research and Publication Principles Applicable at the University of Pannonia

### CHAPTER ONE

### GENERAL PROVISIONS

1. §

(1) This Policy, in conjunction with the Regulation and Rules of Procedure of the Research Ethics Committee, sets out the principles governing research and publication.

(2) This Policy is based on the following document: the Code of Research Ethics of the Hungarian Academy of Sciences, adopted by the General Assembly of the Hungarian Academy of Sciences under Resolution No. 25/2010 (V. 4.).

(3) The personal scope of this Policy extends to:

e) lecturers and researchers employed by the University or otherwise engaged by the University under a work-related legal relationship, who carry out their activities within the institutional framework of the University;

f) persons participating in scientific research or teaching conducted in cooperation with the University;

g) persons holding student status at the University, as well as participants in doctoral programmes and doctoral degree-awarding procedures (hereinafter collectively referred to as: “student”).

(4) The material scope of this Policy extends to scientific research and development activities carried out at the University of Pannonia, including basic research, applied research and experimental development.

### ETHICAL PRINCIPLES OF SCIENTIFIC RESEARCH

2. §

The most important ethical principles of scientific research, which researchers consider binding upon themselves and advocate towards the wider community, may be described as follows:

(1) Integrity in presenting scientific objectives and research intentions, in accurately describing scientific methods, procedures and well-founded interpretations, and in clearly identifying the opportunities, risks and legitimate expectations arising from the application of research findings.

(2) Reliability in conducting research, recording and storing data, and reporting data. The elimination of negligence and carelessness. Comprehensive reporting on the implementation and results of research.

(3) Objectivity, whereby interpretations and conclusions may be based only on facts or on impartial and logical evidence, as well as on data whose accuracy is verifiable, at least in principle.

(4) Impartiality and independence from any interested party or group interest, ideology or political pressure, and from economic or financial influence.

(5) Openness in discussing results with other researchers and in publishing findings, thereby contributing to the advancement of shared knowledge. Openness presupposes the publicity and accessibility of the data supporting the results published in scientific publications for all interested researchers and for the public. In justified cases, this principle may be limited by specific considerations arising from the nature of the research (e.g. intellectual property protection, personal rights, etc.). Openness is also necessarily limited during ongoing research projects.

(6) Due care towards research participants and research subjects, whether they are human beings, experimental animals, the environment or products of culture. Research involving humans and animals must always be based on procedures, respect and consideration, which are in most cases also prescribed by law.

(7) Impartiality in presenting the work of others and in providing references. The professional integrity of fellow researchers must be respected, and their results must be treated honestly.

(8) Responsibility towards future generations of scientists: the supervision and education of young researchers require particular attention, the transmission of ethical standards, and an enhanced commitment to their observance.

(9) Selfless and impartial participation in scientific public life, including peer-review processes and the work of scientific bodies and committees.

## PUBLICATION PRINCIPLES OF SCIENTIFIC RESEARCH

### 3. §

The primary forum in which a researcher reports and disseminates research findings is a scientific publication produced in a form accepted within the relevant discipline and subject to an independent peer-review process.

(1) Scientific publications: Only works published in recognised scientific journals or books, whether in print or electronic form and having an independent editorial board, may be regarded as scientific publications. Research findings may be deposited in internationally recognised repositories prior to publication, but such deposits do not constitute scientific publications. It is a breach of research ethics to present a non-scientific work (e.g. a popular science article, a publication appearing in a non-academic outlet, teaching materials, etc.) as a scientific publication.

(2) Completeness and impartiality: Research findings must be published impartially and in their entirety. Publications must include a description of the methods used in experiments and investigations, or appropriate references to the relevant literature. Experimental error and the limitations of the methods applied must also be reported. Potential hazards arising during the conduct of experiments must be highlighted. Arbitrary selection of data is unacceptable, and results that are inconsistent with the conclusions must not be concealed.

(3) Proper citation: Researchers should strive to provide the broadest possible citation of the essential antecedents of their work and, where possible, comprehensive references to scientific publications addressing disputed issues. It is a breach of research ethics to appropriate another person's idea, method or data through incomplete citation.

(4) Authorship of publications: Any person who has made a significant contribution through their scientific work to the design and implementation of experiments, and to the evaluation and verification of the results, must be listed as an author. Holding a position within an institution or research unit, or contributing to the funding of the research, does not in itself justify authorship. Honorary authorship is not permitted. In publications involving multiple authors and substantially different experimental procedures, efforts should be made to ensure that the contribution of each author is clearly identifiable. A corresponding author may be designated only with the agreement of all co-authors. This role may be assigned only to a person who played a determining or coordinating role in the preparation of the manuscript.

(5) It is not considered good practice to publish the same specific research findings in several separate publications solely for the purpose of increasing the number of a researcher’s publications. An exception may be made where the original article was published in a foreign language. In such cases, subject to compliance with copyright requirements, publication of a Hungarian-language version is also desirable in order to make the findings accessible to a wider domestic professional audience and to support the development of Hungarian scientific terminology. Accepted practices of republication within particular disciplines may likewise constitute exceptions.

(6) Corrections: If, during the course of research, it becomes apparent that previously published data or conclusions are incorrect or erroneous, the author(s) must make this known without delay, preferably in the journal in which the original paper appeared. In the case of a multi-author publication, initiating the correction is the responsibility of the first author. When issuing a correction, particular care should be taken, especially in relation to the naming of authors, to avoid unjustifiably implying that any individual engaged in conduct contrary to research ethics. If one of the authors of the original publication is not included in the correction notice, the reason for this omission must be clearly stated.