Pannon Egyetem
University of Pannonia

Information Transfer Regulation

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Person responsible for the maintenance of this Regulation: Data Protection Officer of the University of Pannonia
Version number: 00

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* if the entry into force of the rules is subject to adoption by the Board of Trustees

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The Information Transfer Regulation (hereinafter referred to as: “Regulation”) issued by the University of Pannonia, acting as a body cooperating in electronic administration, (hereinafter referred to as: ”University”) on the basis of the University’s Organisational and Operational Rules (hereinafter referred to as: “OOR”), Part I Organisational and Operational Rules of Procedure (hereinafter referred to as: “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: “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 1
General Provisions

1. §
Aim of this Regulation

(1) The aim of this Regulation is to ensure the lawful operation of the University, as a public body designated for cooperation under Article 15 of Government Decree No. 322/2024 (XI. 6.) on the detailed technical requirements of digital services, digital citizenship services, and supporting services, by defining the rules governing the exchange of information.

2. §
Scope of this Regulation

(1) The scope of this Regulation shall extend to all information transfers subject to the Digital State Act (DSAct) and conducted by all the faculties, comprehensive organisational units and organisational units of the University.

(2) This Regulation shall apply to the communication, the transfer of information, the administration of matters involving the transfer of information and to IT cooperation in the course of procedures among the University, the bodies providing electronic administration services and the bodies designated by the Government to perform public functions (hereinafter referred to as: “cooperating bodies”).

(3) The scope of this Regulation shall extend to all the faculties, comprehensive organisational units and organisational units of the University, as well as to all the

employees and persons having any other form of employment relationship with the University.

3.§
Applicable legislation

(1) In drafting this Regulation, the following documents, laws and regulations were taken into account, in particular:

a) Act CIII of 2023 on the Digital State and on Certain Rules Governing the Provision of Digital Services (hereinafter referred to as: "DSAct");
b) Government Decree No. 322/2024 (XI. 6.) on the detailed technical requirements for digital services, digital citizenship services and supporting services;
c) Decree No. 3/2018 (II. 21.) of the Ministry of Interior on the requirements for document management software applicable to public bodies;
d) Regulation (EU) 2018/1724 of the European Parliament and of the Council amending Regulation (EU) No 1024/2012;
e) Regulation (EU) No 910/2014 of the European Parliament and of the Council on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC (hereinafter referred to as: "eIDAS Regulation");
f) Act LXVI of 1995 on Public Records, Public Archives, and the Protection of Private Archival Material (hereinafter referred to as: "PAAct");
g) Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as: "InfoAct");
h) Act CLV of 2009 on the Protection of Classified Information;
i) Government Decree No. 335/2005 (XII. 29.) on the general requirements of records management by public bodies;
j) Decree No. 27/2015 (V. 27.) of the Ministry of Human Capacities on the professional requirements related to the activities of public and private archives;
k) Government Decree No. 90/2010 (III. 26.) on the operation of the National Security Authority and the rules governing the handling of classified information;
l) Act CCIV of 2011 on National Higher Education (hereinafter referred to as: "NHEAct");
m) Government Decree No. 87/2015 (IV. 9.) on the implementation of certain provisions of Act CCIV of 2011 on National Higher Education (hereinafter referred to as: "ImpAct");
n) Act I of 2012 on the Labour Code (hereinafter referred to as the "Labour Code").

Chapter 2
General Part – Basic Information about the University and the Information Transfer Regulation

4.§
Basic data for information transfer

(1) Basic data of the University

Official full name	University of Pannonia
Tax number	19310321-2-19

(2) Basic data of the Information Transfer Regulation

Indication of the uniform/specific nature of the Information Transfer Regulation	
Uniform	Specific

(3) Basic data of a Uniform Information Transfer Regulation

Title of the Uniform Information Transfer Regulation	-
Name of the body issuing the Uniform Information Transfer Regulation	-
Version	-
Date of issuance	-
Effective date	-

(4) Basic data of a Specific Information Transfer Regulation

Title of the Specific Information Transfer Regulation	Information Transfer Regulation
Version	4 (the difference in the version number on the cover page is justified by the provisions of Joint Directive No. 7/2024 (IX.09.) of the

	Rector and Chancellor on the regulation of the University's codification activities)
Date of issuance	25th September 2025
Effective date	1st October 2025
The approval of the head of the public administration body/national chamber in charge is required	Yes/No

(5) The public bodies designated by the Government for cooperation are higher education institutions.

(6) The cooperating bodies shall obtain the information generated by another cooperating body or already obtained by another cooperating body in the course of dealing with customers in matters within their scope of duties and competence and in matters which are necessary for the use, waiver or modification of their services to be provided by law, or necessary for the performance of their duties, as well as the decision or statement of the cooperating body necessary for the handling of the matter from that cooperating body in electronic form.

(7) The cooperating bodies shall communicate with each other electronically.

(8) Cooperation may not be subject to the payment of a fee or other consideration.

Chapter 3
Special Part – Data of registers and the related data transfer interfaces

5. §
The University's fields of expertise (case groups)

(1) The University, as a higher education institution, maintains records (student records) containing data managed in accordance with Article 11 of Act CCIV of 2011 on National Higher Education (hereinafter: "NHEAct"), as listed in detail in Annexes 3 and 6 of the NHEAct, which also define the conditions for the transmission of such data.

(2) The University, as a public body, maintains electronic records (electronic register) of incoming requests and the decisions made within the University in an electronic document

management system designed for the registration of public documents, in accordance with Act LXVI of 1995 on Public Records, Public Archives and the Protection of Private Archival Material (hereinafter: "PAAct"), Government Decree No. 335/2005 (XII. 29.) on the general requirements for the document management of public bodies, and Decree No. 3/2018 (II. 21.) of the Minister of the Interior on the requirements for document management software applicable to public bodies.

(3) The University, as a higher education institution, may, upon request, conduct first-instance administrative procedures (recognition or nostrification procedures) as defined in Act C of 2001 on the Recognition of Foreign Certificates and Diplomas.

(4) The University, as an employer, maintains personnel records of individuals employed under an employment relationship, in accordance with the Labour Code.

6. §
The University's special fields in higher education (student records), content of the register of information sources

(1) In accordance with Article 15 of Government Decree No. 322/2024 (XI. 6.) on the detailed technical requirements of digital services, digital citizenship services, and supporting services, the University is designated as a public body responsible for cooperation under Part Four of the DSAct. As such, pursuant to Section (6) of Article 2 of the NHEAct, the University provides data to the Higher Education Information System (hereinafter: "HEIS") or to other systems specified by law.

(2) With regard to the data recorded in the HEIS, the University provides an automatic information transfer service via the Central Government Service Bus (hereinafter referred to as "CGSB") in accordance with the provisions set out by law, or uses such a service as a central service provided by the CGSB operator. Within this framework, the University ensures the possibility of transferring certain data contained in the HEIS register through automatic information exchange.

(3) The personal and special data stored and processed by the University, the conditions of data transfer and the duration of data processing are specified in Annex 3 of the NHEA:

a. the data of the employees according to Section I/A of Annex 3 of the NHEA;

b. the data of students related to their admission and student status in accordance with Section I/B of Annex 3 of the NHEA;

c. the registration of student events in accordance with Section 1 of Annex 6 of the NHEA;

d. records necessary for eduID federated identification.

(4) The processing of data is carried out for the purposes set out in Section (1) of Article 18 of the NHEA.

(5) The documents that the University is obliged to manage in the course of its higher education activities are defined in Section (1) of Article 35 of the ImpDec.

(6) The University implements record-keeping and information transfer through the Neptun Unified Education System.

(7) The University does not process certified public data in its records. Documents containing decisions made within its scope of authority are stored in its document management system.

(8) The subject areas of substantive decisions arising from the exercise of the cooperating institution's powers under the NHEAct include:

a. matters related to student liability,
b. matters related to the establishment and termination of student status,
c. matters related to studies and examinations.

(9) The subject areas of substantive decisions arising from the exercise of the cooperating institution's powers under Act C of 2001 on the Recognition of Foreign Certificates and Diplomas include:

a. matters related to the nostrification of foreign certificates and diplomas within the competence of higher education institutions,

b. matters related to the recognition of foreign certificates and diplomas within the competence of higher education institutions,

c. matters related to the credit transfer of foreign partial studies within the competence of higher education institutions.

(10) A list of the records kept by the University by case group is set out in Annex 1.

7.§
Records and information transfer covering a specific set of data on persons in employment relationship

(1) The register maintained on employees (hereinafter referred to as "personnel records") contains information regarding the personal data of employees as defined in employment-related legislation.

(2) The University maintains this register through the operation of the Nexontime human resource management software.

8.§
Electronic registry and information transfer

(1) For the performance of its tasks, the University uses the Poseidon DMS system for the comprehensive registration of incoming requests, decisions and other official documents generated by the University, in accordance with the PAAct, Government Decree 335/2005 (XII.29) on the general requirements for document management of public bodies, and Decree 27/2014 (IV.18) of the Ministry of Information and Innovation on the requirements for document management software applicable to public bodies. The classification of cases and documents (including requests and decisions) by subject matter and item number is contained in the University's Archiving Plan currently in effect.

9.§
Interfaces and services for information transfer

(1) The University shall provide data to the HEIS in accordance with the provisions of the NHEA and the ImpDec.

(2) The communication between the cooperating bodies under the DSAct may only be possible by means of secure electronic communication that ensures the identity of the sending party, the integrity of the communication delivered, the proof of delivery of the data transferred and the identification of the date of delivery. Exceptions to this rule shall be made where

a. delivery is not subject to any legal consequence;

b. electronic communication is for information purposes.

(3) The University shall fulfil its obligation to maintain secure electronic communication through the Office Portal.

(4) In other respects, the University shall comply with its publication obligation as provided for in the InfoAct.

(5) The contact point for secure electronic communication between the University and the cooperating bodies is the service address ensuring secure delivery. The University may provide personal data from its records only in cases and to persons specified by law.

(6) The University shall ensure the electronic identification of the person making a statement in the communication delivered, the integrity of the communication, the proof of delivery of the communication and the identification of the date of delivery in the course of the communication with the cooperating bodies.

(7) The University shall provide for communication by delivery to a secure electronic contact. The communication shall be deemed to be delivered on the working day following the day on which it is sent.

(8) The University transfers information to the University and the HEIS records.

(9) The University does not ensure the availability of the IT cooperation service (data transfer).

(10) The authenticity of the information transmitted shall be ensured in accordance with the rules laid down in the applicable record-keeping systems.

(11) Description of initiating the transfer of information in the event of a change of primary data: the University, as the primary source of information, shall initiate the transfer of information in the event of a change of information to the cooperating body which received the information from it for its legally established records.

(12) ID1-ID5 electronic information transfer interface, technical description of the service
Nature of data in this chapter: public / non-public

If "non-public", the reason: Not public because the University may process these data for the purposes specified in Section (1) of Article 18 of the NHEA and may transfer them pursuant to Section (2) of Article 18.

(13) The University's information transfer interfaces:

Identification	Form of cooperation	Frequency	Public / Non-public	If "Non-public", reasons:
unique identifier of the interface or service (ID1,...,ID5)	• simple, • automatic	• real-time, • recurrent (periodic, with the period specified), • event-based, • one-off/repetitive		
ID1 (NEPTUN)	simple	event-based	Non-public	I/B Annex 3 of NHEA
ID2 (EIiR)	simple	event-based	Non-public	I/A Annex 3 of NHEA
ID3 (e-company gateway)	simple	event-based	Non-public	I/A-I/B Annex 3 of NHEA
ID4 (official portal)	simple	event-based	Non-public	I/A-I/B Annex 3 of NHEA Ad hoc data reports requested from the University, from other cooperating organisations
ID5 (eduID)	simple	event-based	Non-public	eduID Principles
ID6 (HEIS)	simple	periodic, monthly data provision	Non-public	Ad hoc data provision required by the law

(14) General information on the information interfaces through which the cooperating body can provide information:

Identification	Form of cooperation	Frequency	Public / Non-public	If "Non-public", reasons:

electronic educational administration system – Neptun – **data reporting to the HEIS**	simple	recurrent, event-based, repetitive	Non-public	data are entered into the HEIS
Office Gateway	simple	event-based	Non-public	transfer of information between parties

10. §
Conditions for requesting the transfer of data and fulfilling such requests

(1) The University's identifiers for secure electronic communication via the Office Gateway:

The contact details of the University of Pannonia for electronic communication: the official portal of the University of Pannonia.

a) Official contact details (general matters)::

- *name of the institution: University of Pannonia*
- *abbreviated name: UNIPANNON*
- *KRID: 452217787*

b) Official contact details (educational matters):

- *name of the institution: University of Pannonia*
- *abbreviated name: UNIPEOKTIG*
- *KRID: 762503715*

(2) The administrator of the University's Office Gateway shall check the mail sent to the contact details listed in Section (1) on every working day and forward the request or data to the head of the competent organisational unit who is entitled to register the data concerned, make the necessary decision and send the communication. The head of the organisational unit responsible for the management of the office gateway shall designate the person(s) responsible for the management of the Office Gateway. Their duties in this respect shall be set out in their job description.

(3) When communicating electronically, the University shall ensure the electronic identification of the person sending the communication in the mail, the integrity of the content, proof of delivery of the communication, and the identification of the time of delivery.

(4) The scope of the data that can be transferred to the HEIS is laid down in the NHEA, and the data shall be transferred via a special interface.

(5) Conditions for data transmission:

a) With the exception of the data listed in paragraph cm) of Section 1 of Annex 3 of the NHEA, employee data may be transmitted:

aa) to the operator: all the data, to the extent necessary for the exercise of the rights of the operator;

ab) to social security, salary and wage or other benefit pay-office: all data required to calculate and claim salaries, wages or other benefits or establish entitlement;

ac) to the body responsible for the operation of the higher education information system: any data that may be processed by the higher education information system under this Act;

ad) to the Hungarian Accreditation Committee (HAC): any information necessary to enable the HAC to determine whether the conditions for the operation of the higher education institution are met;

ae) to the court, the police, the public prosecutor's office, the court bailiff's office or public administration body: data necessary for deciding on a specific case;

af) to those entitled to monitor compliance with employment regulations: data relating to employment;

ag) to the National Security Service: all the data necessary to perform the tasks as defined in Act CXXV of 1995 on National Security Services (hereinafter referred to as: "NSSAct");

ah) to the students and employees of the higher education institution: the results of the students' assessment of the teaching performance in the manner specified in the relevant institutional regulations;

ai) to requestors: data which, pursuant to Article 28 of Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter referred to as: "InfoAct"), classify as data of public interest under Section (3) of

Article 26 of the InfoAct and which are necessary to comply with the request for access to data made to the higher education institution.

b) Student data may be transmitted:

ba) to the operator: all the data necessary for carrying out the tasks related to the management of operations;

bb) to the court, the police, the public prosecutor's office, the court bailiff's office or public administration body: data necessary for deciding on a specific case;

bc) to the National Security Service: all the data necessary to perform the tasks as defined in the NSSAct;

bd) to the body responsible for the operation of the higher education information system: any data;

be) to the Student Loan Centre: in relation to students applying for student loans;

bea) the data pursuant to paragraphs ba) and bb) of Section 1. b) of Annex 3 of the NHEA – in the case of non-Hungarian citizens, except for the title of residence in Hungary as well as the name and number of the document entitling to residence and the document certifying the right of residence, and the assessment of the student's studies, examination results and the loan period applied for,

beb) pursuant to Section 1. f) of Annex 3 of the NHEA, for the purpose of determining the amount actually payable by the student to the institution as a student contribution, of assessing eligibility to a student loan or termination thereof and of deciding on the existence or suspension of repayment obligations,

bec) data pursuant to paragraphs ba) and bk) of Section 1. b) of Annex 3 of the NHEA – with the exception of the social security number – for the purpose of contacting and managing customers to exercise rights and fulfil obligations arising from the loan agreement,

bed) data pursuant to paragraphs ba) and bb) of Section 1. b) of Annex 3 of the NHEA, with the exception of the student's academic assessment, examination results and the loan period applied for,

bee) pursuant to paragraph bl) of Section 1. b) of Annex 3 of the NHEA, data concerning the pre-degree certificate and the final examination (doctoral thesis) for the risk analysis of the expected repayment of student loans and for risk-based customer management;

bf) to the body responsible for registering the conditions for the Hungarian state scholarship: with respect to the study programme and the student status.

(6) The University shall provide access to an Office Gateway for the transfer of information.

(7) The University shall inform the cooperating bodies and the Electronic Administration Supervisory Authority at least 5 days in advance of any pre-planned technical activities that will result in limiting or hindering IT cooperation.

11. §
Ensuring the authenticity of the information transferred

(1) Data checking procedures vary from query to query. Validations adapted to the expected results of each query are built into the process.

(2) Data cleansing, if necessary, is performed immediately after the data query connected to the information transfer process has been completed. The purpose of data cleansing is to improve the quality of the data.

12. §
<ID1> -<ID6> electronic information transfer interface, description of the rules of service

(1) If this Regulation is amended, the amendment shall be published on the University's website.

(2) The information transfer service may be terminated on the basis of statutory provisions.

13.§
Technical description of the electronic information transfer interface and service

(1) Nature of the data in this chapter: public / non-public.

a. Non-public: HEIS data reporting, data reporting via the Office Gateway.

b. Public: the provision of data pursuant to the InfoAct and other information made public in connection with the University's activities pursuant to the relevant legislation.

14.§
Scope and description of the data and information that can be transmitted via the electronic information transfer interface

(1) The University shall operate an electronic educational system (Neptun) in accordance with the provisions of the ImpDec.

(2) HEIS data transfer: the content and form of HEIS data transfer is regulated by the Educational Authority and it covers the data that can be stored and transmitted to the HEIS system pursuant to Section II of Annex 3 of the NHEA and Annex 6 of the ImpDec.

(3) Office Gateway: all data recorded and transmittable in the appropriate format.

Chapter 4
Interpretative Provisions

(1) Automatic information transfer: the transfer of information by the cooperating body transferring the information in a way that does not require human intervention;

(2) Automatic information transfer interface: a technical solution for the automatic transmission of information, established and operated by the cooperating body transferring the information;

(3) Internal records: records which are kept solely for the purposes of the body keeping them, for the performance of its own tasks and control activities, and which are not intended to provide data to third parties and are not considered as a source of information for third parties;

(4) Secure delivery service: a delivery service that ensures that all of the following conditions are met in relation to the delivery of an electronic mail item:

a. if the message received from the sender has been made available to the addressee in unaltered form, the sender must have proof of this in an electronic document provided with at least an advanced security electronic signature,

b. the message and the document serving as a proof of delivery cannot be altered undetectably, either during or after delivery,

c. the recipient of the message must be the addressee or an authorised substitute recipient and the identity of the actual recipient must be evidenced by a document relating to the receipt,

d. the sender also has documentary evidence (acknowledgement of receipt) of the failure to deliver within the time limit; the certificate shall state the date of the failure and, if identifiable, the reason for the failure;

(5) Simple information transfer: a transfer of information between cooperating bodies, where the transfer does not constitute an automatic transfer of information;

(6) Electronic identification: the process defined in Section 1 of Article 3 of the eIDAS Decree;

(7) Electronic information system: the set of tools (environmental infrastructure, hardware, network and data carriers) and software used to manage data and information;

(8) Body providing electronic administration:

a. state administration bodies,

b. local governments,

c. other legal entities authorised by law or a government decree to exercise the powers of an administrative authority,

d. the National Office for the Judiciary and the courts,

e. Commissioner for Fundamental rights,

f. public prosecutor's office,

g. notaries public,

h. court bailiff's office,

i. public bodies other than wine communities,

j. public utility providers,

k. legal entities performing public functions or providing public services that are required by law or government decree to use electronic administration; and

l. legal entities not covered by subsections a) to k), which voluntarily undertake the electronic administration of specific matters under this Act, provide such electronic administration in accordance with the conditions set out in this Act and shall notify the Electronic Administration Supervisory Authority thereof.

(9) Information transfer: the transfer and receipt of information between cooperating bodies;

(10) Information transfer service: a service whereby a cooperating body transfers data or documents to another cooperating body by simple or automatic transfer of information;

(11) Source of information: the legal entity in possession of a specific piece of information;

(12) Legal representative: a lawyer, law firm or legal counsels acting on behalf of a client, unless otherwise provided by law;

(13) Body performing public functions: a body which performs public functions as defined by law;

(14) Classified data: classified data as defined in the Act on the Protection of Classified Data;

(15) Qualified trust service: a service as defined in Section 17 of Article 3 of the eIDAS Regulation;

(16) Qualified trust service provider: a service within the meaning of Section 20 of Article 3 of the eIDAS Regulation;

(17) Qualified electronic signature: a signature specified in Section 12 of Article 3 of the eIDAS Regulation;

(18) Customisable electronic administration user interface: an online application which is provided by a service provider designated by law, can be personalised by the customer and which provides a uniformly accessible opportunity for the identified customer to make statements, perform procedural acts and other obligations required for electronic administration and use the electronic administration services available to the customer;

(19) Service policy: a statement by the trust service provider regarding the detailed procedural or other operational requirements for the provision of certain trust services;

(20) Subject of a certificate: a person with the identity or attributes certified in the certificate by the trust service provider, in particular, the signatory in the case of an electronic signature certificate;

(21) Certificate: an electronic signature certificate, an electronic seal certificate and a website authentication certificate, as well as any electronic attestation issued by a service provider as part of a trust service, which contains the validation data for the certificate and the data related to the use of the certificate and which is reliably protected against forgery by technologies available at the time of issuance and during its validity period;

(22) Durable data-storage medium: a device which enables the recipient to store the data addressed to him permanently for a period of time adequate for the purpose for which the data were intended and to display the stored data in an unchanged form and content. Such

devices include, in particular, USB keys, CD ROMs, DVDs, memory cards and computer hard drives;

(23) Natural person: a natural person acting as a non-business entity within the meaning of the Act on the Civil Code;

(24) Natural person certificate subject: a natural person specified in a certificate, regardless of whether the certificate also certifies his or her power to represent or his or her relationship with a non-natural person;

(25) Client: a person or other legal entity, other than an electronic administration body or a member or employee of a proceeding electronic administration body, who participates in a matter within the functions and powers of an electronic administration body as, or as a representative of, a client, party, subject to the proceeding, other participant in the proceeding.

Chapter 5
Final Provisions

(1) This Regulation shall be published and made public by the University on its website (www.uni-pannon.hu).

(2) This Regulation shall enter into force on 1st October 2025.

(3) When this Regulation enters into force, the regulation approved by Senate Directive No. 37/2023. (II.16.) of 16th February 2023 shall be repealed.

(4) This Regulation was adopted by the Senate at its meeting of 25th September 2025 by Resolution 141/2025. (IX.25.).

(5) Annexes to this Regulation: Annex 1 - List of Records Kept by the University by Case Group

Place and date: Veszprém, 25th September 2025

Dr. János Abonyi
Rector

Zsolt Csillag
Chancellor

Approved on behalf of the Foundation for the University of Pannonia, acting as operator:

Dated in Veszprém, 30th September 2025

Dr. Péter Bartus

Executive Director