

## **DATA MANAGEMENT INFORMATION FOR**

### **Respondents of the survey related to the alumni questionnaire prepared by the University of Pannonia**

The University of Pannonia, LimeSurvey GmbH as joint data controllers, pursuant to the General Data Protection Regulation 2016/679 of the European Parliament and of the Council ("GDPR") and Act CXXII of 2011 on the Right to Information Self-Determination and Freedom of Information ("Act on Information"), informs the respondents of survey related to the alumni questionnaire prepared by the University of Pannonia ("Data Subject") about the circumstances of the processing of personal data:

#### **1.THE DATA CONTROLLERS**

##### **1.1. Name: University of Pannonia**

**Institutional Identifier: FI80554**

**Headquarters: 8200 Veszprém, 10. Egyetem Street**

**Website: [www.uni-pannon.hu](http://www.uni-pannon.hu)**

Correspondence office name: Institute for Hungarian and Applied Linguistics

Address for correspondence office: 8200 Veszprém, Wartha Vince street 1., Building „N”, 2nd floor., Office 221.

Email: [batyi.szilvia@htk.uni-pannon.hu](mailto:batyi.szilvia@htk.uni-pannon.hu)

Telephone number: +36 88 624 6238

Correspondence office name: Directorate of International Relations and Communication

Address for correspondence office: 8200 Veszprém, Wartha Vince street 1., Building „E”.

Email: [pr@uni-pannon.hu](mailto:pr@uni-pannon.hu)

Telephone number: +36 88 624 030

Data Protection Officer at the University of Pannonia:

EU-Tender Gazdasági Szaktanácsadó Kft.

Company registration number: 01-09-980262

Tax number: 23830619-2-41

Registered office: 1024 Budapest, 20. Retek Street

Contact: [adatvedelem@uni-pannon.hu](mailto:adatvedelem@uni-pannon.hu)

Data Protection Contact of the University of Pannonia:

Adrienn Zsargó - Legal Expert, Legal Lecturer

Contact: 8200 Veszprém, 10. Egyetem Street

Phone: +36 (88) 624-000 /6234

E-mail: [adatvedelem@uni-pannon.hu](mailto:adatvedelem@uni-pannon.hu)

*Data controller defined in 1.1. is eligible for contacting concerned persons.*

**1.2.** The University of Pannonia manages the voluntary given personal data using an additional data controller due to online questionnaire.

**Company name: LimeSurvey GmbH**

**Headquarters: Papenreya 63, 22453 Hamburg**

**E-mail address: [info@limesurvey.org](mailto:info@limesurvey.org)**

**Phone number: +49 40 22660066** (*not for support – paid telephone support on request*)

## **2. THE LEGISLATION, PRINCIPLES AND CONCEPTS UNDERLYING DATA PROCESSING**

### **2.1. Legislation**

- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter referred to as the "Infotv.")
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation, GDPR)

### **2.2. Principles of data management**

Personal data must be processed in a lawful and transparent manner, ensuring that natural persons are treated fairly with regard to the processing of personal data relating to them ("lawfulness, fairness and transparency").

Personal data may only be processed for specified lawful purposes, for the exercise of a right and the performance of an obligation. At all stages of processing, the purpose of the processing must be fulfilled and the collection and processing of data must be fair and lawful ("purpose limitation").

Only personal data which is necessary for the purpose of the processing and is adequate for the purpose of achieving that purpose may be processed. Personal data may be processed only to the extent and for the time necessary for the purposes for which they are collected ("data minimisation principle" and "limited storage").

The University must ensure that personal data is accurate and up to date, bearing in mind that inaccurate personal data is corrected ("accuracy").

The University should process personal data in such a way as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage ("availability, integrity and confidentiality"), by implementing appropriate technical or organisational measures.

### **2.3. Basic terminology**

**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, 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.

**Special Data:**

(a) personal data revealing racial or ethnic origin, nationality, political opinions or political party affiliations, religious or other philosophical beliefs, membership of an interest group or membership of a representative body, sex life;

b) personal data concerning health, pathological addiction and personal data concerning criminal offences.

**Consent of the data subject:** a freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she signifies, by a statement or by an act expressing his or her unambiguous consent, that he or she gives his or her consent to the processing of personal data concerning him or her.

**Information:** the controllers shall inform the data subject, without undue delay and in any event within one month of receipt of the request, whether or not his or her personal data are being processed and, if such processing is taking place, the data subject shall have the right to obtain access to the personal data and to the following information:

- purposes of the processing;
- categories of personal data concerned;
- the recipients or categories of recipients to whom or with whom the personal data have been or will be disclosed, including in particular recipients in third countries or international organisations;
- where applicable, the envisaged duration of the storage of the personal data or, where this is not possible, the criteria for determining that duration.

**Correction:** the data subject is entitled to have inaccurate personal data relating to him or her corrected by the controller without undue delay upon request.

**Deletion:** the data subject shall have the right to obtain from the controllers the erasure of personal data relating to him or her without undue delay, and the controllers shall be obliged to erase personal data relating to him or her without undue delay, if:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- the data subject withdraws his or her consent and there is no other legal basis 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 in order to comply with a legal obligation under Union or Member State law to which the controllers is subject.

**Restriction:** the data subject has the right to obtain, at his or her request, the restriction of processing by the controllers - indicating the personal data stored - in order to limit their future processing.

**Objection:** a statement by the data subject objecting to the processing of his or her personal data and requesting the cessation of the processing or the erasure of the processed data.

**Data subject:** any specified natural person who is identified or can be identified, directly or indirectly, on the basis of personal data.

**Data controller:** a natural or legal person, public authority, agency or any 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 the processing are determined by Union or Member State law, the controller or specific criteria for the designation of the controller may also be determined by Union or Member State law.

**Data processors:** a natural or legal person or an unincorporated body which processes data on the basis of a contract with a controller, including a contract concluded pursuant to a legal provision

**Third party:** a natural or legal person or unincorporated body other than the data subject, the controller or the processor.

**Data processing:** any operation or set of operations which is performed upon data, whatever the procedure used, in particular any collection, recording, recording, organisation, storage, alteration, use, retrieval, disclosure, transmission, alignment or combination, blocking, erasure or destruction of data or any prevention of their further use, taking of photographs, sound recordings or images and any other physical means of identification of a data subject (e.g. fingerprints, palm prints, DNA samples, iris scans).

**Data Transfer:** when the data is made available to a specified third party. Disclosure: when the data is made available to any person.

**Erasure:** the rendering of data unrecognisable in such a way that it is no longer possible to recover it.

**Destruction of data:** the total physical destruction of the data medium containing the data. Processing of data: the performance of technical tasks related to data processing operations, irrespective of the method and means used to perform the operations and the place of application, provided that the technical task is performed on the data.

**Pseudonymisation:** processing of personal data in such a way that it is no longer possible to identify the natural person to whom the personal data relate without further information, provided that such further information is kept separately and technical and organisational measures are taken to ensure that no natural person can be identified or identified with that personal data.

### 3. CATEGORIES OF PERSONAL DATA PROCESSED

#### 3.1. Personal data content of the questionnaire

Personal data will be used for research. The personal data provided will be analyzed for the purpose of improving the students life of the University of Pannonia, the results from this survey will be used for planning activities and engagement that improve the experience for the university's current and future alumni. Furthermore the result of the analyzed data will be used for the purpose of helping in career choices and encouraging students to choose the University of Pannonia. Occurent personal data are in public databases as institutional data, only these type of database is used. In case of concerned persons, we proceed according to the university data regulation. The questionnaire survey is realized by using Lime Survey: <https://kerdoiv.uni-pannon.hu/index.php/432721?lang=en>

A	B	C	D	E	F
Data subject	Data category	Data source	Purpose of data processing	Legal basis for data processing	Duration of data processing
Respondents of the survey	image and video sound recording	concerned person	for research; for improving students life of the University of Pannonia; for career choies	The data subject's consent in accordance with Article 6(1)(a) GDPR The data subject's consent in accordance with Article 6(1)(a) GDPR	the image and video sound recording will be published and uploaded to the Data Controller's online platforms
Respondents of the survey	name	concerned person	for research; for improving students life of the University of Pannonia; for career choies	The data subject's consent in accordance with Article 6(1)(a) GDPR The data subject's consent in accordance with Article 6(1)(a) GDPR	Personal data will be processed for a fixed period of 5 (five) years from the date of data recording.
	e-mail				
	citizenship				
	study related data				
	residence				
	previous and current work related data				
experiences and opinion about the university					

## Shared images and videos by the concerned person in connection with the survey

*Purpose of data management:* The images and videos shared with the respondent's voluntary given consent will be displayed on the website of the university of Pannonia for the purpose of increasing the popularity of the university, encouraging more applicants and helping in their career choices.

*Time of data management:* The recordings are kept by the Data Controller until the Data Subject requests the deletion of the recordings. In the absence of a request, the Data Manager will store the recordings for a maximum of 5 years from the time the recording was shared.

*Transfer of data:* Photos and videos will be shared and published on the the Data Controller's online platforms. Personal data will not be transferred either to a third country or to an international organization.

Voluntary consent may be withdrawn at any time. We inform you that the withdrawal of consent shall not affect the lawfulness of processing before the withdrawal. In the erasure request, we will ask you for the same information as you used to give consent (cf. chart above).

The required data will be stored for a maximum of 30 days until the withdrawal (erasure) of the voluntary consent is completed. After that time, we will no longer store the revoked personal data or the erasure request.

### 3.2 Information about completing the application form online:

#### Data management related to website use

The application form is filled out using the page <https://kerdoiv.uni-pannon.hu/index.php/432721?lang=en>

A	B	C	D	E	F
Data subject	Data category	Data source	Purpose of data processing	Legal basis for data processing	Duration of data processing
Respondents of the survey	Fill ID Date sent Last page Source language Core First name E-mail address	concerned person	Completion of the survey related to the alumni questionnaire	voluntary contribution	3 years from the date of data collection
	the IP address of the data subject's computer		safe operation of servers and subsequent checks	voluntary contribution	until the session end

#### Cookie information:

Cookies are short entries in a special directory on your computer that are used to *exchange or archive information*.

A	B	C	D	D	E
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<b>Types of cookies</b>	<b>Legal basis</b>	<b>Purpose</b>	<b>Description</b>	<b>Expiry</b>	<b>Name</b>
Session cookies essential for providing the service	<u>Legitimate interest</u>	ensuring proper workflow of the webpage	session ID, users status of the page requests	until the end of visitors session	hash value (Session id)

#### **4. THE SOURCE OF THE DATA PROCESSED**

The data subject is the concerned person.

#### **5. THE PURPOSE OF THE DATA PROCESSING**

Personal data will be used only for research. The personal data provided will be analyzed for the purpose of improving the students life of the University of Pannonia, the results from this survey will be used for planning activities and engagement that improve the experience for the university's current and future alumni. Furthermore the result of the analyzed data will be used for the purpose of helping in career choices and encouraging students to choose the University of Pannonia.

#### **6. LEGAL BASIS FOR PROCESSING**

The data subject's consent in accordance with Article 6(1)(a) GDPR.

#### **7. DURATION OF DATA PROCESSING**

The Data Controller shall process the data provided for a limited period of 5 years from the date of their collection.

#### **8. THE METHOD OF DATA PROCESSING**

Personal data will be used by the Data Controllers on the basis of the consent of respondents and used solely for purpose by processing data and information.

Data about concerned persons is gathered from public available sources. The collected data is stored, and forwarded if necessary to conduct the work in a database accessible via password. Personal data is accessible exclusively for those parties who are responsible for data collection, or for persons contacting concerned persons via phone. Personal data will be processed for a fixed period of 5 (five) years from the date of data recording.

#### **9. DATA PROCESSING**

In accordance with the governing legislation, the data controller is entitled to use a data processor for the purpose of certain technical operations or the provision of the service. The data processor is only entitled to execute the instructions and decisions of the Data Controller.

Name: Pannon University, headquarters: 8200 Veszprém, Egytème utca 10, phone: +36 88/624-000, website: <https://uni-pannon.hu>

Correspondence office name: Institute of Hungarian and Applied Linguistics  
Address for correspondence office: 8200 Veszprém, Wartha Vince street 1., Building „N”,  
2nd floor., Office 221.  
Email: [batyi.szilvia@htk.uni-pannon.hu](mailto:batyi.szilvia@htk.uni-pannon.hu)  
Telephone number: +36 88 624 6238

Correspondence office name: Directorate of International Relations and Communication  
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Email: [pr@uni-pannon.hu](mailto:pr@uni-pannon.hu)  
Telephone number: +36 88 624 030

## **GENERAL RULES ON DATA PROCESSING**

The rights and obligations of the data processor in relation to the processing of personal data are determined by the data controller within the framework of the law and the specific laws applicable to data processing.

The University of Pannonia declares that the data processor has no competence to make a substantive decision on the processing of personal data in the course of its activities, may process personal data that come to its knowledge only in accordance with the provisions of the controller, may not process personal data for its own purposes, and shall store and retain personal data in accordance with the provisions of the controller.

The person concerned consents and accepts Lime Survey GmbH's data management by registering and filling out the Lime Survey GmbH form at the same time. The person concerned acknowledges and accepts The University of Pannonia has no insight into Lime Survey GmbH's data management and the University of Pannonia is not responsible for the data given to Lime Survey GmbH and for its data management/ for the lawfulness of the instructions given to the processor in relation to the processing operations.

<https://www.limesurvey.org/privacy-notice>

### **10. DATA SECURITY**

#### **10.1. Rights in relation to the processing of personal data**

##### **10.1.1. Right to request information**

You may request information from the University in written form, using the contact details provided in section 1, so that the University can inform you:

- what personal data,
- on what legal basis,
- for what purpose,
- from what source,
- for what purpose, for what purpose, for what purpose, for what purpose and for how long it will be processed,
- to whom, when, under what law, and to which personal data the University has granted access

The University will respond to your request within a maximum of 25 days by letter to the contact details you have provided.

##### **10.1.2. Right to rectification**

You may request, in written form, that the University amend any of your personal data (for



example, you may change your email address or postal address at any time) by using the contact details provided in section 1. The University will comply with your request within a maximum of 25 days and will notify you by letter to the contact details you have provided.

#### **10.1.3.Right to erasure**

You may request the deletion of your personal data by writing to the University using the contact details provided in section 1.

However, where there is no such obligation, the University will comply with your request within a maximum of 25 days and will notify you by letter to the contact details you have provided.

#### **10.1.4.Right to blocking**

You may request, in writing, that your personal data be blocked by the University using the contact details provided in section 1. The blocking will last as long as the reason you have given requires the data to be stored.

For example, you may request the blocking of your data if you believe that your submission has been unlawfully processed by the University, but you believe that it is necessary for the purposes of the administrative or judicial proceedings you have initiated that your submission should not be deleted by the University. In such a case, the University will continue to store the personal data (for example, your submission) until the authority or court requests it, after which it will delete the data.

#### **10.1.5.The right to object**

You may object in writing, using the contact details provided in Section 1, to the processing of personal data that the University may transfer or use for direct marketing, public opinion polling or scientific research purposes. For example, you may object to the University using your personal data for scientific research without your consent.

You may also object to processing if you consider that the processing is necessary for the sole purpose of complying with a legal obligation or pursuing a legitimate interest pursued by the University, except for processing based on a legal authorisation. For example, you may not object to the transfer of your submission of your personal data to the Archives, together with the case file, under our internal rules on document retention.

#### **10.1.6.Data security measures**

The Data Controller shall make every effort to ensure the secure handling and storage of data. The processed data is hosted in a high-availability, reliable dedicated server environment.

## **11. DATA SUBJECT'S RIGHTS, JUDICIAL REMEDIES**

### **11.1.Initiation of legal proceedings**

You may bring a civil action against the University in the event of unlawful processing of your personal data. The tribunal has jurisdiction to hear the case. You may also bring the case before the court of your place of residence (for a list of courts and their contact details, please visit <http://birosag.hu/torvenyszekek>).

### **11.2.Notification to the authorities**

Anyone may lodge a complaint with the National Authority for Data Protection and Freedom

of Information (www.naih.hu; 1530 Budapest, Pf.: 5.; phone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: ugyfelszolgalat@naih.hu), in order to initiate an investigation on the grounds that a violation of rights has occurred or is imminent in connection with the processing of personal data or the exercise of the right to access data of public interest or data in the public interest.

### **11.3.Disconnection**

The controller reserves the right to change its privacy notice. In particular, this may occur if required by law. A change in the processing shall not imply a processing of personal data for purposes other than those for which they were intended. The controller shall publish the relevant information on its website 15 days in advance.

In matters not covered by this Information Notice, the provisions of the GDPR and the Infotv. shall apply.

Date: 2024. 04. 08.