

Privacy Notice

on the alumni membership registration of Budapest Business School, news and information materials (newsletter) regarding alumni services

1 General provisions and contact information

This privacy notice (hereinafter: the "Notice") applies to personal data Budapesti Gazdasági Egyetem (Budapest Business School, hereinafter: the "University" or the "Controller") collects and processes about you.

Name: Budapest Business School

Institution identifier: FI 82314

Seat: 1055 Budapest Markó utca 29-31.

Represented by Prof. Dr. Balázs Heidrich, Rector

Phone: (+36) 1 301 3428

Fax: (+36) 1 301 3432

Website: <https://uni-bge.hu/>

Responsible organisational unit: Office for Business Partnerships & Alumni Relations

Data Protection Officer contact information: adatvedelmitisztviselo@uni-bge.hu

2 Laws governing data processing

- Act CXII of 2011 on informational self-determination and freedom of information (hereinafter: the "Privacy Act")
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
- Act V of 2013 on the Civil Code (hereinafter: the "Civil Code")

3 Data processing principles

Personal data must be processed lawfully and in a transparent manner, ensuring fairness in processing the personal data of natural persons ("*lawfulness, fairness and transparency*").

Personal data shall be processed only for a specific lawful purpose, to exercise a right or fulfil an obligation. Data processing shall be in conformity with the purpose of data processing in each phase, the registration and processing of data must be fair and lawful ("*purpose limitation*").

No personal data shall be processed unless indispensable and suitable for achieving the purpose of the data processing. Personal data shall be processed only to the extent and for the duration necessary to achieve that purpose ("*principle of data minimisation*" and "*storage limitation*").

The University shall ensure that personal data are accurate and up-to-date, taking care to rectify any inaccurate personal details ("*accuracy*").

The University must process personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ("*availability, integrity and confidentiality*").

4 Basic concepts

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, 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.

Sensitive data:

- a) personal data relating to racial, national origin, political opinion or party affiliation, religious or ideological belief, membership in any advocacy organisation, sexual life;
- b) personal data relating to the state of health, pathological addictions, and criminal personal data.

Consent: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, 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 should inform the data subject without undue delay and at the latest within one month of a request as to whether or not 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 processing;
- the categories of personal data concerned;
- the recipients or categories of recipient 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: Data subjects 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 if

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws his or her consent and there is no other legal ground for the processing;
- the data subject objects to data processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

Restriction: the data subject has the right to obtain from the controller restriction of processing – the marking of stored personal data with the aim of limiting their processing in the future.

Objection: the statement of the data subject by which he objects to the processing of his personal data and requests termination of the data processing and/or deletion of the processed data.

Data subject: natural person identified or identifiable – directly or indirectly – by reference to any specific personal data.

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 nomination may be provided for by Union or Member State law.

Processor: any natural or legal person or organisation without legal personality which processes personal data under a contract with the controller, including contract under a provision of regulations.

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 regardless of the procedure applied which is performed on personal data, therefore particularly collection, recording, organisation, storage, alteration, use, retrieval, consultation, use, transmission, disclosure, alignment or combination, restriction, erasure or destruction, prevention of further use of data, photo, voice or video recording, and recording physical characteristics that allow for the identification of persons (e.g. finger- or palmprint, DNS sample, iris image).

Transfer: making data accessible to a specific third party. *Disclosure:* making data accessible to any person.

Erasure: making data unrecognisable in such a way that they are not possible to restore any more.

Destruction: total physical destruction of the data carrier containing the data. Processing: the performance of technical tasks related to data processing operations, regardless of the methods or means employed or of the place of application provided that such technical tasks are performed 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 to ensure that the personal data are not attributed to an identified or identifiable natural person.

5 Description of processing activities

5.1 Registration for Budapest Business School alumni membership via <https://alumni-regisztracio.uni-bge.hu> without a Neptun code

5.1.1 Scope of processed data and the purposes of the processing

Personal data categories	Purpose of processing	Legal basis of processing
Current name - surname, first name (required field)	Alumni membership registration, identification of former students, communication, alumni membership rights and alumni scholarship applications	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Name on degree (required field)	Alumni membership registration, identification of former students, alumni membership rights and alumni scholarship applications	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Faculty/predecessor institution (required field)	Alumni membership registration, identification of former students, invitation to thematic events, alumni membership rights and alumni scholarship applications	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Programme (optional field)	Alumni membership registration, identification of former students, invitation to thematic events, alumni	the data subject consented to processing their personal data for

	membership rights and alumni scholarship applications	one or more specific purpose Article 6 (1) a) of the GDPR
Starting year (optional field)	alumni membership registration, identification of former students, invitation to reunions	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Graduation year (optional field)	Alumni membership registration, identification of former students, invitation to reunions of graduates from a given year	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Address – postcode, city, street, number (optional field)	Communication, sending postal matters related to alumni membership and University services	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Place and date of birth (required field)	Alumni membership registration, identification of former students, alumni membership rights and alumni scholarship applications	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Phone (optional field)	Communication	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Email (required field)	Communication, alumni membership rights and alumni scholarship applications	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR

5.1.2 Term of data processing

The Controller processes your data until the withdrawal of your consent upon which the Controller deletes them.

If you do not want to maintain your University alumni membership in the future, you may at any time withdraw your consent to the processing of your above data and request the erasure of your data by an email sent to alumni@uni-bge.hu. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

5.1.3 Persons with access to your personal data, processors

Authorised employees of the Business Partnership, Alumni Relations Office of the University and of the IT Center may have access to your data.

The University engages the following processor(s) for data processing:

For providing the <https://alumni-regisztracio.uni-bge.hu/regisztracio> online platform:

Processor company name: CreatIT Solutions Kft.

Seat: 6724 Szeged, Körtöltés u. 59.

Tax number: 11705967-2-06

Company registration number: 06-09-014875

Phone: +36 20 341 5291

Website: <https://www.creatit.hu>

The processor provides support for the website operation.

5.2 Registration for Budapest Business School alumni membership via <https://alumni-regisztracio.uni-bge.hu> with a Neptun code

5.2.1 Scope of processed data and the purposes of the processing

Personal data categories	Purpose of processing	Legal basis of processing
Neptun code (required field)	Alumni membership registration, identification of former students, alumni membership rights and alumni scholarship applications	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Date of birth (required field)	Alumni membership registration, identification of former students, alumni membership rights and alumni scholarship applications	the data subject consented to processing their personal data for one or more specific purpose

		Article 6 (1) a) of the GDPR
Mother's name (required field)	Alumni membership registration, identification of former students, alumni membership rights and alumni scholarship applications	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Current name - surname, first name (required field)	Alumni membership registration, identification of former students, communication, alumni membership rights and alumni scholarship applications	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Address – postcode, city, street, number (optional field)	Communication, sending postal matters related to alumni membership and University services	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Phone (optional field)	Communication	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Email (required field)	Communication, alumni membership rights and alumni scholarship applications	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR

5.2.2 Term of data processing

The Controller processes your data until the withdrawal of your consent upon which the Controller deletes them.

If you do not want to maintain your University alumni membership in the future, you may at any time withdraw your consent to the processing of your above data and request the erasure of your data by an email sent to alumni@uni-bge.hu. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

5.2.3 Persons with access to your personal data, processors

Authorised employees of the Business Partnership, Alumni Relations Office of the University and of the IT Center may have access to your data.

The University engages the following processor(s) for data processing:

For providing the <https://alumni-regisztracio.uni-bge.hu/neptun-regisztracio> online platform:

Processor company name: CreatIT Solutions Kft.

Seat: 6724 Szeged, Körtöltés u. 59.

Tax number: 11705967-2-06

Company registration number: 06-09-014875

Phone: +36 20 341 5291

Website: <https://www.creatit.hu>

The processor provides support for the website operation.

5.3 Subscription to the electronic or printed newsletter of Budapest Business School at <https://alumni-regisztracio.uni-bge.hu/regisztracio> and at <https://alumni-regisztracio.uni-bge.hu/neptun-regisztracio>

5.3.1 Scope of processed data and the purposes of the processing

Personal data categories	Purpose of processing	Legal basis of processing
Current name - surname, first name	Sending news and information materials (newsletter) to the registered email or physical address about alumni membership and University services	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Email address	Sending news and information materials (newsletter) to the registered email address about alumni membership and University services	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR
Address – postcode, city, street, number	Sending news and information materials (newsletter) to the registered address about alumni membership and University services	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR

If you do not wish to receive newsletters from the Controller in the future, you may withdraw your consent to receiving newsletters at any time by email to alumni@uni-bge.hu or by regular mail to the Controller's Business Partnership, Alumni Relations Office (1055 Budapest, Markó u. 29-31.) If you unsubscribe from the Controller's newsletter, the Controller will not send you newsletters in the future.

The Controller acts lawfully in the course of sending you newsletters in the period after you subscribe to and before you unsubscribe from the newsletter.

5.3.2 Term of data processing

The Controller processes the data until you unsubscribe from the newsletter and erases your personal data within 3 days of receiving your unsubscribe request sent by email to alumni@uni-bge.hu or by regular mail to the Controller's Business Partnership, Alumni Relations Office.

5.3.3 Persons with access to your personal data, processors

Authorised employees of the Business Partnership, Alumni Relations Office of the University and of the IT Center may have access to your data.

The University engages the following processor(s) for data processing:

For the operation of the newsletter mailing system:

Company name: Microsoft Ireland Operations Limited

Seat: One Microsoft Place, South County Business Park, Leopardstown, DUBLIN, 18. Ireland

Phone: +353 1 7064099

Website: www.microsoft.com

For the delivery of mailpieces:

Company name: Magyar Posta Zrt.

Seat: Budapest, 1138 Budapest, Dunavirág utca 2-6.

Mailing address: Budapest 1540

Company registration number: 01-10-042463

Customer service: +36-1-767-8282

Website: www.posta.hu

5.4 Creation of log files on the <https://alumni-regisztracio.uni-bge.hu/> website

The system automatically logs the following data upon the creation (registration) and deletion of alumni membership.

5.4.1 Data created at the time of alumni membership registration and stored during alumni membership

Personal data categories	Purpose of processing	Legal basis of processing
Family name First name Name on degree Faculty Programme Starting year of training Degree attained (year) Postal code City Title Year of birth Place of birth Telephone number E-mail Subscribes to newsletter? May be contacted by mail? Registration IP address Time of registration Token Time of confirmation Email address	Capturing alumni membership related registration data.	the data subject consented to processing their personal data for one or more specific purpose Article 6 (1) a) of the GDPR

5.4.2 Data stored after the deletion of alumni membership registration

Personal data categories	Purpose of processing	Legal basis of processing
Registration IP address Time of registration Token Time of confirmation Time of deleting registration Email address	Capturing the registration for alumni membership and the deletion of registration (withdrawal of consent), as well as the date of registration and the deletion of registration in a demonstrable manner. Safeguarding the legitimate interests of the University.	Data processing is required for enforcing the legitimate interests of the controller Article 6 (1) f) of the GDPR

5.4.3 Duration of processing

In the case of Section 5.3.4 the Controller processes data as long as the alumni membership exists, and deletes them afterwards. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

In the case of Section 5.4.2 the Controller processes data until the end of the 5-year limitation period, that is for the period required to establish, exercise and defend legal claims.

5.4.4 Persons with access to your personal data, processors

Authorised employees of the Business Partnership, Alumni Relations Office of the University and of the IT Center may have access to your data.

The University engages the following processor(s) for data processing:

<https://alumni-regisztracio.uni-bge.hu/regisztracio> and <https://alumni-regisztracio.uni-bge.hu/neptun-regisztracio>

Processor company name: CreatIT Solutions Kft.

Seat: 6724 Szeged, Körtöltés u. 59.

Tax number: 11705967-2-06

Company registration number: 06-09-014875

Phone: +36 20 341 5291

Website: <https://www.creatit.hu>

The processor provides support for the website operation.

6 Rights related to personal data processing

6.1 Right to request information

You may request information from the University in writing via the contact information specified in Section 1 about the following matters:

- what personal data of yours shall NBH control,
- on what legal basis,
- what is the purpose of processing,
- the source your personal data were obtained,
- for how long,
- whom, when, under which regulation and which personal data the University provides access to, or whom your personal data the University transferred to.

The University will answer your information request within not more than 30 days by sending a mail to the contact you provided.

6.2 Right to rectification

You may request the University in writing via the contact information provided in Section 1 to change any of your personal data (e.g., you may change your email address or mail address at any time). The University will fulfil your request within not more than 30 days and informs you thereof by mail sent to the contact address you provided.

6.3 Right to erasure

You may request the University in writing via the contact information provided in Section 1 to erase your personal data.

The University will turn down your erasure request if obliged by a regulation or an internal policy to continue storing your personal data. Such cases include, for example, where the deadline for archiving specified by the relevant internal policy is not reached.

If, however, no such obligation exists, the University will fulfil your request within not more than 30 days and informs you thereof mail sent to the contact address you provided.

6.4 Right to object

You may object to processing in writing via the contact information provided in Section 1 if the University uses or transfers your personal data for the purposes of direct marketing, opinion polling or scientific research. You may, therefore, object to the University using your personal data for the purpose of scientific research without your consent.

You may also object to processing if you deem that processing by the University is solely required for compliance with a legal obligation or for the University's legitimate interest, except for processing based on legal authorisation. Therefore, for example, you may not object to the University transferring your submission – together with the relevant documents of the case – to the Archives based on our internal policy on archiving.

6.5 Right to restrict processing

You may request in writing, through the contact details provided in Section 1, that the University restrict data processing if any of the following conditions is fulfilled:

- a) You challenge the accuracy of your personal data, in which case the restriction applies to the period of time needed for the University to verify the accuracy of your personal data;
- b) The processing is unlawful and you object to the deletion of the data and instead request a restriction on their use;
- c) The University no longer needs your personal data for data processing purposes, but you need them to make, enforce or defend legal claims; or
- d) You have objected to data processing in accordance with Section 6.4, in which case the restriction will apply to the period of time needed to determine whether the legitimate interests of the University override the legitimate interests of the person concerned.

7 Data security measures

The Controller makes all efforts to ensure secure data processing and storage. The processed data are stored in a high availability, reliable server environment. Physical security is ensured through 24-hour security service, electronic entry control system and CCTV surveillance system.

8 Opportunities to vindicate your rights regarding processing

8.1 Court procedure

You may file a civil action against the University if you experience unlawful processing. The court will have competence to rule the case. You may also file the action with the court at your

permanent or temporary residence – at your discretion – (the list and contact details of courts are available under this link: <http://birosag.hu/torvenyszekek>).

8.2 Reporting to authorities

Anybody may initiate an investigation by notifying the Hungarian National Authority for Data Protection and Freedom of Information (www.naih.hu; 1363 Budapest, P.O. box (Pf.) 9.; phone: +36 (30) 549-6838; +36-1-391-1400; fax: +36-1-391-1410; email: ugyfelszolgalat@naih.hu) claiming an infringement or direct risk of an infringement related to personal data processing, or to rights to have access to data of public interest or data public on the grounds of public interest.

9 Disclaimer

The Controller reserves the right to change the privacy notice. This particularly includes changes enforced by regulations. No change of processing may mean processing personal data for other purposes. The Controller sends the relevant information to the email address you provided upon your subscription. If you disagree with the amended privacy notice, you may unsubscribe from the newsletter, in which case the Controller deletes your personal data from its newsletter database.