

Information on data controlling
by the University of Debrecen
for the users of the Neptun Unified Study System

1. The name and contact information of the Controller

Data controller:	Debreceni Egyetem
Registered seat:	4032 Debrecen, Egyetem tér 1.
Postal address:	4032 Debrecen, Egyetem tér 1.
E-mail address:	neptun@unideb.hu
Phone number:	+36-52-512900

2. Provisions of law governing data controlling

The data controlling performed by the University of Debrecen is governed by the following provisions of law:

- Regulation (EU) No 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter: GDPR).
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter: Information Act);
- Act CCIV of 2011 on National Higher Education.

3. The data controlling activities performed by the Controller

3.1. Controlling student data in the Neptun academic information management system

3.1.1. The purpose of the data controlling is to ensure, in accordance with Section 18 of the National Higher Education Act, the normal operation of the University, the maintenance of the records, as defined in the relevant provisions of law, necessary for the exercise of the rights and performance of the obligations of admitted and enrolled students, as well as the determination, evaluation and certification of the entitlements, as defined the provisions of law and in the rules of organisation and operation of the University, and the career tracking of the graduates.

3.1.2. The scope of the data controlled is listed in accordance with Annex 3 of the National Higher Education Act at the end of this document.

3.1.3. The legal basis of the data controlling: the National Higher Education Act, on the basis of which the data controlling is necessary for the performance of the legal obligations pertaining to the University and for the performance of the public functions of higher education. Beyond those listed in the National Higher Education Act as data required to be controlled, the University also controls data on the basis of the rightful interest.

3.1.4. The duration of data controlling: on the basis of the provisions of the National Higher Education Act and the Document Management Policy of the University, in accordance with the operations and possibilities of the IT system, 80 years following the end of the legal status of the data subjects. In case of data controlled on the basis of rightful interest, the duration of the data controlling is until the existence of such rightful interest.

3.1.5. The scope of persons having access to the data: users may have access to the data processed in the Neptun system in accordance with their tasks set forth in their respective job descriptions.

3.2. Controlling faculty members' data in the Neptun information management system

3.2.1. The purpose of the data controlling is to ensure, in accordance with Section 18 of the National Higher Education Act, the normal operation of the University, the maintenance of the records, as defined in the relevant provisions of law, necessary for the enforcement of employer's rights as well as the exercise of the rights and the performance of the obligations of faculty members, researchers and employees, and the determination, evaluation and certification of the entitlements, as defined the provisions of law and in the rules of organisation and operation of the University.

3.2.2. The scope of the data controlled is listed in accordance with Annex 3 of the National Higher Education Act at the end of this document.

3.2.3. The legal basis of the data controlling: the National Higher Education Act, on the basis of which the data controlling is necessary for the performance of the legal obligations pertaining to the University and for the performance of the public functions of higher education. Beyond those listed in the National Higher Education Act as data required to be controlled, the University also controls data on the basis of the rightful interest.

3.2.4. The duration of data controlling: on the basis of the provisions of the National Higher Education Act and the Document Management Policy of the University, in accordance with the operations and possibilities of the IT system, 5 years following the end of the legal status of the data subjects. With a view to the fact that faculty members' data constitute an integral part of the Neptun system, it is a given technical characteristic that such data cannot be deleted and its controlling is in the interest of the University. In case of data controlled on the basis of rightful interest, the duration of the data controlling is until the existence of such rightful interest. In case of data controlled on the basis of the consent of the data subject, the duration of the data controlling is until the withdrawal of such consent.

3.2.5. The scope of persons having access to the data: users may have access to the data processed in the Neptun system in accordance with their tasks set forth in their respective job descriptions.

3.3 The sending of messages of non-academic interest via the Neptun electronic academic information system.

3.3.1. The purpose of the data controlling is to be able to inform students via the Neptun system also on topics that are not related to their student status. This may be advantageous for students and/or for the university as well.

3.3.2. The scope of the controlled data: name, Neptun code, e-mail address

3.3.3. The legal bases for the data controlling: the data subject's consent pursuant to Article 6 (1) a) of the GDPR.

3.3.4. The duration of the data controlling: the data controlling shall be until the withdrawal of the consent.

3.3.5. The scope of persons having access to the data: users may have access to the data processed in the Neptun system in accordance with their tasks set forth in their respective job descriptions.

4. Your rights and the rules applicable to the exercise of such rights

4.1. The right to be informed

You can inform yourself on your personal data controlled in the Neptun electronic academic information management system via the students' and the faculty members' web-based interface, in accordance with Article 15 (1) of the GDPR. Beyond the possibilities provided by the web-based interface, you can also request information concerning your data controlled.

In such a case, using your contact information (e-mail address, postal address), the University of Debrecen shall forward to you the following information:

- what personal data related to you we control;
- what are the purposes of the data control;
- to whom we transmit the personal data;
- the duration of the data controlling and the criteria for the determination of such duration;
- your rights related to the data controlling;
- your right to file complaints addressed to the National Authority for Data Protection and Freedom of Information.

4.2. The right to receive a copy of your data

Pursuant to Article 15 (3)-(4) of the GDPR, you may request a copy of your data controlled by the University of Debrecen in the Neptun electronic academic information management system. In such a case, using your contact information (e-mail address, postal address), the University of Debrecen shall forward to you the personal data that we control in connection with you.

4.3. The right of rectification

Pursuant to Article 16 of the GDPR, at your request, we rectify on the basis of proper certificates.

4.4. The right of deletion

Pursuant to Article 17 (1) (2) of the GDPR, you may request the deletion of your personal data. The data may not be deleted, however, if a provision of law or the internal policies of the University require the continued retention of the personal data.

4.5. The right to restrict the data controlling

You may request the restriction of the data controlling in the following cases:

- you contest the accuracy of the personal data, in which case we restrict the data controlling until the University of Debrecen verifies the accuracy of the personal data;
- the data controlling is unlawful and you oppose the erasure of the personal data and requests the restriction of their use instead;
- the University of Debrecen no longer needs the personal data, but you require them for the establishment, exercise or defence of legal claims; or
- you exercise the right of objection, in which case we restrict the controlling of your data for the duration of verifying the lawfulness of your request.

In your request for the restriction of data controlling, you shall indicate the reason for requesting the restriction.

The data controlling may be not requested, however, if a provision of law or the internal policies of the University require the continued retention of the personal data.

The University of Debrecen shall satisfy your request for the restriction of data processing by way of storing the personal data concerned separately from all other personal data. For example, in case of electronic data files, the personal data concerned shall be stored on an external medium, and in case of paper-based files, it shall be stored in a separate file.

4.6. Objection

You may object to the controlling of your data carried out based on the deliberation of rightful interests for reasons related to your own situation. In such a case, the University of Debrecen shall examine the controlling of data performed with respect to you on the basis of the deliberation of rightful interests, and if your request is found to be well-grounded, we shall delete your personal data, except where a provision of law or the internal policies of the University require the continued retention of the personal data.

In all cases, we shall inform you on the outcome of the above procedure of examination.

4.7. The joint rules of the exercise of rights

The University of Debrecen shall reply to your request and, where possible, shall comply with your request within a period not exceeding one month. The above time limit may be extended by a maximum of two months, with notification given to the requesting party.

In case of the refusal of the request, the University of Debrecen shall inform you, within one month of the receipt of your request, of the reasons for such refusal, as well as your right to file a complaint to the Authority and your right to legal remedy.

The University of Debrecen reserves the right in case of having any doubts of the identity of the person submitting the request to ask for further information as necessary for confirming the identity of the data subject concerned. Such cases include, in particular, where data subjects exercise their right to obtain a copy of their personal data, in which case it is justified for the University of Debrecen to verify that the request is indeed from the data subject concerned.

5. Your opportunities for legal remedy

If, in your opinion, the data controlling performed by the University of Debrecen is not in compliance with the relevant provisions of law, then you may file a complaint with the National Authority for Data Protection and Freedom of Information (postal address: 1363 Budapest, P.O. Box 9, e-mail address: ugyfelszolgalat@naih.hu) to initiate a procedure or may submit your claim to the courts.

6. The categories of personal and sensitive data recorded and controlled

by the University of Debrecen in the Neptun system

The University of Debrecen controls your personal data related to all your current and previous legal statuses (as student, employee) in the Neptun academic information management system, with the time restrictions specified in Section 3.1.4 and 3.2.4. The scope of the data controlled is detailed below.

I/A. The data of employees

a) family and given name, sex, family and given name at birth, place and date of birth, mother's family and given name at birth, citizenship, education identification number, identity document number, tax identification number;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
b) permanent address, address of temporary residence, address for notification;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
c) data pertaining to employment, other legal status based on a contractual relationship for performance of work	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
ca) the name of the employer – or employers in case of several – with the indication of the employer with which further legal relationships aimed at the performance of work was entered;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
cb) level of education, vocational skills, special qualifications, knowledge of foreign languages, academic degrees;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
cc) data pertaining to the employment category in which the position belongs;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
cd) honours, awards and other recognition awards, titles,	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
ce) position, executive assignment, assignment for tasks not specified for position, additional work-related relationships;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
ck) research activities, scientific work, artistic activities, their results, data pertaining to participation in the doctoral course and the doctoral degree award procedure as instructor or researcher;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
cl) declaration made for the purpose of assessing of meeting the operating conditions in the institution;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
d) results of students' evaluation of the teaching activities;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
e) results of the habilitation procedure;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>

f) identification data pertaining to the documents supplied in evidence of data.	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
g) tax identification number:	<i>Based on the rightful interest of the University</i>
h) social insurance (TAJ) number	<i>Based on the rightful interest of the University</i>
i) electronic mail address	<i>Data controlled on the basis of the consent of the data subject</i>
j) photographic image	<i>Based on the rightful interest of the University</i>

I/B. Students' data

a) data related to admission:	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
aa) admitted and enrolled student's family and given names, sex, family and given names at birth, mother's family and given name at birth, place and date of birth, citizenship, permanent address, address of temporary residence, address for notification, telephone number, in the case of non-Hungarian nationals the legal grounds for stay in the territory of Hungary and the designation and number of the document entitling the holder thereto and – in the case of persons entitled to the right to free movement and residence as set forth in a separate act – the designation and number of the document proving the right of residence;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
ab) data pertaining to the secondary school leaving examination;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
ac) data pertaining to the secondary school;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
ad) data necessary for assessment of the application for admission;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
ae) data pertaining to the admission procedure; admission identification number;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
af) identification number of declaration according to Section 48/D (2) (related to a programme of study (partially) financed through a Hungarian state grant);	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
b) data related to student status:	<i>Pursuant to Annex 3 to the National Higher Education Act</i>

<p><i>ba)</i> the student's name, sex, name at birth, mother's name, place and date of birth, citizenship, registered address and temporary residence, address for notification, telephone number, electronic mail address, in the case of non-Hungarian nationals the legal grounds for stay in the territory of Hungary and the designation and number of the document entitling the holder thereto and – in the case of persons entitled to the right to free movement and residence as set forth in a separate act – the designation and number of the document proving the right of residence;</p>	<p><i>Pursuant to Annex 3 to the National Higher Education Act</i></p>
<p><i>bb)</i> type of student (visiting student) status, date and manner of the establishment and cessation of student status, name of course attended by the student indicating if it is state-funded, its schedule, expected ending date of the course, evaluation of the studies of the student, data pertaining to examinations, semesters the student enrolled for, state-funded period used, time of temporary termination of student status;</p>	<p><i>Pursuant to Annex 3 to the National Higher Education Act</i></p>
<p><i>bc)</i> time and place of studies abroad;</p>	<p><i>Pursuant to Annex 3 to the National Higher Education Act</i></p>
<p><i>bd)</i> credits earned and transferred credits, recognised studies;</p>	<p><i>Pursuant to Annex 3 to the National Higher Education Act</i></p>
<p><i>be)</i> data pertaining to student bursaries (benefits in cash and in kind), data necessary for establishing eligibility (social situation, data pertaining to parents, data pertaining to dependant status);</p>	<p><i>Pursuant to Annex 3 to the National Higher Education Act</i></p>
<p><i>bf)</i> data pertaining to the student's employment, results of competitions;</p>	<p><i>Pursuant to Annex 3 to the National Higher Education Act</i></p>
<p><i>bg)</i> data pertaining to disciplinary and compensation issues;</p>	<p><i>Pursuant to Annex 3 to the National Higher Education Act</i></p>
<p><i>bh)</i> data necessary for assessment of applications for special treatment of students with disabilities;</p>	<p><i>Pursuant to Annex 3 to the National Higher Education Act</i></p>
<p><i>bi)</i> data pertaining to student accidents;</p>	<p><i>Pursuant to Annex 3 to the National Higher Education Act</i></p>
<p><i>bj)</i> serial number of the student identification document, master file identification number;</p>	<p><i>Pursuant to Annex 3 to the National Higher Education Act</i></p>
<p><i>bk)</i> identification number and social security number of the student;</p>	<p><i>Pursuant to Annex 3 to the National Higher Education Act</i></p>
<p><i>bl)</i> data pertaining to completion of practical courses, pre-degree certificate, final examination (doctoral defence), and data pertaining to the diploma and diploma supplements;</p>	<p><i>Pursuant to Annex 3 to the National Higher Education Act</i></p>

<i>bm)</i> data necessary for the exercising of rights and fulfilment of obligations deriving from student status (bank account number);	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
<i>c)</i> data related to student career monitoring;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
<i>d)</i> the student's tax identification number;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
<i>e)</i> identification data pertaining to the documents supplied in evidence of data;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
<i>f)</i> information pertaining to fees and expenses paid by the student, such as payment in instalments, deferrals, waivers, reductions (calls, data of paying entity, data pertaining to student loan);	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
<i>g)</i> for those receiving student support, childcare benefit, childcare fee, regular child protection support, residential support, the details pertaining to the above;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
<i>h)</i> the data of scholarships received in the interest of supporting the student's studies, with a view to student status;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
<i>i)</i> data pertaining to the assessment of student competence and the results of the same;	<i>Pursuant to Annex 3 to the National Higher Education Act</i>
<i>j)</i> photographic image	<i>Based on the rightful interest of the University</i>
<i>k) lifestyle development club membership statement, membership fee</i>	<i>Data controlled on the basis of the consent of the data subject</i>