

DATA PROCESSING INFORMATION FOR ATTENDEES OF DENNIS GABOR UNIVERSITY EVENTS

Effective: From September 12, 2024, until revoked

The purpose of this Data Processing Information is to inform attendees of events organized by Dennis Gabor University (hereinafter: "University" or "DGU") (headquarters: 1119 Budapest, Fejér Lipót utca 70, institution ID: fi54333, tax number: 18122772-2-43), about the data processing related to them.

University staff may take photographs, videos, and audio recordings at the University's events, which may feature the image or voice of participants.

In the case of public events, media representatives may also make recordings, but they act as independent data controllers, and their data processing activities are not subject to this data processing information. The recordings may be published on DGU's or the media's websites, journals, or social media platforms.

DGU processes certain personal data based on Section 2:48 (2) of the Hungarian Civil Code (Act V of 2013). Furthermore, DGU may process photographs, videos, and audio recordings based on the participant's voluntary consent, legitimate interest, or a contract.

1. Laws and internal regulations governing data processing

The University considers the following legal norms as governing its data processing activities described in this notice:

- a) Act V of 2013 on the Civil Code;
- b) Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR);
- c) Act CXII of 2011 on the right to informational self-determination and on the freedom of information;
- d) The University's regulations on data protection, data processing, and the enforcement of the right to access public information.

2. Data controller's information

2.1. Data controller's name

Name: Dennis Gabor University
Address: 1119 Budapest, Fejér Lipót utca 70.
Institutional ID: FI54333
Phone: +36 20 999 8900
Website: www.gde.hu

2.2. Data Controller's Data Protection Officer

Participants can contact the University's Data Protection Officer with any questions regarding the protection of their personal data, the exercise of their rights related to personal data, or to report a data breach.

The University's Data Protection Officer: Dr. Ágnes Vámos
Email: adatvedelem@gde.hu

3. Data Processing Based on the Civil Code

3.1. Legal Basis for Data Processing

The legal basis for processing is Section 6(1)(e) of the GDPR and Section 5(1)(b) of the Information Act, based on statutory provisions. The statutory provision is Section 2:48(2) of the Civil Code, which stipulates that consent from the individual is not required for the recording and use of their image or voice in cases of mass recordings or recordings of public figures.

Mass recordings feature large groups of people where individuals are not depicted as unique people but as part of the crowd. If no individual draws attention to themselves in the picture and is instead shown as part of the crowd, it is considered a mass recording.

A public figure is defined as a person whose actions influence societal life, local or national circumstances. Public appearances are characterized by speaking or participating in the public interest. This typically includes speeches or public roles at cultural or social events. Anyone can be a public figure, and the classification is not tied to any formal social or legal status.

3.2. Purpose of Data Processing

The purpose of data processing is to document DGU events, inform those interested in the events, and provide evidence that the events occurred.

3.3. Scope of Recorded Data

Mass recordings and recordings of public figures made during the event.

3.4. Duration of Data Processing

The data will be processed for the duration of the article informing the public, or for the duration of the archive in case of archiving. The length of storage is determined by the potential use of the recording for future articles or DGU publications.

3.5. Access and Data Sharing

Mass recordings made public are accessible to anyone.

4. Data Processing Based on Consent

4.1. Legal Basis for Data Processing

The legal basis for data processing is the consent of the participant, in accordance with Article 6(1)(a) of the GDPR and Section 5(1) of the Information Act. Consent is given by individuals who enter the event area after reviewing the data processing information provided on the DGU website.

Apart from public figures, recordings of specific individuals, or focusing on a particular person in a crowd (e.g., using telephoto lenses or zoom), require the individual's consent for both the recording and its use. If individualization occurs later through editing from a mass recording, consent is also required.

4.2. Purpose of Data Processing

To document DGU events, inform those interested in the events, and provide evidence of the events' occurrence.

4.3. Scope of Recorded Data

Images or recordings of participants made during the event.

4.4. Duration of Data Processing

The data will be processed for the duration of the article informing the public, or for the duration of the archive if archived. The length of storage is determined by the potential use of the recording for future articles or DGU publications. Consent can be withdrawn at any time without explanation. Withdrawing consent does not affect the legality of data processing carried out based on prior consent.

4.5. Access and Data Sharing

Recordings made public are accessible to anyone.

5. Data Processing Based on Contract Performance

5.1. Legal Basis for Data Processing

The legal basis for data processing is the performance of a contract between the participant and DGU, in accordance with Article 6(1)(b) of the GDPR.

5.2. Purpose of Data Processing

To document the occurrence of the event based on the contract between DGU and the participant.

5.3. Scope of Recorded Data

Images or recordings of participants made during the event.

5.4. Duration of Data Processing

The recordings documenting the event will be stored until the contract is fully closed, including financial and operational closure.

5.5. Access and Data Sharing

The stored recordings are accessible to those responsible for verifying the fulfillment of the contract, and occasionally may appear on DGU's website.

6. Data Processing Based on Legitimate Interest

6.1. Legal Basis for Data Processing

The legal basis for data processing is DGU's legitimate interest, in accordance with Article 6(1)(f) of the GDPR.

6.2. Purpose of Data Processing

6.2.1. If participants receive entry cards, DGU electronically records the entry data, i.e., the usage data of the entry card. The purpose of recording these data is to ensure the safety and security of persons and property, for which the recording of entry data is essential.

6.2.2. DGU uses an electronic (camera) surveillance system for the protection of human life, physical integrity, personal freedom, building operations, critical infrastructure, and property. The system records and stores footage.

6.3. Scope of Recorded Data

For Section 6.2.1: entry data.

For Section 6.2.2: images or recordings of participants made during the event.

6.4. Duration of Data Processing

For Section 6.2.1: entry data are stored for 15 working days, after which they are deleted.

For Section 6.2.2: the recordings are stored for 10 days, after which they are deleted.

6.5. Access and Data Sharing

For Section 6.2.1: the DGU staff responsible for HR tasks have access to the entry data.

For Section 6.2.2: The DGU staff responsible for HR tasks have access to the stored recordings.

7. General Information on Data Processing Based on Legal Requirements, Contract Performance, Consent, and Legitimate Interest

7.1. Responsibilities of the Data Protection Officer

According to Article 39 of the GDPR, the data protection officer's duties include:

- a) providing information and professional advice to the data controller and staff regarding their obligations under the GDPR and other EU or national data protection regulations;
- b) monitoring compliance with the GDPR, other data protection regulations, and the internal policies of the data controller or processor regarding the protection of personal data, including assigning responsibilities, raising staff awareness, training, and conducting related audits; providing expert advice on data protection impact assessments, and monitoring the performance of such assessments in accordance with Article 35 of the GDPR;
- c) Cooperating with the supervisory authority;
- d) acting as a contact point for the supervisory authority regarding issues related to processing and, where appropriate, consulting with the authority.

7.2. Protection of Data

DGU takes all reasonable measures to ensure that the data it processes are not accessible to unauthorized persons. Access to the data is restricted, and password protection is in place.

DGU has regulations regarding the protection and security of personal and public data.

The data controller places great emphasis on the confidential handling of the data. To achieve this, the controller stores the data exclusively on servers under its own control.

7.3. Automated Data Processing (Including Profiling)

There is no automated decision-making, including profiling, carried out at DGU.

7.4. Consequences of Not Providing Data

If data processing based on a contract does not occur, the contract will fail.

7.5. Exercise of Rights and Legal Remedies

The data subject may exercise the rights guaranteed by the GDPR and the Information Act throughout the data processing period.

The data subject can request:

- access to their personal data (the data subject has the right to receive feedback from the data controller about whether their personal data is being processed, and if so, they have the right to access the personal data, and the information specified in the GDPR) (Article 15 of the GDPR),
- rectification (the data subject has the right to request the correction of inaccurate personal data concerning them without undue delay, considering the purpose of the data processing, and the right to have incomplete personal data completed, including by means of a supplementary statement) (Article 16 of the GDPR),
- erasure of personal data (the data subject has the right to request that the data controller erase their personal data without undue delay, and the data controller is obligated to delete the personal data without undue delay if the conditions set forth in the GDPR are met; erasure requests cannot be fulfilled if the data processing is required by law) (Article 17 of the GDPR),
- restriction of processing (the data subject has the right to request that the data controller restrict data processing if the conditions set forth in the GDPR are met) (Article 18 of the GDPR),
- the right to data portability (the data subject has the right to receive the personal data concerning them, which they have provided to a data controller, in a structured, commonly used, and machine-readable format and has the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, under the conditions set forth in the GDPR) (Article 20 of the GDPR),
- the right to object to data processing (the data subject has the right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them, based on Article 6(1)(e) or (f), including profiling based on those provisions. In such a case, the data controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defense of legal claims; if data processing is required by law, the right to object cannot be exercised) (Article 21 of the GDPR).

8. Legal Remedies

If the data subject believes that DGU has improperly processed their personal data in violation of applicable law, or if DGU has failed to adequately address a request related to the exercise of data subject rights, the data subject may submit a complaint to the Hungarian National Authority for Data Protection and Freedom of Information:

Address: 1055 Budapest, Falk Miksa utca 9-11

Postal address: 1363 Budapest, Pf. 9



Phone: +36-1-391-1400

Email: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>

Online complaint submission: <https://naih.hu/online-ugyinditas>

The data subject may also turn to the court competent for their place of residence or stay (information on courts available at <http://birosag.hu/torvenyszekek>).

In case of a legal dispute, the data subject is free to choose whether to submit the case to the court of their residence, stay, or to the court where the data controller is based.

We kindly ask data subjects to first contact the University if they believe any data processing described in this notice involves or has involved a legal violation. The University will take all necessary steps to thoroughly investigate the complaints and resolve the issue in a satisfactory manner for all parties involved.