



# DATA PROCESSING POLICY

In connection with the activity of the SZTE Horizon Europe Team (workshops, conferences, lectures, trainings, project management, newsletters, researches, consultancy)

This Data Processing Policy aims to draw attention to the data management processes related to the operation of the Horizon Europe Team.

## 1. Who can you turn to?

The University of Szeged has a dual role with regards to the Horizon Europe Team.

If the University of Szeged is present **as data controller**, the specific data control is carried out through the organizational unit specified below. If you have any questions regarding data control, you may request additional information and guidance at the following contacts.

University of Szeged Directorate for Quality Management and Strategy Horizon Europe Team Contact: László Maróti, international project development manager Mailing address: 13 Dugonics tér, Szeged, H-6720 Tel.: +36 (62)544-180 E-mail address: <u>sztehorizon@rekt.szte.hu</u> Honlap cím: http://horizoneurope.szte.hu/

If the University of Szeged is present **as data processor**, the data controller is the Ministry of Human Capacities. If you have any questions regarding data processing, you may request additional information and guidance at the following contacts:

https://www.kormany.hu/en/ministry-of-human-resources/contacts

## 2. What are the main legal requirements?

Please be advised that your personal data is controlled according to the provisions of the

- Regulation (EU) 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, and repealing Directive 95/46/EC as well as the
- Act CXII of 2011 on Informational Self-determination and Freedom of Information by the University of Szeged as data controller.

3. Does the University of Szeged have a Data Protection Guide?

Yes. You can download the Data Protection Guide of the University of Szeged from the following link: <u>http://www.u-szeged.hu/szabalyzatok</u>

## 4. What data management do we implement?

During the operation of the Horizon Europe Team we carry out the following data management activities and you may be subject to data management activities at -1. event registration, 2. image recording, 3. attendance sheet collection, 4. preparing newscasts, 5. decision preparation, 6. subscription to newsletter 7. messaging 8. social media 9. references and links

## 4.1. Event registration

In respect of the events organised by the Horizon Europe Team we manage the following data:

Type of data	Role of SZTE	Why we take it?	On what right do we handle it?	How long we store it?
Name (surname and first name)	Data collector	For identification	Based on voluntary consent	The data will be automatically deleted from the registration platform after 3 working days from the end of the event. Except if you subscribe to our newsletter because in this case your name and e-mail address will be handled until the consent is revoked.
E-mail address		For contact		
Area of interest		For identification		
Organisational unit represented		For planning the preliminary topic and lecture of the programme schedule		

## 4.2. Image recording

Please be advised that based on legitimate interest, we record image and audio at the event, generally in the form of mass recordings. We also call your attention that the event is public. Pursuant to Article 2:48. of the Act V of 2013 on the Civil Code, in case of mass recordings and public performances, the consent of those involved is not required for either the recording or its use. However, those involved must be informed beforehand in this case too thus we comply with our pre-notification obligation by this data protection policy and by placing the awareness note "Please be advised that during this event image recording will be made" on site.

Single images are taken of our lecturers. If the lecturer is not a public servant of the University of Szeged (hereinafter: USZ) i.e. do not fulfil their lecturer assignment as a public persona, they shall provide us with their voluntary consent before their image is recorded by any means.

Type of data	Why we take it? On what right do we handle it?		How long we store it?
Name (surname and first name) Birth name (surname and first name) Mother's name Signature	For identification according to Act XX of 1996 on the Ways of Identification Replacing the Personal Identification Number and on the Use of Identification Codes	Based on voluntary consent	Until the withdrawal of the voluntary consent

However, as the University of Szeged is committed to the protection and security of all types of personal data as well as to respect personal rights, please be advised that records from the mass recordings and public appearance will be used for marketing purposes for promoting the event through the online and offline communication channels of the University of Szeged.

# 4.3. Attendance sheet mandatory for project reports

The primary data management purpose of the attendance sheet is to substantiate the operation of the Horizon Europe Team within the project EFOP-3.6.1-16-2016-00008. Within this programme, to guarantee accountability, the University of Szeged is obliged to the – identifiable – data management of the individuals attending the particular stages of the event series, however, we intend to implement this obligation by data minimization. Thank you for supporting our work by signing the attendance sheet.

In terms of the attendance sheet, the data controller is the Ministry of Human Capacities, and the University of Szeged acts as data processor.

As regards to the attendance sheet, the following data will be processed:

Type of data	Role of the USZ	Why do we document it?	On what grounds do we administer it?	How long do we store it?
Name (surname and first name) Signature	Data processor	Mandatory for project reports	On legitimate interest	The University of Szeged stores the data until the end of the sustainment period of the project (2026)

## 4.4. Preparing newscasts

In order to promote the activities of the Horizon Europe Team and to inform the professional public we prepare newscasts for online and offline marketing communication platforms.

Type of data	Role of the USZ	Why do we document it?	On what grounds do we administer it?	How long do we store it?
Name of the lecturer (surname and first name) Title of the lecture Name of the enterprise, organisation	Data controller	For identification	On legitimate interest	For maximum 5 years

# 4.5. Data management with regards to the decision preparation activity of the Horizon Europe Team

The information provided in the incoming decision preparation documentation will be managed on the basis of legitimate interest.

Type of data	Role of the USZ	Why do we document it?	On what grounds do we administer it?	How long do we store it?
Name (surname and first name)		For identification		
E-mail address		For contact		
Phone number		For contact	Based on	For 5 years
Data of the project proposal	Data controller	For the categorisation of the project proposal and for making leader decision	voluntary consent	after the decision
Represented organisation		For identification		

## 4.6. Subscription to newsletter

By participating in international partnerships, the SZTE Horizon Europe Team aims to ensure that SZTE researchers successfully join H2020 and later Horizon Europe and other international projects. In order tothis, the following data of event attendees will be identifiably recorded for the purpose of later identification and networking purposes. However, we intend to fulfil this obligation by data minimisation.

We draw your attention to the fact that we send out a newsletter to the employees of the University of Szeged, in which case we administer the employees' names and official e-mail addresses based on legitimate interest. Please be noted that the employee has the right to protest against data management (see form).

Type of data	Role of the USZ	Why do we document it?	On what grounds do we administer it?	How long do we store it?
Name (surname		For		
and first name)		identification		
Official e-mail		For contact		
address			Based on	Until the protest
	Data controller	For sending	legitimate	against data
		focused	interest	management
Area of interest		newsletters		
		according to		
		areas of interest		

There are three ways to sign up for the newsletter.

Online subscription by registering at the website of the Horizon Europe Team, based on voluntary consent.

Online sing-up by registering to a particular event, based on voluntary consent.

Sign up for the newsletter at our events, if you have not done so during the event registration.

By providing your e-mail address, you give your consent to us voluntarily and based on prior information to send you newsletters about the activity of the Horizon Europe Team. The purpose of the newsletter is to provide up-to-date information about the activities of the Horizon Europe Team and the international grant opportunities.

Please note that by subscribing to the newsletter, your personal data will be managed pursuant to Act XLVIII of 2008 on the essential conditions and certain limitations of business advertising activity as specified below.

Type of data	Role of the USZ	Why do we document it?	On what grounds do we administer it?	How long do we store it?
Name (surname and first name)		For identification	Based on	Until the withdrawal
E-mail address	Data	For contact	voluntary consent	of the voluntary consent
Area of interest	controller	For sending focused newsletters according to areas of interest		

You can unsubscribe from the newsletter by sending an e-mail to the following e-mail address: <u>modulo@hszi.u-szeged.hu</u>. By doing so, you can withdraw your voluntary consent of future data management.

## 4.7. Social media sites

The Horizon Europe Team is available on Facebook and LinkedIn social networking sites. The use of the social networking sites and the contact with the Team through these, as well as other, social networking site related activity is based on voluntary consent.

The aim of the data management is to share content of the Team's site. We provide information about our activity through social media sites as well.

You can subscribe to the News Feed of the Horizon Europe Team by clicking the "like" button and you can unsubscribe from it by clicking the "dislike" button. The unwanted news can be deleted by the settings of the message board.

For sharing images on social media sites, we will follow section 4.2 of this document.

For sharing newscasts or other text entry on social media sites, we will follow section 4.4 of this document.

In some cases you can also find the features of social networks on the Horizon Europe Team page. These features include an operating principle that is able to read cookies and, in some cases, place social network cookies on your device. These cookies may allow you to send personalised ads. As a data controller, we do not have access to these cookies and to the information they collect, but we would like to inform you of these items and request your permission to use them.

Otherwise, the privacy rules of the social media sites applies which can found in the privacy policy of the social media site at <u>www.facebook.com</u> and www.linkedin.com.

## 4.8. References and links

The webpage of the Horizon Europe Team contains such references and useful links that are not operated by the Team but are intended only to inform visitors. The Team has no control over the content and security of these websites therefore it is not responsible for them. Please, review the privacy policy and privacy statement of the sites you visit before submitting any information.

#### 5. Whom do we forward the data to?

The data we administer about you is managed only by the people appointed by the head of the data controller unit mentioned in Section 1, within the objectives, legal basis and retention period specified in Section 4.

#### 5.1. Inside the organisation

During our decision preparation activity, we provide the decision preparation documents to the Director of Project Management, to the General Director of Quality Management and Strategy, to the Vice Rector for Scientific Affairs and Innovation and to the Rector's and Chancellor's Cabinets.

#### 5.2. Outside the organisation

The data of the attendance sheet and photo documentation of the event(s) will be forwarded to the Ministry of Human Capacities as part of the mandatory project documentation in our data processor role.

# 6. Do we collect information about you from another person?

No. The data we administer about you is collected from you, we do not collect data from other sources.

## 7. Does automated decision-making take place during data management?

No.

## 8. What are your rights about the activity of the Horizon Europe Team?

The following rights apply to you regarding the activity of the Horizon Europe Team:

- 1. right to information you may request information about the management of your personal data
- 2. right to access you may access your personal data we handle about you
- 3. right to correction if you detect inaccuracies in the personal data, we administer, you have the right to request correction
- 4. right to deletion if the data management is based on voluntary consent and there is no other legal basis for data management you may request the deletion of your personal data
- 5. right to protest you may object to the data management based on legitimate interest at any time
- 6. right to restriction you may request the restriction of your data, e.g. you dispute the accuracy of the data being administered until the accuracy of the data is checked by the USZ
- 7. right to remedy you have the right to have legal remedies in case of violation of your rights

#### 9. What legal remedies do you have?

**9.1.** You can contact the Data Protection Officer at the University of Szeged at the following contact details:

#### Dr. Dóra Lajkó

Address: University of Szeged, József Attila Study and Information Center 13 Dugonics tér, 3<sup>rd</sup> floor 304.,, Szeged H-6722 Tel.: +36 (62) 342-376, +36 (62) 544-000/2376 E-mail: dpo@gmf.u-szeged.hu

**9.2.** You can contact the Hungarian National Authority for Data Protection and Freedom of Information at the following contact details:

Hungarian National Authority for Data Protection and Freedom of Information Address: 22/C Szilágyi Erzsébet fasor, Budapest H-1125 Tel.: +36 (1) 391-1400 E-mail: <u>ugyfelszolgalat@naih.hu</u>

#### 9.3. You can contact court

Depending on the nature of the illicit data management that you experienced, you may initiate lawsuits even against the Authority. Information about the possibility, method and forums of the litigation can be found at the following website: <u>https://birosag.hu/birosagi-szervezetek</u>

#### 10. Does the University of Szeged have Data Protection Officer?

Yes. The contact details of the Data Protection Officer of the University of Szeged can be found in Section 9.1 of this document.

The Data Protection Officer serves as a contact point between you and the data controller. Regarding this event the Date Protection Officer also monitors compliance with the legal requirements and our internal policies.