## **Privacy Policy**

for the data management at the Time Management Workshop event regarding the marketing communication activities of the Budapest Metropolitan University

(The use of photo and video recordings, the management and evaluation of the event)

5<sup>th</sup> December, 2019

#### 1. Preamble

The purpose of this Privacy Policy is to inform you about the data management operations of the **Budapest Metropolitan University** (Seat: 1148 Budapest, Nagy Lajos király útja 1-9., Institutional identification: Fl33842) (hereinafter: Data Controller) in connection with the educational core activities and **the marketing communication activities of the Time Management Workshop event** according to

- the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 201 on the 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; GDPR)
- the applicable Hungarian legislation.

#### 2. Data Controller

The Budapest Metropolitan University is considered to be a Data Controller (hereinafter: Data Controller) regarding the data management of this Privacy Policy. Contact information: phone: + 361-273-2987, e-mail: <a href="mailto:metujog.kapu@metropolitan.hu">metujog.kapu@metropolitan.hu</a>.

In the data management processes, the Data Controller complies with the regulations in force and fully respects the protection of the fundamental rights and privacy of individuals with special attention to the provisions of the General Data Protection Regulation.

If you have any questions or comments, please contact us at metujog.kapu@metropolitan.hu.

# 3. Data management in connection with the use of image for promotional and archiving purposes

### 3.1. The purpose of data management

The Data Controller shall manage the photos, video recordings made by the Data Controller in order to document, verify and promote the educational activities, training opportunities, the daily operation, and events organized by or in collaboration with the Data Controller (the foregoing collectively: events). The data management includes the recording, archiving and the use of recordings.

The purpose of data management related to the event is to promote the Time Management Workshop event and to archive the event.

Recordings of the event may be uploaded on the Data Controller's website (<a href="https://www.metropolitan.hu">www.metropolitan.hu</a>), the Intranet, Facebook (<a href="https://www.facebook.com/METUMuveszet">www.facebook.com/METUMuveszet</a>, <a href="https://www.facebook.com/MetropolitanAlumni">www.facebook.com/METUmybrand</a>, <a href="https://www.facebook.com/BudapestMetUniversity">www.facebook.com/BudapestMetUniversity</a>, <a href="https://www.facebook.com/BudapestMetUniversity">www.facebook.com/BudapestMetUniversity</a>,

<u>www.facebook.com/METUFresh</u>) and post it on the Data Controller's Instagram page until 31<sup>st</sup> December, 2021.

## 3.2. The range of data managed

The Data Controller manages the following data:

- a) the photograph or video recording of the individuals participating in the event (mass recording)
- b) a portrait or video of individuals attending the event (the person in the recording occupies a central position, is well recognizable).

## 3.3. Data subjects

Individuals, students, trainers, lecturers, staff members, or others registering for or participating in the event, who are photographed, and whose photographs are used by the Data Controller.

## 3.4. Legal basis of data controlling

The data processing described in point a) of section 3.2. of this Privacy Policy is based on the legitimate interest of the Data Controller according to Point f) of Paragraph 1, Article 6 of the GDPR.

The Data Controller has carried out the necessary weighing of its legitimate interests in order to examine the risks, disadvantages to the rights and freedoms of individuals and took the necessary measures to mitigate them, and to take precedence over the interests of the Data Controller.

Data Controller data controlling described in point b), section 3.2. of this Privacy Policy shall be based on the data subject's consent (Article 6 (1) (a) of the GDPR). You may withdraw Your consent at any time, without prejudice to any lawful processing prior to Your consent.

Please be advised that the collection, management, and storage of data is solely in accordance with Section 3.1. for the purposes set out in point.

#### 3.5. Sources of data

Data is generated during or in connection with participation in an event after informing the data subject.

If the data subject does not wish to be provide data, or does not wish to be included in a photo or video recording, they may indicate the fact before or simultaneously with the data management.

#### 3.6. Access to data, storage

The Data Controller shall take special care to ensure that the photo and video recordings are accessible only to authorized employees of the organizational unit responsible for the concerned task.

The Data Controller uses its own IT systems for the primary storage of personal data.

Paper-based data is stored at the Data Controller's seat under secure conditions.

### 3.7. Duration of data controlling

The Data Controller will store the photo and video recordings until 31st December, 2021.

#### 3.8. Data forwarding

The Data Controller does not transfer the managed data.

# 4. Data management related to organizing, conducting and evaluating the Time Management Workshop event

### 4.1. The purpose of data management

The purpose of the event is to document, verify and promote the educational activities, training opportunities, the daily operation, and events organized by or in collaboration with the Data Controller for current, or former students, lecturers of the Data Controller, furthermore, for inquirers and the general public. In order to organize, prepare, conduct and evaluate the event, the Data Controller manages the data provided upon registration by the data subject for the event, occasionally the attendance-related data, and the evaluation provided after participation in the event.

# 4.2. The range of data processed

The Data Controller manages the following data:

- a) name, nickname, e-mail address,
- b) the post-event evaluation
- c) the fact of applying for the event, the date of participation.

# 4.3. Data subjects

The data subjects are the individuals applying, registering, or attending the event.

## 4.4. Legal basis of data controlling

The data processing described in point a) of section 4.2. of this Privacy Policy is based on the legitimate interest of the Data Controller according to Point f) of Paragraph 1, Article 6 of the GDPR.

The Data Controller has carried out the necessary weighing of its legitimate interests in order to examine the risks, disadvantages to the rights and freedoms of individuals and took the necessary measures to mitigate them, and to take precedence over the interests of the Data Controller.

Please be advised that the collection, management, and storage of data is solely in accordance with Section 4.1. for the purposes set out in point.

#### 4.5. Sources of data

The data is provided by the data subject upon registration for the event, furthermore, is generated upon registration and participation in the event. If the data subject does not wish to submit the data, they will not be able to participate in the announced application process.

### 4.6. Access to data, storage

The Data Controller shall take special care to ensure that the photo and video recordings are accessible only to authorized employees of the organizational unit responsible for the concerned task.

The Data Controller uses its own IT systems for the primary storage of personal data. The www.metropolitan.hu website and the application forms therein are operated by BeMind (Seat: 8200, Veszprém, Damjanich utca 7/A, Registration number: 19-09-512458) Ltd. acting as a data processor under a separate contract.

Paper-based data is stored at the Data Controller's seat under secure conditions.

## 4.7. Duration of data processing

The Data Controller manages the data subject to Section 4.2. (a), (c) until the event has taken place. In case data specified in Section 4.2. (b) was also collected, the data will be stored for 30 days after receipt of the event evaluation.

# 4.8. Data forwarding

The Data Controller does not transfer the managed data to anyone else.

### 5. Confidentiality and security of data

The Data Controller processes personal data confidentially, and takes all complementary IT measures required to a safe data processing.

The Data Controller and the Data Processor shall take appropriate technical and organizational measures – taking into account the state of science and technology and the costs of implementation, the nature, scope, circumstances and objectives of data management and the risk of varying probability and severity of natural persons' rights and freedoms – to guarantee a level of security that is appropriate to the degree of risk.

The Data Controller selects and manages the IT tools used to manage personal data in the provision of the service so that the data processed

- can only be accessed to the authorized person,
- are protected against unauthorized access through server-level and application-level security procedures,
- can be verified to be unaltered, and the verification of the changes is ensured,
- is available throughout the data processing period.

## 6. Your rights

Please note that according to the law in force you can enforce your rights at <a href="metujog.kapu@metropolitan.hu">metujog.kapu@metropolitan.hu</a> by e-mail - under the statutory terms -:

- a) You may request access to Your personal information, and to their copies; (Article 15)
- b) You may request information about the main parameters of data processing (purpose, scope of data processed, involved data processors, duration of data management); (Article 15)
- c) You have the right to withdraw your consent at any time; (Article 7 (3))
- d) You have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning You.
- e) You may request the deletion of your personal information without undue delay; (Article 17)
- f) You may request a restriction of processing of your data; (Article 18)
- g) You shall have the right to receive the personal data concerning You, which You have provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller; (Article 20)
- h) shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of Your habitual residence, place of work or place of the alleged infringement; (Article 77)

In Hungary the supervisory authority is the National Data Protection and Information Authority. (Budapest, 1125, Szilágyi Erzsébet fasor 22 / c.)

In the event of a violation of rights, You may also initiate litigation against the data controller or the data processor before the court of the Member State where the data controller or the data processor is located and before the court of Your habitual residence.

### 7. Contacts

Please contact us at <a href="mailto:metujog.kapu@metropolitan.hu">metujog.kapu@metropolitan.hu</a> for information and privacy inquiries.

Data Controller appointed a Data Protection Officer on May 25, 2018. Contact of Data Protection Officer: <a href="mailto:adatvetelmitisztviselo@metropolitan.hu">adatvetelmitisztviselo@metropolitan.hu</a>.

Upon request, we will respond to you within 30 days of your request.

The current version of our Privacy Policy is available at <a href="https://www.metubudapest.hu/career-events">www.metubudapest.hu/career-events</a>.

Prof. Dr. Bálint Bachmann DLA Rector Budapest Metropolitan University