

## PRIVACY NOTICE

for participants of the graduation ceremony organised by the Faculty of Education and Psychology of ELTE  
(updated version, date of update: 29 June 2021)

In accordance with Article 12 (1) of 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 (henceforth: GDPR)

Eötvös Loránd University informs you, as data subject, on the processing of your personal data related to the data processing of the graduation ceremony of the spring semester of the 2020/2021 academic year (hereinafter: the Ceremony) organised by the Faculty of Education and Psychology of ELTE (hereinafter: PPK).

Location: ELTE Faculty of Education and Psychology's Main Hall (Kazinczy u. 23–27. Budapest VII)

Date: 2:00 PM Tuesday, 27 July 2021

### Who is the Data Controller?

**Data controller:** Eötvös Loránd University Egyetem tér 1-3. H-1053 Budapest

**Responsible department for exercising the rights and fulfilling the obligations:** ELTE PPK Student Affairs and Registrar's Office (hereinafter: Organiser); Kazinczy u. 23–27. Budapest VII, H-1075

**Representative:** Papp, Lajos Dr. head of office

**Contact person:** Weismüller, Ágnes Anna; 461-4500/3832, diplomaosztó@ppk.elte.hu.

**Data processor:** –

### EXECUTION AND LIVE BROADCAST OF THE CEREMONY

<b>Data are processed by the University</b>	<p>The Ceremony will be broadcast live by the Organiser. The broadcast will show crowd shots, the students receiving their diplomas (hereinafter: students), performers at the event (people giving a ceremonial speech, or giving a performance, hereinafter referred to together as performers), and handing over of the diplomas.</p> <p>Processed data:</p> <ul style="list-style-type: none"><li>– the names and likenesses of students, participants, and the employees of the Organiser as personal data, as well as other personal data appearing on the broadcast (e.g.: programmes of the students, title and position of performers);</li><li><del>— personal identification document and immunity certificate (plastic card or mobile app) of the students — both only to be shown upon entry;</del></li><li>– presentations of the performers.</li></ul> <p>Participants can't make recordings of the event.</p>
<b>Purpose of the processing</b>	Broadcasting the Ceremony for the families and acquaintances of the students on a non public channel.
<b>Legal basis for the processing</b>	<ul style="list-style-type: none"><li>– Legal basis for data processing during the execution of the ceremony: Article 6 (1) f) of GDPR: the legitimate interest of the data controller, necessary for the handover of the diplomas at a formal ceremony worthy of the traditions of the university.</li><li><del>— Legal basis for the data processing of the data on the immunity certificate and on the personal identification document is Article 6 (1) e) of GDPR: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The relevant legislation is Government Decree no. 264/2021 (V. 21.) on the modification of the government decrees regulating the protective measures to be applied during emergencies, due to the fifth stage of the gradual termination of the protective measures.</del></li><li>– The live broadcast of the event is the legitimate interest of the data controller, and the people not allowed to attend due to the epidemiological measures (Article 6 (1) f) of GDPR): it is in the interests of the University to protect the university</li></ul>

	citizens from the epidemic, but provide at least online participation to their family and acquaintances at this important event in their life.
<b>Duration of the processing</b>	Data is processed on the day of the event.
<b>Data transfer</b>	–
<b>Data Processor</b>	Broadcasting the Ceremony is done through the non-public service of the public video sharing website YouTube. YouTube is a subsidiary of Google, its headquarters are at 901 Cherry Avenue San Bruno, California, United States.
<b>Right to object</b>	In case of Article 6 (1) e) and f) of GDPR you, as affected, are entitled to object any time to the data processing of your personal data as detailed above due to personal reasons. In case you object, your data can't be processed further by the data controller, except if they prove, that data processing is for compelling reasons, that take precedence over your interests, rights, and freedoms, or which are connected to the submission, validation, or protection of legal claims.

### RECORDINGS, MAKING AND USING PHOTO AND VIDEO RECORDING

<b>Data are processed by the University</b>	<p>The Organiser makes photo and video recordings (hereinafter referred to together as recordings) of the Ceremony. The recordings will show crowd shots, the students receiving their diplomas, performers at the event, and handing over of the diplomas. The video recording will record the event process, with an emphasis on the handing over of the diplomas.</p> <p>Processed data:</p> <ul style="list-style-type: none"> <li>– the names and likenesses of students, participants, and the employees of the Organiser as personal data, as well as other personal data appearing on the broadcast (eg: programmes of the students, title and position of performers);</li> <li>– presentations of the performers.</li> </ul>
<b>Purpose of the processing</b>	<p>Documenting the Ceremony for the participants, the popularisation of the PPK's programmes and the Ceremony event.</p> <p>The recordings will be made available to students by the Organiser on a non-public website registered for this purpose. Registered students will be informed of the address of the website in a Neptun message.</p>
<b>Legal basis for the processing</b>	Article 6 (1) f) of GDPR "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party": documentation of reception of the diplomas in a ceremonial setting for the participants, bringing to attention and popularisation of PPK's programmes and higher education activities.
<b>Duration of the processing</b>	For three months after the publication of the article using the recordings. In case the affected objects to the data processing, and there is no legal cause for data processing taking precedent, than the data controller will delete the recording with the personal data.
<b>Right to object</b>	<p>You can always object to the material data procession (recording showing your likeness). Your objection can relate to either or both of the making of the recording and the publication of it.</p> <p>Objection to the making of the recording can happen</p> <ul style="list-style-type: none"> <li>– during the registration to the Ceremony submitted in Neptun;</li> <li>– before the Ceremony, by sending an e-mail to the Organiser: <a href="mailto:diplomaoszt@ppk.elte.hu">diplomaoszt@ppk.elte.hu</a>;</li> <li>– before entering the Ceremony location, or while being there: in this case – according to your decision – you either don't participate in the Ceremony, or stay in a location during the vent, where no recordings will be made (outside the area of the Main hall bordered by pillars);</li> </ul>

	<ul style="list-style-type: none"> <li>– during diploma reception: in this case, when proceeding to the location of the diploma reception, the participant indicates that no recordings can be made of them with the sign bearing the “no photography allowed” icon provided to them.</li> <li>– You can object to the publication of the recording before or after it’s publication by providing the necessary data to be identified on the recording (name, programme, attire, hairdo... etc.). The objection can be sent to the Organiser’s e-mail address: diplomaosztó@ppk.elte.hu.</li> </ul> <p>In case you object, your data can’t be processed further by the data controller, except if they prove, that data processing is for compelling reasons, that take precedence over your interests, rights, and freedoms, or which are connected to the submission, validation, or protection of legal claims (like in the case of video recordings).</p>
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Automated processing: –

**Your rights:**

1. *Transparent information, communication and modalities for the exercise of the rights of the data subject* – In this privacy notice the controller provides information about the circumstances of data processing, e.g. data controller, purposes, legal basis and duration of data processing, enforceable data subject rights, complaint procedures and available legal remedies for data subjects;
2. *Right of access by the data subject* – You have the right to obtain from the controller confirmation as to whether or not personal data concerning you are being processed, the controller shall provide complete information and a copy of the personal data undergoing processing;
3. *Right to rectification* – You have the right to obtain from the controller the rectification of inaccurate personal data concerning you and you also have the right to have incomplete personal data completed;
4. *Right to erasure ('right to be forgotten')* – You can ask for the controller the erasure of your personal data;
5. *Right to restriction of processing* – If you ask, your personal data can’t be processed with the exception of storage;
6. *Notification obligation regarding rectification or erasure of personal data or restriction of processing* – We inform you about the recipients referred to GDPR under the conditions set out in the GDPR;
7. *Right to data portability (if the controller processes your data on the basis of your consent/contract and the processing is carried out by automated means)* – You have the right to receive your personal data, which you have provided to a controller, in a structured, commonly used and machine-readable format and you have the right to transmit those data to another controller;
8. *Right to object* – you can object, at any time to processing of your personal data;
9. *The right not to be subject to a decision based solely on automated processing, including profiling* – Tell us, if you are concerned! This right is not relevant if this privacy notice does not contain information about automated decision-making.
10. *The right to legal remedy* – In the case of breach of your rights, you can turn to the data protection officer, to the National Authority for Data Protection and Freedom of Information or you can sue in court.

**Legal remedy possibilities**

**Data protection officer of the University:**

Dr. Csibra Klára; Rector’s Cabinet Office of Data Protection and Strategic Administration; Ferenciek tere 6 . H-1053 Budapest; Tel.: +3614116500/2855 Email: [dataprotection@rk.elte.hu](mailto:dataprotection@rk.elte.hu)

**National Authority for Data Protection and Freedom of Information;** 1363 Budapest, Pf. 9. Szilágyi Erzsébet fasor 22/c. H-1125 Budapest; [www.naih.hu](http://www.naih.hu); Tel.: +36-1-391-1400

**The court:** You can sue for a claim according to your place of residence.

### Details concerning the rights of data subjects

For the purposes of this information sheet (and of GDPR), '**data subject**' shall mean a natural person who has been identified by reference to specific personal data, or who can be identified, directly or indirectly; '**personal data**' means 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 (Article 4 of GDPR).

Data subjects may contact the controller with regard to all issues related to the exercise of their rights under GDPR. The controller shall provide information on action taken on a request under Articles 15 to 22 to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

#### You can read about your rights below:

- 1. Transparent information, communication and modalities for the exercise of the rights of the data subject (Article 12-14 of GDPR)** With this information sheet, the controller provides the information relating to processing to the data subject referred to in GDPR. If the data subject asks, further detailed oral information can be given, if the data subject proves his or her identity.
- 2. Right of access by the data subject (Article 15 of GDPR)** The data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, has the right to access the personal data – including a copy of the personal data – and the following information:
  - (a) the purposes of the processing;
  - (b) the categories of personal data concerned;
  - (c) 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;
  - (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
  - (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
  - (f) the right to lodge a complaint with a supervisory authority;
  - (g) where the personal data are not collected from the data subject, any available information as to their source;
  - (h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- 3. Right to rectification (Article 16 of GDPR)** The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- 4. Right to erasure ('right to be forgotten') (Article 17 of GDPR)** 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 where one of the following grounds applies:
  - (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - (b) the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
  - (c) the data subject objects to the processing of personal data which is carried out for a) a legitimate interest pursued by the controller or by a third party or b) the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller and there are no overriding legitimate grounds for the processing;
  - (d) the personal data have been unlawfully processed;
  - (e) 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;
  - (f) the personal data have been collected in relation to services related to information society offered directly to children.
- 5. Right to restriction of processing (Article 18 of GDPR)** The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
  - (a) the accuracy of the personal data is contested by the data subject;
  - (b) the processing is unlawful and the data subject opposes the erasure of the personal data;

- (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
  - (d) the data subject has objected to processing of personal data which is carried out for a) a legitimate interest pursued by the controller or by a third party or b) the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- 6. Notification obligation regarding rectification or erasure of personal data or restriction of processing (Article 19 of GDPR)**  
The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out, to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.
- 7. Right to data portability (Article 20 of GDPR)** The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a 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, where:
- (a) the processing is based on consent or on a contract; and
  - (b) the processing is carried out by automated means.
  - (c) In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
  - (d) The exercise of this right shall be without prejudice to the right to be forgotten.
- 8. Right to object (Article 21 of GDPR)** The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is carried out for a) a legitimate interest pursued by the controller or by a third party or b) the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, including profiling<sup>1</sup> based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
- 9. Automated individual decision-making, including profiling (Article 22 of GDPR)** The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. This provision shall not apply if the decision:
- (a) is necessary for entering into, or performance of, a contract between the data subject and a data controller;
  - (b) is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
  - (c) is based on the data subject's explicit consent.
- In this case, the data controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.
- 10. Legal remedy – alternative possibilities**
- 10.1. Data protection officer (Article 38-39 of GDPR)** Data subjects may contact the data protection officer with regard to all issues related to processing of their personal data and to the exercise of their rights under GDPR. If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy. (Article 12(4) of GDPR)
- 10.2. Procedures of the National Authority for Data Protection and Freedom of Information (Articles 57-58 and 77 of GDPR; Sections 51/A (1), 52-54, 55 (1)-(2), 56-58, and 60-61 of InfoAct<sup>2</sup>)** It is possible to initiate an investigation or a data protection authority procedure with the National Authority for Data Protection and Freedom of Information pursuant to the InfoAct. To ensure that the right to the protection of personal data is enforced, the Authority shall commence an authority procedure for data protection at the application of the data subject in line with Sections 60-61 of InfoAct.
- 10.3. Right to an effective judicial remedy against a controller or processor (Section 23. of InfoAct. Article 79 of GDPR)** Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, each data subject has the right to an effective judicial remedy where he or she considers that his or her rights under GDPR have been infringed as a result of the processing of his or her personal data in non-compliance with GDPR. Proceedings against a controller or a processor shall be brought before the courts of the Member State where the controller or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the data subject has his or her habitual residence, unless the controller or processor is a public authority of a Member State acting in the exercise of its public powers.

<sup>1</sup> Article 4 of GDPR: 'profiling' means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

<sup>2</sup> Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information