**PRIVACY NOTICE**

**for members of ALUMNI**

The Hungarian Dance University (hereinafter: MTE or Controller), as data controller, hereby informs the members of ALUMNI system about the processing of their personal data.

1. DATA AND CONTACT INFORMATION OF THE CONTROLLER

Data controller: **Hungarian Dance University**

(in Hungarian *Magyar Táncművészeti Egyetem*) Seat: 1145 Budapest Columbus u. 87-89.

Postal address: 1592 Budapest Zugló 1., Pf. 472. Email address: [titkarsag@mte.eu](mailto:titkarsag@mte.eu)

Name and contact information of the data protection officer: Dr. Nagy Krisztina Law Firm,

[dpo@mte.eu](mailto:dpo@mte.eu).

The Controller complies with the applicable laws in the course of its processing activities, especially with the following:

* 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 (hereinafter: General Data Protection Regulation or GDPR);

* Act CXII of 2011 on the Right to Informational Self-determination and on the Freedom of Information (hereinafter: Info Act).

The Controller is committed to the protection of personal data, processes the personal data in a confidential manner, and implements appropriate security, technical and organisational measures to ensure the protection and security of the personal data.

The Controller reserves the right to amend the present Privacy Notice unilaterally at any time, the data subjects will be informed of any such amendment in due course.

1. CATEGORIES OF THE PERSONAL DATA PROCESSED, PURPOSE, LEGAL BASIS AND PERIOD OF THE DATA PROCESSING

|  |  |
| --- | --- |
| **Purpose of Data Processing** | Development of the MTE Alumni community, sharing notifications about community opportunities and aspirations, news, events, etc. Making life-long learning, continuing education, knowledge acquisition available to Alumni members within the framework of MTE, following their careers and supporting them as needed.  To enable Alumni members to regularly share their knowledge and experiences with other Alumni members, MTE students and instructors.  Preservation and continuous strengthening of MTE's domestic and international reputation and attractiveness, maintenance and generation of interest in MTE's courses, further development of training and education systems, research opportunities and methods.  Cultivating university traditions on a wider and higher level, ensuring regular and continuous communication about MTE's activities, goals, results, opportunities, events, and scientific conferences to be provided to Alumni members. Based on the consent of the data subject, the data controller also sends notifications about the operation of the University, the opportunities open to members of the Alumni community, and community programs directly to the e-mail address provided by the data subject. The Alumni community also serves as a forum for students to communicate with each other. |
| **The Personal Data Processed** | * name * birth name * place of birth * date of birth * e-mail address * mobil number * address (city, street, house number) * study program * graduationa year * current workplace * what types of events would you like to attend |
| **Legal Basis of the Processing** | The data processing is based on the consent of the data subject (i.e. on Article 6 (1)(a) of the GDPR) |
| **Persons Authorized to Access to the Personal Data** | Employees of MTE are authorized to do so, to the extent that is absolutely necessary for the performance of the duties and responsibilities. |
| **Recipients of the Personal Data** | MTE does not forward or pass on the processed personal data to third parties without the consent of the data subject. |
| **Transfer of data to a third country** | The Data Controller uses the Google Form interface for Alumni registration. Google Ireland Limited is a company incorporated in Ireland and operating under the laws of Ireland. Google's privacy policy is available at: [www.policies.google.com/privacy](http://www.policies.google.com/privacy) )  The Data Controller uses the Mailchimp system to send newsletters. "Mailchimp" is operated by Rocket Science Group, based in Atlanta, Georgia, United States. Mailchimp's privacy policy is available at: <https://mailchimp.com/gdpr/> and <https://mailchimp.com/about/security/> |
| **Period of the Data Processing** | The personal data provided by the data subject will be processed by MTE until the consent of the data subject is revoked, but for a maximum of eighty years from the termination of the student relationship |

1. DATA SECURITY MEASURES

The Controller stores the personal data at its seat on a paper-based way and on the servers thereat. The Controller does not use services of third parties to the storage of the personal data, and not assign data processors. The Controller implements appropriate IT, technical and personnel-related measures to ensure the protection of the processed personal data against, among others, unauthorised access or unlawful alteration. The IT Policy of the Controller regulates the protection of electronically stored data.

1. RIGHTS OF THE DATA SUBJECTS
   1. **Brief summary of your rights (the detailed description of the rights is set forth in the next point):**
      1. right to transparent information **– you may require information about the processing of your personal data at any time;**
      2. right of access to your personal data **– you may have access to your personal data processed by us and to the details of the processing at any time;**
      3. right to rectification of your personal data **– if we process your personal data inaccurately, please, let us know and we will rectify them;**
      4. right to erasure (‘right to be forgotten’) and right to restriction of the data processing **– in certain cases, you are entitled to require us to erase your personal data processed, or to store them only without any other processing activity;**
      5. right to data portability (only in regard with data processed based on consent or contract, if the processing is carried out by automated means) – **if you need them we provide you, in electronic format, with your personal data which you have provided to us;**
      6. right to object **– you may object to the processing of your personal data which is based on legitimate interest at any time;**
      7. right to remedy **– in case your rights are infringed you may turn to the data protection officer or seek remedy at the Hungarian National Authority for Data Protection and Freedom of Information or the courts.**

**Who can you turn to if you would apply for remedy or if you have questions regarding the data processing?**

With questions, requests: to the data protection officer of the Controller

**The data protection officer is:**

Dr. Nagy Krisztina Law Firm

email address: [dpo@mte.eu](mailto:dpo@mte.eu)

With filing a complaint: to the Hungarian National Authority for Data Protection and Freedom of Information

**Contact information of the Authority (in Hungarian *Nemzeti Adatvédelmi és Információszabadság Hatóság*):**

Registered office: HU-1125 Budapest, Falk Miksa street 9-11.

Website: [www.naih.hu](http://www.naih.hu/)

Telephone number: +36-1-391-1400

You may launch a lawsuit for the protection of your personal data

against the Controller as respondent at the regional courts competent, at your discretion, based on the seat of the Controller or your residence, which proceeds with priority in the case. The Budapest-Capital Regional Court (in Hungarian *Fővárosi Törvényszék*) has competence for the lawsuit based on the seat of the Controller.

* 1. **Detailed description of the rights and remedial opportunities of the data subjects concerning the data processing**

Being aware of the rights and remedial opportunities of the person affected by the data processing (hereinafter: data subject) is important since the Controller processes personal data.

Any information shall be qualified as **personal data** based on which the data subject can be identified. Accordingly, not only the name or the ID number of the data subject is personal data but any information relating to him/her.[[1]](#footnote-1)

According to the provisions of Chapter III (‘Rights of the data subject’) of the GDPR **the data subjects shall have the following rights**:

1. Right to information (Articles 12-14 of the GDPR)

The controller shall take appropriate measures to provide any information referred to in Articles 13 and 14 and any communication under Articles 15 to 22 and 34 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language. The Controller fulfils its obligation on providing information in regard with the data processing set out here through the present document.

**Right to withdraw the consent: if the data processing is based on the consent of the data subject (i.e. on Article 6 (1)(a) or Article 9 (2)(a) of the GDPR), the data subject shall have the right to withdraw his/her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.**

1. Right of access by the data subject (Article 15 of the GDPR)

The data subject shall have the right to obtain from the Controller confirmation as to whether or not personal data concerning him/her are being processed, and, where that is the case, access to the personal data and the following information:

* + the purposes of the data processing;
  + the categories of personal data concerned;
  + 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;
  + the envisaged period for which the personal data will be stored;
  + the existence of the right to request from the Controller rectification or erasure of personal data, restriction of data processing, or to object to the data processing;
  + the right to lodge a complaint with a supervisory authority;
  + where the personal data are not collected from the data subject, any available information as to their source;
  + the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

If the personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

The Controller shall provide a copy of the personal data undergoing the data processing. For any further copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs. The Controller provides the information in electronic form if the data subject requires so.

The right to information may be exercised in writing (including the electronic format) through the above contact details of the Controller, and it may be fulfilled after the identity of the data subject is verified in an authentic way.

1. Right to rectification of the data subject’s data (Article 16 of the GDPR)

The data subject shall have the right to obtain from the Controller the rectification of inaccurate personal data concerning him/her as well as to have incomplete personal data completed, which the Controller has to perform without undue delay.

1. Right to erasure - ‘right to be forgotten’ (Article 17 of the GDPR)

The data subject shall have the right, should any of the following grounds exist, to obtain from the Controller the erasure of personal data concerning him/her without undue delay:

* + the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  + the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
  + the data subject objects to the processing and there are no overriding legitimate grounds for the processing (if applicable);
  + the personal data have been unlawfully processed;
  + 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;
  + the personal data have been collected in relation to the offer of information society services.

The above rule on the erasure of the data shall not apply to the extent that processing is necessary:

* + for exercising the right of freedom of expression and information;
  + for compliance with a legal obligation which requires processing by Union or Member State law to which the Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;
  + for reasons of public interest in the area of public health, for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or
  + for the establishment, exercise or defence of legal claims.

1. Right to restriction of processing (Article 18 of the GDPR)

The data subject shall have the right to obtain from the Controller restriction of the data processing if one of the following conditions applies:

* + the accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data;
  + the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  + 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; or
  + the data subject has objected to the data processing, in which case the restriction is applicable for the period until it is verified whether the legitimate grounds of the Controller override those of the data subject.

If the data processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A data subject who has obtained restriction of the data processing shall be informed by the Controller before the restriction of processing is lifted.

1. Notification obligation regarding rectification or erasure of the personal data or restriction of the data processing (Article 19 of the GDPR)

The Controller shall communicate any rectification or erasure of the personal data or restriction of the data processing 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.

1. Right to data portability (Article 20 of the GDPR)

The data subject shall have the right to receive the personal data concerning him/her, which he/she has provided to a Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, if

* + the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
  + the processing is carried out by automated means.

In exercising his/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.

The exercise of this right shall be without prejudice to the right to be forgotten. This right shall not adversely affect the rights and freedoms of others.

1. Right to object (Article 21 of the GDPR)

The data subject shall have the right to object, on grounds relating to his/her particular situation, at any time to the processing of personal data concerning him/her which 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, or which is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, including profiling 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.

If the personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of the personal data concerning him/her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

If the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

1. Right of the data subject in case of automated individual decision-making (Article 22 of the GDPR)

The data subject shall have the right not to be subject to a decision based solely on automated data processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/her.

The above right shall not apply if the decision:

* + is necessary for entering into, or performance of, a contract between the data subject and the Controller;
  + 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
  + is based on the data subject's explicit consent.

**Proceeding of the Controller in case of the data subject exercises his/her rights:**

The Controller shall provide information to the data subject on the action taken on a request under Articles 15 to 22 without undue delay and in any event within one month as of receipt of the request. That period may be extended by two further months if 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 as of receipt of the request, together with the reasons for the delay. If the data subject makes the request by electronic means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

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 as 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.

Information provided and any communication and any actions taken shall be provided free of charge. If the requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the Controller may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or refuse to act on the request.

The Controller shall communicate any rectification or erasure of the personal data or restriction of the data processing 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.

The Controller shall provide a copy of the personal data undergoing the data processing. For any further copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs. If the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

**Possibility of remedy regarding the data processing:**

**With questions and requests, you may turn to the data protection officer of the Controller, i.e. to:**

Dr. Nagy Krisztina Law Firm

email address: [dpo@mte.eu](mailto:dpo@mte.eu).

If you believe that the Controller has infringed the applicable data protection laws in the course of the processing of your personal data,

* + you may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (in Hungarian *Nemzeti Adatvédelmi és Információszabadság Hatóság*):

Registered office: HU-1125 Budapest, Falk Miksa streeet 9-11.

Mailing address: 1363 Budapest, Pf. 9.

Email address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) Website: [www.naih.hu](http://www.naih.hu/)

Telephone number: +36-1-391-1400

or

* + you may launch a lawsuit for the protection of your personal data against the Controller as respondent at the regional courts competent, at your discretion, based on the seat of the Controller or your residence, which proceeds with priority in the case. The Budapest-Capital Regional Court (in Hungarian *Fővárosi Törvényszék*) has competence for the lawsuit based on the seat of the Controller.

1. **‘personal data’** (Article 4 (1) of the GDPR) 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; [↑](#footnote-ref-1)