



Bölcsészettudományi Kutatóközpont
1097 Budapest, Tóth Kálmán utca 4.



PRIVACY STATEMENT

REGARDING RECIPIENTS OF NEWSLETTERS, INVITATIONS,
PUBLICATIONS AND PARTICIPANTS OF PUBLIC EVENTS

Entering into force:

15 Jun 2022



Bölcsészettudományi
Kutatóközpont

I. Name and contact details of Data Controller

Research Centre for the Humanities

Postal address: 1097 Budapest, Tóth Kálmán u. 4.

Public administration ID number. (ÁHT azonosító): 039738

Tax ID number: 15300629-2-43

E-mail: titkarsag@abtk.hu

Website: <https://abtk.hu>

II. General provisions

The purpose of current privacy statement is to provide information on the processing of personal data, with a special emphasis on the identity of data controller and processor, the purpose of data processing, the scope of personal data, the legal grounds, the period of processing, the eventual external data processors, the possible range of persons accessing data, the means of data protection, the rights of the data subject and the enforcement of rights.

This Privacy Statement is published and permanently accessible on the website of HRC (<https://abtk.hu/en/privacy-policy>).

1. Legal background of data processing

- Act CXII. of 2011 on Information, self-determination and freedom of information (hereafter referred to as: InfoAct);
- Act V. of 2013 on the Civil Code;
- Act I. of 2012 on the Labour Code;
- 2016/679 Regulation 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, (hereafter referred as: Regulation)

HRC collects and processes data in a lawful, fair and transparent manner complying with the legal provisions. HRC shall not use disclosed personal data for other purposes than provided in this document. HRC collects and processes data either disclosed directly by the data subjects or on a lawful basis in order to exercise his public duty. He shall by no circumstances disclose the personal data to third parties – unless legal provisions in force order it differently.

HRC may only collect and store personal data upon the consent of the data subject or in order to comply with binding legal obligations and only to the extent of such consent or legal obligation.

III. Information on processing of personal data

Present document governs the following events of data-processing by HRC

1. disseminating information on seminars, conferences, workshops and other professional events, or circulating information letters,
2. dissemination of publications or professional newsletters,
3. data processing in relation with the organisation of events.

Event means in this information document professional events organized by HRC as seminars, conferences, workshops or other public events.

1. Processing of personal data by sending invitations to events and information letters

1.1. Scope and purpose of data

Regarding the invitations to events, HRC collects and stores contact details (names and email addresses) of those who have registered to attend regular events.

The purpose of processing these data is to offer information on a regular basis about public events (seminar series).

1.2. Legal ground

The legal ground is constituted by the consent of the data subject.

1.3. Duration of data processing in connection with the organisation of events

In the main text of invitations and information letters, HRC provides information about unsubscribing from the address list. Such cancellation requests can also be sent to the central e-mail account: titkarsag@abtk.hu

2. Processing personal data by sending publications and professional newsletters

2.1. Scope and purpose of data

In order to disseminate professional newsletters and publications, HRC collects and processes the names and email-addresses of the subscribers. The purpose of data processing is to be able to provide information on a regular basis about HRC' publications and scientific news.

2.2. Legal ground

The legal ground is constituted by the consent of the data subject.

2.3. Duration of data processing

HRC process the data until the withdrawal of the consent. The subscriber is entitled to request his removal from the mailing list and thus to delete his personal data at any moment. Information about issuing such request is provided in the main body of the newsletters, on the relevant the webpages and is part of any communication. The information includes the name and contact details of the person responsible for handling such a request. The request can also be sent to the central email-address of HRC: titkarsag@abtk.hu.

3. Data processing during public events organized by HRC

3.1. There are three kinds of data collecting and processing regarding professional events:

- processing of data of the preliminary registered persons,
- processing of data of the persons attending the event (preparation of attendance lists),
- handling pictures or video's taken at the event.
-

3.1.1. Preliminary registration for an event

In case of previous registration for an event (through a website, e-mail address or any other form given according to the invitation), HRC processes the following personal data:

- name,
- affiliation/employer,
- contact details.

The purpose of data processing is to indicate the number of attendees for an appropriate room planning.

3.1.2. Attendance list

In most cases, in order to document an event, it is necessary to prepare an attendance list which demonstrates the actual number and composition of persons attended. On such a list, HRC stores the following data:

- name,
- affiliation, employer,
- contact details.

The purpose of data processing is to record the number of participants in the event, which is a mandatory element of the financial report, requested by the funding institution.

3.1.3. Photo images and video's

In order to document events HRC may take photos or videos during his events according to the following principles:

- the photos or videos primarily aim to display crowds and should not display individuals in an identifiable manner,
- in case of taking a picture or video of an identifiable individual attending an event, he or she shall be subject to give his or her distinct and prior consent to this operation.

The purpose of data processing is to record the number of participants in the event, which is a mandatory element of the financial report requested by funding institution.

Under his communication activity, HRC may publish pictures or videos from his events on which individual persons are not identifiable. If a person is identifiable on the picture or video, he or she shall be asked to present his or her consent to the publication.

3.2. *Legal grounds*

- concerning to the preliminary registrations, the legal ground is the consent of the data subject according to the Regulation Art. 6. (1) a),
- concerning to the attendance lists, photo and video takings the legal ground is the legitimate interest pursued by HRC in order to give sufficient documentation for his externally funded projects according to the Regulation Art. 6. (1) f), in lack of such legitimate interest the legal ground is the consent of the data subject.

3.3. *Duration of data processing*

Data on preliminary registration shall be deleted after the event. Attendance lists, videos and picture images are stored by the end of the reporting periods stated in the funding contracts.

IV. Technical information on data processing

HRC stores and processes data on the server located at his headquarter office (1097 Budapest, Tóth Kálmán u. 4.). The following legal entities – besides HRC – have the means to access the stored personal data on contractual grounds:

- Master-Hardware Kft. (1213 Budapest, Horgász utca 6.) as IT service provider;
- InteRoot Számítástechnika, ifj. Gereöffy Árpád e. v. (1085 Budapest, Somogyi Béla u. 17.) as IT service provider;
- Facility Management Centre of the Hungarian Academy of Sciences, (1112 Budapest, Budaörsi út 45.).

V. Rights of the data subject

Complying with the Regulation, the data subject shall have the following rights during the period of data processing:

- right of access to personal data and information on data processing,
- right to rectification,
- right to restriction of processing,
- right to erasure,

- right to data portability,
- right to object,
- right of withdrawal of the consent.

In case the data subject intends to exercise his or her rights, he or she needs to be identified during handling the request. For identification, he or she shall be asked to disclose personal data. The request or complaint will be stored in the e-mail account of HRC. HRC stores these requests, complaints for the duration of 5 years. Complaints and requests shall be answered within 30 calendar days.

Right of withdrawal of the consent

The data subject shall any time withdraw his or her consent to data processing. In case of withdrawal of the consent, the corresponding data shall be erased from the databases.

Right of access to personal data and information on data processing

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

- to the personal data and
- to the following information:
 - the purposes of the processing;
 - the categories of personal data concerned;
 - the recipients or categories of recipient to whom the personal data have been or will be disclosed;
 - where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or in case of the processing is based on the legitimate interest of HRC to object to processing;
 - the right to lodge a complaint with a supervisory authority;
 - where the personal data are not collected from the data subject, information as to their source;
 - the existence of automated decision-making (if there is applicable), including profiling, and, 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.

Exercising these rights serves to determine and control the lawfulness of data processing. In case of repeated and excessive requests, HRC may charge a reasonable fee for providing information based on administrative costs.

Access to personal data is provided electronically. After identifying the data subject, HRC sends information on the processed data in an email message. The data subject shall indicate in his or her request whether it concerns the personal data or the related information.

Right to rectification.

The data subject shall have the right to obtain from HRC without undue delay the rectification of inaccurate personal data concerning him or her.

Right to restriction of processing.

The data subject shall have the right to obtain from HRC restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling HRC to verify the accuracy of the personal data, if verifying is not necessary, HRC shall not apply restriction;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- HRC 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;
- the data subject has objected to processing but HRC can demonstrate compelling legitimate ground for processing, for the period of verification whether the legitimate grounds of HRC override those of the data subject, processing shall be restricted.

Where 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.

The data subject shall be informed by HRC (at least 3 days prior) before the restriction of processing is lifted.

Right to erasure ('right to be forgotten').

The data subject shall have the right to obtain from HRC the erasure of personal data concerning him or her without undue delay and HRC shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- 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 based on legitimate interest and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed and it has been established after investigating a complaint;
- the personal data have to be erased for compliance with a legal obligation in Union or state law to which HRC is subject.

Where HRC on any legal grounds has made the personal data public and is obliged pursuant to the provisions above to erase the personal data, he, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

Erasure 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 HRC is subject or for the performance of a task carried out in the public interest;
- for the establishment, exercise or defence of legal claims.

Right to object

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 based on HRC's legitimate interest.

HRC shall no longer process the personal data unless he 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.

Right to data portability

Where the data processing is essential to comply with contractual obligations, the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to HRC, and have HRC to transmit those data to another data controller.

Remedies

Where the data subject considers that his or her rights under the Regulation or under other binding legal acts have been infringed or his or her requests was not handled satisfactory to him or her, he or she has the right to lodge a complaint to the National Data Security and Freedom of Information Authority (Nemzeti Adatvédelmi és Információszabadság Hatóság) to initiate an investigation. (Postal address: 1530 Budapest, Pf.: 5., e-mail: ugyfelszolgalat@naih.hu)

The data subject has the right to launch a civil procedure against HRC if legislative provisions related to GDPR were infringed or if HRC failed in executing his/her request on data protection.

VI. Security of personal data

During the operation of information technology systems, HRC shall implement appropriate authorization, technical and organisational measures to ensure that unauthorized persons shall not have access to personal data and shall not be able to erase, download or alter personal data. The data protection and security measures are employed for all data processors.

HRC documents any occurring personal data breach and if necessary, communicates it to the data subject.

VII. Final provisions

HRC reserves the right to modify or amend current privacy statement. Modifications shall not affect the provisions relating to the purpose of and the legal ground for data processing. The data subject accepts the amended statement by continuing using the website of HRC after the date of modification.

Where HRC intends to change the purpose of collecting and processing personal data, he shall communicate the followings to the data subject prior to that operation:

- the new purpose of processing;
- the period for which the personal data shall be stored, if that is not possible than the criteria used to determine this period;
- the existence of the right to request access, rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or in case the processing is based on the legitimate interest of HRC the right to object to processing;
- the existence of the right to data portability in case the processing is based on contract or consent;
- the right to withdraw consent at any time;
- the right to lodge a complaint with the supervising authority;
- the legal ground (contract or legal provisions) for collecting personal data and whether the collection is necessary for facilitating contracting, whether the data subject is obliged to disclose his or her personal data and what are the possible consequences of denying the disclosure;
- the existence of automated decision-making (if it is applicable), including profiling, and, 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.

Data processing shall proceed after the communication described above. Where the legal ground is the consent of the data subject, his or her consent is also necessary for further procedure.