PRIVACY NOTICE
short-cycle micro-credential programmes
Applicable from: 5 February 2026 until further notice

1. Purpose Of Data Processing

The purpose of this Privacy Notice is to inform you about the data processing operations carried out by Dennis Gabor University (registered office: 70 Fejér Lipót Street, Budapest 1119, Hungary) (hereinafter: DGU or the Data Controller) in connection with its activities relating to short-cycle micro-credential programmes, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: the GDPR) and the provisions of applicable Hungarian legislation.

DGU's activities include the organisation and delivery of short-cycle micro-credential programmes.

2. Data Controller

DGU qualifies as the data controller in respect of the data processing activities described in this Privacy Notice. The Data Controller's contact details are as follows:

Name of the Data Controller: **Dennis Gabor University**
Registered Office: 1119 Budapest, Fejér Lipót utca 70.
Institutional Identifier: FI54333
Telephone Number: +36 20 999 8900
Website: www.gde.hu

The University's Data Protection Officer: **dr. Vámos Ágnes**
Contact Details: adatvedelem@gde.hu

In the course of its data processing operations, the Data Controller complies with the requirements of applicable legislation and, when establishing its data processing practices, fully respects the protection of individuals' fundamental rights and privacy, with particular regard to the provisions of the GDPR.

If you have any questions or comments, please contact us at adatvedelem@gde.hu.

3. Data Processing Relating To Student Status

The Data Controller processes the categories of personal data to be processed as defined in Annex 3 to Act CCIV of 2011 on National Higher Education (hereinafter: the Nftv.).

Purpose Of Data Processing	Legal Basis For Data Processing	Personal Data Processed	Duration Of Data Processing
Application to the programme, establishment of participation (student status), management of tuition fee payment and administration, and	Article 6(1)(b) GDPR – processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the	Data required to identify the data subject and to register the application (in particular: name, birth details, mother's maiden name, email address, telephone number,	Eighty years from the termination of the student status. If, despite the application, participation is not established (e.g. withdrawal, unsuccessful fee payment, or the

completion of the enrolment process.	data subject prior to entering into a contract.	permanent address/place of residence, billing details, name of the programme, date of application), as well as administrative data required to establish participation (student status).	programme does not commence), the Data Controller will process the related personal data for two years from the closure of the application period.
Maintaining statutory records and processing data within the electronic student records system. For the purposes of performing its statutory record-keeping obligations in respect of the data prescribed by law, the Data Controller operates a unified electronic student records system.	Article 6(1)(c) GDPR – processing is necessary for compliance with a legal obligation (Section 18(1)(e) of the Nftv.; Section 34 of the Nftv. Implementing Decree).	The data specified in Annex 3, Section I/B of the Nftv., and in Section 60 of the Nftv. Implementing Decree.	Eighty years from the termination of the student status.
Data processing required for the delivery of online teaching and examinations.	Article 6(1)(c) GDPR – processing is necessary for compliance with a legal obligation (Section 18(1)(c) of the Nftv.).	Name, email address, and Neptun code.	Eighty years from the termination of the student status.
Sending informational emails for study-related purposes.	Article 6(1)(b) GDPR – processing is necessary for the performance of a contract to which the data subject is a party.	Neptun code, name, email address, start year, and programme name.	Eighty years from the termination of the student status.

3.1. Data Transfers

On the basis of point I/B.4 of Annex 3 to the Nftv., the Data Controller transfers the data as follows: to the maintainer, all data; to the court, the police, the public prosecutor's office, the judicial enforcement officer and the public administrative authority, the data necessary for deciding the specific case; and to the body responsible for operating the higher education information system, all data.

3.2. Access To Data, Storage And Data Processors

The Data Controller takes particular care to ensure that applicants' and students' data may be accessed on the Data Controller's side only by authorised employees and contractors of those organisational units involved in organising, delivering and monitoring education, fulfilling study-related and payment obligations, and providing mandatory data disclosures. With regard to data stored in the Neptun student administration system, the IT department and the Student Administration Centre also have access.

For the primary storage of personal data, the Data Controller uses the Neptun system, which is uniformly applied across higher education institutions and is operated by SDA Informatika Zrt. as a data processor. SDA Informatika Zrt.'s data processing activities are governed by a data processing agreement concluded with the Data Controller. The Data Controller stores the data in its electronic systems.

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Data Processor	Function
SDA Informatika Zrt. Registered office: 46 Retyezáti Street, Érd 2030, Hungary Company registration number: 01-10-140314 |	Operation of the Neptun system, used as the unified higher education student administration system and for the primary storage of personal data.

3.3. Source Of Personal Data And Categories Of Data Received

The primary source of personal data is the data subject, who applies for the programme electronically. In addition, the Data Controller may periodically (e.g. annually) receive information from recruitment partner(s) cooperating with DGU about the outcome of recruitment activities, which typically may include data necessary to identify the data subject (e.g. name and contact details) and administrative information related to the recruitment (e.g. the fact and date of the recruitment).

3.4. Recipients And Data Transfers (Recruitment Partner)

For the purposes of organising and delivering the programme and managing applications, the Data Controller may, where necessary, provide feedback to the recruitment partner on the status of an application (e.g. whether enrolment has been completed), strictly to the extent necessary to achieve the relevant purpose. The categories of data transferred by the recruitment partner to DGU are determined within the framework of the specific cooperation.

3.5. International Data Transfers

If the recruitment partner and/or service providers engaged by the recruitment partner (e.g. operators of IT systems) carry out data processing operations outside the European Union and the European Economic Area, the Data Controller will ensure that any such transfers are made subject to appropriate safeguards in accordance with Chapter V of the GDPR (e.g. an adequacy decision of the European Commission and/or standard contractual clauses).

4. Confidentiality And Security Of Data

The Data Controller treats personal data as confidential and takes all IT-related and other measures supporting data security in connection with data storage and processing in order to safeguard the data.

The Data Controller and the data processor implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, taking into account the state of the art and the costs of implementation, as well as the nature, scope, context and purposes of the processing and the varying likelihood and severity of risks to the rights and freedoms of natural persons.

In providing the service, the Data Controller selects and operates the IT tools used for processing personal data in such a way that the processed data:
- are accessible only to authorised persons,
- are protected against unauthorised access through server- and application-level security procedures, and the integrity of the data as well as the verifiability of any changes are ensured,
- remain available throughout the entire duration of the processing.

5. Your Rights

Please note that you may exercise your rights under applicable law by contacting us at adatvedelem@gde.hu

Pursuant to Article 7(3) of the GDPR, the data subject has the right to withdraw their consent at any time.

The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Pursuant to Article 15 of the GDPR, the data subject may request access to their personal data as set out below.

The data subject has the right to obtain from the data controller confirmation as to whether or not personal data concerning them are being processed and, where that is the case, access to 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 right to request from the data controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, and 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, 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.

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

Pursuant to Article 16 of the GDPR, the data subject has the right to obtain from the data controller the rectification of inaccurate personal data concerning them.

Where the data subject so requests, the data controller shall, without undue delay, rectify inaccurate personal data concerning them. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Pursuant to Article 17 of the GDPR, the data subject has the right to obtain from the data controller the erasure of personal data concerning them, as set out below.

The data subject has the right to obtain from the data controller the erasure of personal data concerning them, and the Data 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 objects to the processing carried out in the public interest, in the exercise of official authority, or for the purposes of the legitimate interests of the data controller (or a third party), and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing for direct marketing purposes;
c) the personal data have been processed unlawfully;
d) the personal data must be erased for compliance with a legal obligation in Union or Member State law (Hungarian law) to which the Data Controller is subject.

Where the Data Controller has made the personal data public and is obliged to erase it, the Data Controller shall, taking account of available technology and the costs of implementation, 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.

The data subject's right to erasure may be restricted only where one of the following exceptions set out in the GDPR applies; that is, where such an exception applies, the continued retention of the personal data may be regarded as lawful:

a) for exercising the right of freedom of expression and information, or for compliance with a legal obligation;
b) for the performance of a task carried out in the public interest;
c) for the exercise of official authority vested in the data controller, or for reasons of public interest in the area of public health;
d) for archiving purposes in the public interest;
e) for scientific or historical research purposes or statistical purposes; or

f) for the establishment, exercise or defence of legal claims.

Pursuant to Article 18 of the GDPR, the data subject has the right to obtain from the data controller restriction of processing of personal data concerning them, as set out below.

The data subject has the right to request that the data controller restrict processing where one of the following applies:

a) the data subject contests the accuracy of the personal data, in which case the restriction shall apply for a period enabling the Data Controller to verify the accuracy of the personal data;
b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
c) the Data Controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims;
d) the data subject has objected to processing carried out in the public interest, in the exercise of official authority, or for the purposes of the legitimate interests of the data controller (or a third party); in this case, the restriction shall apply pending verification of whether the Data Controller's legitimate grounds override those of the data subject.

The data subject has the right to request that the data controller restrict processing where one of the following applies:

a) the data subject contests the accuracy of the personal data, in which case the restriction shall apply for a period enabling the Data Controller to verify the accuracy of the personal data;
b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
c) the Data Controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims;
d) the data subject has objected to processing carried out in the public interest, in the exercise of official authority, or for the purposes of the legitimate interests of the data controller (or a third party); in this case, the restriction shall apply pending verification of whether the Data Controller's legitimate grounds override those of the data subject.

Where processing has been restricted on the above grounds, such personal data shall, with the exception of storage, be processed only 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.

Pursuant to Article 20 of the GDPR, the data subject has the right to data portability as set out below:

The data subject has the right to receive the personal data concerning them, which they have provided to a data controller, in a structured, commonly used and machine-readable format, and has the right to transmit those data to another data controller without hindrance from the data controller to which the personal data have been provided, where the processing is based on the data subject's consent or on the performance of a contract with the data subject, and the processing is carried out by automated means.

In exercising the right to data portability, the data subject has the right, where technically feasible, to have the personal data transmitted directly from one controller to another.

The exercise of the right to data portability shall not adversely affect the right to erasure. The right to data portability does not apply where 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 data controller.

The right to data portability shall not adversely affect the rights and freedoms of others.

Pursuant to Article 21 of the GDPR, the data subject has the right to object to the processing of personal data concerning them, as set out below:

The data subject has the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on points (e) or (f) of Article 6(1), including profiling based on those provisions. In such cases, the data controller shall no longer process the personal data unless the data 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.

6. Judicial Remedies, Complaints To The Supervisory Authority, Questions

If the data subject considers that the Data Controller has infringed applicable data protection provisions when processing their personal data, they may:

- lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (9–11 Falk Miksa Street, Budapest 1055, Hungary; postal address: 1363 Budapest, Pf.: 9.); or
- bring legal proceedings before a court in order to protect their data.

If you bring court proceedings, you may choose whether to submit your claim to the competent court based on your place of residence or habitual residence, or based on the Data Controller's registered office

We respectfully ask data subjects that, if they consider that an infringement has occurred or is occurring in connection with any of the processing activities described in this notice, they should, where possible, first contact the University's Data Protection Officer. Contact details: adatvedelem@gde.hu. The University will take all necessary steps to ensure that complaints are investigated thoroughly and that the matter is resolved in a manner satisfactory to all parties concerned.