

PRIVACY STATEMENT

At Central European University (seat: 224 West 57th street, New York, NY 10019, USA ; establishment: 1051 Budapest, Nádor u. 9.) and Közép-európai Egyetem (seat: 1051 Budapest, Nádor u. 9.) (Central European University and Közép-európai Egyetem hereinafter jointly as “CEU”) we place great emphasis on the protection of your personal information and compliance with the applicable data privacy requirements, including specifically the EU General Data Protection Regulation (GDPR)¹. This Privacy Notice relates to the collection, use, transfer, and retention of personal data managed by Human RightS Initiative.

Please read it carefully before submitting your personal data.

Who are we and what do we do?

The Human RightS Initiative (HRSI) is an awareness raising and capacity building organization based at CEU. It was founded in 1999 by the students of the CEU Legal Studies Human Rights Program. Since then it has grown into an internationally-recognized human rights organization, focusing on youth involvement, education and active student participation. HRSI's mission is to promote social engagement through awareness raising and capacity building. Our main target groups are CEU students and alumni, local and regional students, NGO staff and activists as well as local and regional NGOs. HRSI works with local and regional human rights organizations, as well as international organizations such as the Council of Europe.

Identity and Contact Details of the Joint Data Controllers

Central European University and Közép-európai Egyetem qualify as joint data controllers according to Article 26 of the GDPR (the “Joint Data Controllers”).

Közép-európai Egyetem

1051 Budapest
Nador u. 9.
Phone: + 36 1 3273000

Central European University

224 West 57th street
New York
NY 10019, USA

Contact Details of the Joint Data Protection Officer

Irisz Szel, Data Protection Officer
1051 Budapest
Nador u. 9.
Phone: + 36 1 3273000
Email: privacy@ceu.edu

¹ 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.

What is the Purpose and Legal Basis of Processing your Data?

What kind of personal data do we collect?

How long will your Information be Held?

Interaction Matters Series			
Purpose of data processing	Category of personal data	Legal basis	Retention period
Collecting applications for the workshop	Interaction Matters Series Template (registration form): <ul style="list-style-type: none"> • First name or nickname • Email ID • Affiliation • Date of application 	Consent of data subject based on the GDPR Article 6 (1) a)	Until the consent of the person concerned has been withdrawn; in the absence thereof, up to the end of the Academic Year in which the workshop was held
Contacting participants regarding the workshop, including distributing materials about the workshop (if applicable)	<ul style="list-style-type: none"> • First name or nickname • Email ID 		
Taking photographs at the event	<ul style="list-style-type: none"> • Image 	Consent of data subject based on the GDPR Article 6 (1) a)	Until the consent of the person concerned has been withdrawn
Publishing photographs taken at the event on HRSI promotion material and social media pages	<ul style="list-style-type: none"> • Image 	Consent of data subject based on the GDPR Article 6 (1) a)	Until the consent of the person concerned has been withdrawn
One Day Workshop			
Collecting applications for the workshop	<ul style="list-style-type: none"> • First name • Last name • Department/Organization • Educational background • Work experience • Volunteer and community service experience • Statement of Purpose 	Consent of data subject based on the GDPR Article 6 (1) a)	Until the consent of the person concerned has been withdrawn; in the absence thereof, up to the end of the Academic Year in which the workshop was held

Selecting participants if there are more than 20 who apply	<ul style="list-style-type: none"> • First name and Last name • Email ID • Affiliation • Date of application 	Legitimate interests of the data controller based on the GDPR Article 6 (1) f)	Until the consent of the person concerned has been withdrawn; in the absence thereof, up to the end of the Academic Year in which the workshop was held
Contacting selected and non-selected (if any) participants regarding the workshop, including distributing materials about the workshop (if applicable)	<ul style="list-style-type: none"> • First name Last name • Email ID 	Consent of data subject based on the GDPR Article 6 (1) a)	Up to the end of the Academic Year in which the workshop was held
Taking photographs at the event	<ul style="list-style-type: none"> • Image 	Consent of data subject based on the GDPR Article 6 (1) a)	Until the consent of the person concerned has been withdrawn
Publishing photographs taken at the event on HRSI promotion material and social media pages	<ul style="list-style-type: none"> • Image 	Consent of data subject based on the GDPR Article 6 (1) a)	Until the consent of the person concerned has been withdrawn
Preparing and distributing certificates after the workshop	<ul style="list-style-type: none"> • Name • Signatures of the trainer and the HRSI coordinator 	Legitimate interests of the data controller based on the GDPR Article 6 (1) f)	Until the consent of the person concerned has been withdrawn
Coming Out Photo-campaign			
Collecting applications for the campaign	<ul style="list-style-type: none"> • Name • Story • Sexual orientation • CEU Affiliation 	Consent of data subject based on the GDPR	Until the consent of the person concerned has been withdrawn
Taking photographs of the participants	<ul style="list-style-type: none"> • Image 		

Publishing photos and stories on HRSI social media pages	<ul style="list-style-type: none"> • Name • Image • Story • Sexual orientation • CEU Affiliation 	Article 6 (1) a)	
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After the period specified above, we shall delete your personal data from our system, unless data processing has a further legal basis.

Where we have made the personal data public and are obliged pursuant to the GDPR to erase your personal data, we, 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 you have requested to be erased by such controllers of any links to, or copy or replication of, those personal data.

After you withdraw your consent, we will process your personal data for a maximum of 25 (twenty-five) days for technical reasons. After this period, we shall delete your personal data from our system.

[Who Receives your Information?](#)

CEU works closely together to provide a coordinated approach. Any transmission of data between the Joint Controllers and their internal units is managed through agreed processes which comply with relevant data protection legislation.

Unless we have a legal obligation to do so, we will not disclose your data to individuals, organizations, or other entities outside CEU other than those who are acting as agents and data processors working on our behalf.

Specific third parties acting as data processors we work with include:

- **Microsoft 365:** Based in the US, with CEU’s data stored within EU in datacenters located in Amsterdam and Dublin. Software as a service which provides CEU’s email and document management.

We use the following social media pages:

Social Media	Privacy Notice
Facebook	https://www.facebook.com/privacy/explanation
Instagram	https://help.instagram.com/519522125107875?helpref=page_content
Flickr	https://www.flickr.com/help/privacy
Youtube	https://support.google.com/youtube/answer/2801895?hl=hu

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

What are your Rights?

You have the right:

- to access your personal information – you can obtain a confirmation that we are processing your data and information how we process it. We suggest that you make a request in writing.
- to object to the processing of your personal information – this allows you to ask us to stop processing your data at any time. Where we rely on legitimate interest, you must give specific reasons why you are objecting the processing of your data. In this case this is not an absolute right, we can demonstrate compelling legitimate grounds for processing, which override your interests, rights and freedoms. Where we are processing personal data for scientific or historical research, or statistical purposes, you only have a right to object if our lawful basis for processing is legitimate interest.
- to rectify – you have a right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed.
- to erase (also known as the right to be forgotten) – in certain circumstances you can ask for the data we hold about you to be erased from our records. Your personal data will be erased where the data are no longer needed for their original processing purpose, or you have withdrawn your consent and there is no other legal ground for processing, or you have objected and there are no overriding legitimate grounds for the processing, or erasure is required to fulfill a statutory obligation under the EU law or the right of the national law.
- to request data portability – you can ask to have the data we hold about you transferred to another organisation.
- to restrict processing your personal information – where certain conditions apply you have a right to restrict the processing of your personal information.
- to withdraw your consent at any time – without affecting the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise any of these rights, please email to privacy@ceu.edu or write to us at University Data Protection Officer, Nádor utca 9, 1051 Budapest, Hungary. The University will make every effort to fulfill your request to the extent allowed by law and will respond in writing within 25 days of receiving your request.

Should you wish to request help from the relevant national authority, their details are as follows:

National Authority for Data Protection and Freedom of Information

Postal address: 1530 Budapest, Pf.: 5.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: privacy@naih.hu

Web: <http://naih.hu/general-information.html>

In addition to the legal remedy, you have the right to apply to the court against the activities of data controller. In Hungary, at the data subject's request, the action may be brought before the court that is competent based on the domicile or the place of residence of the data subject.

Security of your Information

We are committed to holding your data securely and treating it with sensitivity. All data are held securely and in accordance with the relevant data privacy laws and our internal policies. We do not sell to or trade your data with any other organizations. For further details please see CEU's Data Protection Policy at <https://documents.ceu.edu/documents/p-1805>.

Future Changes

If our information policies or practices change at some time in the future, we will post the changes on our [website](#).