

## Privacy Notice

At Central European University (address: 224 West 57th street, New York, NY 10019, USA and 1051 Budapest, Nádor u. 9.) and Közép-európai Egyetem (address: 1051 Budapest, Nádor u. 9.), as joint data controllers (jointly as “CEU” or the “University”), 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)<sup>1</sup> and Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information and the Hungarian Civil Code.

This Privacy Notice relates to the collection, use and retention of photo/voice/video recordings made at events organized by the units and departments of the University.

### 1. Who are we and what do we do?

Central European University is a graduate-level “crossroads” university where faculty and students from more than 100 countries come to engage in interdisciplinary education, pursue advanced scholarship, and address some of society’s most vexing problems.

It is accredited in both the United States and Hungary, and offers English-language Master's and doctoral programs in the social sciences, the humanities, law, management and public policy. Located in the heart of Central Europe – Budapest, Hungary – CEU has developed a distinct academic and intellectual focus, combining the comparative study of the region's historical, cultural, and social diversity with a global perspective on good governance, sustainable development and social transformation.

### 2. Contact details of the Data Controller

#### **Közép-európai Egyetem**

1051 Budapest

Nádor u. 9.

Phone: + 36 1 3273000

#### **Central European University**

224 West 57th street, New York,

NY 10019, USA and

1051 Budapest,

Nádor u. 9.

### 3. Contact details of the Data Protection Officer

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<sup>1</sup> 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.

## Írisz Szél

Data Protection Officer

1051 Budapest, Nádor u. 9.

Phone: + 36 1 327-3000

E-mail: [privacy@ceu.edu](mailto:privacy@ceu.edu)

### 4. What is the purpose of processing your data?

We process your personal data for the purposes of:

- 4.1. registration for events organized by the University;
- 4.2. taking photos and making voice/video recordings at events organized by the units and departments of the University;
- 4.3. publishing photos/voice/video recordings on CEU's webpage and social media pages such as:

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

- 4.4. publishing a note, comment to the photo/voice/video including personal data (name, position, university, etc. of individuals)
- 4.5. contacting you, as well as sending invitations and newsletters regularly about our upcoming events.
- 4.6. retaining the signed consent forms
- 4.7. concluding a data processing agreement with the service provider(s)

### 5. What kind of personal data do we collect?

#### What is our legal basis for processing your data for the purposes set out in section 4?

For the purpose of data processing specified in point 4 of this Privacy Notice, CEU manages the personal data and rely on the legal bases described below:

Personal data	Legal basis
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<i>Individual's name, e-mail address, institution or any other personal data specified in registration form</i>	The legal basis for data processing is the consent of the data subject under Article 6 (1) (a) of the GDPR.
<i>Individual photo/voice</i>	The legal basis for data processing is the consent of the data subject under Article 6 (1) (a) of the GDPR.
<i>Small group photo/group voice</i>	The legal basis for data processing is the consent of the data subject under Article 6 (1) (a) of the GDPR.
<i>Photo of public figures</i>	The legal basis for data processing is the consent of the data subject under Article 6 (1) (a) of the GDPR. Consent of a public figure is automatically considered to have been given regarding his/her public activity.
<i>Name, profession, position etc. of individuals to be published on publicly available platforms or in print</i>	The legal basis for data processing is the legitimate interests pursued by CEU under Article 6 (1) (f) of the GDPR
<i>Individual's name, e-mail address to send newsletters, invitations</i>	<i>Individual's name, e-mail address to send newsletters</i>
<i>Individual's name and signature on the consent form</i>	Processing is necessary for compliance with a legal obligation to which CEU is subject under Article 6 (1) (c) of the GDPR
<i>Contractual data of data processors</i>	The processing is necessary for the performance of a contract to which the data subject is a party under Article 6 (1) (b) of the GDPR

The data subject is entitled to withdraw his/her consent at any time.

Where individuals are not the focus, and/or they are incidentally included in an image as part of a crowd, we talk about a crowd image (e.g. individuals at a conference or a busy open day). The same applies for voices, where individual voices can be heard as one (e.g. in a choir).

If there are not any identified or identifiable persons on the photo, no processing of personal data takes place, therefore the GDPR is not applicable.

Based on case law, a photo taken at a public event or on a street (landscape and street view/scene) is considered to be a crowd image.

Public event shall mean an event, with the exception of assembly, that is open to the general public without discrimination. It shall also mean any political, social, artistic activity, manifestation based on the individual's voluntary determination, autonomous decision that affects the narrower or broader life of society, the local or national relations, the lives of smaller or larger communities, their interests and habits.

## 6. Whom do we share your personal data with?

Your data will be processed by the University. Unless we have a legal obligation to do so, we will not disclose your data to a third party.

Specific third parties acting as data processors based on a data processor agreement we work with include:

- **Office 365:** Based in the US, with University's data stored within EU in datacenters located in Amsterdam and Dublin. Software as a Service which provides University's email and document management

In case there are other data processors involved in the data process(es) (e.g. photographer, video maker), we will provide you with information about them in due time.

We require all third parties and data processors to respect the security of your personal data and to treat it in accordance with the law and CEU's data privacy policies, as determined in the respective Data Processing Agreements.

## **7. How long will your information be held for the purposes set out in section 4?**

Your personal data provided for the registration will be deleted after the event, unless data processing has a further legal basis.

For the purposes of data processing defined in point 4.2-4.4 your personal data will be held until the consent of the data subject has been withdrawn. In the absence thereof or objection, we keep the photos and videos for 5 years.

Newsletters will be sent until the consent of the data subject has been withdrawn. In the absence thereof, we send newsletters for 5 years.

Where applicable, the data processing agreement is stored for 8 years after the service frame contract expired.

We keep the signed consent forms for 5 years after the purpose of processing has been achieved.

After you withdraw your consent, object to data processing we will process your personal data for a maximum of 25 (twenty-five) days for technical reasons. In the absence of withdrawal or objection and after data processing periods mentioned 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.

## 8. What are your rights?

You have a right

- to access your personal data,
- to object to the processing of your personal data,
- to rectify,
- to erase and
- to restrict processing your personal data
- to withdraw your consent at any time
- to an effective legal remedy.

If you wish to exercise any of these rights, please email to [privacy@ceu.edu](mailto: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](mailto: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.

## 9. 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 University's Data Protection Policy: <https://documents.ceu.edu/documents/p-1805v1812>

Last updated on: July 10, 2019

