

PRIVACY NOTICE

on the processing of personal data in connection with registration for and records of the Students' Scientific Association (TDK) of the Faculty of Pharmacy, University of Pécs

I. Data Controller

Name: University of Pécs (PTE)

Registered office and postal address: Vasvári Pál u. 4., H-7622 Pécs, Hungary

Represented by: Prof. Dr. Adrián Fábián, Rector

Organisational unit carrying out the processing and its head: Faculty of Pharmacy, University of Pécs; Prof. Dr. András Fittler

Contact person: Dr. Györgyi Horváth

Contact person's telephone number: +36-72-503-650/28823

E-mail: horvath.gyorgyi@gytk.pte.hu

Data Protection Officer: Dr. Roland Bernát, adatvedelem@pte.hu, <https://pte.hu/hu/adatvedelem>

II. Applicable Legislation

- 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 (General Data Protection Regulation; hereinafter: GDPR);
- Act CCIV of 2011 on National Higher Education (hereinafter: Nftv.).

III. Categories and Source of Personal Data

- The categories of personal data processed are set out under each processing operation in Section IV. In the course of the processing operations described in this Notice, the Data Controller does not process any special categories of personal data (e.g. data concerning health).
- The Data Controller collects personal data directly from the data subject; the source of the data is therefore the data subject. The names and e-mail addresses of supervisors and co-supervisors are provided by the student during registration; the source of these data is therefore the student.
- Should any of your personal data processed by the Data Controller change during the processing period, please notify the contact person indicated in Section I without delay.

IV. Purposes and Legal Basis of Processing, Categories of Personal Data and Data Subjects, Retention Period

TDK Registration and Data Recording

Purpose of processing: registration, identification of the registrant and recording of the registration data (registration ensures that the student's TDK activity is entered in the Faculty records, enabling the student to take part in the Faculty TDK Conference, to be nominated for the National Scientific Students' Associations Conference (OTDK) and to be considered for Faculty awards).

Legal basis: Article 6(1)(e) GDPR – processing necessary for the performance of a task carried out in the public interest [namely, pursuant to Section 18(1)(a)–(b) of the Nftv., the proper functioning of the institution and the exercise of applicants' rights and the fulfilment of their obligations].

Categories of personal data: name, e-mail address, degree programme, semester of study, faculty and institute where the TDK work is carried out, title of the research topic, name of the supervisor and co-supervisor(s), year of commencement of studies, academic year, semester and cycle identifier.

Data subjects: students applying for TDK.

Retention period: 10 years from the termination of the student's student status.

Registration takes place via the built-in form of Microsoft Lists. Microsoft Lists is the actual data storage system for TDK records. A registration is deemed confirmed and final once the supervisor and the co-supervisor have confirmed it.

Approval Records (Confirmation of Supervisor and Co-supervisor Involvement)

Purpose of processing: a complete and traceable record of the approval activity, the professional involvement and the chain of review is essential for the following reasons:

Compliance with research ethics and evidence of academic supervision: it provides reliable documentation that the TDK work was produced under genuine academic/research mentoring and in accordance with the research ethics standards of PTE and the National Council of Scientific Students' Associations (OTDT), thereby preventing unauthorised authorship and the misuse of intellectual property.

Institutional consent and research security safeguard: research frequently involves the Faculty's laboratory infrastructure, reagents, experimental models or clinical/patient data. The supervisor's approval and its logging evidence that the institute concerned and its head have consented to the public presentation of the research data (abstract book, conference

presentation), and that publication does not breach any obligations relating to industrial property protection, patent filing, confidentiality or research ethics approval.

Accountability and auditability (Article 5(2) GDPR): logging of the electronic approval chain (audit trail) ensures that deadlines can be objectively verified and that requests to remedy formal and substantive deficiencies can be tracked, and, in disputed cases (e.g. missed deadlines, a missing supervisor's declaration, appeals or requests for discretionary relief), guarantees a fair and demonstrable procedure.

Legal basis: Article 6(1)(e) GDPR – processing necessary for the performance of a task carried out in the public interest [namely, pursuant to Section 18(1)(a)–(b) of the Nftv., the proper functioning of the institution and the exercise of applicants' rights and the fulfilment of their obligations].

Categories of personal data: from the data recorded at registration, the student's name and the title of the TDK topic; the academic's name and university e-mail address; in addition, the academic's role (supervisor / first or second co-supervisor), the approval decision (approval or rejection), the date and time of the decision, the approval task identifier and a reference to the original registration.

Data subjects: students applying for TDK and the academic staff members carrying out the approval.

Retention period: the points attributable to a given student are retained for 10 years from the termination of the student's student status.

The approval process is conducted via Microsoft Approvals. The system records the decision (approval or rejection) and its date and time in a separate approval list.

Registrations approved/confirmed by the academic concerned are transferred to a separate consolidated register. Rejected and incompletely confirmed registrations are not transferred.

Preparation of the Faculty TDK Conference and OTDK Nominations

Purpose of processing: ensuring participation in the Faculty TDK Conference and nomination for the OTDK.

Legal basis: Article 6(1)(e) GDPR – processing necessary for the performance of a task carried out in the public interest [namely, pursuant to Section 18(1)(a)–(b) of the Nftv., the proper functioning of the institution and the exercise of applicants' rights and the fulfilment of their obligations].

Categories of personal data: the student's name, contact e-mail address, degree programme, institute, title of the TDK topic, name of the supervisor and co-supervisor(s), academic year and semester.

Data subjects: students entered for the Faculty TDK Conference and the OTDK.

Retention period: 10 years from the termination of the student's student status.

Entries are made on the basis of the data held in the consolidated register of approved registrations.

Records of Dean's Competition Papers and TDK Results

Purpose of processing: keeping records of Dean's Competition papers and Faculty TDK results is necessary for the exercise of students' rights, for determining academic and final examination concessions (in particular exemption from the thesis and the award of the thesis grade), for certifying eligibility for nomination to the National Scientific Students' Associations Conference (OTDK), and for assessing academic and talent-development scholarships (e.g. the National Higher Education Scholarship). Retention of the data also serves to reliably document PTE's obligations relating to higher education quality assurance, talent development and institutional accreditation.

Legal basis: Article 6(1)(e) GDPR – processing necessary for the performance of a task carried out in the public interest [namely, pursuant to Section 18(1)(a)–(b) of the Nftv., the proper functioning of the institution and the exercise of applicants' rights and the fulfilment of their obligations].

Categories of personal data: the student's name, institute, name of the supervisor and co-supervisor(s), title of the competition paper or thesis, result achieved (placement, special prize, participation), academic year and semester.

Data subjects: students applying for TDK and students who have submitted a Dean's Competition paper.

Retention period: 10 years from the termination of the student's student status.

Data on OTDK participation and placements, Dean's Competition papers and their results are held in dedicated Excel spreadsheets.

Aggregate Statistics

Purpose of processing: (a) preparation of aggregate Faculty-level statistics on TDK activity broken down by institute, degree programme, academic year and semester; (b) aggregation of the TDK activity of supervisors and co-supervisors under the points system for the purposes of institute-level and individual academic awards and evaluations.

Legal basis: Article 6(1)(e) GDPR – processing necessary for the performance of a task carried out in the public interest [namely, pursuant to Section 18(1)(a)–(b) of the Nftv., the proper functioning of the institution and the exercise of applicants' rights and the fulfilment of their obligations].

Categories of personal data: as held in the master database (TDK_statistics), the student's name, faculty, degree programme, semester of study, institute, title of the TDK topic, name of the

supervisor and co-supervisor(s), academic year and semester, participation and placements at the Faculty TDK Conference and the OTDK, Dean's Competition papers and their results, and the points-system scores of supervisors and co-supervisors.

Data subjects: students who have applied for TDK, participated in the Faculty TDK Conference or the OTDK, or submitted a Dean's Competition paper; supervisors and co-supervisors.

Retention period: 10 years from the termination of the student's student status.

The statistics are based on the Power BI service (semantic model), the sources of which are the consolidated register and the Excel spreadsheets containing OTDK participation and placements and Dean's Competition papers and their results.

The content displayed in the Power BI reports is aggregated: counts, proportions and trends by institute, semester and degree programme. However, the semantic model underlying the reports contains record-level personal data – the names of students and supervisors and the titles of topics – which may be accessed only by the academic members of the TDK Committee.

V. Recipients, Processors and Transfers of Personal Data

Access to the personal data is restricted to employees of those organisational units of the University that require the data to perform their duties. Such employees are bound by confidentiality obligations with respect to the personal data they access.

The University carries out the registration process and maintains the records within the Microsoft 365 environment (Microsoft Lists, Power Automate, Microsoft Approvals, Exchange Online, Microsoft Teams, Power BI); the provider of these services acts as a data processor. Details of the processor:

Name: Microsoft Ireland Operations Limited

Registered office: One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland

Contact details of the processor and its privacy statement: <https://www.microsoft.com/hu-hu/privacy/privacystatement>

<https://www.microsoft.com/hu-hu/privacy/privacystatement#mainhowtocontactusmodule>

The University does not transfer or disclose the personal data to any other recipient.

VI. Data Security

The University ensures the appropriate security of the data subject's personal data by applying appropriate technical and organisational measures, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. Further information on

the data security measures applied by the University is available in Sections 20–22 of the [Data Protection Regulations](#) of the University of Pécs and in Chapter IV of its [IT Regulations](#).

VII. Rights of the Data Subject

The processing operations described in this Notice are based on the performance of a task carried out in the public interest [Article 6(1)(e) GDPR]; therefore, the right to withdraw consent and the right to data portability do not apply [Article 20(3) GDPR], and the right to erasure is restricted by Article 17(3)(b) GDPR. Subject to the foregoing, the data subject may exercise the following rights under the GDPR:

- **Right of access:** the data subject may request information on what personal data the University processes about them, for what purposes, on what legal basis, from what source and for how long, and to whom the data have been disclosed.

The data subject has the right to access the information specified in Article 15 GDPR in relation to the processing of their personal data, including in particular to be informed by the University of:

- the personal data concerning them that it processes;
 - the purposes of and legal basis for the processing;
 - the source from which the personal data were collected;
 - the envisaged period for which the personal data will be stored or the criteria used to determine that period;
 - to whom, when and to which of their personal data the University has granted access, or to whom it has transferred their personal data; and
 - the rights, complaint procedures and remedies available to the data subject in relation to the processing.
- **Right to rectification:** the data subject may request the correction of inaccurate or incomplete data.

Under Article 16 GDPR, the data subject has the right to obtain the rectification of inaccurate personal data concerning them and to have incomplete personal data completed.

- **Right to erasure:** the data subject may request the erasure of their personal data where the purpose of the processing no longer applies or the processing is unlawful.

Under Article 17 GDPR, the data subject has the right to obtain the erasure of their personal data where:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

- the data subject withdraws the consent on which the processing is based and there is no other legal ground for the processing;
- the data subject has successfully objected to the processing by exercising the right to object;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation.

The personal data will not be erased where processing is necessary:

- for the establishment, exercise or defence of legal claims;
- for compliance with a legal obligation or for the performance of a task carried out in the public interest or in the exercise of official authority;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing.
- **Right to restriction of processing:** the data subject may request the restriction of processing in certain cases (e.g. where the accuracy of the data is contested, or for the establishment or exercise of legal claims).

Under Article 18 GDPR, the data subject has the right to obtain restriction of the processing of their personal data where:

- the accuracy of the personal data is contested by the data subject, for a period enabling the University 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 University 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 processing by exercising the right to object, pending the determination of whether the University upholds the objection.

Where processing has been restricted, such personal data may, with the exception of storage, be processed only with the data subject's consent, for the establishment, exercise or defence of legal claims, 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.

- **Right to withdraw consent:** where processing is based on consent, the data subject may withdraw their consent at any time.

Where processing is based on consent, the data subject has the right to withdraw their consent at any time without giving reasons, pursuant to Article 7(3) GDPR. Consent may be withdrawn in writing or in the same form in which it was given. The withdrawal of consent does not affect the lawfulness of processing carried out before its withdrawal.

- **Right to data portability:** the data subject may request the University to provide the data they have supplied in electronic form or to transmit them to another controller.

Where processing is based on consent or on a contract and is carried out by automated (electronic) means, the data subject has the right, as set out in Article 20 GDPR, to receive the personal data concerning them which they have provided in a commonly used electronic format, or to request the University to transmit the data to another controller.

- **Right to object:** where processing is based on the performance of a task carried out in the public interest or on legitimate interests, the data subject may object to the processing.

Under Article 21 GDPR, the University shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or the processing is necessary for the establishment, exercise or defence of legal claims.

The data subject may exercise their rights free of charge using the contact details of the contact person or the Data Protection Officer indicated in Section I. In most cases, exercising these rights requires identification of the data subject, and in some cases verification of further data may be necessary. The University will decide on a request to exercise data subject rights within one month of its receipt at the latest. Where necessary, taking into account the complexity and number of requests, this period may be extended by a further two months; the data subject will be informed of any such extension within one month.

VIII. Complaints and Remedies

Any complaint concerning the processing may be submitted using the contact details of the contact person indicated in Section I, or addressed to the University's Data Protection Officer (adatvedelem@pte.hu). Complaints by post may be sent to Vasvári Pál u. 4., H-7622 Pécs, Hungary, addressed to the contact person indicated in Section I or to the Data Protection Officer.

If you consider that your rights have been infringed in connection with the processing of your personal data, or that there is an imminent risk of such an infringement, you may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) (postal address: 1363 Budapest, Pf. 9.; telephone: +36 (1) 391-1400; e-mail: ugyfelszolgalat@naih.hu; website: <https://naih.hu>).

In the event of an infringement of your data protection rights, you may also bring proceedings before a court; at your choice, the action may be brought before the regional court (törvényszék) having jurisdiction over your place of residence or place of stay.