



Reference number: KEA/130-9/2024.

PRIVACY POLICY

regarding the processing of personal data of contractual partners, contractual partners' contacts and accompanying persons, applicants, and other persons participating in the Data Controller's events (hereinafter referred to as "Data Subjects")

The **Central European Academy** (hereinafter referred to as **Data Controller**) hereby informs the Data Subjects about the processing of personal data of the Data Controller's **contractors, contractors' contact persons and accompanying persons, as well as other persons attending the Data Controller's events**, in accordance with Regulation 2016/679. of the European Parliament and the Council (hereinafter: **GDPR**) and Act CXII of 2011 on the right to information self-determination and freedom of information.

Please read the Privacy Policy carefully.

This Privacy Policy is continuously available on the Data Controller's website (<https://centraleuropeanacademy.hu/>) and at its registered office indicated below, as well as at the venue of the events it organizes. Data Subjects may access, view, print, and save this privacy policy on the website, but they may not modify it, only the Data Controller may do so.

The Data Controller may at any time unilaterally amend the present Privacy Policy. The Data Controller shall send the amended Privacy Policy to the data subjects or, where the Data Subject is acting on behalf of an organisation that is a contractual partner, to the represented organisation, in the event of an amendment to the privacy notice. In the latter case, the contractual partner has the obligation to inform the Data Subjects designated to be contacted.

I. The Data Controller and its Data Protection Officer

Data Controller:

Central European Academy

Seat:	H-1122 Budapest, Városmajor utca 12-14.
Registration number:	Education Authority FNYF/419-4/2023
Tax identification number:	19359711-1-43
Statistical number:	19359711-7220-599-01



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Data Protection Officer of the Data Controller:

Réti, Várszegi és Társai Ügyvédi Iroda

Responsible employee: Dr. András Csenterics, lawyer, data protection and data security lawyer

Address: 1055 Budapest, Bajcsy-Zsilinszky út 78.

E-mail: hu_central_european_academy@pwc.com

If the Data Subject wishes to exercise his or her rights or lodge a complaint regarding data protection issues, he or she may contact the Data Controller by sending a letter to the e-mail address provided above, which is also the contact address of the Data Protection Officer. In addition, you may contact the Data Controller by postal mail at the above addresses.

II. Scope of personal data processed by the Data Controller, purpose, legal basis and duration of processing

(A) Data of persons who actively participate as speakers, moderators or otherwise in events organised by the Data Controller

Scope of data processed	Purpose of data processing	Legal basis of data processing	Duration of data processing
Name, e-mail address, phone nr.	Preparation and performance of the contract, including contact and identification of the person concerned (for contract-related data processing, see also section II (D) of this notice)	The performance of the public tasks of the Data Controller for the establishment and operation of a legal and political science research education network, the support of research, training, publication, and promotion activities, the organisation and development of domestic and international legal and political science relations and cooperation (legal basis under Article 6(1)(e) of the GDPR) in accordance with Annex 1, point 30 of Act IX of 2021 on public interest trusts with a public purpose.	Until the end of the event in question
Bank account number			Until the end of the retention period (8 years) pursuant to Article 169 of Act C of 2000 on Accounting
Image, sound, video	Capture and promote the event for scientific, educational, and networking purposes		For 10 years from the date the recording was made, or, if the recording contains a work of authorship, for 5 years from the date



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			of termination of the licence granted to the Data Controller.
Career details, CV information	Informing the audience about the experiences of the contributors of the event, the content of the event, promoting the event		For 5 years from the termination of the contract
Data on eating habits and food allergies	Taking into account the person's preferences and possible health considerations (e.g. food sensitivities) when providing meals	Article 6(1)(a) GDPR: consent of the Data Subject If the personal data you have provided includes specific information about your eating habits (e.g. health, religious beliefs): Article 9(2)(a) GDPR: consent of the Data Subject	Until the termination of the contract or, if earlier, the withdrawal of consent
Data provided on the booking form <i>(for accommodation booked by the Data Controller)</i>	Reserving accommodation	Article 6(1)(a) GDPR: consent of the Data Subject	Until the termination of the contract or, if earlier, the withdrawal of consent
Information on the booking form for flights, trains and buses <i>(in case of booking by the Data Controller)</i>	Transport services	Article 6(1)(a) GDPR: consent of the Data Subject	Until the termination of the contract or, if earlier, the withdrawal of consent
Data in the travel document of the passenger car <i>(in case of car travel by the Data Controller)</i>	Transport services, settlement	Article 6(1)(a) GDPR: consent of the Data Subject	Until the termination of the contract or, if earlier, the withdrawal of consent



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<p>All of the personal data identified above - to the extent that their retention is necessary for the purposes of legal claims</p>	<p>To ensure that the Data Controller has sufficient evidence to assert or defend its legal position in the event of a legal claim</p>	<p>Article 6(1)(f) GDPR: the Data Controller's legitimate interest in having the necessary evidence in order to pursue legal claims.</p>	<p>Until the end of the applicable legal limitation period: 5 years from the termination of the contract (civil limitation period).</p> <p>If an actual legal claim is made concerning the contract, until the final and conclusive conclusion of the relevant legal proceedings.</p>
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(B) Data of the persons accompanying the contributors referred to in point (A) or persons travelling with the contributors for whom the Data Controller is involved in the organisation of travel and accommodation

Concerning Data Subjects who are accompanying or travelling with the persons who are accompanying or travelling with the contributors falling within the scope of point (A) above and in whose travel and accommodation arrangements the Data Controller assists the Data Subject at the Data Subject's explicit request, the Data Controller processes the following data.

Scope of data processed	Purpose of data processing	Legal basis of data processing	Duration of data processing
<p>Name, phone nr., e-mail address</p>	<p>Registering the accompanying person for the event, ensuring their access to the event and identification</p>	<p>The performance of the public tasks of the Data Controller for the establishment and operation of a legal and political science research education network, the support of research, training, publication, and promotion activities, the organisation and development of domestic and international legal and</p>	<p>Until the end of the event</p>
<p>Image recording, audio recording (if the Data Subject asks questions during the event), video recording</p>	<p>Capture and promote the event for scientific, educational, and networking purposes</p>		<p>10 years from the date of the recording</p>



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		political science relations and cooperation (legal basis under Article 6(1)(e) of the GDPR) in accordance with Annex 1, point 30 of Act IX of 2021 on public interest trusts with a public purpose.	
Data on eating habits and food allergies	Taking into account the person's preferences and possible health considerations (e.g. food sensitivities) when providing meals	Article 6(1)(a) GDPR: consent of the Data Subject If the personal data you have provided includes specific information about your eating habits (e.g. health, religious beliefs): Article 9(2)(a) GDPR: consent of the Data Subject	Until the end of the event or, if earlier, the withdrawal of consent
Data provided on the booking form, name, date and place of birth, passport number, telephone number, email address	Reserving accommodation	Article 6(1)(a) GDPR: consent of the Data Subject	Until the end of the event or, if earlier, the withdrawal of consent
Information on the booking form for flights, trains and buses	Transport services	Article 6(1)(a) GDPR: consent of the Data Subject	Until the end of the event or, if earlier, the withdrawal of consent
Data in the travel document of the passenger car <i>(in case of car travel by the Data Controller)</i>	Transport services, settlement	Article 6(1)(a) GDPR: consent of the Data Subject	Until the end of the event or, if earlier, the withdrawal of consent

In all cases where the legal basis for processing is the consent of the Data Subjects, the Data Subjects may withdraw their consent to processing at any time by sending an e-mail to the e-mail address of the Data Controller, where the mandatory data to be provided are name and e-mail address, in order to enable the Data Controller to identify which Data Subject's data should be deleted.



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In the event of withdrawal of consent, the Data Controller shall delete all data of the Data Subject processed by the Data Controller as described above. The obligation to erasure covers both electronic and paper data.

The Data Controller draws the attention of the Data Subjects to the fact that if their consent to data processing is withdrawn, certain operations based on consent (such as booking accommodation and purchasing airline tickets on behalf of the Data Subject) will become impossible. In this case, the people concerned must do it themselves.

(C) Other participants attending the Data Controller's events

Scope of data processed	Purpose of data processing	Legal basis of data processing	Duration of data processing
Name, e-mail address, and institution from which the participant comes	Registration for an event, and identification of the participant concerned Recording of what was said at the event as regards contributions	The performance of the public tasks of the Data Controller for the establishment and operation of a legal and political science research education network, the support of research, training, publication, and promotion activities, the organisation and development of domestic and international legal and political science relations and cooperation (legal basis under Article 6(1)(e) of the GDPR) in accordance with Annex 1, point 30 of Act IX of 2021 on public interest trusts with a public purpose.	Until the end of the event
Image recording, audio recording (if the Data Subject asks questions during the event), video recording	Capture and promote the event for scientific, educational, and networking purposes		10 years from the date of the recording

(D) Personal data of tenderers, applicants, contractors and their contacts



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The Data Controller processes the personal data of **natural persons** (in particular sole traders and applicants) who have a contractual relationship with the Data Controller and who submit offers or applications to the Data Controller as follows.

Scope of data processed	Purpose of data processing	Legal basis of data processing	Data storage period, date of deletion
Name, e-mail address, phone nr., postal address, title, tax number or tax identification number, registered office	Processing and evaluation of the offer received, identification and contact during the evaluation of the offer, and communication of the result of the evaluation	Article 6(1)(f) GDPR: legitimate interest of the Data Controller in the evaluation of the offer, if the evaluation of the offer does not fall within the scope of its public tasks. The performance of the public tasks of the Data Controller (legal basis under Article 6(1)(e) of the GDPR), if the evaluation of the offer falls under point 30 of Annex 1 to Act IX of 2021 on public interest trusts with a public task	The Data Controller shall keep the file containing personal data related to the evaluation of the tenders for 5 years from the date of the evaluation of the tenders in order to have sufficient evidence in case of legal claims, which is also in accordance with Article 46 (2) of the Public Procurement Act.
	Retention of tender documentation for the purpose of legal claims	Article 6(1)(f) GDPR: The Data Controller's legitimate interest in pursuing legal claims for procurements not covered by the Public Procurement Act Article 6(1)(c) GDPR: Fulfilling the legal obligation under Article 46 (2) of the Public Procurement Act for procurements that fall within the scope of the Public Procurement Act	
The personal data recorded in the contract (in particular: name, e-mail address, telephone number,	Contract preparation and performance	The performance of the public tasks of the Data Controller (legal basis under Article 6(1)(e) of the GDPR) if	The Data Controller shall keep the records containing personal data relating to the performance of contracts for a period of 5 years



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postal address, registered office, tax number or tax identification number, bank account number, and other contract data)		<p>the performance of the contract falls under Annex 1, point 30 of Act IX of 2021 on public interest trusts performing a public task</p> <p>If the performance of the contract does not fall within the scope of the public tasks of the Data Controller, the performance of the contract with the contractual partner (legal basis under Article 6(1)(b) GDPR)</p>	<p>from the performance of the contract in order to have sufficient evidence in case of legal claims, which is also in accordance with Article 46 (2) of the Public Procurement Act.</p>
	Retention of contract-related documentation to ensure legal redress	<p>Article 6(1)(f) GDPR: The Data Controller's legitimate interest in pursuing legal claims for procurements not covered by the Public Procurement Act</p> <p>Article 6(1)(c) GDPR: Fulfilling the legal obligation under Article 46 (2) of the Public Procurement Act for procurements that fall within the scope of the Public Procurement Act</p>	
Personal data included in the scholarship application, in particular the applicant's name, date and place of birth, mother's name, address, citizenship, type and number of identification document, bank account details, telephone number, email address,	<p>Assessing applications on a professional basis, checking that the conditions for the scholarship are met and contacting the applicant</p> <p>In the case of a successful application, the administration and</p>	<p>Article 6(1)(f) GDPR: the Data Controller's legitimate interest in a professional and reasoned assessment of the application</p> <p>In case of a successful application, Article 6(1)(b) GDPR: performance of the contract with the Data Subject (the scholarship agreement)</p>	<p>During the evaluation period and, if successful, until the end of the scholarship agreement</p> <p>The Data Controller reserves the right to keep the documents containing personal data relating to the evaluation of applications for a period of 5 years from the date of the evaluation, in order to have sufficient evidence in case of legal claims</p>



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<p>details of the applicant's workplace at the time of application, and personal data included in the CV and cover letter</p> <p>Amount of the scholarship paid in the case of a successful application</p> <p>The reasons for postponing the scholarship if the successful applicant fails to claim the scholarship through no fault of his/her own</p>	<p>fulfilment of the scholarship agreement</p> <p>Maintaining contact with the institution organising the programme related to the scholarship, and, to the extent necessary, forwarding the data of the scholarship holder to that institution for the purpose of paying the scholarship</p>		
<p>Personal data content of documents that are accounting records</p>	<p>Meeting accounting and tax obligations, invoicing</p>	<p>Legal obligations under Act C of 2000 and Act CL of 2017</p>	<p>With regard to documents subject to invoicing, until the end of the tax (end of the calendar year in which the tax return is due + 5 years pursuant to Article 78(3) of Act CL of 2017) or accounting retention period (8 years pursuant to Article 169(2) of Act C of 2000)</p>
<p>Personal data contained in the contract between the Data Controller and the Data Subject, in the documents proving its performance, and in supporting documents relating to the payment to the Data Subject</p>	<p>In the case of an audit by the State Audit Office of Hungary (SAO), the transfer of personal data (the documents recording them) to the SAO for the purpose of planning, defining, and conducting the audit.</p>	<p>Act LXVI of 2011 on the State Audit Office of Hungary (SAO Act) Article 28 (2) legal obligation.</p>	<p>If the payment to the Data Subject is made from the subsidy granted to the Data Controller, the Data Controller shall keep the data (and the documents containing them) for as long as the SAO is entitled to monitor the use of the subsidy (i.e. for five years after the calendar year of the use of the subsidy; see Article 23/A of the SAO Act).</p>



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The Data Controller shall carry out the following processing in relation to natural persons acting as a contact person for a **non-natural person** tenderer or contractor.

Scope of data processed	Purpose of data processing	Legal basis of data processing	Data storage period, date of deletion
Name, e-mail address, phone nr., postal address, title	Contacts related to the offer, and contract.	<p>The performance of the public tasks of the Data Controller (legal basis under Article 6(1)(e) of the GDPR) if the performance of the contract falls under Annex 1, point 30 of Act IX of 2021 on public interest trusts performing a public task</p> <p>If the performance of the contract does not fall within the scope of the public tasks of the Data Controller, the Data Controller has a legitimate interest (Article 6(1)(f) GDPR) to maintain contact with the tenderer or the contractor in connection with the tender, the preparation, conclusion, and performance of the contract.</p>	Until the evaluation of the tender or during the duration of the contract or, if earlier, until the tenderer or contracting partner duly notifies the Data Controller that the contact person has been replaced.
Personal data contained in the contract between the Data Controller and the organisation represented by the Data Subject, in the documents evidencing its performance, and in supporting documents relating to the payment to the organisation represented by the Data Subject	In the case of an audit by the State Audit Office of Hungary (SAO), the transfer of personal data (the documents recording them) to the SAO for the purpose of planning, defining, and conducting the audit.	Act LXVI of 2011 on the State Audit Office of Hungary (SAO Act) Article 28 (2) legal obligation.	If the payment to the organisation represented by the Data Subject is made from a grant to the Data Controller, the Data Controller shall keep the data (and the documents containing them) for as long as the SAO is entitled to verify the use of the grant (i.e. for five years after the calendar year of the use of the grant; see Article 23/A of the SAO Act).



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III. Recipients and categories of recipients of personal data

Data Processor:

The Data Controller uses the following data processors for the processing of the data covered by this notice:

Data Processor	Purpose of data processing
H1 Systems Mérnöki Szolgáltatások Korlátolt Felelősségű Társaság (seat: H-1117 Budapest, Budafoki út 62.; company registration number: 01-09-469226)	Operation of the Data Controller's IT system
Google Ireland Limited (Gordon House, Barrow Street, Dublin 4., Ireland)	Use of Google Forms due registration to events

Individual data controller recipients

The Data Controller may transfer the personal data referred to in point II for the purpose of scientific cooperation and organisation as well as the administration of certain scholarship programmes to its cooperation partners, in particular the **Ministry of Justice**, the **Ferenc Mádl Institute of Comparative Law (MFI)**, the **Central European Law Association (KÖSZ)**, the **Hungarian Comparative Law Association (MÖJE)** and **Faculty of Law, University of Miskolc**. These organisations are considered as **independent data controllers**, and Data Subjects can obtain further information on their data processing from the privacy policies of these organisations. The controller excludes its own responsibility for the processing of these independent controllers.

The personal data collected and processed for the organisation of the events **will be transmitted to the co-organisers of the events to the extent and scope directly necessary for the organisation and implementation of the event**; provided that in the case of each event, the Data Controller will inform the Data Subjects in advance of the co-organisers as recipients of the data transmission. The Data Controller excludes its own responsibility for the processing of the recipients of the transfer as **independent controllers**.

If the Data Controller is also involved in booking accommodation or organising travel, such as booking flights, buses, or trains, the personal data will also be transferred to **the accommodation, tour operator, or travel agency**. These recipients act as **independent data controllers**, and the Data Controller excludes its own liability for the processing carried out by them. The Data Controller shall not transfer the data processed in accordance with this Privacy Policy to third parties within the meaning of the GDPR, except as set out above. The Data Controller is also entitled and obliged however, to transmit to the competent authorities and courts any personal data at its disposal and stored by it in accordance with the law, which it is obliged to transmit by law or by a final and binding order of a public authority or court.



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As a general rule, the Data Controller does not transfer personal data outside the European Economic Area. However, if this is unavoidable, it will ensure in advance that a safeguard mechanism is in place to ensure an adequate level of protection of personal data in accordance with the GDPR.

Automated decision-making, profiling

The Data Controller does not carry out any automated decision-making or profiling of the data processed under this Privacy Policy.

IV. Data security

I. Data security

The Data Controller respects the rights of Data Subjects under the law and, in accordance with the principle of data security, designs and implements its processing operations in a way that ensures the protection of the privacy of Data Subjects.

In order to ensure the security of personal data, the Data Controller shall in particular take the following measures:

- the personal data can only be accessed by those authorised to do so, they cannot be accessed by others and cannot be disclosed to others, the Data Controller has defined the scope of authorised persons according to the employees whose daily work requires the knowledge of the data;
- staff carrying out data processing may leave the premises where data processing is taking place only by locking the data media entrusted to them or by closing the office;
- the computers used in the processing are the property of the Data Controller or over which the Data Controller has the right to exercise control in order to protect personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage;
- access to the data on the computer is only possible with valid, personal, identifiable access rights - at least with a username and password - and the Data Controller ensures that passwords are changed regularly;
- virus protection of the information systems processing personal data is continuously ensured by the Data Controller;
- in the event of a physical or technical incident, the Data Controller shall ensure the ability to restore access to and availability of personal data in a timely manner;
- the Data Controller regularly reviews its data processing;
- the Data Controller has adopted internal data protection and data security policy and regularly provides data protection and data security awareness training to staff working with personal data;



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- the Data Controller employs a Data Protection Officer with appropriate market reputation and expertise.

V. Rights of the person concerned

The rights referred to in this clause may in any case be exercised by contacting I. All questions, complaints, and requests will be investigated individually and answered within one month of receipt at the latest. If necessary, taking into account the complexity of the application and the number of requests, this deadline may be extended by a further two months. In such a case, we will inform the Data Subject of the extension of the deadline within one month of receipt of the request, stating the reasons for the delay.

The Data Subject may request from the Data Controller access to personal data concerning him or her, rectification, erasure, and in certain cases restriction of processing, object to the processing of personal data, and the right to data portability. The Data Subject also has the right to lodge a complaint with a supervisory authority, the right to a judicial remedy, and in the case of processing based on consent, the right to withdraw consent at any time. These rights are explained in detail below.

a) **Right of access**

The Data Subject shall have the right at any time to obtain information on whether and how his or her personal data are processed by the Data Controller, including the purposes of the processing, the recipients to whom the data have been disclosed, or the source from which the data were obtained by the Data Controller, the retention period, his or her rights in relation to the processing and, in the case of transfers to third countries or international organisations, information on the safeguards relating thereto. In exercising the right of access, the Data Subject also has the right to request a copy of the data. Where the Data Subject's right of access adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, the Data Controller shall have the right to refuse to comply with the Data Subject's request to the extent necessary and proportionate.

b) **Right to rectification**

The Data Subject shall have the right to obtain from the Data Controller the rectification of inaccurate personal data relating to him or her. Depending on the purpose of the processing, the Data Subject has the right to request that incomplete personal data be completed, including by means of a supplementary declaration. If there is doubt about the corrected data, the Data Controller may request the Data Subject to provide the Data Controller with evidence of the corrected data in an appropriate manner, in particular by means of a document.

c) **The right to erasure ("right to be forgotten")**

Where the Data Subject requests the erasure of some or all of his or her personal data, the Data Controller shall erase them without undue delay where:

- the Data Controller no longer needs the personal data for the purposes for which it was collected or otherwise processed;



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- processing that was based on the Data Subject's consent, but the Data Subject has withdrawn that consent and there is no other legal basis for the processing;
- processing based on a legitimate interest of the Data Controller or a third party, but the Data Subject has objected to the processing and there is no overriding legitimate ground for the processing;
- the personal data have been unlawfully processed by the Data Controller, or
- the erasure of personal data is necessary to comply with a legal obligation.

The Data Controller is not always obliged to delete personal data, in particular, if the processing is necessary for the establishment, exercise, or defence of legal claims.

d) Right to restriction of data processing

Restriction of data means that during the period of restriction, the Data Controller will only store the data and will not perform any other operation on them.

The Data Subject may request the restriction of the processing of his or her personal data in the following cases:

- the Data Subject contests the accuracy of the personal data - in this case, the restriction applies for the period of time that allows the Data Controller to verify the accuracy of the personal data;
- the processing is unlawful, but the Data Subject opposes the erasure of the data and instead requests the restriction of their use;
- 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; or
- the Data Subject has objected to the processing - in which case the restriction applies for the period until the Data Controller has dealt with the objection.

d) Right to objection

Where the legal basis for processing data relating to the Data Subject is the legitimate interest of the controller or a third party, or the performance of a public task, the Data Subject shall have the right to object to the processing. The Data Controller is not obliged to uphold the objection if the Data Controller proves that

- data processing is justified by compelling legitimate grounds that override the interests, rights, and freedoms of the Data Subject, or
- the processing relates to the establishment, exercise, or defence of legal claims by the Data Controller.

f) The right to data portability



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Where the legal basis for the processing is the Data Subject's consent, the Data Subject has the right to receive the personal data provided in a structured, commonly used, machine-readable format (i.e. digital) and the right to request the transfer of those data to another controller, where such transfer is technically feasible, without hindrance from the Data Controller.

g) The right to lodge a complaint with a supervisory authority, judicial redress

If the Data Subject believes that his or her personal data have been misused, he or she can also contact the data protection authority and lodge a complaint, in particular in the Member State of his or her habitual residence, place of work, or place of the alleged breach.

In Hungary, you can contact the National Authority for Data Protection and Freedom of Information at the address: H-1055, Budapest, Hungary, Falk Miksa utca 9-11.; postal address: 1363 Budapest, Pf.: 9.; phone number: +36-1 391-1400; telefax: +36-1 391-1410; e-mail: ugyfelszolgalat@naih.hu; webpage: <http://naih.hu/>).

Irrespective of their right to lodge a complaint, Data Subjects may also take legal action in the event of a breach of their rights in relation to the processing of their personal data. The Data Subject also has the right to take legal action against a legally binding decision of the supervisory authority. The Data Subject also has the right to a judicial remedy if the supervisory authority does not deal with the complaint or does not inform the Data Subject within three months of the procedural developments or the outcome of the complaint.

This Privacy Policy is effective from 06 August 2024.

Dr. Heinerné Dr. Barzó Tímea Tünde (signed)
Director General