



## PRIVACY NOTICE

on the processing of personal data of participants as applicants and supervisors in the Central European Academy's Junior Programme

The **Central European Academy** (hereafter: “**Data Controller**”) hereby informs applicants (“**Applicants**”) to the Junior Programme training and internship programme (hereinafter: Junior Programme) and their supervisors (“**Supervisors**”) as data subjects, of the processing of personal data provided by applicants during the application process, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the General Data Protection Regulation (hereinafter: **GDPR**) and Act CXII of 2011 on the right to self-determination and freedom of information (hereinafter: **Information Act**).

Please read the privacy notice carefully!

This privacy notice is available on the website of the Data Controller (<https://centraleuropeanacademy.hu/>) and at its registered office indicated below .

### **I. The Data Controller and its Data Protection Officer**

#### **Data Controller:**

##### **Central European Academy**

Registered office: 1122 Budapest, Városmajor utca 12-14.  
Registration number: Education Office FNYF/419-4/2023  
Tax number: 19359711-1-43  
Statistical identifier: 19359711-7220-599-01  
E-mail address: [adatvedelem@centraleuropeanacademy.hu](mailto:adatvedelem@centraleuropeanacademy.hu)

#### **The Data Protection Officer of the Data Controller:**

##### **Réti, Várszegi & Partners Law Firm**

Contact: dr. András Csenterics, lawyer, data protection and data security lawyer  
Postal address: 1055 Budapest, Bajcsy-Zsilinszky út 78.  
E-mail address: [hu\\_central\\_european\\_academy@pwc.com](mailto:hu_central_european_academy@pwc.com)

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

### A) Processing of personal data of applicants for the Junior Programme:

Scope of data processed	Purpose of data processing	Legal basis for data processing	Retention period
Applicant's name and contact details as given in their CV	Identification, contact	The legitimate interest of the Data Controller to be able to contact the applicant during the application process	Duration of the application procedure
Personal data provided in the application form (such as name, date and place of birth, passport or ID card number, nationality/country of origin), personal data provided in the CV and motivational letter submitted during the application process, including, where applicable, any related certificates, diplomas, etc	Checking eligibility to participate in the Junior Programme	The Data Controller's legitimate interest in recruiting the most suitable applicants for the Junior Programme who meet the application criteria and comply with the Programme's rules and regulations	Duration of the application and selection procedure
	Conducting the selection process		
When applying for the Junior Programme, in addition to the above, the additional data indicated in the online application form (chosen scholarship programme; other data concerning travel and accommodation)	Ensuring enrolment in the programme	The Data Controller's legitimate interest in recruiting the most suitable applicants for the programme who meet the application criteria and comply with the Programme's rules	Duration of the application and selection procedure

Scope of data processed	Purpose of data processing	Legal basis for data processing	Retention period
If the applicant establishes an employment relationship with the Data Controller, the data required for the establishment of the employment relationship or other legal relationship related to work (e.g. name, address/usual place of residence, place and date of birth, mother's name, job title, signature, etc.), as well as personal data related to the notification to the National Tax and Customs Administration, including tax identification number and social security number, information on foreign language skills, number of the document related to language skills, nationality, etc	Identifying the data subject, establishing a legal relationship with the data subject.  Meeting tax and social security obligations	Preparation and performance of a contract with the person concerned	For 5 years after reaching the retirement age applicable to the person concerned, pursuant to Section 99/A (1) of Act LXXXI of 1997
		Fulfilling legal obligations under tax and social security legislation, including in particular the obligations related to the notification pursuant to Article 16(1) of Act CL of 2017 and Annex 1, point 3 of the Act CL of 2017 and Article 66(2) of Act CXXII of 2019	
Personal data relating to housing <i>(If the Data Controller contributes to the provision of housing)</i>	Facilitating the provision of housing in Hungary	The consent of the data subject.	For the duration of participation in the Programme or, if earlier, until the withdrawal of consent
Information on the booking form for flights, trains and buses <i>(in case of a reservation by the Data Controller)</i>	Travel insurance	Consent of the data subject	Until participation in the Programme or, if earlier, until withdrawal of consent
Personal data content of documents that are accounting records	Meeting accounting and tax obligations, invoicing	Legal obligations under Act C of 2000 and Act CL of 2017	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 Section 78(3) of Act CL of 2017) or

Scope of data processed	Purpose of data processing	Legal basis for data processing	Retention period
			accounting retention period (8 years pursuant to Section 169(2) of Act C of 2000)
Bank account number, BIC, IBAN, name of the account-holding financial institution and bank branch	Payment of scholarship and, where relevant, wages (including all fringe benefits and allowances) and other accounts relating to the employment or employment relationship	Performance of the contract with the person concerned	If the bank account forms part of the accounting records, it must be kept for 8 years in accordance with § 169 (2) of Act C of 2000  In other cases, up to the end of the period for enforcing labour law claims (3 years)
		Fulfilling a legal obligation	
All the personal data mentioned above	Presenting, enforcing and defending legal claims in the event of a dispute	The Data Controller's legitimate interest in having the appropriate evidence at its disposal in the event of legal claims or in being able to enforce its legal claims	In case of enforcement of claims arising from the application procedure, until the end of the civil enforcement period (5 years)

**B) Processing of personal data of supervisors participating in the Junior Programme**

Scope of data processed	Purpose of data processing	Legal basis for data processing	Retention period
Supervisor's name and contact details	Identification, contact	The Data Controller's legitimate interest in being able to contact the supervisor during the programme	For the duration of the programme
Data on the accommodation booking form <i>(in case of accommodation booking by the Data Controller)</i>	Booking accommodation and making check-in faster and easier.	Article 6(1)(a) GDPR: consent of the data subject	Until participation in the Programme or, if earlier, until withdrawal of consent

Scope of data processed	Purpose of data processing	Legal basis for data processing	Retention period
Information on the booking form for flights, trains and buses <i>(in case of a reservation by the Data Controller)</i>	Travel insurance	Article 6(1)(a) GDPR: consent of the data subject	Until participation in the Programme or, if earlier, until withdrawal of consent
The personal data recorded in the contract (in particular: name, e-mail address, telephone number, postal address, registered office, tax number or tax identification number, bank account number, other contract data)	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 performance of the contract falls under Annex 1, point 30 of Act IX of 2021 on public interest trusts performing public tasks 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 (GDPR. 6. article (1)(b))	During the contract period
	Retention of contract-related documentation to ensure legal claims		
Personal data content of documents that are accounting records	Meeting accounting and tax obligations, invoicing	Legal obligations under Act C of 2000 and Act CL of 2017	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 Section 78(3) of Act CL of 2017) or accounting retention period (8 years pursuant to Section 169(2) of Act C of 2000)
All the personal data mentioned above	Presenting, enforcing and defending legal claims in the event of a dispute	The Data Controller's legitimate interest in having the appropriate evidence at its disposal in the event of legal claims or in being able to enforce its legal claims	In case of enforcement of claims arising from the application procedure, until the end of the civil

Scope of data processed	Purpose of data processing	Legal basis for data processing	Retention period
			enforcement period (5 years)

The Data Controller draws your attention to the fact that **if the applicant does not provide all the data strictly necessary for the assessment of the application, the possible consequence of not providing the data may be exclusion from the application procedure**, given that the Data Controller cannot assess the application for the programme or cannot assess it completely without the data.

The Data Controller does not collect any special data during the application process and explicitly reminds applicants **not to provide any data in the special category of personal data** (i.e. data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning sexual life or sexual orientation, genetic data, biometric data, health data) **during the application process**.

### **III. Automated decision-making, profiling**

Data Controller does not perform any automated decision-making or profiling in relation to the data processed in accordance with this privacy notice.

### **IV. Protection of personal data**

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 based on which employees' 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 user name 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 an internal data protection and data security policy and regularly provides data protection and data security awareness training to staff working with personal data;
- the Data Controller employs a Data Protection Officer with appropriate market reputation and expertise.

#### **V. Rights of the data subject**

The rights listed in this point may in any case be exercised by the data subject by sending a request to the contact details indicated in point 1. 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 request 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.

##### **a) Right of access**

The data subject shall have the right to obtain from the Data Controller information as to whether or not his or her personal data are being processed and, if so, to request access to and a copy of his or her personal data.

The data subject shall have the right to request further information on the processing, in particular on the purposes of the processing, the persons to whom the data have been disclosed, the source from which the data were obtained by the Data Controller, the rights associated with the processing or the retention period.

Where the data subject's right of access adversely affects the rights and freedoms of others, in particular the business secrets or intellectual property of others, the Data Controller shall be entitled to refuse to comply with the data subject's request to the extent necessary and proportionate. For identification purposes, the Data Controller may request additional information from the data subject or charge a reasonable administrative fee if the data subject requests more than one copy of the above information.

##### **b) The 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) Right to erasure ("right to be forgotten")**

The data subject shall have the right to request the erasure of his or her personal data by the Data Controller and the Data Controller shall be obliged to erase such personal data if:

- the Data Controller no longer needs the personal data for the purposes for which it was collected or otherwise processed;
- the processing is based on the data subject's consent, but the consent has been withdrawn by the data subject and there is no other legal basis for the processing;
- the processing is based on the legitimate interests of the Data Controller or a third party, but the data subject has objected to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed by the Data Controller, or
- the deletion of personal data is necessary to comply with a legal obligation.

In case of deletion, the person concerned can no longer participate in the application process.

**d) Right to restriction of data processing**

The data subject has the right to request the restriction of the processing of his or her personal data. Restriction of processing means that, with the exception of storage, the Data Controller does not process the personal data concerned by the restriction or only within the scope to which the data subject has consented or which is necessary for the establishment, exercise, or defense of legal claims, for the protection of the rights of another person, or for reasons of important public interest.

In the event of a request for restriction, the Data Controller shall identify the personal data concerned which it may process only for the purposes set out above.

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 limitation 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 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.

**e) The right to object**

Where the legal basis for the processing of data relating to the data subject is the legitimate interest of the Data Controller or a third party, 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

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

**f) Right to lodge a complaint with a supervisory authority**



Reference number: KEA/2025/8166

If the data subject believes that his or her personal data has 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:** address: H-1055, Hungary, Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, PO Box.: 9.; phone: +36-1 391-1400; fax: +36-1 391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: <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. The data subject also has the right to appeal to the courts against a legally binding decision of the supervisory authority. The data subject also has the right to 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 Notice is effective from 15 September 2025.

Dr. Heinerné Dr. Barzó Tímea Tünde  
Director-General