

## PRIVACY NOTICE

### **on the processing of personal data of contractors, contractors' contacts and accompanying persons and other persons participating in the Data Controller's events (hereinafter referred to as "data subjects")**

The **Central European Academy** (hereafter: **Data Controller**) informs the data subjects below **about the processing of personal data of the Data Controller's contractual partners, the contractual partners' contacts and accompanying persons, as well as other persons participating in the Data Controller's events**, in accordance with Regulation 2016/679 of the European Parliament and of the Council (hereinafter: **GDPR**) and the provisions of Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter: **Infotv.**).

Please read the privacy notice carefully.

This Privacy Notice is available on the website of the Data Controller(<https://centraleuropeanacademy.hu/dokumentum/>) and at its registered office indicated below, as well as at the venue of the events it organises .

The Data Controller may unilaterally amend this privacy notice at any time. In the event of an amendment to the privacy notice, the Data Controller shall send the amended privacy notice to the data subjects or, where the data subject is acting on behalf of an entity that is a contractual partner, to the entity represented. In the latter case, it is the contractual partner's responsibility to inform the data subjects designated to be contact persons

#### **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

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)

If the data subject wishes to exercise his or her rights in relation to data protection issues or to lodge a complaint, he or she may contact the Data Controller by sending an e-mail to the above e-mail address, which is also the contact address of the Data Protection Officer. In addition, you may contact the Data Controller by postal mail to 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 for data processing	Duration of data processing
Name, e-mail address, telephone number and other identifying information (e.g. mother's name; social security number, place and date of birth, etc.)	Preparation and performance of the contract, including contact and identification of the data subject <i>(for more information on data processing in the context of the contract, see also section II (D) of this notice)</i>	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
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	Recording and promotion of the event for scientific, educational and networking purposes		For 10 years from the date of the recording, or, if the recording contains a copyright work, for 5 years from the date of termination of the licence granted to the Data Controller.

Career details, information contained in a CV	Informing the audience about the professional experience of the people involved in the event, the content of the event, promoting the event		For 5 years from the termination of the contract
Data on eating habits, 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 provide include special data about your eating habits (e.g. health, religious beliefs): The explicit consent of the data subject pursuant to Article 9(2)(a) GDPR	Until the termination of the contract or, if earlier, the withdrawal of consent
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 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 a reservation by the Data Controller)</i>	Travel insurance	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>	Travel insurance, settlement	Article 6(1)(a) GDPR: consent of the data subject	Until the termination of the contract or, if earlier, the withdrawal of consent
Name, date and place of birth, mother's name of the representative of the owner (e.g. lessor) of the car	Proof of legal use of the vehicle	Article 6(1)(a) GDPR: consent of the data subject	Until the end of the event or, if earlier, the withdrawal of consent

<i>(if the owner of the car and the person travelling in it are different)</i>			
All the personal data identified above - insofar as their retention is necessary for the purposes of legal claims	To ensure that the Data Controller has adequate evidence to assert or defend its legal position in the event of legal claims	Article 6(1)(f) GDPR: the legitimate interest of the Data Controller to have in possession of the relevant evidence in the event of legal action.	Until the end of the applicable legal limitation period: 5 years from the termination of the contract (civil limitation period).  If an actual legal claim is made in relation to the contract, this will be until the final and conclusive conclusion of the relevant proceedings.
Portrait photo <i>(If the data subject has provided such a photo to the Data Controller)</i>	Ensuring that the data subject is recognised and contacted by a Data Controller employee or another person acting on behalf of the Data Controller at an event organised by the Data Controller, thereby facilitating the smooth running of the event and enhancing the data subject's experience of participation.	Article 6(1)(a) GDPR: consent of the data subject	Until consent is withdrawn
If the data subject requests a book purchased at an event to be sent by post: <ul style="list-style-type: none"> <li>• full name,</li> <li>• e-mail address,</li> <li>• phone number,</li> <li>• delivery address,</li> <li>• other information provided by the data subject in connection with the service</li> </ul>	Delivery of the ordered book to the data subject	Performance of a contract pursuant to Article 6(1)(b) GDPR.	Until successful delivery

**(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**

With regard to data subjects 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 at the data subject's explicit request, the Data Controller processes the following data.

Scope of data processed	Purpose of data processing	Legal basis for data processing	Duration of data processing
Name, telephone number, e-mail address	Registering the accompanying person for the event, ensuring their access to the event and identification	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	Recording and promotion of the event for scientific, educational and networking purposes		10 years from the date of the recording
Data on eating habits, 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 provide include special data about your eating habits (e.g. health, religious beliefs):  The explicit consent of the data subject pursuant to Article 9(2)(a) GDPR	Until the end of the event or, if earlier, the withdrawal of consent

Data provided on the accommodation booking form, name, date and place of birth, passport number, telephone number, email address	Booking accommodation and making check-in faster and easier.	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	Travel insurance	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>	Travel insurance, settlement	Article 6(1)(a) GDPR: consent of the data subject	Until the end of the event or, if earlier, the withdrawal of consent
If the data subject requests a book purchased at an event to be sent by post: <ul style="list-style-type: none"> <li>• full name,</li> <li>• e-mail address,</li> <li>• phone number,</li> <li>• delivery address,</li> <li>• other information/information provided by the data subject in connection with the delivery</li> </ul>	Delivery of the ordered book to the data subject	Performance of a contract pursuant to Article 6(1)(b) GDPR.	Until successful delivery

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.

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, purchasing airline tickets on behalf of the data subject) will become impossible. In this case, the people concerned must do these tasks themselves.

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

Scope of data processed	Purpose of data processing	Legal basis for data processing	Duration of data processing
Name, e-mail address, institution from which the participant comes	Registration for an event, identification of the participating data subject Recording of what was said at the event as regards comments	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	Recording and promotion of the event for scientific, educational and networking purposes		10 years from the date of the recording
If the data subject requests a book purchased at an event to be sent by post: <ul style="list-style-type: none"> <li>• full name,</li> <li>• e-mail address,</li> <li>• phone number,</li> <li>• delivery address,</li> <li>• other information/information provided by the data subject in connection with the delivery</li> </ul>	Delivery of the ordered book to the data subject	Performance of a contract pursuant to Article 6(1)(b) GDPR.	Until successful delivery

**(D) Personal data of tenderers, applicants, contractual partners and their contact persons**

The Data Controller processes the personal data of **natural persons** who have a contractual relationship with the Data Controller, who submit offers to the Data Controller or who submit applications (in particular, self-employed persons, professors and experts participating in the Profnet Programme and applicants for LL.M. scholarships) as follows.

Category of data processed	Purpose of data processing	Legal basis for data processing	Data storage period, date of deletion
Name, e-mail address, telephone number, postal address, function, tax number or tax identification number, registered office	Processing, evaluation, identification and contact during the evaluation of the offer received 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 Annex 1, point 30 of Act IX of 2021 on public interest trusts with a public task	The Data Controller shall keep the files 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	



<p>For LL.M. candidates, personal data provided in the application form (e.g. name, date and place of birth, passport or ID number, nationality/country of origin of the applicant), personal data provided in the CV and motivation letter submitted during the application process, including, where applicable, any certificate, or diploma (e.g. data on education and studies, professional experience).</p>	<p>Verifying eligibility to participate in the LL.M. programme</p>	<p>The Data Controller's legitimate interest in admitting to the LL.M. programme the best qualified applicants who meet the application criteria and comply with the programme's regulations</p>	<p>Duration of the application and selection procedure</p>
	<p>Conducting the selection process</p>		
<p>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, IBAN, Swift/BIC Code, identity card or passport or a copy thereof, other data relating to the contract) and the personal data recorded in the tax residence certificate (name, mother's name, date and place of birth, tax residence)</p> <p>In addition to the above, in the case of a research contract under the Profnet programme, the subject of the research, the title of the research, study, article or</p>	<p>Preparation and performance of the contract</p>	<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 public tasks</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>The Data Controller shall keep the records containing personal data relating to the performance of contracts for a period of 5 years from the date of performance of the contract, in accordance with Article 46 (2) of the Public Procurement Act, or until the end of the accounting retention period (8 years pursuant to Article 169 (2) of Act C of 2000), in order to have sufficient evidence in case of legal claims</p>
	<p>Retention of contract-related documentation to ensure legal claims</p>	<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>other related data (e.g. plagiarism and AI usage check results).</p> <p><i>If you send an electronic document containing your personal data to the Data Controller, please protect it with a password, if possible, and send the password to the Data Controller in a separate email</i></p>	<p>Determining tax residence</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> <p>To fulfil a legal obligation under Act C of 2000</p>	
<p>Personal data included in the application for a scholarship or Profnet programme, in particular the applicant's name, date and place of birth, mother's name, address, nationality, type and number of identity document, bank account details, telephone number, email address, details of the job held at the time of application, and personal data included in the CV and motivational letter</p> <p>In case of a successful application, the amount of the scholarship paid</p> <p>If the applicant who has been awarded the scholarship does not take up the scholarship through no fault of his/her own, the reasons for postponing the scholarship</p>	<p>Assessing the application on a professional basis, checking that the conditions for the scholarship are met and contact with the applicant</p> <p>In the case of a successful application, the administration and execution of the scholarship contract</p> <p>To contact the institution organising the training related to the scholarship and, to the extent necessary, to forward the data of the scholarship recipient to that institution for the purpose of paying the scholarship</p>	<p>GDPR Article 6(1)(f): legitimate interest of the Data Controller 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 (the scholarship contract) with the data subject</p>	<p>During the period of the evaluation of the application and, if successful, until the end of the scholarship contract</p> <p>The Data Controller reserves the right to keep the files containing personal data relating to the evaluation of applications for 5 years from the date of the evaluation of the applications, in order to have sufficient evidence in case of legal claims</p>

<p>If the data subject participates in the Profnet programme organised by the Controller, and, in addition to the above, if he or she has such a document, personal data contained in the decision awarding the pension, personal data contained in the tax residence certificate (its Hungarian translation) and personal data relating to the assessment of the advance tax</p> <p><i>If you send an electronic document containing your personal data to the Data Controller, please protect it with a password, if possible, and send the password to the Data Controller in a separate email</i></p>	<p>Determining the tax residence and taxable amount of a contract</p>	<p>Fulfilling legal obligations under Act C of 2000, Act CXVII of 1995 and Act CL of 2017</p>	<p>With regard to documents subject to invoicing, until the end of the tax retention period (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)</p>
	<p>Payment of fees, verification of entitlement to benefits and reimbursement.</p> <p>Fulfilling tax, accounting, and social security obligations</p>		
<p>Personal data relating to housing</p> <p><i>(If the Data Controller contributes to the provision of housing)</i></p>	<p>To facilitate the provision of housing in Hungary, if the data subject so requests</p>	<p>Explicit consent of the data subject</p>	<p>For the duration of participation in the Programme or, if earlier, until the withdrawal of consent</p>
<p>Information on the booking form for flights, trains and buses</p> <p><i>(in case of a ticket reservation by the Data Controller)</i></p>	<p>Providing travel, if the data subject so requests</p>	<p>Explicit consent of the data subject</p>	<p>For the duration of participation in the Programme or, if earlier, until the withdrawal of consent</p>

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 retention period (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)
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	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.	Legal obligation pursuant to Section 28(2) of Act LXVI of 2011 on the State Audit Office of Hungary (SAO Act).	If the payment to the data subject is made from the grant 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 grant (i.e. for five years after the calendar year of the use of the grant; see Section 23/A of the SAO Act).
Where the data subject creates and transfers an intellectual work to the Data Controller in performance of a contract with the Data Controller: the personal data content of the notification form as set out in Annex 2 to the Data Controller's Intellectual Property Policy for the data subject	Notification of intellectual works to the Data Controller and registration of intellectual works by the Controller	The performance of the contract during the term of the contract with the data subject, thereafter, the legitimate interest of the Data Controller in the registration of intellectual works.	5 years from the last use of the intellectual property by the Data Controller.

The Data Controller shall process data relating to a **non-natural person** who is a tenderer or contractual partner or a natural person acting as a contact person for other entities as follows.

Category of data processed	Purpose of data processing	Legal basis for data processing	Data storage period, date of deletion
Name, e-mail address, telephone number, postal address, function	Contacts related to the offer or contract.	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	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

		<p>under Annex 1, point 30 of Act IX of 2021 on public interest trusts performing public tasks</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 contractual partner in connection with the tender, the preparation, conclusion and performance of the contract.</p>	Data Controller that the contact person has been replaced.
Information relating to conflicts of interest of persons acting on behalf of the non-natural person contractual partner concerned	To ensure compliance with internal rules on conflict of interest, and conduct relevant internal audits	The legitimate interest of the Data Controller in the verification and control of conflicts of interest of its contractual partners and compliance with internal regulations applicable to the Data Controller	<p>Until the end of the contractual relationship</p> <p>Where it is likely that proceedings will be brought in which the personal data concerned may be necessary to prove the Data Controller's point of view until the end of the applicable period for asserting claims (5 years).</p>
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.	Legal obligation pursuant to Section 28(2) of Act LXVI of 2011 on the State Audit Office of Hungary (SAO Act).	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 use of the grant; see Section 23/A of the SAO Act).
Where the data subject creates and transfers an intellectual work to the Data Controller in the context of the performance of a contract between the Data Controller and a non-natural person contracting partner (such as a university in cooperation	Notification of intellectual works to the Data Controller and registration of intellectual works by the Data Controller	The Data Controller's legitimate interest in the performance of the contract between the Data Controller and its non-natural person contractual partner during the term of the contract and, thereafter, the Data Controller's legitimate interest	5 years from the last use of the intellectual property by the Data Controller.

with the Data Controller): the personal data content of the notification form as set out in Annex 2 to the Data Controller's Intellectual Property Policy for the Data Subject		in the registration of intellectual works.	
If the Data Controller is contacted by a natural person acting on behalf of a press organisation, the personal data processed in connection with the request and the response to it (name, position, telephone number, e-mail address, name of the workplace - the media outlet, other personal data provided by the data subject)	Contacting and replying to the request	<p>If the request relates to the performance of a public task of the Data Controller, the Data Controller is performing its public tasks concerning 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 national and international legal and political science contacts and cooperation (GDPR 6(1)(e) legal basis) in accordance with Annex 1, point 30 of Act IX of 2021 on public interest trusts with a public purpose</p> <p>If the request is not related to the performance of a public task of the Data Controller, the Data Controller has a legitimate interest (Article 6(1)(f) GDPR) to be able to contact the media outlet and its representative acting on its behalf and to reply to the request received.</p>	<p>Until the request has been answered or the media outlet has duly informed the Data Controller that the contact person has been replaced.</p> <p>If the Data Controller considers, on a case-by-case basis, that the retrievability of the communication with the media outlet may be necessary to support its position in a possible future dispute, the Data Controller reserves the right to retain it for the duration of the limitation period under civil law (5 years).</p>

**(E) Processing of data relating to the publication of data of public interest and processing of data relating to public interest requests**

Category of data processed	Purpose of data processing	Legal basis for data processing	Duration of data storage, date of deletion
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Personal data of the categories of data subjects under (A) and (D) which are necessary for the fulfilment of the publication obligation under the Infotv. pursuant to Annex 1 of the Infotv. (e.g. the names of the contracting parties of contracts involving the use of public funds or the management of public assets exceeding HUF 5 million, the data of tenderers in certain tenders, etc.)	Fulfilling the publication obligation pursuant to Article 37 (1) (e) of the Infotv	Fulfilment of the legal obligation under Article 37 (1) (e) of the Infotv. and Annex 1 of the Infotv	Until the end of the retention periods set out in Annex 1 of the Infotv., depending on the type of data published.
If a given public interest data request would relate to the data subjects referred to in points (A) and (D) or to the contract concluded with them, the personal data (e.g. names of the contracting parties, names of the persons signing the contract) concerned by the public interest data request and provided by the Data Controller to the data subject	Fulfilling data requests in the public interest, ensuring compliance with the provisions of the Infotv	Fulfilment of the legal obligation pursuant to Art. 26 (1) (e) of the Infotv	The Data Controller shall keep the personal data for one year from the date of execution or refusal of the public interest data request or, if the Data Controller does not respond to the data request within the time limit for execution of the data request, from the expiry of the time limit for execution, in order to be able to support its legal position in the event of legal claims (the Data Controller shall also record that it may retain the personal data for other purposes beyond the retention period)

### III. Recipients and categories of recipients of personal data

#### Data processor:

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

<b>Data processor</b>	<b>Purpose of data processing</b>
Google Ireland Limited (Gordon House, Barrow Street, Dublin 4., Ireland)	Using Google Forms to register for the event



The partner hired by the Data Controller to take photos and videos of the events (information about the partner who will capture the event can be obtained from the contact details provided in this privacy policy)	Recording the events
MONGUZ Information Technology Ltd. (6726 Szeged, Páncél köz 25-27.)	Operation of the publishing platform (OMP and OJS platforms) for professional content produced in the framework of research work commissioned by the Data Controller.

As a general rule, the Controller does not transfer personal data outside the European Economic Area.

Where the Data Controller transfers personal data to a third country outside the European Union in the context of the performance of research and proofreading contracts under the Profnet programme, it does so subject to the additional safeguards required by applicable law, on the basis of a so-called adequacy decision issued by the European Commission or on the basis of the exception rule under Article 49 of the GDPR that the transfer is necessary for the performance of a contract with the professor or proofreader concerned.

#### **Individual data controller recipients**

Certain personal data as defined in point II are processed by the Data Controller for the purposes of scientific cooperation, publication of publications, administration of certain scholarship programmes and, occasionally, on the basis of the explicit consent of the data subject, for other administrative purposes, for its cooperating partners, in particular the partners responsible for the preparation and production of professional publications, the **Ministry of Justice**, the **Hungarian Academy of Sciences**, the **University of Miskolc**, the **Ferenc Mádl Institute of Comparative Law (MFI)**, the **Central European Association for Comparative Law (KÖSz)**, the **Hungarian Association for Comparative Law (MÖJE)**, the **Faculty of Law of the University of Miskolc**, the **Institute of Justice in Warsaw**, the **Romanian Association for Comparative Law**, the **Scientific Association for Comparative Law, Poland** and the **Association for the Advancement of Comparative Law Researches in Serbia** (hereinafter jointly referred to as: "**partner(s)**"). These organisations are considered as **independent data controllers**, and data subjects can obtain further information on their data processing from the privacy notices of these organisations.

The Data Controller may cooperate with different partners for each event, the partners cooperating during the event can be found in the thematic documentation of the event concerned. You can find out more about all of the Data Controller's partners and their data processing activities on the following link: <https://centraleuropeanacademy.hu/partnereink/>. The Data Controller excludes its own responsibility for the processing carried out by its partners as 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 carried out by the recipients of the data 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 Notice to third parties within the meaning of the GDPR, except as set out above.



The Data Controller shall forward personal data relating to contracts concluded in the course of procedures under the Public Procurement Act, in accordance with the mandatory provisions of the Public Procurement Act entitled "Publicity in Public Procurement Procedures" (Sections 42-45) (such as, but not limited to, the data contained in the contract concluded in the course of the procedure, the names of the parties to the contract, the names and tax numbers of the subcontractors involved in the performance of the contract, etc.) to the **Public Procurement Authority** (registered office: 1026 Budapest, Riadó utca 5.), the **National Development Center** (registered office: 1077 Budapest, Wesselényi utca 20-22) and other recipients specified therein, as **independent data controllers**. In this case, the purpose of the transfer is to comply with the publication and reporting obligations imposed by the above provisions of the Public Procurement Act and to ensure lawful operation. The Public Procurement Authority and the National Development Centre publish the personal data transmitted for the period specified in the Public Procurement Act (in particular for 5 years from the fulfilment of the contract).

In the case of the purchase of books exhibited at individual events, the Data Controller undertakes to deliver the purchased books to the data subject by courier service, if the data subject expressly requests it. In this case, the Data Controller will transfer the personal data to the courier service as **independent data controllers**. In this case, the purpose of the data transfer is to fulfil the delivery obligation undertaken by the Data Controller in the framework of the sales contract. You can obtain information about the specific courier service by contacting the contact details provided in this privacy notice.

However, the Data Controller is entitled and obliged 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 other legislation or by a final and binding obligation of a public authority or court.

Those requesting data of public interest shall act as independent data controllers with regard to the personal data affected by the request for data of public interest and transferred by the Data Controller in the course of fulfilling the data request, and shall be independently responsible for the processing (use) of personal data following the transfer.

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 automated decision-making or profiling on the data processed in accordance with this Privacy Notice.

#### **IV. 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 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 data 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 an appointed Data Protection Officer with appropriate market reputation and expertise.

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

**The rights referred to in this section may be exercised in all cases via the contact details provided in section 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 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.

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 data subject has 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 be entitled to refuse to comply with the data subject's request to the extent necessary and proportionate.

### **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")**

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

- the 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 data subject has withdrawn that consent and there is no other legal basis for the processing;
- the processing is 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 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 processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- the data subject has objected to the data 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 processing of data relating to the data subject is the legitimate interest of the Data 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

- the processing is justified by compelling legitimate grounds which 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**

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) Right to lodge a complaint with a supervisory authority, judicial redress**

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, Pf.: 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 in relation to the processing of their personal data. 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 14 November 2025.



Dr. Heinerné Dr. Barzó Tímea Tünde  
Director General