

PRIVACY NOTICE

about data management on the website

The **Central European Academy of the University of Miskolc** (hereinafter referred to as the "**Data Controller**") informs the persons (**data subject(s)**) visiting its website at <https://centraleuropeanacademy.hu> about the processing of personal data in connection with the Website, 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. Please read the privacy notice carefully!

This Privacy Notice covers the processing of personal data provided by the data subject to the Data Controller through the Website, as well as the processing of all personal data collected by the Data Controller through the interfaces of the Website or through the use of "cookies".

This privacy notice is available to data subjects on the website of the Data Controller (<https://centraleuropeanacademy.hu/dokumentum/>) on an ongoing basis.

I. The Data Controller and its Data Protection Officer

Data Controller:

Central European Academy of the University of Miskolc

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

Data Protection Officer of the Data Controller:

Réti, Várszegi and Partners Law Firm

Responsible employee: Dr. András Csenterics, lawyer, data protection and data security lawyer
Address: 1055 Budapest, Bajcsy-Zsilinszky út 78.
Email address: hu_centraleuropean_academy@pwc.com

If you wish to exercise your rights or lodge a complaint regarding data protection issues, you can contact the Data Controller or its Data Protection Officer at the above addresses.

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

II.1 Data processing in relation to cookies

A *cookie* is a small text file that the website you visit stores on the device you use to browse the internet. Your device stores the cookie for a set period of time. Some cookies are deleted as soon as you close your browser (these are called "*session cookies*"), others are stored for a longer period of time and allow a website to remember certain parameters - such as the language you choose - so that when you visit the website again, these "remembered" settings are automatically loaded.

Websites use cookies for several purposes. Some cookies are necessary to ensure the proper technical functioning of the website and to ensure that all content is displayed correctly on your browsing device, and are therefore strictly necessary. Other cookies provide certain conveniences, such as additional functionality, or help the website operator to tailor the website to the needs and browsing habits of its users, based on your activity on the website (e.g. the content you view, the menus you open).

Cookies pose no security risk on your device and do not cause any disruption to its functionality.

Given that some cookies may collect information that could be considered personal data (such as the IP address of your browsing device, the type of device you use, your activity on the Website), their use is only possible if it complies with the applicable data protection legislation.

Cookies can be categorised according to several criteria. On the one hand, based on whether they are used by the Data Controller itself (these are called "*first party cookies*") or by a third party organisation (these are called "*third party cookies*"). Another possible grouping is based on the categories mentioned above, so we can distinguish between e.g. strictly necessary, optional or marketing cookies.

The cookies available on the Website can be divided into the following categories:

- **Strictly necessary cookies.** They are absolutely necessary for the technical operation of the website (e.g. for the correct display of graphic content, navigation), therefore **it is not possible to disable them**. These cookies are automatically installed on your computer or other device when you visit the Website to ensure the smooth use of the Website. Their aim is to guarantee the security of the Website, the correct display of its content and to balance the load on the Website. Without their use, the proper technical functioning of the Website cannot be ensured. **The data collected through the use of these cookies (such as the type of browser, device and operating system you use, version number and IP address) is processed by the Data Controller on the basis of its legitimate interest in the secure and uninterrupted operation of the Website**, for a period of time depending on the type of cookie. When you close the browser, some of them are automatically deleted from your device's cache, others remain there for a limited period of time.
- **Settings-related and convenience cookies (Functional cookies).** They are used to enhance your experience on the Website by remembering certain preferences you have about the way the Website works and displaying it accordingly when you visit it again (such as language preference choices). These cookies are only used with your consent, which you can withdraw at any time by turning them off in the cookie settings interface.

- **Statistical cookies (tracking and performance cookies).** They are used for statistical purposes to measure the number of visits to the Website and the activity of users on the Website, in order to enable the Data Controller to continuously improve the Website. These cookies are important for the Data Controller because they enable it to be informed about certain statistical characteristics of its Website visitors (e.g. IP address, country, device used, browser, type of operating system, time of visit, statistical data of the visit - e.g. which contents of the Website were visited and how much time was spent there, etc.). The Data Controller will use the anonymous data to compile general statistics on the number of visitors to the Website and use them to improve it. These cookies are used by the Data Controller only with your consent, which you can withdraw at any time by disabling such cookies in the cookie settings interface.
- **Marketing cookies (Targeting and advertising cookies).** The Website also uses marketing cookies to enable the Data Controller or its third party partners to serve you with advertisements and tailored marketing content in addition to the main content, based on your interests. These cookies try to "guess" which content and menu items are most relevant to the visitor based on the activity of the visitor on the Website. These cookies are used by the Data Controller only with your consent, which you can withdraw at any time by disabling such cookies in the cookie settings interface.

Please note that you can manage cookies in your browser settings and delete all cookies stored on your device at any time. However, if you (also) delete cookies that are essential for the proper functioning of the Website, some features of the Website may not function or may not function properly.

Below you will find information on the specific of cookies running on the <https://centraleuropeanacademy.hu> Website:

Cookie name	Marking	Function	Objective	Type	Duration of storage	Expiry date	Comment
_stripe_mid	0b74e135-e910-4f89-a215-77a9190ca95bbaa0d2	Session manager cookie	The cookie used by the Stripe payment gateway to manage user sessions and payment processes, to securely identify the user session. Preventing fraud	Third-party cookie	1 year	03.09 2025	
_ga	GA1.1.1364580634.1724331322	Google Analytics cookie	A cookie used by Google Analytics to help identify individual users when they visit a website, thereby measuring website	Third party cookie, Analytical cookie	2 years	14.11. 2025	

			traffic and performance.				
_ga_7KZ0MXVCLZ	GS1.1.1728552876.16.1.1728553061.60.0.1024901712	Google Analytics cookie	A cookie used by Google Analytics to help identify individual users when they visit a website, thereby measuring website traffic and performance.	Analytical cookie	forever	14.11. 2025	This cookie points to the specific Analytics account.
cookie_consent_level	%7B%22strictly-necessary%22%3Atrue%2C%22functionality%22%3Atrue%2C%22tracking%22%3Atrue%2C%22targeting%22%3Atrue%7D	Consent cookie	This cookie is used to record the user's level of consent to the use of cookies. It ensures that the level of consent given by the user is applied appropriately on the website, for example, the types of cookies the user has allowed.	Functional cookie	1 year	26.09. 2025	
cookie_consent_user_accepted	TRUE	It allows the website to remember the consent given by the user and not to show the cookie consent bar again based on this.	This cookie is used to record the user's consent to accept cookies. This avoids the user having to give consent every time they visit the site.	Functional cookie, First-party Cookie	At least 1 year	26.09. 2025	
cookie_consent_user_consent_token	Liy1ZYHSNzka	The function of the cookie is to provide a unique identifier	This cookie may store a unique identifier linked to the consent given	Functional cookie, First-party cookie	At least 1 year	26.09. 2025	

		for the user's consent to cookies.	by the user. The details of the consent may be stored by the website or an external system, and this token can be used to refer back to the type of cookies the user has allowed (e.g. only functional cookies, analytical cookies, etc.).				
IDE	AHWqTUmLsrn9Ni 4H6odqfHbk6BW3 K_ObsfRLhvVWYXi Y2k4g0zJz5iu8avN D8E09Z9U	It allows Google and its partners to serve relevant ads to users based on their browsing history and interactions.	The purpose of the IDE cookie is to measure the effectiveness of advertising and to show relevant, personalised ads to users.	Third-party cookie	2 years	27.09.2026	

II.2 Processing of personal data you provide on the Website

Data subjects visiting the Website have the possibility to contact the Data Controller through the contact form on the Website. If the data subject wishes to contact the Controller by filling in the contact form, the Controller will process the following personal data:

Scope of processed data	Purpose of data processing	Legal basis of data processing	Duration of data processing
<p>Personal data provided when filling in the contact form:</p> <ul style="list-style-type: none"> • surname, • first name, • e-mail address, • if the data subject wishes to provide it, a telephone number • selected case type; • the content of the request, if it contains personal data <p><i>In the free text section of the contact form, please provide only the personal data that is strictly necessary to respond to the request you have sent us. Please do not provide any information that falls under the special category of personal data in the free text section, unless it is strictly necessary to respond to your request.</i></p>	<p>To ensure that you can contact the Data Controller via the Website and that the Data Controller can provide an appropriate response to your questions, comments or complaints</p>	<p>Article 6(1)(f) GDPR: The Data Controller's legitimate interest in being able to provide an adequate response to your message</p> <hr/> <p>Article 6(1)(c) GDPR: where your message relates to the exercise of a right under the GDPR, to comply with a legal obligation on the Data Controller pursuant to Article 12(2) of the GDPR, under which the Data Controller is required to facilitate the exercise of rights</p>	<p>Until the successful conclusion of the communication with you</p>

Any personal data collected in the course of contacting us through the Website and subsequent communications, on a case-by-case basis, at our discretion	In the event of a possible legal claim, to provide evidence of the position of the Data Controller (e.g. to prove the content of the exchange of messages between the Data Controller and the data subject, the subject of your request, etc.)	Article 6(1)(f) GDPR: the Data Controller's legitimate interest in having the necessary evidence in order to pursue legal claims.	Until the expiry of the applicable civil limitation period (5 years), which starts from the moment the request is closed.
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III. Recipients of personal data

Addressee	Recipient category	Purpose of data transfer
Rackforest Informatikai Kereskedelmi Szolgáltató és Tanácsadó Zrt. (1132 Budapest, Victor Hugo utca 11-5. floor)	data processor	Hosting service
Google Ireland Limited (seat: Gordon House, Barrow Street, Dublin 4, Ireland)	data processor	Provision of Google Analytics service

In the case of data transfers to Google Ireland Limited, there is a possibility that personal data may be transferred to the United States of America. Such transfers are based on the EU-US Data Privacy Framework approved by the European Commission. If this framework were to be repealed or not applicable, the transfers would be based on the model agreement on data transfers used by Google and approved by the European Commission.

For more information about how Google uses the data collected by Google cookies embedded in the Data Controller's website, please see the links below:

- <https://policies.google.com/privacy>;
- <https://support.google.com/analytics/answer/6004245?hl=en#zippy=%2Cgoogle-analytics-under-the-general-data-protection-regulation-gdpr%2Cour-privacy-policy>

For more information on the EU-US Data Privacy Framework, click here:

https://ec.europa.eu/commission/presscorner/api/files/document/print/hu/ip_23_3721/IP_23_3721_HU.pdf

IV. Rights of the Data Subject

In all cases, the rights referred to in this point may be exercised by using the contact details provided in point 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 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 has the following rights in relation to the processing of data under point II:

a) Right to access:

The Data Subject shall have the right at any time to obtain information on whether and how his/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/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 to 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 business 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 request the Data Controller to correct inaccurate personal data relating to him/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/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;
- the processing 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;
- the processing was 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/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) Right to data portability

The data subject shall have the right to request that the Data Controller provide him or her with personal data which he or she has provided to the Data Controller on the basis of his or her consent in a machine-readable, structured format or, if technically feasible, to transmit it directly to another controller designated by him or her at his or her request. If the exercise of the data subject's right to data portability would adversely affect the rights and freedoms of others, the Data Controller is entitled to refuse to comply with the Data Subject's request to the extent necessary.

f) Right to objection

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

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

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

If the data subject believes that there has been a breach in the processing of his or her personal data, he or she may contact the data protection authority and lodge a complaint, in particular in the Member State where he or she has 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 (NAIH): 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; 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 take legal action 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 01 April 2026.



Dr. Heinerné Dr. Barzó Tímea Tünde
Director-General