

**DATA PROCESSING NOTICE**  
**on data processing related to the pre-registration for the mental health**  
**workshop**  
**and psychological counselling organised by the Moholy-Nagy University of**  
**Art and Design Budapest**

The purpose of this Data Processing Notice is to provide information about the processing of data by the **Moholy-Nagy University of Art and Design Budapest** (hereinafter as: **MOME** or the **Controller**) in connection with the pre-registration for the Mental Health **Workshop** (hereinafter as: the **Workshop**) and psychological counselling organised by MOME.

The purpose of the data processing is to collect the data of the participating students for the Workshop organised by MOME, to carry out the registration and to conduct a preliminary survey on the experience of the data subjects in relation to psychological counselling.

In the course of its data processing actions, MOME shall take into account and comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter as: GDPR), and the provisions of Act CXII of 2011 on Informational Self-determination and Freedom of Information (hereinafter as: the Information Act).

The purpose of this Data Processing Notice is to inform Data Subjects of the facts and circumstances surrounding the processing of their data, in accordance with Article 13 of the GDPR.

## **1. THE CONTROLLER**

Name of the Controller: **Moholy-Nagy University of Art and Design Budapest**

Short name: MOME

Registered office: 1121 Budapest, Zugligeti út 9-25.

Postal address: 1121 Budapest, Zugligeti út 9-25.

Tax number: 19253172-2-43

Ministry of Education Identifier: FI73435

Website: [www.mome.hu](http://www.mome.hu)

Represented by: Pál Koós Rector and Réka Matheidesz CEO

E-mail: [jog@mome.hu](mailto:jog@mome.hu)

Phone: +36 1 392 1100

Data protection officer: dr. Márk Kovács

E-mail: [mark.kovacs@galnet.eu](mailto:mark.kovacs@galnet.eu)

## **2. DEFINITIONS**

**Personal data:** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Processing:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission,

dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Controller:** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

**Profiling:** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person.

**Execution of the technical tasks of data processing:** the performance of the technical tasks related to the data processing operations, regardless of the method applied and the devices used for such operations, or the place of application, provided that the technical tasks are executed on the data subject's personal data.

**Processor:** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**Data Subject:** any natural person who is or who can be identified directly or indirectly on the basis of any specific personal information.

**Consent of the Data Subject:** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

**Recipient:** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

**Third party:** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### 3. DATA PROCESSING ACTIVITIES

#### 3.1. Registration for mental health workshop

The Controller collects personal data of Data Subjects in relation to applications for the Workshop in connection with the event. MOME shall not use this data for any other purposes.

Purpose of data processing	Legal basis of processing	Scope of processed data	Data retention time
Data collection and processing for the purpose of organising the Workshop.	Consent based on point (a) of Article 6(1) of the GDPR, which states that the processing of	1. Name, e-mail address, Neptun code 2. Which service he	The Controller shall process the personal data of the persons assigned to the Workshop participants until the last day of

	personal data is lawful if <i>“the data subject has given consent to the processing of their personal data for one or more specific purposes”</i> .	or she is applying for, for what reason	the academic year concerned, after which it will delete the processed personal data without delay.
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### 3.2. Pre-registration for psychological counselling

The Controller conducts psychological counselling through external experts (third parties), processes the following data for the organisation of this counselling and for the purpose of determining eligibility to participate, forwards the data under point 1 of the table below to the external experts conducting the counselling.

Where any data subject, in the context of exercising his or her right of access under Article 15 of the GDPR, requests information about the recipients, external experts with whom or to whom personal data have been or will be disclosed, the Controller shall be obliged to comply with that request.

Purpose of data processing	Legal basis of processing	Scope of processed data	Data retention time
Data collection and processing for the purpose of handling pre-registration for group psychological counselling	<p>Consent based on point (a) of Article 6(1) of the GDPR, which states that the processing of personal data is lawful if <i>“the data subject has given consent to the processing of their personal data for one or more specific purposes”</i>.</p> <p>Consent based on point (a) of Article 9(2) of the GDPR, which states that sensitive data may be processed if the data subject has given consent to the processing of the sensitive data for one or more specific purposes.</p>	<ol style="list-style-type: none"> <li>1. Name, e-mail address, Neptune code</li> <li>2. Which service he or she is applying for, for what reason</li> </ol>	The Controller shall process the personal data of the persons participating in psychological counselling until the last day of the academic year concerned, after which it will delete the processed personal data without delay.

## 4. DATA SECURITY

The Controller shall process the personal data of the data subjects in accordance with the principles of the GDPR and in compliance with the provisions of the GDPR, the Information Act and other Hungarian data protection legislation, confidentially and in compliance with its statutory confidentiality obligation.

MOME designs and implements its data processing operations in a way that ensures that the privacy of data subjects is adequately protected. It shall implement the necessary technical and organizational measures and establish procedural rules to ensure data security, considering the latest

advancements in technology. It shall protect the personal data, in particular against unauthorised access, modification, transmission, public disclosure, deletion or destruction, accidental destruction or damaging, accidental loss or corruption and also against such data becoming inaccessible due to changes in the technology used.

The Controller shall treat the personal data it processes as confidential and shall not disclose or transfer them to the public, unless the data subjects or persons having parental control over minors concerned expressly consent for any reason or unless required by law. In the event of any doubt, it shall be presumed that the data subjects did not provide their consent.

After the purpose of data processing ceases to exist, the Controller shall ensure that the data are erased. The senior manager responsible for processing the data and the Controller's data protection officer may verify erasure at any time.

## **5. EXERCISING THE DATA SUBJECT'S RIGHTS, LEGAL REMEDIES**

You have various rights in relation to the processing of your data, as detailed below. If you wish to exercise any of your rights, please contact us using the contact details below:

postal address: Moholy-Nagy University of Art and Design; 1121 Budapest, Zugligeti út 9-25.

e-mail: [jog@mome.hu]

In all cases, we will need to verify your identity before we can fulfil your request. If we are unable to identify you, unfortunately we cannot fulfil your request.

After identification, we will provide you with information about your request in writing, by e-mail or orally at your request. Please note that if you have submitted your request electronically, we will respond electronically. Of course, you still have the option to request a different method in this case.

We will inform you of the action taken on your request within 1 month of receiving it at the latest. If necessary, taking into account the complexity of the request and the number of requests received, this deadline may be extended by a further 2 months, which will be communicated to you within the 1-month administrative deadline.

We are also obliged to inform you of any failure to take action within the one-month time limit.

The information and action requested is free of charge. An exception is made if the request is clearly unfounded or excessive, in particular because of its repetitive nature. In this case, we may charge a fee or refuse to comply with the request.

Your rights in relation to our processing of your data are as follows:

### **5.1 Right of access**

The data subject shall have the right to obtain from the Controller, through the contact details provided in Section 1, information as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to obtain the following information from the Controller:

- which personal data are processed;
- based on what legal basis;
- for which data processing purpose;
- for how long are the data processed.

The data subject has the right to know:

- to whom, when, under what legislation was access provided by the Controller to the data subject's personal data, which personal data were involved, to whom were these transferred by the Controller;
- the source of his or her personal data;

In order to meet the data security requirements and to protect to rights of the data subject, the Controller is obliged to make sure that the data subject and the person exercising his/her right to access are the same, therefore providing information, access to data and issuing copies of data are also conditional upon identification of the data subject.

## **5.2 Right to rectification**

The data subject may request the Controller to amend any of his or her personal data through the contact details provided in Section 1. If the data subject can verify – by providing sufficient and reliable proof – the accuracy of the rectified data, the Controller shall perform the request within one month at the latest, and shall notify the data subject thereof through the provided contact details.

## **5.3 Right to withdraw the consent**

The data subject may withdraw his or her consent at any time, without giving reasons, in relation to the processing of those data in terms of which the data subject's consent represents the legal basis. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. However, the Controller shall no longer carry out operations using the personal data of the data subject and shall delete them. Consent may be withdrawn through the contact details of the Controller.

## **5.4 Right to blocking (restriction of processing)**

The data subject has the right to request that the processing of his/her personal data be restricted by the Controller (by clearly indicating the restricted nature of processing and by ensuring a processing separated from the other data), if:

- he/she contests the accuracy of his/her personal data (in this case the Controller shall restrict processing for the period until it checks the accuracy of the personal data);
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- the Data Subject has objected to the processing (in this case the restriction is pending the verification whether the legitimate grounds of the Controller override those of the data subject).

## **5.5 Right to object**

The data subject may object to the processing of his or her personal data at any time on grounds relating to his or her particular situation or if he or she considers that the Controller would process his or her personal data in a way incompatible with the purposes of this Data Processing Notice. In this case, the Controller must demonstrate compelling legitimate grounds for processing the personal data which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

## **5.6 Right to erasure**

The data subject shall have the right to request, on the basis of a request made through the contact details of the Controller, the erasure of personal data relating to him or her processed by the Controller, if one of the following conditions applies:

- the purpose of the processing no longer exists and there is no longer a need to process the data;

- the processing of his or her data is unlawful, for example if the Controller processes the data without a proper legal basis;
- his or her data must be erased in order to comply with a legal requirement;
- the data subject exercised their right to object, and based on the details provided in their request, the termination of data processing is justified.

If, following the request, the Controller determines that there is an obligation to erase the personal data it has processed, it shall cease processing the data and destroy the personal data previously processed. In addition, the obligation to erase the personal data may also be based on the withdrawal of consent, the exercise of the right to object or legal obligations.

## 6. Legal Remedy

If the data subject considers that the Controller has infringed the applicable data protection requirements in the processing of his or her personal data, he or she

- *may lodge a complaint with the Controller* at the postal address or e-mail address specified in Section 1. The Controller shall provide written information about the complaint as soon as possible, but within 1 month at the latest (within 15 days in the case of objections) (this deadline can be extended with 2 further months, taking the complexity of the request into account – the Controller shall inform the data subject of any such extension within 30 (thirty) days of receipt of the request, together with the underlying reasons);
- *may turn to the Hungarian National Authority for Data Protection and Freedom of Information* (address: 1055 Budapest, Falk Miksa utca 9-11.), or
- *may refer the case to court* in order to protect his or her data, and the court will address his or her case in an accelerated procedure (with priority). In that case, the Data Subject may decide whether he/she files his/her legal action to the regional court having competence according to his/her domicile (permanent address) or according to his/her habitual residence (temporary address) or the registered office of the Controller. The Data Subject can look up the regional court having competence according to his or her domicile or habitual residence on the website at <http://birosag.hu/birosag-kereso>.

Contact details of the National Authority for Data Protection and Freedom of Information are as follows:

postal address: 1374 Budapest, Pf. 603.  
 address: 1055 Budapest, Falk Miksa u. 9-11.  
 Phone: +36 (1) 391-1400  
 Fax: +36 (1) 391-1410  
 web: <https://www.naih.hu>  
 e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

If MOME causes damage to the Data Subject or infringes the Data Subject's right to privacy by unlawfully processing his or her data, compensation and aggravated damages (compensation for injury to feelings) can be claimed from the Controller. The Controller shall be released from its liability for the damages caused and from its obligation to pay aggravated damages if it proves that the damage or the violation of the personal rights of the Data Subject occurred due to a force majeure beyond the scope of data processing.

Date of last amendment of this data processing notice:

**30 August 2024**