

DATA PROTECTION AND DATA PROCESSING NOTICE

I. INTRODUCING THE DATA CONTROLLER

The **Hungarian University of Sports Science** (in Hungarian: Magyar Testnevelési és Sporttudományi Egyetem; hereinafter: the "**University**" or the "**Data Controller**") adopts this data protection notice in order to ensure the lawfulness of its internal data processing activities and to safeguard the rights of data subjects.

Name of the Data Controller:	Hungarian University of Sports Science
Institutional ID number:	FI89399
Registered seat of the Data Controller:	1123 Budapest, Alkotás u. 42-48., Hungary
Electronic contact of the Data Controller:	info@tf.hu
Represented by:	Prof. Dr. Tamás Sterbenz, Rector
Contact details of the Data Protection Officer:	tf-adatvedelem@tf.hu

As a higher education institution, the Data Controller is an organisation established, in accordance with Act CCIV of 2011 on National Higher Education (hereinafter: the "**Higher Education Act**"), for the pursuit of education, scientific research and artistic creative activity as its core activities, and it contributes to the social development of its region by making the intellectual assets arising from these core activities available to the community, including through supporting the integration and community life of its students.

The Data Controller processes personal data in accordance with all applicable legislation, in particular:

- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter: the "**Infotv.**"),
- 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 (general data protection regulation, hereinafter: the "**Regulation**" or "**GDPR**").

The Data Controller treats personal data as confidential and takes all technical and organisational measures relating to data storage and data processing that are conducive to secure data management.

The Data Controller reserves the right to amend this notice at any time. Should any circumstance relevant to the processing change, this notice will be updated within 30 days. Any amendments will be published in a consolidated version together with this notice.

Definitions

The terminology used in this notice corresponds to the definitions set out in Article 4 of the Regulation, supplemented in certain respects by the definitions in Section 3 of the Infotv.

Where this notice refers to data or to data processing, this is to be understood as referring to personal data and the processing thereof.

II. PURPOSES OF DATA PROCESSING

1. Organising and holding the International Welcome Day 2026

The University supports the integration and community life of newly arrived international students through orientation and community-building programmes. As part of this activity, on 26 September 2026 (Saturday), with a rain date of 3 October 2026 (Saturday), between 11:00 and 17:00, the University organises a team-building and orientation event for newly arrived international students, to be held at the University's premises and at the Csörsz Street sports ground (hereinafter: the "Event"). Approximately 100 participants are expected.

Participation in the Event is free of charge but is subject to prior registration. The Data Controller complies with its information obligation regarding the processing related to the Event by means of this notice.

Purpose of the processing

The purpose of the processing is to identify registrants and to ensure the safe running of the Event.

The University processes the data provided during registration in order to identify registrants and to ensure the safe running of the Event, including catering arrangements that take into account participants' individual health-related and dietary needs. In addition, the e-mail address of the data subject is also processed so that the University is able to contact the data subject in the event of any unexpected circumstance, any important change relating to the Event, or any other necessary and justified case, both before and after the Event.

Personal data processed and the legal basis for their processing

In connection with registration for, and the safe running of, the Event, the following personal data are processed:

- a) name (identification),
- b) nationality (identification, and statistical overview of the international student community),
- c) e-mail address and its confirmation (contact),
- d) student status, i.e. whether the participant is an exchange student (Erasmus, Makovecz), a scholarship holder (SH, SHS, DFP) or a fee-paying student (identification, eligibility),
- e) information on allergies or dietary restrictions, provided voluntarily by the data subject (to ensure appropriate and safe catering at the Event), and
- f) signature, provided on the paper-based registration sheet on the day of the Event (proof of registration).

The processing of the data listed under points a)–d) and f) above is necessary for the performance of a task carried out by the University in the public interest, which in this case specifically consists in its obligation, as a higher education institution, to support the integration and student services of its international student community, so the legal basis for this processing is Article 6(1)(e) of the Regulation.

The information referred to under point e) above, concerning allergies or dietary restrictions, qualifies as a special category of personal data concerning health within the meaning of Article 9

of the Regulation. The legal basis for the processing of this data is the explicit consent of the data subject pursuant to Article 9(2)(a) of the Regulation. Providing this information is voluntary, and a data subject who chooses not to provide it thereby accepts that the University will not be able to take the relevant allergy or dietary need into account when arranging catering for the Event.

Source of personal data

The source of the personal data is the data subject.

Access to personal data

The personal data may only be accessed by those employees of the Data Controller for whom this is necessary for the performance of their job duties.

Transfer of personal data to a third country or an international organisation

The Data Controller does not transfer the personal data to any third country or international organisation.

Duration of the processing of personal data

The Data Controller stores the personal data listed under points a)–f) above until the administration of the Event has been completed, but no more than 1 month after the Event.

Automated decision-making and profiling

No automated decision-making or profiling takes place in the course of this processing.

2. Taking photographs, video recordings and interviews at the Event, and their use

Purpose of the processing

In order to promote its international educational activities and student life, and to document its events, the University takes photographs, video recordings and interview recordings at the Event, which may be published, without any time limitation, on the University's own online platforms, as follows:

- the University's website at <https://tf.hu/>;
- the University's social media platforms, in particular:
 - o Facebook: <https://www.facebook.com/uniTestnevelesiEgyetem>
 - o Instagram: <https://www.instagram.com/testnevelesiegyetem>
 - o TikTok: <https://www.tiktok.com/@testnevelesiegyetem>
 - o LinkedIn: <https://www.linkedin.com/school/tf1925/>

The photographs, video recordings and interview recordings referred to above may also be used, without any time limitation, in the University's printed and promotional materials (e.g. flyers, brochures and other publications).

[PFT1] megjegyzést írt: A kérsben szereplő „commercial materials” kifejezést a fenti mondatban „promotional materials”-re enyhítettük, mivel az Egyetem közfeladatot ellátó, nonprofit intézményként nem folytat kereskedelmi tevékenységet.

Photographs and recordings are always taken in a clearly recognisable manner, so that data subjects have the opportunity to step out of the photographer's field of view or to indicate that they do not wish to appear in a recording or to be interviewed.

Personal data processed

Photographs, video recordings and interview recordings made at the Event, in which participants may appear or be heard.

Legal basis for the processing

The processing is necessary for the performance of a task carried out by the University in the public interest, which in this case specifically consists in its obligation to support the promotion of the University's international education through online publicity, so the legal basis for this processing is **Article 6(1)(e) of the Regulation**.

Source of personal data

The recordings taken at the Event are handed over to the University for the purposes described above.

Where the recordings are made by a contracted photography or video partner acting as processor, the contracted partner delivers the recordings made to the University after the Event and permanently and irretrievably deletes them from its own devices thereafter.

Access to personal data

The personal data may only be processed by those employees of the Data Controller for whom this is necessary for the performance of their job duties.

With respect to the Facebook and Instagram platforms, Meta Platforms Ireland Ltd. acts as an independent data controller, whose general privacy notice is available at <https://www.facebook.com/privacy/explanation>. In data protection matters, Meta's data protection officer may be contacted via the following link: <https://www.facebook.com/help/contact/540977946302970>.

TikTok Technology Limited (The Sorting Office, Ropemaker Place, Dublin 2, Dublin, D02 HD23, Ireland; hereinafter: **TikTok Ireland**) acts as an independent data controller and collects data about visitors to individual TikTok accounts in accordance with its own privacy policy. TikTok Ireland acts as a joint controller together with TikTok Information Technologies UK Limited (4 Lindsey Street, London, EC1A 9HP, United Kingdom) in respect of the processing of personal data carried out for the technical operation of the TikTok platform.

The general privacy notice of TikTok Ireland (10 Earlsfort Terrace, Dublin, D02 T380, Ireland) is available at <https://www.tiktok.com/legal/privacy-policy?lang=en#privacy-eea>. In data protection matters, its data protection officer may be contacted via the following link: <https://www.tiktok.com/legal/report/privacy?lang=en>.

LinkedIn Ireland Unlimited Company (Gardner House, Wilton Plaza, Wilton Place, Dublin 2, Ireland; hereinafter: **LinkedIn Ireland**) acts as an independent data controller and collects data, in accordance with its own privacy policy, about persons interacting within the LinkedIn Group or

on the LinkedIn Page, or submitting a job application through it. The general privacy notice of LinkedIn Ireland is available at <https://www.linkedin.com/legal/privacy-policy?src=li-other&veh=www.linkedin.com#use>.

Processor:

Where the recordings are made by a contracted photography or video partner, that partner acts as processor.

A processor may process the data subject's personal data solely for the purpose specified by, and set out in the agreement with, the Data Controller, in accordance with the Data Controller's instructions, and has no independent decision-making authority in respect of the processing. The processor has undertaken a duty of confidentiality and contractual guarantees for the safekeeping of the personal data it becomes aware of in the course of performing its tasks.

Transfer of personal data to a third country or an international organisation

The Data Controller does not transfer the personal data to any third country or international organisation, although, owing to the borderless nature of the internet, recordings uploaded to the online platforms listed above may become accessible to anyone. The University has no control over how such publicly available recordings are subsequently used by those who access them, and accordingly accepts no liability in this respect.

Duration of the processing of personal data

Following publication, the University does not delete the photographs, video recordings or interview recordings from the platforms listed above, except at the explicit request of the data subject or where the data subject objects to the processing.

Automated decision-making and profiling

No automated decision-making or profiling takes place in the course of this processing.

1. Providing further information to participants following the Event

Purpose of the processing

The purpose of the processing is to enable the University to send further information to participants after the Event has taken place, including information relating to the Event itself, the University's international programmes, forthcoming programmes and events, news and developments concerning the University, and news relating to education and studies at the University.

Personal data processed

The name and e-mail address of the participant, as provided during registration for the Event.

Legal basis for the processing

The processing is based on the voluntary consent of the data subject pursuant to Article 6(1)(a) of the Regulation. The data subject may withdraw their consent at any time, in accordance with the provisions on the withdrawal of consent set out in Section III of this notice.

Source of personal data

The source of the personal data is the data subject.

Access to personal data

The personal data may only be accessed by those employees of the Data Controller for whom this is necessary for the performance of their job duties.

Transfer of personal data to a third country or an international organisation

The Data Controller does not transfer the personal data to any third country or international organisation.

Duration of the processing of personal data

The Data Controller stores the personal data for 12 months following the Event.

Automated decision-making and profiling

No automated decision-making or profiling takes place in the course of this processing.

III. RIGHTS OF THE DATA SUBJECT IN CONNECTION WITH THE PROCESSING

Right to information

The data subject has the right to be informed about the processing of their data, which the Data Controller fulfils by making this notice available.

Processing based on consent

Where the legal basis for a given processing is the data subject's consent, the data subject is entitled to withdraw their previously given consent at any time. It should be noted, however, that the withdrawal of consent can only concern data whose processing has no other legal basis. Where the processing of the personal data concerned has no other legal basis, the Data Controller will permanently and irretrievably delete the personal data following withdrawal of consent. The withdrawal of consent does not affect the lawfulness of processing based on the consent before its withdrawal, in accordance with the Regulation.

Right of access

At the data subject's request, the Data Controller will at any time provide information as to whether the processing of the data subject's personal data is taking place and, if so, will grant access to the personal data and to the following information:

[PFT2] megjegyzést írt: Javasolt szöveg a weboldalas űrlap kötelező checkbox-ához: „I have read the privacy policy and consent to the processing my data by the Hungarian University of Sports Science to send me further information about the Event, the University's international programmes, upcoming events and news, as described in the **Privacy Notice**.”

A privacy notice-nak klikkelhetőnek kell lennie és az adatkezelési tájékoztató szükséges mögé rakni, vagy máshogy megoldani azt, hogy a hozzájárulással egyidejűleg

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, including in particular recipients in third countries or international organisations;
- d) the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the data subject's right to request from the Data Controller rectification, erasure or restriction of processing of personal data concerning them, and to object to such processing;
- f) the right to lodge a complaint with a supervisory authority or to bring judicial proceedings;
- g) where the personal data were not collected directly from the data subject, any available information as to their source;
- h) where automated decision-making, including profiling, takes place, at least in those cases, information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

The Data Controller will also, upon request, provide the data subject with a copy of the personal data undergoing processing.

Right to rectification of personal data

The data subject has the right to obtain from the Data Controller, without undue delay, the rectification of inaccurate personal data concerning them. Taking into account the purposes of the processing, the data subject also has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

When requesting rectification of data, the data subject is required to substantiate the accuracy of the data to be modified and to prove that they are indeed the person entitled to request the modification. This is necessary in order to enable the Data Controller to assess whether the new data are accurate and, if so, whether the previous data may be modified.

The Data Controller further draws attention to the fact that the data subject should report any change in their personal data as soon as possible, in order to facilitate lawful processing and the exercise of their rights.

Right to erasure

At the data subject's request, the Data Controller will, without undue delay, erase personal data concerning the data subject where one of the following applies:

- i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- j) where the processing is based on consent, the data subject withdraws the consent on which the processing is based, and there is no other legal basis for the processing;
- k) the data subject objects to the processing and there are no overriding legitimate grounds for the processing, or the data subject objects to processing for direct marketing purposes;
- l) the personal data have been unlawfully processed by the Data Controller;
- m) the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the Data Controller is subject;
- n) the personal data were collected in relation to the offer of information society services.

Right to restriction of processing

The data subject has the right to obtain from the Data Controller restriction of processing where one of the following applies:

- o) the data subject contests the accuracy of the personal data, for a period enabling the Data Controller to verify the accuracy of the personal data;
- p) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- q) the Data Controller no longer needs the personal data for the purposes of processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- r) the data subject has objected to processing, pending the verification whether the legitimate grounds of the Data Controller override those of the data subject.

Right to object

Where the legal basis for the processing of personal data is the legitimate interest of the Data Controller (Article 6(1)(f) of the Regulation) or the processing is necessary for the performance of a task carried out in the exercise of official authority vested in the Data Controller (Article 6(1)(e) of the Regulation), the data subject has the right to object, on grounds relating to their particular situation, at any time to the processing of their personal data, including profiling based on those provisions.

Right to data portability

The data subject has the right to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used and machine-readable format, and has the right to transmit those data to another controller, where:

- s) the processing is based on consent or on a contract pursuant to Article 6(1)(b) of the Regulation; and
- t) the processing is carried out by automated means.

PROCEDURE FOR EXERCISING THE RIGHTS OF THE DATA SUBJECT

The data subject may exercise the above rights by sending an e-mail to tf-adatvedelem@tf.hu, by post to the registered seat of the Data Controller, or in person at the registered seat of the Data Controller. The Data Controller will, without undue delay, begin examining and fulfilling the data subject's request upon its receipt. The Data Controller will inform the data subject of the measures taken in response to the request within one month of its receipt. Where the Data Controller is unable to fulfil the request, it will, within one month, inform the data subject of the reasons for refusal and of the available legal remedies.

Within five years following the death of a data subject, the rights that would have belonged to the deceased data subject under this notice during their lifetime may be exercised by a person authorised to do so by an instrument of disposition made for the purpose of case management, or by a public deed or private document with full probative force made to the Data Controller (or, if the data subject made several such statements to a given data controller, by the person authorised in the most recent statement). Where the data subject made no such statement, a close relative

within the meaning of Act V of 2013 on the Civil Code is, in the absence thereof, entitled, within five years following the death of the data subject, to exercise the rights that would have belonged to the deceased data subject under Articles 16 (right to rectification) and 21 (right to object) of the Regulation, as well as — where the processing was already unlawful during the data subject's lifetime, or the purpose of the processing ceased upon the data subject's death — under Articles 17 (right to erasure) and 18 (right to restriction of processing) of the Regulation. The close relative entitled to exercise the data subject's rights under this paragraph is the one who first exercises this entitlement.

IV. RIGHT TO LEGAL REMEDY IN CONNECTION WITH THE PROCESSING

Where, in the data subject's assessment, the Data Controller processes their personal data in breach of the legislation applicable to the processing of personal data or of a binding legal act of the European Union, the data subject may, in order to exercise their right to judicial remedy, turn to a court. The court will deal with the case as a matter of priority. The action falls within the jurisdiction of the regional court (törvényszék). The action may be brought, at the data subject's choice, before the regional court having jurisdiction over the data subject's place of residence or habitual residence, or over the registered seat of the Data Controller. Court finder: <https://birosag.hu/birosag-kereso>

Anyone may initiate an investigation against the Data Controller by lodging a complaint with the National Authority for Data Protection and Freedom of Information (NAIH), on the grounds that a violation of their rights in connection with the processing of personal data has occurred or that there is a direct threat thereof, or that the Data Controller restricts the exercise of their rights in connection with the processing, or rejects their request to exercise such rights. The complaint may be lodged using any of the following contact details:

National Authority for Data Protection and Freedom of Information (NAIH)

Postal address: 1363 Budapest, Pf. 9., Hungary

Address: 1055 Budapest, Falk Miksa utca 9-11., Hungary

E-mail: ugyfelszolgalat@naih.hu

URL: <http://naih.hu>

Budapest, 2026.