

Privacy Policy

Regarding the processing of personal data during the use of the <https://modu.education> website (hereinafter: "Website").

The purpose of this Privacy Policy is to provide information to users of the Website (hereinafter: "User" or "Data Subject") about the processing of their personal data.

The Data Controller processes any personal data it becomes aware of in compliance with the applicable data protection regulations, in particular, Act CXII of 2011 on Informational Self-Determination and Freedom of Information ("Info Act") and Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: "GDPR" or "General Data Protection Regulation").

Data Subject: *Any identified or identifiable natural person, in the present context, the User.*

Personal Data: *Any information relating to an identified or identifiable natural person ("data subject"). A natural person is identifiable if they can be directly or indirectly identified, 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.*

Data Controller: *The natural or legal person, public authority, agency, or other body that, alone or jointly with others, determines the purposes and means of the processing of personal data. In the context of this Privacy Policy, the Moholy-Nagy University of Art and Design (MOME/University) acts as the Data Controller. Where the purposes and means of data processing are determined by Union or Member State law, the Data Controller or the specific criteria for its nomination may also be determined by Union or Member State law.*

Processing of Personal Data: *Any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of data.*

Consent of the Data Subject: *Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them.*

Protection of Personal Data

The Data Controller respects the protection of personal data and ensures the management and storage of the provided personal data in compliance with the applicable laws. Personal data may only be used for the specified purpose, shall not be merged with other databases, and will only

be disclosed to third parties with the express consent of the Data Subject, except where otherwise provided by law. The Data Controller takes all reasonable measures to protect the data.

Data Controller's Information:

- **Name:** Moholy-Nagy University of Art and Design (MOME);
- **Registered Office:** 1121 Budapest, Zugligeti út 9-25.
- **Email:** info@mome.hu;
- **Representatives of the Data Controller:** Pál Koós (Rector), Réka Matheidesz (CEO)
- **Data Protection Officer:** Dr. Márk Kovács
- **Email:** jog@mome.hu

Scope, Legal Basis, Purpose, and Retention Period of Processed Personal Data:

Scope of Processed Personal Data:

Personal Data Provided on the Website (Name, Email Address, Employer's Name, Subject of Interest).

Legal Basis for Processing:

The processing is based on the voluntary consent of the Data Subject [GDPR Article 6 (1) (a)].

Purpose of Data Processing:

Customer Relationship Management (CRM) and communication.

Data Retention Period:

Personal data shall be retained for 5 years from the date of collection.

Access to Personal Data:

- The personal data provided by the Data Subject may only be accessed by the relevant employees of the Strategic Development Department of MOME.
- Personal data *may only be transferred to third parties if expressly required by law.*

Data Storage and Security Measures:

- Personal data covered by this Privacy Policy is stored in the CRM system created within MOME's ClickUp platform and on the email account contactus@modu.education.
- MOME takes appropriate measures to protect personal data from unauthorized access and unlawful alteration.

Rights of the Data Subject Regarding the Processing of Their Personal Data:

Data processing does not involve automated decision-making or profiling. The electronic data is accessible only to employees with the appropriate authorization for the purposes specified in this Privacy Policy.

The Data Subject may *exercise their rights related to personal data processing* by contacting the Data Controller using the contact details provided above. The following rights apply:

- **Right to Withdraw Consent (GDPR Article 7):** *If processing is based on consent, the Data Subject may withdraw their consent at any time. The withdrawal does not affect the lawfulness of prior processing.*
- **Right of Access (GDPR Article 15):** *The Data Subject may request information about the personal data processed by the University, the method of processing, and may request a copy of their data.*
- **Right to Data Portability (GDPR Article 20):** *You have the right to request a copy of your personal data and to transmit it to another organization or to request the University to transfer your data, provided that the processing is based on consent or a contract, or if it is carried out by automated means. This request may be denied if the processing is carried out for reasons of public interest.*
- **Right to Rectification (GDPR Article 16):** *You have the right to request the rectification of any inaccurate personal data processed by the University without undue delay, as well as the completion of any incomplete personal data. The University will verify the accuracy of the data and make corrections accordingly. In such cases, the University will not only rectify the data in its own records but will also forward your request to the individuals and organizations with whom the data has been shared, provided they are reasonably and feasibly identifiable.*
- **Right to Erasure (GDPR Article 17):** *You may request the deletion of your personal data from the University's records if:*
 - *The purpose of the data processing is no longer applicable, and the data is no longer needed for further processing;*
 - *The processing of your data is unlawful, for example, if the University processes your data without a valid legal basis;*
 - *The deletion of your data is required to comply with a legal obligation;*
- **Right to Restriction of Processing (GDPR Article 18):** *You have the right to request the University to restrict the processing of your data. In such cases, your data will be locked, and any data processing operations (except for storage) may only be carried out with*

your consent. The restriction may be lifted if the data in question is required for the establishment, exercise, or defense of legal claims, for the protection of the rights of others, or for reasons of public interest under Union or Member State law. You will be notified in all cases when the restriction is lifted. The University will forward your restriction request to the persons or organizations with whom the data has been shared, provided they are reasonably and feasibly identifiable. You may exercise your right to restriction in the following cases:

- *You contest the accuracy of your personal data; in such cases, the restriction applies for the period during which the University verifies the accuracy of the data;*
 - *The processing of your data is unlawful, but for some reason, you oppose the deletion of the data;*
 - *The University no longer requires your data, but you need it for the establishment, exercise, or defense of legal claims;*
- ***Right to Lodge a Complaint and Seek Remedies (GDPR Chapter VIII):*** *If you believe that the University has violated your rights regarding your personal data, you may request redress from the University, file a complaint with the National Authority for Data Protection and Freedom of Information (hereinafter: the Authority), or seek legal remedy before a court.*

Authority's registered office: 1055 Budapest, Falk Miksa utca 9-11.

Authority's mailing address: 1374 Budapest, P.O. Box 603.

Authority's telephone number: +36 1 391 1400

Authority's fax number: +36 1 391 1410

Authority's email address: ugyfelszolgalat@naih.hu

Authority's website: www.naih.hu

If you believe that the processing of your personal data is not being carried out lawfully, we kindly request that you first submit your observations and requests to us, as the Data Controller, using one of the contact details provided above. This will enable us to review and address your concerns as efficiently and effectively as possible.

Submission of Data Protection Requests:

You may submit your requests for the exercise of your data protection rights electronically via email at jog@mome.hu. When submitting a request, the applicant must ensure that their identity can be clearly verified and must provide at least the following information in the request:

- Family name and given name;
- Date of birth;
- Tax identification number;

The University will inform you of the measures taken in response to your request as soon as possible, but no later than 30 days from the date of receipt. This deadline may be extended once by up to 60 days due to the complexity of the request or the number of requests received. In such cases, the University will notify you of the extension within 30 days of receiving your request.

Warranty and Security Measures:

The University implements appropriate technical and organizational measures to ensure that, by default, only personal data necessary for the specific data processing purpose is processed. This obligation applies to the quantity of personal data collected, the extent of processing, the duration of storage, and access to the data.

In addition to these measures, the University protects the data in proportion to the risks associated with data processing through various physical, logical, and administrative safeguards. Physical security is ensured through electronic security systems at the University's headquarters, while logical protection includes password security, firewalls, and access management. On an administrative level, the University establishes dedicated regulations for security systems and provides regular data protection and information security training to its employees. These measures collectively safeguard personal data against unauthorized access, modification, transmission, disclosure, deletion, destruction, as well as accidental loss or damage.

Review of the Privacy Notice:

The University regularly reviews and updates this Privacy Notice as necessary. Any changes to the Privacy Notice will be communicated to the affected individuals. When determining the method of notification, the University considers factors such as the significance of the changes and the categories of individuals and data affected by the modifications.