

INFORMATION ON DATA PROCESSING POLICY BY
DEBRECENI NYÁRI EGYETEM OKTATÁSI SZOLGÁLTATÓ
NONPROFIT KÖZHASZNÚ KFT.
(DEBRECEN)

2020

I. Preamble, basic principles, and the purpose and effect of this Information Package

Debreceni Nyári Egyetem Oktatási Szolgáltató Nonprofit Közhasznú Korlátolt Felelősségű Társaság (corporate seat: 4032 Debrecen, Egyetem tér 2., postal address: H-4010 Debrecen, Pf. 35., company registry number: 09-09-015201, adult education registry number: E-000132/2014, tax number: 21084630-2-09, statistical identity number: 21084630-8559-572-09, e-mail: debrecen@nyariegyetem.hu, tel.: +36 52 532 594, Fax: +36 52 532 595, website: www.nyariegyetem.hu, represented by: Managing Director dr. Péter Szafkó, hereinafter referred to as “**Data Controller**”), as data controller, shall act during the processing of personal data in compliance with the provisions of 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 (hereinafter referred to as “**Regulation**” or “**GDPR**”) and in compliance with the applicable law.

Data Controller shall respect your (hereinafter referred to as “**Data Subject**”) rights relating to the protection of personal data. This information sheet provides a brief and simple summary of what data we collect, how we can use such data and it describes the means employed by us and Data Subject’s possibilities of data security and right enforcement in connection with data security.

You may find a detailed regulation in the Regulation mentioned above and in related legal acts; in case you need more information, the study of Regulation is recommended or you may contact Data Controller at the contact channels identified in this information sheet.

The objective of this Information Package is to ensure by Data Controller the application of the constitutional principles of data protection and to prevent unlawful access to data as well as its unlawful transformation, loss, or publication.

During the processing of data, Data Controller shall act in compliance with the following principles

Before the beginning of the processing of data, Data Controller shall inform the Data Subject in compliance with the prescribed provisions and in a timely manner.

Data Controller shall collect, store and use personal data in compliance with the requirement of purpose limitation; only for the purpose for which it is requested.

The collected personal data shall be adequate, relevant and shall be collected to the extent that is appropriate for the purpose for which it is collected, and by complying with such rule the principle of data minimisation is respected.

With respect to accuracy and regarding the purposes for which the data is processed, Data Controller must take every reasonable step so that Data Subject’s personal details are complete, accurate, up-to-date and reliable.

Data Controller shall use the personal data for marketing purposes only upon the consent of Data Subject and opportunity shall be provided to Data Subject to prohibit such communication.

Data Controller shall take proportionate and comprehensive measures in order to ensure the protection of Data Subject’s personal data pursuant to this Data Processing Policy, including such cases where personal data are transferred to third parties.

The scope of this data processing policy includes the entire data processing activity of Data Controller and pursuant thereto it – particularly but not exclusively – includes the processing of personal data of contact persons of business entities coming into contact with Data Controller during its business activities as Data Subjects and it also includes the processing of personal data of Data Controller’s prospective employees (job seekers), the use of the www.nyariegyetem.hu website, the data processing relating to the electronic surveillance system operating at Data Controller and the principles of data security being employed

II. Interpretative provisions

- **Regulation, GDPR:** means the 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;
- **Infotv:** means Act CXII of 2011 on Informational Self-determination and Freedom of Information;
- **Art.:** means Act CL of 2017 on Taxation;
- **Szvtv.:** means Act C of 2000 on Accounting
- **Áfa tv.:** means Act CXXVII of 2007 on Value Added Tax;
- **Ptk:** means Act V of 2013 on Civil Code;
- **Fktv.:** means Act LXXVII of 2013 on Adult Education
- **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;
- **Sensitive data:** means personal data relating to racial or ethnic origin, political opinion or preferred party, religion or beliefs, trade union membership, sex life, health status, addiction or criminal record.
- **Genetic data:** means personal data relating to the inherited or acquired genetic characteristics of a natural person, which represent unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;
- **Biometric data:** means personal data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
- **Data concerning health:** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;
- **Data 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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **Data Controller:** means the natural person or legal entity, 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, while Data Controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- **Data Processor:** means a natural person or legal entity, public authority, agency or other body which processes personal data on behalf of the data controller;

- **Records of processing activities:** means the records of processing activities carried out by Data Controller according to Paragraph (1) of Article 30 of GDPR, which contain, in addition to the data relevant to Data Controller, the identification and the purpose of data processing, the categories of Data Subjects, and the categories of Personal Data processed. If possible, also the recipients to whom the Personal Data have been or will be disclosed, the name and contact details of data processor(s), and, if applicable, the time period and deadline prescribed for the erasure of the individual data categories;
- **Recipient:** means a natural person or legal entity, 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;
- **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 Data Controller or processor, are authorized to process personal data;
- **Consent of 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;
- **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, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements;
- **Data Protection breach:** means IT error, data protection incident.
- **IT Error:** means operation, service provision, termination, or slowdown in the operation of the IT system, which hinders work or which is different from the usual practice, which does not qualify for a data protection incident but may represent a hazard for the reliability, integrity or availability of the IT system;
- **Personal Data Breach:** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- **Data Protection Officer:** A person designated by the Organization on the basis of Point a.) of (1) of Article 37 of the Regulation (EU) 2016/679 (GDPR Regulation), whose contact information and legal status are included in this Information Package;
- **Authority:** Hungarian National Authority for Data Protection and Freedom of Information, www.naih.hu

III. Data and contact info of the Data Controller (service provider)

Name of the Data Controller: *Debreceni Nyári Egyetem Oktatási Szolgáltató Nonprofit Közhasznú Korlátolt Felelősségű Társaság*

Corporate seat: 4032 Debrecen, Egyetem tér 2.

Postal address: H-4010 Debrecen, Pf. 35.

Company registry number: 09-09-015201

Felnőttképző nyilvántartásba vételi szám: B/2020/000223

Felnőttképző engedély száma: E/2020/000097

Tax number: 21084630-2-09

Statistical identity number: 21084630-8559-572-09

E-mail: debrecen@nyariegyetem.hu

Tel.: +36 52 532 594, Fax: +36 52 532 595

Website: www.nyariegyetem.hu

Name of Data Protection Officer: dr. Péter Onder

IV. Purpose of processing, processed data, term of processing, authorized persons who can access the data of the customers being the Data Subjects who use the services of the Data Controller, and the use of the website www.nyariegyetem.hu

1. Purpose of processing and legal grounds for processing

Data Controller shall process personal data for the purpose of conclusion and performance of contracts and based on legitimate interests in the following cases: performance of contracts (in which Data Subject is one of the parties): intention to conclude a contract, performance of contracts (rendering services in education, sale of books and other publications, provision of accommodation, organizing scholarly conferences and similar events).

Data Controller shall process Personal Data due to requirements by law, according to legal prescriptions, in the following cases: fulfilling obligations relating to billing, accounting and bookkeeping (Act on Accounting, Act on Value Added Tax, Act on the Rules of Taxation), for the purpose of data processing according to the provisions of the Act on Adult Education (§§ 21, 22, and 27/A-27/B).

Data Controller shall process personal data based on the expressed and voluntary consent of Data Subject in the following cases: sending Newsletters and invitations to events, maintaining contact – responding to query received on web/electronic surfaces, marketing purpose, satisfaction surveys/happy sheets, photo image for the sake of identification, recording of audio and visual images during the course of presentations for marketing purposes, program data – in the interest of future requests for data.

2. Processed data, term of processing, authorized persons who can access the data

Data Controller collects and processes personal data for the indicated retention period pursuant to the contents of the following table(s) by referring to the indicated legal grounds:

Data processed relating to concluding and performing contracts (in which Data Subject is one of the parties)	Personal Data identification	Data Retention Period
	Name, address and temporary address, mother's maiden name, e-mail address, telephone number	5 years according to fulfillment or termination of the contract, as prescribed by law (Point. 6 of § 22 of the Civil Code)

Additional data received on the given legal basis related to the services rendered by Data Controller:

During the course of providing educational services, Data Controller shall process the data of Data Subject, such as:

- a) Billing name and address,
- b) EU VAT number, bank account number, bank card data (number, expiration date, CVV2 code)

Furthermore, in the case of ordering books and other publications: tax number/tax identification number, EU VAT number, bank account number, delivery name and address, billing name and address, bank card data (number, expiration date, CVV2 code)

Furthermore, in the case of providing accommodation: Full name, title, date of arrival, date of departure, number of adults staying in the same room, email address, full postal address, Comment –potential preferences given, tax number/tax identification number, EU VAT number, bank account number, delivery name and address, billing name and address, bank card data (number, expiration date, CVV2 code)

Personal Data processed due to requirements by law, (according to legal prescriptions)	Personal data identification	Retention period
	Data in accounting receipts	at least 8 years, according to (2) of § 169 of Act on Accounting
	Data Controller shall process the following data of Data Subject according to (1) of § 21, (2-5) of § 21, § 22, § 27/A and § 27/B of Act on Adult Education: aa) name, maiden name, mother’s name, place and date of birth, sex, citizenship, permanent and temporary addresses, telephone number, legal grounds for the residence of non-Hungarian citizens as well as the denomination and number of the document allowing such residence, ab) name, address and phone number of his or her parent or guardian, in the case of participants enrolled in a program identified according to Point (b) of Paragraph (1) of § 1 of Act on Adult Education, b) data related to the legal status of enrolment in program, concerning ba) certificates of education, professional degrees, and certificates of language exams, bb) admission to the educational program, bc) evaluation and qualification of the completion of requirements, bd) the denomination of the qualification or other competence acquired in the educational program, with the place, time and result of the examination, c) and the social security number of the program participant.	5 years, according to (6) of § 21 of Act on Adult Education

	Personal data identification	Retention period
	Name, email address, telephone number, personal data of contact person	until withdrawal of consent or signing off

Data processed based on the expressed and voluntary consent of the Data Subject <i>(on how Data Subject can withdraw consent, see this Information Package further below)</i>	facial image (photograph) of participants of scholarly-scientific events, data on professional achievements, professional titles, degrees, or specialization	until withdrawal of consent
	audio and visual image recording	until withdrawal of consent
	data recorded in § 21 of Act on Adult Education	until withdrawal of consent, but no longer than 20 years

3. Authorized persons who can access the data: Data Controller may forward the data to its employees conducting tasks in connection with customer service and commercial activities and to employees responsible for the management of the fields of accounting and taxation who are considered as recipients.

Means of data storage: both electronic (digital) and paper-based

4. Data Controller informs the visitors of the website that by using the website (lacking the contact with the Data Subject being the user of the website), data collection and data processing do not take place – among other things – via the application of anonymous user IDs (cookies).

V. Purpose of data processing, the scope of data processed, and terms of data processing in relation to partners who are authorized to access the data and are related to Data Controller through economic (business) activities (e.g. private entrepreneurs, etc.) as well as contact persons, employees, partners, and members of business enterprises, as Data Subjects

1. Purpose of processing and legal grounds for processing

Data Controller shall process personal data based on legitimate interests in the following cases: intention to conclude a contract, conclusion and performance of contracts.

Data Controller shall process Personal Data due to requirements by law, according to legal prescriptions, in the following cases: fulfilling obligations relating to billing, accounting and bookkeeping (Act on Accounting, Act on Value Added Tax, Act on the Rules of Taxation).

Data Controller shall process personal data based on the expressed and voluntary consent of Data Subject in the following cases: sending Newsletters (Marketing).

2. Processed data, term of processing, authorized persons who can access the data

Data Controller shall collect and process personal data, depending on the quality of Data Subject, for the indicated retention period pursuant to the contents of the following table(s):

	Personal data identification	Retention period
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Data processed due to legal interests	<p>Name, email address, telephone number</p> <p>Furthermore, in the case of partner contact persons: position in partner's enterprise/business</p> <p>In the case of Data Subjects who are assigned tasks to complete or are employed directly by Data Controller – depending on their quality as Data Subjects - also: citizenship, place/date of birth, address (corporate seat) tax number, CV, work experience, education/ training, command of languages, photo image, audio and video recording</p>	<p>until performance of contract or termination of legal interest or the related prescription by law: 5 years, according to 6 of § 22 of the Civil Code</p>
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Data processed due to requirements by law	Personal data identification	Retention period
	Data in accounting receipts	at least 8 years according to (2) of § 169 of Act on Accounting

Data processed based on the expressed and voluntary consent of the Data Subject <i>(on how Data Subject can withdraw consent, see this Information Package further below)</i>	Personal data identification	Retention period
	name, email address, telephone number, furthermore, in the case of partner contact persons: position in partner's enterprise/business	until withdrawal of consent or signing off

3. Authorized persons who can access the data: Data Controller may forward the data to its employees conducting tasks in connection with customer service and commercial activities and to employees responsible for the management of the fields of accounting and taxation who are considered as recipients.

Means of data storage: both electronic (digital) and paper-based

VI. Purpose of data processing, the scope of data processed, and terms of data processing in relation to partners who are authorized to access the data and are related to Data Controller through applying as job seekers as well as temporary employees forwarded by a third party partner for work purposes, as Data Subjects

1. Purpose of processing and legal grounds for processing

Data Controller shall process personal data based on the **expressed and voluntary consent** of Data Subject in the following cases: labor force recruitment, implementation of application/selection processes.

Data Controller shall process personal data based on the expressed and voluntary consent of Data Subject in the case of application for a job position in email, as there is no other technical way or means to prove voluntary consent in this case.

2. Processed data, term of processing, authorized persons who can access the data

Data Controller shall collect and process personal data for the indicated retention period pursuant to the contents of the following table(s) by referring to the indicated legal grounds:

Personal Data processed based on the expressed and voluntary consent of the Data Subject <i>(on how Data Subject can withdraw consent, see this Information Package further below)</i>	Personal data identification name, email address, telephone number, CV, photograph	Retention period until withdrawal of consent, or until position is filled in the case of a lack of consent.

3. Data Controller shall transfer data to its employees conducting tasks in connection with customer service and commercial activities and to employees responsible for the management of the competent field of the Company who are considered as recipients.

Means of data storage: both electronic (digital) and paper-based

VII. Social (web)sites (e.g. Facebook)

Signing up for the news feed maintained on the Facebook page by Data Controller is possible for users by clicking on the link (“like”/“follow”) on the given page of the message board, while signing off is possible by clicking on the link (“dislike”) at the same page. Alternately, users can delete news they do not need from the message board by setting the parameters of the latter. Data Controller has access to the profiles of “followers” but does not record or process it in its own internal system.

The objective of data processing: sharing the contents that belong to the events offered by Data Controller, communicating news, and maintaining contacts. With the help of Facebook pages, Data Subject can access information on the activities of Data Controller and on events hosted or posted by Data Controller.

The legal basis for data processing is the voluntary consent granted by Data Subject, which may be withdrawn at any time. Withdrawal shall not affect or concern any prior legally acceptable data processing. In the case of such withdrawal, Data Subject shall not receive information from Data Controller’s news feed, and news about Data Subject shall not be posted on Data Subject’s news feed, but news feeds shall continue to be accessible, as the website is public and freely accessible to all.

The term of data processing shall end when Data Subject signs off. There shall be neither transferring/forwarding of data, nor any use of data processors.

Facebook is a data controller independent of Data Controller. Data Subjects can find information on data processing by Facebook at its website, detailed in data protection guidelines and regulations, by clicking on the links below:

1. <https://www.facebook.com/policies/cookies/>
2. <https://www.facebook.com/about/privacy/update>

VIII. Data security

Data Controller shall do its utmost pursuant to Act CXII of 2011 on Informational Self-Determination and Freedom of Information to take care of the security of Data Subject's data and Data Controller shall take all technical and organizational measures and shall establish all procedural regulations that are necessary for the enforcement of Act CXII of 2011 on Informational Self-Determination and Freedom of Information and of other data and secrecy protection rules. The data of Data Subjects stored in the database of Data Controller can only be accessed by those employees who have express authorization.

The services include so called cloud-based applications, as well. Cloud apps are typically international and cross-border and they are used for purposes such as storing data when they are not stored on Data Controller's computer/at the company's computer center but they are stored in a server center that can be located anywhere in the world. The main advantage of cloud apps is that they do not depend on geographical location, they ensure a high level of security and they provide a flexibly extendable IT storage place and processing capacity.

Data Controller shall choose its partners who provide cloud services with the utmost care and takes all efforts to enter into contracts with them that respect the data security interests of Data Subjects and that ensures the transparency of the data processing principles and the regularly checking of data security.

References or links may be found on Data Controller's website that lead to websites that are operated by other service providers (including buttons and logos directing to log-in or share options) where Data Controller has no effect regarding the practices of processing of Personal Data. Data Controller shall call the attention of Data Subjects that, if they click on such links, they may be directed to websites of other service providers. In such cases, it is recommended to read the data processing policy that is applicable to the use of such websites. This Data Processing Policy only applies to the data processing conducted by Data Controller. If you modify or erase any of your data on an external website that does not affect data processing by Data Controller, such modifications have to be done on the Website, as well.

IX. Accessibility, modification, rectification and portability of Personal Data

1. Accessibility

Data Subject shall have the right to obtain from the controller confirmation as to whether or not Personal Data concerning him or her are being processed, and, where that is the case, and access the Personal Data and the following information:

- 1.1. the purposes of Data Processing;
- 1.2. the categories of Personal Data concerned;
- 1.3. the recipients or categories of recipients to whom the Personal Data have been or will be disclosed.

2. Modification, rectification

Data Subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate Personal Data concerning him or her. Taking into account the purposes of the processing, Data Subject shall have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

3. Portability

Data Subject shall have the right to receive the Personal Data concerning him or her that he or she has provided to a Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another Data Controller without hindrance from the Data Controller to which the Personal Data have been provided, where:

- 3.1. Data Processing is based on consent or on a contract where Data Subject is one of the parties; **and**
- 3.2. Data Processing is carried out by automated means.

X. Erasure, restriction of personal data, right to object

1. Erasure

(1) Data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) Data Subject withdraws consent on which the processing is based via Customer Service, and where there is no other legal ground for data processing;
- c) Data Subject objects on grounds relating to his or her particular situation, or where personal data are processed for direct marketing purposes and there is no primary legal ground for the processing;
- d) the Personal Data have been unlawfully processed;
- e) the Personal Data have to be erased for compliance with a legal obligation in Union or Member State law to which Data Controller is subject;
- f) the Personal data have been collected in relation to the offer of information society services for children.

(2) Where Data Controller has made the Personal Data public and is obliged pursuant to paragraph (1) to erase Personal Data, Data Controller, by taking into account available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform data controllers that are processing the Personal Data that Data Subject has requested the erasure by such Controllers of any links to, or copy or replication of, those Personal Data.

(3) Paragraphs (1) and (2) shall not apply to the extent that processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which Data Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in data Controller;
- c) for reasons of occupational medicine or public interest in the area of public health;
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to in paragraph (1) is likely to render impossible or seriously impair the achievement of the objectives of data processing; or
- e) for the establishment, exercise or defense of legal claims.

2. **Restriction**

(1) The data subject shall have the right to obtain from Data Controller restriction of processing when one of the following applies:

- a) the accuracy of Personal Data is contested by Data Subject, for a period enabling Data Controller to verify the accuracy of Personal data;
- b) data processing is unlawful and Data Subject opposes the erasure of Personal Data and requests the restriction of their use instead;
- c) Data Controller no longer needs the Personal Data for the purposes of data processing, but they are required by the Data Subject for the establishment, exercise or defense of legal claims; or
- d) Data Subject has objected to processing due to reasons in connection with his or her own status; pending the verification whether the legitimate grounds of Data Controller override those of Data Subject.

(2) Where Data Processing has been restricted under paragraph (1), such Personal Data shall, with the exception of storage, only be processed with Data Subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

(3) A Data Subject who has obtained restriction of processing pursuant to Paragraph (1) shall be informed by Data Controller before the restriction of processing is lifted.

3. **Objection**

Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of Personal Data concerning him or her if processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Data Controller, or on grounds of the legitimate interests of a Data Controller or a third party, including profiling based on those provisions. Data Controller shall no longer process the Personal data unless Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of legal claims.

Where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of Personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where Data Subject objects to processing for direct marketing purposes, Personal Data shall no longer be processed for such purposes.

XI. Possibilities of the user to exercise his/her rights

The user may seek the help of Hungarian National Authority for Data Protection and Freedom of Information if his or her inherent rights are violated or in cases stipulated by the Regulation and the user is entitled to file a lawsuit to the competent superior court within the geographical area in which the he or she resides or within the geographical area in which his or her usual residence is - subject to his or her choice:

Name: Nemzeti Adatvédelmi és Információszabadság Hatóság
Postal address: 1530 Budapest, Pf.: 5.
Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.
Telephone: +36 (1) 391-1400
Fax: +36 (1) 391-1410

Web: naih.hu
E-mail: ugyfelszolgalat@naih.hu

XII. Amendments to this information package, date of effect

Data Controller preserves the rights to amend or update this policy any time without prior notification and to publish the updated version on its website. Amendments only apply to Personal data that are collected after the disclosure of the amended version.

This information on data processing policy shall be in effect as of the date of its announcement, automatically canceling the effect of Data Controller's previous Information on Data Processing Policy.

Debrecen, 1/September/2020

Debreceni Nyári Egyetem Oktatási Szolgáltató Nonprofit Közhasznú Kft.

Data Controller

represented by: Managing Director dr. Péter Szafkó