



## **DATA PRIVACY NOTICE**

### **University of Veterinary Medicine Budapest Hutýra Ferenc Library, Archives and Museum Data privacy regulations and data management**

In order to ensure lawful data management and data subjects' rights, the University of Veterinary Medicine Budapest (hereinafter: University or Data Controller), issues this data privacy notice in connection with the data processing activities related to the library services of the University's Hutýra Ferenc Library, Archives and Museum (hereinafter: Library).

#### **1. DATA CONTROLLER**

**University of Veterinary Medicine Budapest**

Registered head office: 1078 Budapest, István u. 2.

**mailing address:** 1400 Budapest Pf. 2.

**E-mail:** [info@univet.hu](mailto:info@univet.hu)

**Phone:** +36 (1) 478-4100

**Website:** <https://univet.hu/hu/>

**Institution's identification code:** FI 21261

**tax number:** 19253268-2-42

**represented by:** Dr. Péter Sótonyi, Rector

Bea Winkler, Library Director

**Name of the Data Protection Officer:** dr. Gyula Fonyó

**Contacts of the Data Protection Officer:** [adatkezeles@univet.hu](mailto:adatkezeles@univet.hu), +36 20 932-9144  
(hereinafter: University, Data Controller or we).

#### **2. LEGAL REGULATIONS, PRINCIPLES**

##### **2.1 Key regulations applicable to data processing**

- **General Data Protection Regulation** - 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: GDPR)
- Act CXII of 2011 on the right to informational self-determination and on the freedom of information and its regulations of execution (hereinafter: **Info Act**)
- Act V of 2013 on the Civil Code of Hungary (**Civil Code**).

## 2.2 Data processing is conducted based on the principles below

- We only process personal data for pre-determined, clear and lawful purposes, for the indicated period. We only process such personal data that are essential for the purposes of data processing and suitable for achieving such purposes.
- Personal data which have come to our knowledge in the course of the performance of data processing shall only be accessed by persons employed or commissioned by our University who have a task in relation with data processing.
- During the course of data processing, we constantly make sure that the processed data are accurate and up to date. Throughout the storage period of the data, the subjects can only be identified for the time period necessary to achieve the purposes of data processing; any data stored for a longer period are maintained based on legal authorization for archiving purposes in the public interest.
- We conduct data processing in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- Personal data are processed lawfully, fairly and in a manner transparent for data subjects and we assume responsibility for compliance with the data protection regulations.

## 3. DEFINITIONS

**Personal data:** any information relating to an identified or identifiable natural person ('data subject') (such as a name, an identification number, location data, an online identifier or any data specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person).

**Data Subject:** identifiable natural person whom the particular personal data pertain to.

**Processing:** 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 as well as carrying out the technical tasks related to data processing activities.

**Controller:** 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.

**Processor:** means a natural or legal person, public authority or agency or other body which processes personal data on behalf of the University (by commission, order and decision of the University).

**Profiling:** 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 analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

**Third party:** 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.

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

**Core services:** granting free-of-charge access to the public areas of the library and the local use of the designated books and documents, allowing the use of the cataloguing devices and providing information about the services of the library and the library system. The Library does not process personal data in the course of providing the core services.

#### 4. DATA PROCESSING ACTIVITIES CONDUCTED IN CONNECTION WITH LIBRARY SERVICES

##### 4.1 Data processing required for using library services

Such Library services that are not deemed as core services may be used after registration in the Library. The registration process can be completed personally in the Library or by filling out the relevant electronic form on the Library’s website and submitting it to the Library.

Depending on its purpose, the legal basis of data processing may be the fulfilment of a legal obligation, the data subject’s consent or the University’s legitimate interest. In the case of data processing based on the data subject’s consent, data subjects may, by way of a declaration, give their consent to the processing of their personal data other than the legally required and provided personal data (identification data and address of a natural person). Consent can be given by ticking the appropriate boxes in the electronic form during registration.

Source of the personal data: the data subject.

The data shall be accessed by the Library’s director and the designated library staff.

If the data processed based on a legal requirement are not provided, the data subject shall not have the right to use the Library’s other services than its core services. Where the legal basis of data processing is the data subjects’ consent, if data subjects fail to give their consent or withdraw it, they can only use the Library’s legally required core services.

Purpose of data processing	Legal basis of data processing	Scope of the processed data	Duration of data processing
To execute the Library’s fundamental operational processes, in order for which the affected library user needs to be identified, registered and filed to be able to use the library services, and for the Library, to provide a continuous service.	- <b>Meeting a legal requirement [GDPR Article 6 (1) c)]. Act CXL of 1997</b> on museum institutions, public library services and public education: <i>“Upon registration, library users must communicate and provide evidence for the following personal data: identification data and address of a natural person”</i> (Article 57 (1) of <b>Act XX of 1996</b> on the use of identification methods and codes	Data identifying a natural person (as laid out in Section 4 (4) of <b>Act XX of 1996 of Hungary</b> ): Name, né(e), place and date of birth, mother’s name,  and address.	For 1 year after the library usage contract is terminated

	replacing the personal identification code		
Keeping contact in order to provide library services and inform library users	<b>The data subject's consent [GDPR Section 6 (1) a)]</b>	Name, e-mail address, user name, password	Until the consent is withdrawn, but no later than by the end of the year subsequent to the year of the termination of legal relations
The demonstration of the data controller's legal basis to process the data subject's personal data, for accountability purposes	<b>The University's legitimate interest, whereby the University is required to demonstrate the lawfulness of data processing [GDPR Section 6 (1) f)]</b>	The data subject's submitted consent to data processing	Until the consent is withdrawn but no later than by the end of the year subsequent to the year of the termination of legal relations

**4.2 Book recommendations**

By filling out and submitting an electronic form via the Library's website, the University provides an opportunity for visitors to recommend books and publications for Library acquisition which are missing but are within the Library's scope of collection. If the person issuing the recommendation wishes to be notified of such acquisition by the Library, they may volunteer, in their own discretion, their e-mail address to the Library via the e-form. In such cases, the person submitting the recommendation i.e., data subject, give their consent to processing their personal data provided.

Source of the personal data: the data subject.

The data shall be accessed by the Library's director and the designated library staff.

If the data are not submitted, the affected person will not receive electronic notification from the Library about the acquisition of the recommended book or publication.

<b>Purpose of data processing</b>	<b>Legal basis of data processing</b>	<b>Scope of the processed data</b>	<b>Duration of data processing</b>
Notification of the affected person about the acquisition of the publication recommended	<b>The data subject's consent [GDPR Section 6 (1) a)]</b>	The Data Subject's e-mail address	Until the consent is withdrawn, but no later than by the end of the year subsequent to the year of the recommendation

The demonstration of the data controller's legal basis to process the data subject's personal data, for accountability purposes	<b>The University's legitimate interest,</b> whereby the University is required to demonstrate the lawfulness of data processing <b>[GDPR Section 6 (1) f]</b>	The data subject's submitted consent to data processing	Until the consent is withdrawn, but no later than by the end of the year subsequent to the year of the termination of legal relations
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### 4.3 Automated decision-making and profiling

No automated individual decision-making or profiling is conducted by the University in connection with data processing related to library services.

## 5. PROCESSORS

The Data Controller may involve a Processor in its activity. The Processor shall not involve further processors without the Data Controller's approval.

With regard to particular data processing activities, we use the services of the following data processor:

Activity	Name/Company name	Registered head office
Operation of the Library's digital system	SOFTLINK Hungary Kft.	H-1074 Budapest, Rákóczi út 30.

For certain services, the Library uses the services of the following data processor:

**Microsoft Ireland Operations Limited** (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland) who is the developer and operator of the Microsoft 365 software used by Data Controller.

## 6. DATA TRANSFER

The University does not transfer personal data processed in connection with library services to any third country or international organization.

In case of data transfers required by EU or Hungarian law, Data Controller has the right to transfer the subject's personal data to the natural or legal person, or organization, authority or court indicated in the legislation, in compliance with their requests and the relevant legal regulations.

## 7. DATA SECURITY

The University has taken and will continue to take all the appropriate technical and organizational measures which, considering the current development level of science and technology, the costs of implementation, the nature of the particular data processing activity as well as the risks to the freedom and rights of natural persons, guarantee the necessary level of data security appropriate to the extent of the risk.

The personal data shall always be processed confidentially with limited access, in an encrypted form and with the maximum available resistance capability, with guaranteed data recoverability. Our systems are regularly tested to ensure security.

With regard to determining the appropriate level of security, we consider the potential risks arising from the data processing activity, especially from the accidental or unlawful destruction, loss, modification as well as unauthorized disclosure of or unauthorized access to the personal data stored or otherwise processed.

## **8. YOUR RIGHTS AS A DATA SUBJECT**

As a Data Subject involved in a data processing activity, you have the rights detailed below. If you as a Data Subject wish to exercise any of your rights, you can contact the University via the addresses below:

**Mailing address:** University of Veterinary Medicine Budapest, 1077 Budapest, István utca 2.

1400 Budapest Pf. 2.

**E-mail:** [adatkezeles@univet.hu](mailto:adatkezeles@univet.hu)

Before processing your request, we need to ascertain your personal identity. If we cannot identify you, we cannot fulfill your request.

After identification, we provide information with regard to your request in writing, electronically, or - subject to your request - verbally. If you submit your request electronically, the University will reply electronically as well. Of course, you can also ask for a different mode of communication in such cases as long as you priorly inform the University accordingly.

The information is provided and the measure is taken free of charge unless the request is clearly unfounded or - especially due to its repetitive nature - excessive. In the cases above, we may charge a fee or deny the request.

The summary of your rights as a Data Subject in relation with a data processing activity is laid out as follows:

### **8.1 You can withdraw your consent**

In case of data processing conducted based on the data subject's consent, data subjects may withdraw their consent at any time (GDPR Article 7). In such cases, we erase the personal data in connection with the particular processing without undue delay after we receive the data subject's notification to such effect. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

### **8.2 You may request information (access)**

With regard to personal data processed on or via the website, data subjects may request the University to provide information as to whether or not their personal data are being processed by Data Controller (GDPR Article 15) and if so:

- What is the purpose of processing?
- What is the legal basis for processing your personal data?
- What specific data are processed?
- Who did we get your data from?
- Who do we transfer these data to?
- How long do we store these data?

- What rights and legal remedy options do data subjects have with regard to processing?
- Are there any automated decisions made in terms of data subjects by using their personal data? In such cases, you can also request information about the logic (method) involved as well as about the significance and the envisaged consequences of such data processing activity.
- If data subjects experience that we transferred their data to an international organization or third country (non-EU member state), they may request demonstration of the safeguards for the appropriate processing of their personal data.
- Data subjects may request a copy of their personal data processed, which we shall comply with. (As far as additional copies are concerned, we may charge a fee based on the administrative costs.)

Data Subjects also have the right to request information from the University with regard to their rights (rectification, erasure, restriction, objection, lodging a complaint with a supervisory authority) in connection with the data processing activity.

As laid out in GDPR Article 34, data subjects have the right to be notified whether there has been any breach in connection with their personal data processed, and if so, they can request information about the circumstances, effects and the countermeasures taken as well as about when, based on what legal regulation and who was granted access to which of the data connected to the data subject, and who such data was then disclosed to.

### **8.3 You may request rectification**

Data subjects may request correction and/or completion of inaccurate or incomplete data (GDPR Article 16).

Data Controller shall communicate any rectification to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Controller shall inform the data subject about those recipients if the data subject requests it.

### **8.4 You may request the erasure of your personal data (exercise your “right to be forgotten”)**

Data subjects may request the erasure of your personal data (GDPR Article 17) if:

- the personal data are no longer necessary in relation to the purposes for which they were processed;
- the processing is based solely on the data subject’s consent;
- it is determined that the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in EU or Hungarian law.

We **cannot erase** the personal data if they are necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation and/or public interest which requires processing by Union or Member State law;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the erasure is likely to render impossible or seriously impair that processing; or
- for the establishment, exercise or defence of legal claims.

## **8.5 You may request us to restrict processing**

Data subjects may request us to restrict processing (GDPR Article 18), where one of the following applies:

- the accuracy of the personal data is contested by the data subject, in this case the restriction applies for a period enabling us to verify the accuracy of the personal data;
- the processing is unlawful, but the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- we no longer need 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;
- the data subject has objected to processing, pending the verification whether the legitimate grounds of the University override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage,

- only be processed with the data subject's consent or
- for the establishment, exercise or defence of legal claims or
- for the protection of the rights of another natural or legal person or
- for reasons of public interest of the European Union or a Member State.

We will inform you before the restriction of processing is lifted.

## **8.6 You may request us to transmit your personal data to another controller (right to data portability)**

Data subjects shall have the right to receive the personal data concerning them in a machine-readable format (GDPR Article 20) and have the right to transmit (or have us transmit directly) those data to another controller, provided that the processing is solely based on the data subject's consent or a contract concluded with and/or in the interest of the data subject and the processing is carried out by automated means.

The above mentioned right shall not apply to processing necessary for the performance of a task of the University carried out in the public interest. The right to data portability shall not violate the right to erasure and adversely affect the rights and freedoms of others.

## **8.7 You may object to the processing of your personal data**

Data subjects shall have the right to object to the processing of their personal data (GDPR Article 21), if:

- processing is necessary for carrying out the University's task of public interest, including profiling;
- processing is necessary for the enforcement of the University's or a third party's rightful interests, including profiling.

In the cases above, we shall erase the personal data unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Data subjects can also object to the processing of their personal data if:

- personal data are processed for direct marketing purposes (including profiling to the extent that it is related to such direct marketing). We shall erase the personal data in such cases.
- The personal data are processed for scientific or historical research purposes or statistical purposes. In such cases, personal data shall only be erased if processing is not



necessary for the performance of the University's tasks carried out for reasons of public interest.

### **8.8 Rights related to automated decision-making, including profiling**

Data subjects shall have the right not to be subject to a decision based solely on automated processing, including profiling (GDPR Section 22), which produces legal effects concerning them or similarly significantly affects them.

The above shall not apply if the decision:

- is necessary in order to contract the data subject or to perform the contract with the data subject;
- is authorised by Union or Member State law which also lays down appropriate measures to safeguard the data subject's rights and freedoms and legitimate interests;
- or is based on the data subject's explicit consent.

In such cases, except for legal obligation, data subjects may request a human intervention into the process, express their opinion and file a complaint to the Data Controller with regard to the decision.

## **9. LEGAL REMEDY**

### **9.1 File a complaint to the data protection authority**

If, according to the data subject, the University's processing of the data subject's personal data is in violation of the GDPR or the Hungarian data protection regulations, data subjects may file a complaint to the Hungarian National Authority for Data Protection and Freedom of Information (hereinafter: NAIH)

Contact information of NAIH:

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

Mailing address: 1374 Budapest Pf. 603.  
address: 1055 Budapest, Falk Miksa utca 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)

### **9.2 Judicial remedy**

If, according to the data subject, the University's processing of the data subject's personal data is in violation of the GDPR or the Hungarian data protection regulations and thus the Data Controller has breached the data subject's rights, data subjects may turn to the court for judicial remedy.

The legal proceedings belong to the competency of regional courts. Data subjects can, in their own discretion, file a lawsuit with the court competent according to the data subject's permanent or temporary place of residence. NAIH may intervene in the proceedings in support of the data subject.

### **9.3 Damages and compensation**

If the University causes damage by unlawfully processing the subject's data or breaches the rights of the data subjects, they can claim damages and compensation from the University. The University shall be exempt from liability for the caused damage and the payment of damages,

if it can prove that the damage or the violation of the data subject's rights was caused by force majeure beyond the scope of data processing.

The University reserves the right to update, review, complement or otherwise modify this data privacy notice at any time at a priorly undetermined frequency.

Budapest, 1 February 2023