

**PRIVACY POLICY**  
**DATA PROTECTION DIRECTIVES**

**on data processing carried out by the Coordinating Center For International Education of the University of Debrecen on the website <https://edu.unideb.hu/>**

**Coordinating Center For International Education of the University of Debrecen (hereinafter referred to as the "Data Controller")** is committed to the principles of data protection and data management at all times. The principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, limited storage, integrity and confidentiality, data protection by default and by design, and accountability are fully respected in the data management of the Data Controller.

The processing of personal data is governed by Regulation (EU) 2016/679 of the EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation) (the "Regulation"), Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information.

In connection with the processing of data, the Data Controller hereby informs the visitors of the website (hereinafter referred to as the User) about the personal data processed by the Data Controller, the principles and practices followed in the processing of personal data, as well as the ways and means of exercising the User's rights.

**Data Controller**

**Name:** Coordinating Center For International Education of the University of Debrecen (CCIE)

**Representative:** Prof. Dr. Attila Jenei, director

**Headquarters:** H-4032 Debrecen, 94 Nagyerdei krt.

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

**Phone number:** +3652258058

**Website:** [www.edu.unideb.hu](http://www.edu.unideb.hu)

## Data processing by the controller

<b>Data processing in connection with the use of the contact form</b>	
Purpose of data processing	Facilitating contact with CCIE staff and administration. Under Contact.
Legal basis for data processing	Article 6(1)(a) GDPR: the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes
Scope of data processed	e-mail address, name, country and other personal data provided in the message
Duration of data processing	until consent is withdrawn, but no later than the time of response
<b>Data processing in connection with the publication of individual images, videos on the website</b>	
Purpose of data processing	To present and promote the events of CCIE and the University of Debrecen.
Legal basis for data processing	Article 6(1)(a) GDPR: the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes
Scope of data processed	portrait, motion
Duration of data processing	until the recordings are archived
<b>Data processing in connection with the publication of bulk images (pictures, videos) on the website</b>	
Purpose of data processing	To present and promote the events of CCIE and the University of Debrecen.
Legal basis for data processing	Article 6(1)(f) GDPR: processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party.
Scope of data processed	portrait, motion
Duration of data processing	until the recordings are archived
<b>Other personal data logged by the system</b>	
Purpose of data processing	The identification number assigned by the ISP to the User's device when logging in to the system. It is processed by the Data Controller to ensure the IT security of the system.
Legal basis for data processing	Article 6(1)(f) GDPR: processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party.

Scope of data processed	the IP address of the Data Subject's device, the type of browser used, the Internet Service Provider, the time of browsing, the addresses of the pages accessed and exited, the number of clicks during the visit
Duration of data processing	will be deleted after 3 months at the latest, depending on the storage capacity.
<b>Processing of data related to the use of cookies (cookies are strictly necessary)</b>	
<b>Purpose of data processing</b>	This is a general purpose identifier used to maintain user session variables. It is usually a randomly generated number, the way it is used may depend on the site, but a good example is to maintain a user's logged in state between pages.
<b>Legal basis for data processing</b>	Article 6(1)(f) GDPR: processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party.
<b>Scope of data processed</b>	registering page views
<b>Duration of data processing</b>	You have the right to delete the cookie from your computer or disable the use of cookies in your browser.
<b>Third-party cookies (cookies): Data processing related to the use of <i>performance cookies</i></b>	
<b>Purpose of data processing</b>	This cookie is associated with Google Universal Analytics, a major update to Google's more commonly used analytics service. This cookie is used to distinguish individual users by assigning a randomly generated number as a client identifier. It is included in all site page requests and is used to calculate visitor, session and campaign data for site analytics reports.
<b>Legal basis for data processing</b>	Article 6(1)(a) GDPR: the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes
<b>Scope of data processed</b>	IP address
<b>Duration of data processing</b>	2 years
<b>Third-party cookies (cookies): Data processing related to the use of <i>performance cookies</i></b>	
<b>Purpose of data processing</b>	This cookie is set by Google Analytics. It stores and updates a unique value for each page visited and is used to count and track page views.
<b>Legal basis for data processing</b>	Article 6(1)(a) GDPR: the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes
<b>Scope of data processed</b>	number of page views, IP address

<b>Duration of data processing</b>	1 day
<b>Third-party cookies (cookies): Data processing related to the use of <i>performance cookies</i></b>	
<b>Purpose of data processing</b>	This cookie is associated with Google Universal Analytics and is documented as being used to reduce the rate of requests - limiting data collection on high-traffic websites.
<b>Legal basis for data processing</b>	Article 6(1)(a) GDPR: the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes
<b>Scope of data processed</b>	IP address, number of requests
<b>Duration of data processing</b>	1 minute
<b>Third-party cookies (cookies): Data processing in relation to the use of <i>targeted cookies</i></b>	
<b>Purpose of data processing</b>	This cookie is set by YouTube to track the views of embedded videos.
<b>Legal basis for data processing</b>	Article 6(1)(a) GDPR: the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes
<b>Scope of data processed</b>	IP address, number of video views
<b>Duration of data processing</b>	Until the video is deleted.
<b>Third-party cookies (cookies): Data processing in relation to the use of <i>targeted cookies</i></b>	
<b>Purpose of data processing</b>	This cookie is set by Youtube to keep track of user preferences for Youtube videos embedded in websites; it can also determine whether a website visitor is using a new or old version of the Youtube interface.
<b>Legal basis for data processing</b>	Article 6(1)(a) GDPR: the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes
<b>Scope of data processed</b>	IP address
<b>Duration of data processing</b>	6 months

**Management and deletion of cookies (cookies):**

You can delete or disable "cookies" in the browser programs you use. By default, browsers allow cookies to be set. You can disable this in your browser settings and delete existing ones. You can also set the browser to notify the user when a cookie is sent to the device. It is important to stress, however, that disabling or restricting these files will degrade the browsing experience and may also cause errors in the functionality of the website.

The options are usually found in the "Options" or "Preferences" menu of the browser. Each web browser is different, so please use the "Help" section of your browser or the links below to change your cookie settings:

[Cookie settings in Internet Explorer](#)

[Cookie settings in Firefox](#)

[Cookie settings in Chrome](#)

[Cookie settings in Safari](#)

To turn off anonymous Google Analytics "cookies", you can install a so-called "Google Analytics plug-in" in your browser, which prevents the website from sending information about you to Google Analytics. For more information on this, please see the following [links](#)

## **1. Data processing related to the use of Hotjar Analytics**

*Purpose of data processing:* to analyse the visitation and functional use of our website with anonymised information provided by a software in order to improve the user experience (e.g.: to provide optimised navigation, the order of placement of information on a sub-page).

*The data subjects are* all visitors to the website, but the measurements do not store any identifiable information about the user, such as IP address or personal data.

*Legal basis for processing:* legitimate interest [precise indication of the legal basis under the GDPR: Article 6(1)(f) GDPR].

*Duration of processing:* 365 days

*Persons with access:* employees of CCIE and the data processor used by the user to perform and fulfil his/her tasks under the contract.

Hotjar's privacy policy is available at <https://www.hotjar.com/legal/policies/privacy>.

Read more about Hotjar cookies at <https://www.hotjar.com/legal/policies/cookie-information>.

## **2. Data processing in connection with the use of Facebook pixels**

*Purpose of data processing:* the Facebook pixel (pixel) is a service of Meta Platforms Ireland. It is a piece of code placed on a user's website that allows users who are registered and logged in on Facebook to track and analyse visitor activity on the page and to collect remarketing opportunities based on the visitor's interests. The resulting data can be used to evaluate and optimise advertising and to provide personalised offers to specific groups of website visitors.

*Data subjects:* all visitors to the Data Controller's website

*Data processed:* time of visit, IP address of the visitor and length of time spent on the website, and the interests identified on the basis of the visit

*Legal basis for processing:* legitimate interest [precise indication of the legal basis under the GDPR: Article 6(1)(f) GDPR].

*Duration of processing:* according to the Facebook policy in force.

*Persons with access:* employees of the department and the data processor used by the user to perform and fulfil his/her tasks under the contract.

More information can be found in the Facebook Privacy Policy: <https://www.facebook.com/about/privacy/>. If you do not want Facebook to associate you with specific lists by targeting Custom Audiences, you can uncheck Custom Audiences [here](#). If you do not accept the use of cookies, certain features will not be available to you.

### **3. Data processing related to the use of TikTok pixels**

The cookies (facebook button, facebook-like button) that facilitate your visit to the TikTok social networking site and your liking of this website on the social networking site are provided by Facebook Ireland Ltd., so that the anonymous data processed by these cookies is also accessible by TikTok Technology Ltd., 10 Earlsfort Court Dublin 2 DUBLIN, D02 AK70, Ireland.

Through these services, TikTok Technology Limited (Ireland) therefore has access to the anonymous data described above, which is processed to measure website traffic and to map browsing habits. TikTok Technology Ltd. also uses the above data to deliver targeted advertising to the browsing user, in addition to the aforementioned analytics. TikTok Technology Ltd. does this by combining the anonymous data with the IP address of the browsing device used to determine the discoverable interests based on the browsing patterns from that device, and then delivers targeted advertising to that device. TikTok Technology Ltd. does not have access to any information other than the anonymous information described in this section.

#### **Rights of the data subject in relation to data processing**

**Right to prior information:** in accordance with Article 15(1) of the GDPR, you may request information about your personal data processed by the Data Controller, which will send the following information to the contact details you have provided (e-mail address, postal address):

- Scope of personal data processed by the controller;
- the purposes and legal basis of the processing;
- the recipients of the data in the case of transfers;
- the duration of the processing and the criteria for determining that duration;
- the rights of the Data Subject and how to exercise them;

**Right to request a copy:** under Article 15(3) to (4) of the GDPR, you may request a copy of the personal data we process. In this case, the personal data that we process about you will be transmitted to the contact details (e-mail address, postal address) that you provide.

**Right to rectification:** you may request the rectification of your personal data in accordance with Article 16 of the GDPR if it is untrue or inaccurate, or you are obliged to notify us of any change to your personal data.

**Right to erasure:** You can request the erasure of your personal data in accordance with Article 17(1) of the GDPR. You cannot request the erasure of the personal data processed within the retention period, unless the processing is unlawful.

**Right to restriction:** you may request restriction of processing in accordance with Article 18(1) GDPR in the following cases:

- if you dispute the accuracy of the personal data, we will restrict processing until we verify the accuracy of the personal data;
- the processing is unlawful and you object to the deletion of the data and instead request the restriction of their use;
- if the personal data are no longer necessary but you need them to establish, exercise or defend legal claims; or
- if you exercise your right to object, we will limit the processing to the period during which we assess the lawfulness of your request.

In the case of a request for restriction of processing, you must also indicate the grounds for the restriction.

Your request for restriction of processing will be met by storing your personal data separately from any other personal data. For example, in the case of electronic data files, it saves them on an external storage medium and stores paper files in a separate folder.

**Right to object:** you have the right to object, on grounds relating to your particular situation, to processing based on a legitimate interest in accordance with Article 21(1) of the GDPR. In this case, we will examine the processing of your personal data on the basis of the legal ground of legitimate interest and, if we consider your request to be justified, we will delete your personal data. You will be informed of our investigation.

### **Remedies**

The User may contact the Data Controller to exercise the rights granted to him/her. If the User considers that the Data Controller has not complied with the provisions of the GDPR and other applicable laws in the processing of his or her personal data, he or she may initiate an investigation with the National Authority for Data Protection and Freedom of Information or its successor (designated supervisory authority):

- Name: National Authority for Data Protection and Freedom of Information
- Seat:
- Mailing address: 1363 Budapest, PO Box 9.
- Phone: +36 (1) 391-1400
- Fax : +36 (1) 391-1410
- Homepage: <http://naih.hu>
- E-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

The User may take legal action against the Data Controller or, in the context of processing operations within the scope of the Data Processor's activities, against the Data Processor, if the User considers that the Data Controller or the Data Processor acting on his behalf or at his instructions is processing his/her personal data in breach of the provisions on the processing of personal data laid down by law or by binding legal acts of the European Union. The User may also bring their case before the competent court in the place where he or she resides or is from, at his or her choice. The court will process the case by default. The Data Controller shall prove that the processing complies with the law.