



PÉCSI TUDOMÁNYEGYETEM
EGYETEMI KÖNYVTÁR
ÉS TUDÁSKÖZPONT

Data Protection Notice

Knowledge Centre, Room 3422

Pécs, 2022.

Data Protection Notice

on CCTV surveillance and data management of the recordings taped in Room 3422, Knowledge Centre (group study)

The University of Pécs Library and Knowledge Centre (hereinafter: Library) has acquired an LSK ClassBoard CBT3275 type, high-value, interactive display (hereinafter: display) within the framework of the EFOP-3.4.3-16-2016-00005 university project. The display is in Room 3422 on the third floor of the Knowledge Centre (hereinafter: Room 3422 or room) together with a new computer (PC) and a monitor, forming the high-value equipment for the group study set-up (hereinafter collectively referred to as equipment). In order to protect the assets of the equipment, an IP camera has been installed in Room 3422, which continuously records moving images during opening hours, restrictively to the area where the equipment is located. The camera does not record sound. The recordings are kept for 72 hours and are available on the Library's dedicated virtual computer located on the Library's server and are accessible only to the head of the Library's IT Department, the IT officer who installs, configures and monitors the operation of the system and one of the deputy director-generals.

The head of department and the deputy director-general may watch the recordings only if there is property damage done during the use of the equipment located in Room 3422 and if this is absolutely inevitable in order to identify the person who is responsible for the damage. The IT technician on duty may watch live images and recordings only to the extent and for the duration necessary for the IT monitoring and configuration settings of the system. The IT officer has to make the system adjustments based on live image only when the room is not in use and the person concerned is not visible on it. Particular recordings shall be stored by the Library beyond 72 hours only if they present property damage that has been factually established and if

- initiation of official proceedings is likely (until the recording is given to the relevant authorities), or
- the person responsible for the damage done has not been identified yet, or
- the person responsible for the damage denies the damage or disputes his liability (or its extent), or
- after compensation for the damage has been paid, if the person who caused the damage simultaneously acknowledges the fact and circumstances of the damage in a private document with full probative value, or
- the expiry of the limitation period under civil law has not happened yet, in order to provide evidence in any court proceedings.

The Library informs the persons about the fact of recording by means of this notice, which will be available on the Library's website at <https://lib.pte.hu/hu/adatvedelem>, furthermore, in printed and shortened version upon entering Room 3422 (with reference to the availability of the full text of this notice), which will be posted on the door of Room 3422. A pictogram on the door also indicates that the room is camera-surveilled. By using and entering the room, the persons acknowledge that they have accessed the present notice and they are familiar with

its contents. Only persons who have read and understood the content of the notice are entitled to enter the room.

In a given time slot a person who is entitled to use Room 3422 and responsible for its usage (hereinafter: user of the room, who may be lecturer, employee/student of the University of Pécs or registered member of the library not having a legal relationship with the University of Pécs) will collect the key to the room and the equipment needed to operate the interactive display (interactive pens, remote control) from the circulation desk on 3rd floor. At the circulation desk the user of the room accepts (giving his/her name and Neptun ID or library card number in the way as it they are recorded in the study system) to confirm that he/she accepts the terms and conditions regarding the use of the room, that he/she is responsible for the integrity and proper use of the equipment, that he/she is willing to cooperate in the investigation of the circumstances in case of any damage done and that he/she is familiar with the contents of the data protection notice. Data recorded in this paragraph shall be kept by the Data Controller until the end of the month in question and shall then be anonymized in order to form statistical data.

The legal basis for the processing is 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 Article 6 (1) point (e) of repealing Directive 95/46/EC (General Data Protection Regulation; hereinafter: GDPR¹) *“Processing shall be lawful only 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 the controller (...)*

The relevant public tasks of the Library are as follows: as a supporting institution, the Library provides learning and reading spaces for students and teachers of the University of Pécs and other library users, who use public library services. The library's premises and the equipment made available to library users are assigned to the performance of its public tasks as defined in Act CXL of 1997 on museums, public libraries and public education.

Preserving the condition of the equipment (including the interactive screen, which is particularly expensive) is of paramount interest in the Library's mission of supporting education, as defined in Annex 38 to the Organizational and Operational Regulations of the University of Pécs.

The Data Controller:

Name: University of Pécs

Location: 7622, Pécs, Vasvári Pál street 4.

Related institutions: University of Pécs Library and Knowledge Centre (Pécsi Tudományegyetem Egyetemi Könyvtár és Tudásközpont) Location: 7621, Pécs, Universitas street 2/A.

Representative: Szeberényi Gábor Director-General

¹ <https://eur-lex.europa.eu/eli/reg/2016/679/oj>

DPO: dr. Szőke Gergely László

E-mail: szoke.gergely@ajk.pte.hu and adatvedelem@pte.hu

Telephone: (72) 501 599 / ext. 23321

Contact person on data protection relating the University of Pécs Library and Knowledge Centre: dr. Füzes Barnabás

E-mail: adatvedelem@lib.pte.hu

Tel.: +36-30-922-94-36

Related Documents:

- Data Protection Rules of the University of Pécs in Hungarian:

[https://adminisztracio.pte.hu/sites/adminisztracio.pte.hu/files/files/Adminisztracio/Szabalyzat ok utasitasok/Hat Es Egyeb Sz/adatvedelmiszabalyzat20180525.pdf](https://adminisztracio.pte.hu/sites/adminisztracio.pte.hu/files/files/Adminisztracio/Szabalyzat%20utasitasok/Hat%20Es%20Egyeb%20Sz/adatvedelmiszabalyzat20180525.pdf)

The Data Controller, i.e. the University of Pécs (hereinafter Data Controller) is responsible for the content of this notice. This Data Protection Notice is force from 1 February 2022 until withdrawal. The Data Controller reserves the right to amend the information in this present notice as necessary and to publish the amended text on the website of the Library.

The Data Protection Notice's purpose is to provide information on data protection issues related to the CCTV surveillance of Room 3422 and its usage.

The Data Controller makes every effort in order to ensure that the processing of personal data complies with the GDPR and related data protection rules (national legislation and internal rules).

Scope of data, purpose data processing and lawful basis

Scope of data	Purpose of data processing	Lawful basis
Recordings of people using the room.	The Library manages the data to protect the assets of the interactive display and other equipment (monitors and PCs) located in Room 3422, and also in order to investigate the circumstances of the damage.	Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; (Article 6 point (e) of the GDPR). In accordance with Article 55 (1) point (g) of Act CXL of 1997 on museum institutions, public library services and community culture, the public library helps library users to acquire digital literacy and information literacy and to engage in lifelong learning. Pursuant to Article 11 (2) of Act CCIV of 2011 on national higher education, higher education institutions shall provide the library services. According to Article 14 (2), the library of a higher education institution shall – among other things – carry out information and educational tasks. According to Annex 1, part A), line 31 of Act IX of 2021 on public-interest trusts performing public function, the maintainer of the University of Pécs carries out higher education activities as a public function through the University of Pécs.
Name and signature of the person who uses the room and is responsible for the correct use of it; the registered Neptun ID of the person in the case of University of Pécs citizens; and the library card number in the case of those library users who are not citizens of the University of Pécs.	The Library manages the data to protect the assets of the interactive display and other equipment (monitors and PCs) located in Room 3422, and also in order to investigate the circumstances of the damage, to determine the responsible party in advance, for prevention purposes and to produce annual statistics.	

Duration of data processing:

The video recordings of users of Room 3422 are kept for 72 hours and are available on the Data Controller's server. The recordings are automatically deleted if no damage was done during the certain period. In case of damage, only those recordings are kept that present events directly related to the factually established property damage, and only if:

- initiation of official proceedings is likely (until the recording is given to the relevant authorities), or
- the person responsible for the damage done has not been identified yet, or
- the person responsible for the damage denies the damage or disputes his liability (or its extent), or
- after compensation for the damage has been paid, if the person who caused the damage simultaneously acknowledges the fact and circumstances of the damage in a private document with full probative value, or
- the expiry of the limitation period under civil law has not happened yet, in order to provide evidence in any court proceedings.

The Library keeps the name, signature, Neptun ID or library card number of the person who uses the room and is responsible for the correct use of it until the end of the calendar month in question, then the signature forms are anonymized in order to form statistical data. Afterwards, the signature forms are permanently destroyed.

Right to information

Prior to the data processing, the Data Subject has the right to obtain all relevant information related to the data processing. Pursuant to Article 14 (5) point (b) of the GDPR, the Data Controller may waive the obligation to provide prior information to the Data Subject if this would involve a disproportionately big effort, in particular in the case of data processing for the purpose of archiving in the public interest, scientific or historical research.

The Library informs the persons about the fact of recording by means of this notice, which will be available on the Library's website at <https://lib.ptt.hu/hu/adatvedelem>, furthermore, in printed and shortened version upon entering Room 3422 (with reference to the availability of the full text of this notice), which will be posted on the door of Room 3422. A pictogram on the door also indicates that the room is camera-surveilled. By using and entering the room, the persons acknowledge that they have accessed the present notice and they are familiar with its contents. Only persons who have read and understood the content of the notice are entitled to enter the room.

Right to access

The Data Subject shall have the right to obtain confirmation from the Data Controller during the entire period as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to information on all issues again detailed in this notice. At the request of the Data Subject, the Data Controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs. The right to obtain a copy shall not adversely affect the rights and freedoms of others – i.e. if a video recording contains other persons' personal data, the Data Controller shall provide a copy of the recording in such a way that no other person can be identified on it (covering-up, masking), unless the Data Subject proves that he or she would otherwise be entitled to the processing under the provisions of the data protection regulations.

Right to rectification

The Data Subject shall have the right to request for the rectification of inaccurate or incomplete personal data, with the help of authorised employees of the Library.

Right to erasure

Subject to specific conditions, the Data Subject shall have the right to obtain from the Data Controller the erasure of personal data concerning him or her (especially if the purpose of the data processing no longer exists or is unlawful, or if the Data Subject has withdrawn his or her consent regarding the freely given data and there is no other legal ground for the processing). The Data Controller is only obliged to erase the data on one of the grounds laid down in Article 17 (1) of the GDPR, and the right to erasure may be limited in cases in accordance with the law.

If the data processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, and the erasure would be likely to render the processing impossible or seriously impair it, the Data Subject may not exercise this right (Article 17 (3) point (d) of the GDPR).

Right to restriction of processing

The Data Subject shall have the right to obtain from the Data Controller restriction of processing regarding his or her personal data if one of the conditions laid down in Article 18 (1) of the GDPR applies. In such case where the processing has been restricted, the 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 important public interest of the Union or of a Member State.

Right to data portability

The Data Subject shall have the right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format and have the right to transmit those data to another Data Controller.

Right to object

The Data Subject shall have the right to object to data processing where the legal basis is processing in the public interest or it is necessary for the purposes of the legitimate interests of the Data Controller or other third parties. In this case, in the justification the Data Subject shall state the grounds for the objection relating to his or her own situation.

The Data Controller can continue processing where it is necessary for scientific and historical research purposes or for the execution of a task related to archiving purposes in the public interest.

Procedure in the event of a request to exercise the above rights

Procedure for submission of the request

If the Data Subject has any questions regarding the data processing and the exercise of the rights set out above, he or she may submit written comments or a request addressing the Data Protection Officer.

The expected procedure for handling the request

The Library shall provide information to the Data Subject on action taken in relation to the exercise of the rights set out in this Notice without undue delay and in any event within 30 days of receipt of the request. That period may be extended by 60 days where necessary, taking into account the complexity and number of the requests.

If the Library considers that the Data Subject's request cannot be complied with, it shall inform the Data Subject without delay, but no later than 30 days after receipt of the request, of the reasons for the failure not to implement the action and of the possibility for the Data Subject to lodge a complaint with the supervisory authority and to seek a legal remedy.

In order to ensure the safety of personal data, it is important that the Data Subject can only exercise the above rights if he or she supplies satisfactory proof of his or her identity when submitting the request (in writing, orally or electronically).

Further legal remedies available

In the event of failure to cooperate in relation to the Data Subject's data processing requests, the Data Subject has the following additional remedies:

At the National Authority for Data Protection and Freedom of Information (address: 1363 Budapest, mailbox number: 9., telephone: +36 (1) 391-1400, +36 (30) 683-5969, +36 (30) 549-6838, e-mail address: ugyfelszolgalat@naih.hu, website: www.naih.hu), the Data Subject can initiate an investigation by filing a complaint alleging that he or she has suffered an injury in connection with the processing of his or her personal data or is at imminent risk of suffering one.

The Data Subject may take legal action against the Data Controller (in this case, the University of Pécs) in case of violation of his or her data subject rights in relation to the processing of personal data. The court shall handle the case with priority. The Data Controller shall prove that the data processing complies with the law. The court has jurisdiction to decide on the case. The lawsuit can also be started at the court of the Data Subject's place of residence or place of stay – at the Data Subject's choice.

Pécs, 28 January 2022