



PÉCSI TUDOMÁNYEGYETEM
EGYETEMI KÖNYVTÁR
ÉS TUDÁSKÖZPONT

**INFORMATION ON DATA MANAGEMENT POLICY
In Regards of the data management of the
University Library's group study rooms
reserving application**

2023

LINK TO KNOWLEDGE

INFORMATION ON DATA PROTECTION

INFORMATION ON DATA PROTECTION, IN REGARDS OF THE DATA MANAGEMENT OF THE UNIVERSITY LIBRARY'S GROUP STUDY ROOMS RESERVING APPLICATION

The University of Pécs (hereinafter: University) is committed to the fair and lawful processing of personal data in order to ensure that its data processing activities are in compliance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council 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 referred to as: GDPR), with Act CXII of 2011 on Informational Self Determination and the Freedom of Information (hereinafter: Privacy Act), to Act CVIII of 2001 on certain issues of electronic commerce activities and information society services, and other legislation, and to the good practices developed by the Hungarian National Authority for Data Protection and Freedom of Information (hereinafter referred to as: NAIH). Precise details are set out below.

1. THE DATA CONTROLLER

Name: University of Pécs

Registered office and contact address: 4 Vasvári Pál St. Pécs 7622

Represented by: Dr. Attila Miseta Rector and István Decsi Chancellor

Name of the Unit that manages the data: University of Pécs Library and Knowledge Centre

Representing the Unit: Gábor Szeberényi Director General

Contact information: Dr. Barnabás Füzes Deputy Director-General for Strategy and Innovation

Phone Number: +36 (30) 922 9436

Email address: adatvedelem@lib.pte.hu

Name of data protection officer: Dr. Gergely László Szőke, PhD head of the Department of Technology- and Energy Law

Contact information: adatvedelem@pte.hu; +36 (30) 179 5672

2. THE RANGE OF THE PROCESSED PERSONAL DATA AND THEIR SOURCE

The range of the processed personal data is included the family and last name of the concerned (data subject), their email address the name of their workplace, and faculty, their Neptun code, their permissions within the application, their missed reservations, and their application usage data.

The source of the data is the booking form and the related data entry fields filled in by the data subject in the online booking application and the related university Office 365 account. If there is any change in the concerned data, during the processing period, please immediately make a notification in the application, or directly to the library personnel, who makes your reservation.

3. THE LEGAL GROUNDS AND PURPOSE OF THE DATA MANAGEMENT

In order to exercise the students' rights and fulfil their obligations [Nftv. § 18 (1)], to carry out the public duty of the public library service [Nftv. 11.§ (2)] [GDPR Article 6 (1) point e)] and to ensure the non-

discriminatory accessibility of group student spaces and premises for university citizens, the University manages the personal data of the data subject specified in point 2 for the purpose of planning and organizing reservations.

4. DATA RETENTION PERIOD

The data subject's family and last name, email address, designation of their workplace or faculty, the data subject's Neptun code, and their permissions within the application, as well as any missed reservations and usage data are retained until the end of the year in which the actual usage concluded, until the closure of the annual usage statistics, but no longer than 31 January of the year following the last usage.

Data related to room reservations by the data subject (reservation location, duration, repetition, reserved equipment and services, and reservation-related notes) are retained until the closure of the monthly usage statistics, but no longer than 35 days.

5. PERSONS WITH ACCESS TO THE DATA, DATA PROCESSING, DATA TRANSFER

Only the employees of the University of Pécs Library and Knowledge Centre who require access to the data for the performance of their duties related to room reservations may access the data. These employees are subject to confidentiality obligations regarding the personal data they have become acquainted with.

The University does not engage a data processor for data processing and does not transfer them to third parties.

6. DATA SECURITY

The University ensures the appropriate security of the data subject's personal data by applying suitable technical and organizational measures, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage of the data. Additional information about the data security measures employed by the University can be found in Sections 20-22 of the University of Pécs Data Protection Regulations, as well as in Chapter IV of the Information Technology Regulations (see: https://adminisztracio.pte.hu/adminisztracio/szabalyzatok_utasitasok/hatalyos_egyeb_szabalyzatok).

7. RIGHTS OF THE DATA SUBJECT AND THEIR EXERCISE

7.1. The data subject is entitled, in relation to the data processing concerning them, to access the information as defined in Article 15 of the General Data Protection Regulation (GDPR) (right of access). This includes, (in particular), the right to be informed by the University about:

- which of their personal data,
- for what purpose and on what legal basis,
- from which source it is collected;
- the planned duration of storage or the criteria used to determine the duration;

- to whom and when the University has provided access to or transmitted their personal data; and
- what rights, complaints and legal remedy the data subject has during the data processing.

7.2. The data subject is entitled to have any inaccurate (incorrect or incomplete) personal data corrected under Article 16 of the General Data Protection Regulation (GDPR) (right to rectification).

7.3. Under Article 17 of the General Data Protection Regulation (GDPR) (right to erasure), the data subject is entitled to have their personal data erased when:

- The personal data is no longer necessary for the purposes for which it was collected or otherwise processed.
- The data subject withdraws their consent and there is no other legal basis for the data processing.
- The data subject has successfully objected to the data processing under 7.7.
- The personal data has been processed unlawfully.
- The personal data must be erased to fulfil a legal obligation.

Data shall not be erased where processing is necessary:

- To fulfil a legal obligation, or for the performance of a task carried out in the public interest or in the exercise of official authority.
- For the establishment, exercise, or defense of legal claims.
- For the exercise of the right to freedom of expression and information.
- 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, where the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing.

7.4 The data subject is entitled to request the restriction of processing of their personal data under Article 18 of the General Data Protection Regulation (GDPR) (right to restriction of processing) if:

- The data subject disputes the accuracy of the personal data. In this case the restriction applies for the period allowing the University to verify the accuracy of the personal data.
- The data subject has objected to the processing under 7.7. In this case, the restriction shall apply for the period until it is determined whether the University complies with the objection.
- The processing is unlawful, and the data subject opposes the erasure of the data, instead requesting the restriction of their use.
- The University no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise, or defense of legal claims.

Personal data under restriction shall be processed only with the 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 (EU) or of a Member State, except for storage.

7.5. In case of consent-based data processing, the data subject has the right to withdraw their consent at any time without giving any reason, in accordance with Article 7(3) of the General Data Protection Regulation (GDPR) (right to withdraw consent). The withdrawal must be made in writing or in the same form as the consent was given. The withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

7.6. In case of consent-based or automated (electronic) data processing carried out for the performance of a contract, the data subject has the right, in accordance with Article 20 of the General Data Protection Regulation (GDPR), to receive their personal data concerning them, which they have provided, in a widely used electronic format or to request the transmission of those data to another data controller (right to data portability) from the University.

7.7. In case of data processing for the performance of a public task or the exercise of official authority, as well as data processing based on a legitimate interest, the data subject has the right to object to the data processing for reasons related to their (particular) situation (right to object). According to Article 21 of the General Data Protection Regulation (GDPR), the University may not further process the personal data unless it demonstrates compelling legitimate grounds for the processing, which override the interests, rights, and freedoms of the data subject, or the processing is necessary for the establishment, exercise, or defense of legal claims.

7.8. The data subject can exercise their rights free of charge through the contact person specified in point 1 or the data protection officer's contact details. In most cases, the data subject may need to provide identification for their rights to be exercised, while in some cases (e.g., exercising the right to rectification), additional data may need to be verified. The University will process the request for exercising data subject rights within one month at the latest. If necessary, considering the complexity and number of requests, this deadline may be extended by an additional two months, with the data subject being informed of the extension within one month.

8. COMPLAINTS AND REMEDIES

Any complaints related to data processing can be filed through the contact person specified in point 1, or the University's Data Protection Officer can also be contacted (adatvedelem@pte.hu). If the complaint is submitted by mail, please address it to 4 Vasvári Pál Street, 7622 Pécs, Hungary, and send it to the contact person mentioned in point 1 or the Data Protection Officer.

In the event that a violation of rights or a direct threat of such would arise in connection with the processing of personal data, the National Authority for Data Protection and Freedom of Information can be contacted (postal address: 1363 Budapest, P.O. box. 9, phone: +36 (1) 391 1400, email: ugyfelszolgalat@naih.hu, website: <https://naih.hu>).

In the case of violations of data protection rights, the case can be taken to court and choose to initiate legal proceedings can be chosen to initiate in the court that has jurisdiction based on the place of residence or habitual residence of the data subject.