GENERAL PRIVACY NOTICE

This general privacy notice sets out the rights and obligations regarding the processing of your personal data by the Hungarian Innovation Agency Non-profit PLC (hereinafter referred to as the "**Agency**" or "**Controller**"). The Agency may publish separate privacy notices for certain specific processing operations and processing activities in addition to this notice.

1. DETAILS OF THE CONTROLLER

Hungarian Innovation Agency Non-profit PLC
registered seat: H-1077 Budapest, Kéthly Anna tér 1. 1. em.
site address: 1088 Budapest, Rákóczi út 1–3. 2. em.
email: office@niu.hu
phone: +36 1 445 1865
website: www.niu.hu
place and number of registration: Budapest-Capital Regional Court, Company Court Cg. 01-10-049678
tax number: 26231019-2-42
represented by: Hild Imre CEO
name of the data protection officer: Dr. Fonyó Gyula
contact details of the data protection officer: gdpr@niu.hu, +36 20 932 9144.

2. LEGISLATION, PRINCIPLES

2.1 Main legislation applied during processing

- **GDPR Regulation (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 referred to as the "GDPR Regulation")
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information and the legislation issued for its implementation (hereinafter referred to as the "Privacy Act")
- Act LXXVI of 2014 on Scientific Research, Development and Innovation (RDIA.)
- Act CVIII of 2001 on certain issues related to Electronic Commerce Services and Information Society Services (ECA)
- Act V of 2013 on the Civil Code (Civil Code)

- Government Decree No. 344/2019 (XII. 23.) on the National Research, Development and Innovation Office and the designation of the managing body of the National Research, Development and Innovation Fund

2.2 We follow the following principles when processing data:

- We process personal data exclusively for specific, clear, and lawful purposes, for the specified period of time. We only process personal data that is essential for achieving the purpose of processing and suitable for achieving that purpose.
- During processing, personal data that comes to our knowledge may only be accessed by persons employed by or contracted to our Company who have a role in relation to the processing in question.
- During processing, we continuously ensure that the personal data processed is accurate and, where necessary, kept up to date. When storing data, we only allow the identification of data subjects for as long as is necessary to achieve the purpose of processing. We only retain data for longer periods on the basis of legal authorisation and for archiving purposes in the public interest.
- We process personal data in such a way that appropriate technical and organisational measures are applied to ensure the adequate security of the personal data processed, and to protect against unauthorised or unlawful processing, accidental loss, destruction, or damage.
- We process personal data lawfully and fairly, in a manner that is transparent to the data subjects, and we are responsible for compliance with data protection legislation.

3. DEFINITIONS

Key definitions used in this notice:

"**personal data**" means any information relating to an identified or identifiable natural person ("data subject"); A natural person is identifiable if they 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.

"**controller**" means the natural or legal person, public authority, agency, or any other body that, alone or jointly with others, determines the purposes and means of the processing of personal data;

"**profiling**" means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal characteristics relating to a natural person, in particular to analyse or predict characteristics relating to work performance, economic situation, health, personal preferences, interests, reliability, behaviour, location, or movements;

"**data subject**" means any natural person who is identified or can be identified, directly or indirectly, on the basis of any personal data;

"**processing**" means any operation or set of operations performed on personal data or data files, whether automated or not, 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;

"**legal grounds for processing**" means the cases specified in Article 6 of the GDPR, which form the basis for lawful processing, with particular regard to the consent of the data subject, the performance of a contract, processing based on legislation, and processing based on public interest and legitimate interests;

"**consent of the data subject**" means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action (e.g. ticking a box), signify agreement to the processing of personal data relating to them;

"**processing of data**" means the performance of technical tasks related to processing operations, regardless of the method and means used to perform the operations and the location of the application, provided that the technical task is performed on the personal data of the data subject;

"**processor**" means a natural or legal person, public authority, agency, or any other body that processes personal data on behalf of the controller;

"**recipient**" means the natural or legal person, public authority, agency, or any other body to whom personal data are disclosed, whether a third party or not. Public authorities which may access personal data in the framework of a specific inquiry in accordance with Union or Member State law shall not be considered as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

"**third party**" means a natural or legal person, public authority, agency, or any other body other than the data subject, the Agency, the processor, or the persons who, under the direct authority of the Agency or the processor, are authorised to process personal data;

"**data security**" means the set of organisational, technical solutions and procedural rules against unauthorised handling of data, including personal data, in particular its acquisition, processing, alteration and destruction; the state of processing in which the risk factors for damage, unauthorised use, or destruction of data—and thus the threat of such factors—are minimised by organisational and technical solutions and measures.

4. PROCESSING ACTIVITIES

4.1 Visiting the website of the Agency

4.1.1 Collecting access data

You may view the pages of our website at any time without revealing your identity or providing any personal information about yourself. When you visit our website, certain data from your device (e.g. laptop, PC, phone, tablet) is automatically recorded. The recorded data is automatically logged by the web server hosting the website when you view the website, without your specific consent or active involvement. The system generates statistical data from this information. We use the information exclusively in aggregated and processed form, for the purpose of ensuring the security and improvement of the website's operation, as well as for statistical purposes.

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Distinguishing visitors to the Agency's website, identifying their current session, checking the functioning of website services, and compiling statistics. Providing users with access to the website and enabling them to send emails directly to the Agency via the website interface. Improving IT security by ensuring that data can be used to identify the source in the event of misuse.	Legitimate interest pursuant to Article 6(f) of the GDPR, according to which the processing of personal data is lawful if "*processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child*".	Your - IP address, - the time of the visit, - the pages visited, - the website from which the visit originated, - the type of the browser used, - the type of operating system, and - the domain name and address of the Internet service provider.	Not more than 30 days from the date of visiting the website.

4.1.2 Handling cookies

The Agency uses cookies to facilitate the use of its website and to track activity on the website. A cookie is a small text file (information package) that the Agency's website server sends to the user's web browser when they visit the website or use the services provided by the website. The cookie is stored on the user's device and the text files are stored in the device's cache for the duration specified in the cookie. The purpose of cookies is to record information related to visits (pages visited, time spent on pages, browsing data, exits, personal settings, etc.) and to use the knowledge gained in this way to improve the functioning of the website and enhance the user experience when using the website. Cookies speed up the operation of a given service by making a significant portion of the information necessary for the operation of the website immediately accessible.

4.1.3 Google Analytics

We also use Google Analytics service, which compiles and presents detailed statistics about visitors to our website. The internet information and analytics service introduced and operated by Google LLC enables website operators to learn about the users who visit their website and how they use it. The cookies placed collect data related to the device used for browsing and the browser, IP addresses, and data related to activity on the website. These cookies are deleted two years after use.

With regard to the Google Analytics service, the processor is Google LLC, Amphitheatre Parkway, Mountain View, CA 94043, United States, whose European representative is Google Dublin EU HQ, Google Building Gordon House, Barrow St, Dublin 4, Ireland, 8QQ7+WJ6 Dublin, Ireland.

Details about how Google LLC handles cookies can be found at the following links:

https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
https://policies.google.com/technologies/cookies

4.2 Job advertisements

The Agency processes the personal data of applicants who respond to job advertisements posted on the "Careers" subpage of its website in order to assess their suitability for employment and decide whether to hire applicants or reject their applications.

Beyond the above purpose, based on the express consent of the applicants, the Controller shall store and process the personal data provided separately in the database of job applicants for a further six (6) months from the date of notification of rejection, in order to consider the application for other positions advertised by the Agency and to contact the applicant with job offers at a later date. In addition, the controller compiles statistics by anonymising and aggregating the data, but does not use the data for any other purpose.

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Decision on whether to hire or reject applicants for the job advertised. Temporary storage of personal data for the purpose of possible use in connection with a future job offer.	Consent pursuant to Article 6(1)(a) of the GDPR, according to which the processing of personal data is lawful if "*the data subject has given consent to the processing of his or her personal data for one or more specific purposes*".	Name, contact details (email address and phone number), other personal data included in the CV attached to the job application.	If the Controller does not enter into an employment contract with the applicant and the applicant does not consent to the permanent processing of their personal data by the Controller in the database of job applicants, the Agency's employee shall, after communicating the results of the selection process to the candidate, delete the documents sent in electronic form without delay, but not later than 30 (thirty) days after the completion of the selection process, and shall destroy the documents sent in paper form. If the Controller does not enter into an employment contract with the applicant, but the applicant consents in writing to the processing of their personal data in the Controller's database of job applicants, the Controller shall store their data for a further 6 (six) months from the date of notification of rejection, after which the applicant's personal data available in electronic form will be permanently deleted and the documents available in paper form will be destroyed.

4.3 MyNIÜ

The purpose of the Agency's processing is to obtain, store, and continuously maintain the personal data of persons who fill out the online registration form uploaded to the MyNIÜ subpage of the Agency's website (and thereby create a MyNIÜ profile). The purpose of this is to enable the Agency to grant these persons access to the MyNIÜ application and thus to the services provided through the application that facilitate the innovation activities of the data subjects.

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Data collection and continuous use for logging into the MyNIÜ application and using the services contained therein	Consent pursuant to Article 6(1)(a) of the GDPR, according to which the processing of personal data is lawful if "*the data subject has given consent to the processing of his or her personal data for one or more specific purposes*".	Name, contact details (email address and phone number). If data subjects register with their LinkedIn account, the MyNIÜ application will request the same data from their LinkedIn profile.	The Controller will process the personal data of persons registered in the MyNIÜ application until the MyNIÜ user account is deleted, but for a maximum of 10 (ten) years. If, after 10 (ten) years following registration, the data subjects wish to maintain their registration account, they shall re-accept the provisions of this Privacy Notice relating to MyNIÜ registration.

4.4 Company Profile

The purpose of processing is to obtain personal data uploaded to the Company Profile of persons with a "MyNIÜ" user account by the Agency for the purpose of recording company data assigned to the MyNIÜ application.

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Recording company data assigned to the MyNIÜ application	Legitimate interest pursuant to Article 6(f) of the GDPR, according to which the processing of personal data is lawful if "*processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child*".	Name, ID details, contact details (email address and phone number), position (job, office).	The Controller will process the Company Profile data for a maximum of two years.

4.5 Workshops

The purpose of processing is to obtain the personal data previously uploaded by persons registering for workshops organised by the Agency—who already have a MyNIÜ registration account—for the purpose of using it to organise the Workshop. With the express consent of the data subject, the Controller will continue to store the data subject's data in its records for the purpose of organising future workshops.

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Organising data collection and processing workshops.	Consent pursuant to Article 6(1)(a) of the GDPR, according to which the processing of personal data is lawful if "*the data subject has given consent to the processing of his or her personal data for one or more specific purposes*".	Name, contact details (email address and phone number)	If the participant does not consent to the further processing of their personal data: The Controller shall process the personal data of persons assigned to Workshop participants by the company registered for the Workshop until the end of the Workshop, but for a maximum of 60 (sixty) days, after which the processed personal data shall be deleted without delay. If the participant consents to the further processing of their personal data: The Controller shall process the personal data of persons assigned to Workshop participants by the company registered for the Workshop for 2 years, after which the processed personal data shall be deleted without delay.

4.6 Newsletter

The Agency provides information on the performance of its public interest tasks and on the events, programs, campaigns, and training courses it organises, and for the purpose of direct marketing communications containing its own and its partners' business offers, to all those who are interested and request to receive newsletters.

The Agency collects the personal data of subscribers in connection with the periodic distribution of its newsletter. The purpose of processing is for the Agency to use the email addresses of subscribers for the operation of the newsletter service and for statistical data collection.

Data subjects of the processing are all natural persons who have subscribed to the Agency's newsletter service and, on this basis, receive informational newsletters in the form of email messages.

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Operating the newsletter service.	Consent pursuant to Article 6(1)(a) of the GDPR, according to which the processing of personal data is lawful if "*the data subject has given consent to the processing of his or her personal data for one or more specific purposes*".	Email address.	The Controller shall process the personal data of persons who have subscribed to the newsletter until the subscription is withdrawn by the data subject.

The Controller has issued a separate privacy notice regarding the processing of personal data of subscribers to the Agency's newsletter, which is available here: 250529_NIU_hirlevel-adatkezelesi-tajekoztato_v1_cl.pdf

4.7 Establishing and maintaining contact

The Agency processes the contact details of natural persons acting as contact persons for partner organisations, companies, and other institutions for the purpose of establishing and maintaining partnerships, preparing and concluding contracts, and fulfilling them. If you act as a representative or contact person for one of our organisational, corporate, or institutional partners, your employer (principal) will provide us with the personal data necessary for communication, or we will obtain it directly from you.

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Establishing contact, requesting information, and maintaining contact with partner organisations, companies, and institutions	Consent of the data subject [Article 6(1)(a) of the GDPR] or performance of a contract [Article 6(1)(b) of the GDPR] or enforcement of the legitimate interests of the Agency/third party [Article 6(1)(f) of the GDPR]	Name, name of the partner legal entity (organisation, company, institution), position, (corporate) email address, (corporate) phone number.	Processing continues until the purpose ceases to exist.

4.8 Processing related to events

4.8.1. Processing necessary for organising the event

If the event requires prior registration, you may submit your registration by way of the electronic application available or downloadable from the event invitation or other electronic notification, or from the Agency's website (e.g. Google Forms, by filling out an electronic form sent to a central email address), by sending your application to the Controller. By providing your data during registration—after reading this privacy notice—and by filling in the appropriate box on the form (e.g. empty square, circle) or by answering the multiple-choice question (e.g. yes/no), and then by submitting the form electronically, you consent to the use of your personal data for organisational purposes.

Notwithstanding the organisation of the given event, the Controller may also use the contact details collected during registration (name, email address, represented organisation, institution) for the

purpose of providing information prior to the organisation of events with the same or similar objectives. The data subject may object to the processing of their contact details for this purpose at any time, free of charge. In such cases, the Agency shall no longer process the personal data that is the subject of the objection and shall delete it from its systems.

Persons authorised to access the data: the event organiser and persons designated by the organiser who are involved in the organisation.

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Identification of event applicants and the institutions they represent, as well as recording of contact details necessary for establishing and maintaining contact for the purpose of organising the event, and use of data necessary for the flow of information throughout the entire organisational process (pre-communication, event holding, post-communication)	Your consent as the data subject [Article 6(1)(a) of the GDPR].	Name, institution (workplace, represented organisation), email address, phone number	Until the consent is withdrawn, but not later than the end of the year following the end of the event
Use of contact details for organising similar events in the future	Performance of the Agency's task carried out in the public interest [Article 6(1)(e) of the GDPR, Section 5/A of Government Decree No. 344/2019 (XII.23.)]	Name, institution (workplace, represented organisation), email address	Until the data subject objects to the processing of their data, but not later than the end of the year following the end of the event

4.8.2. Processing during the event

The Agency may prepare an attendance sheet of those participating in the event. The attendance sheet is based on the personal data provided during registration. Of the information requested during registration, the name and workplace or the details of the organisation or institution represented will be entered in the attendance sheet, and the person concerned will confirm their participation in the event by signing the sheet.

Persons authorised to access and process the data: the event organiser and persons designated by the organiser who are involved in the organisation.

Providing this data is voluntary, and the Agency does not make it obligatory to fill out the attendance sheet. However, if you request a certificate to prove that you participated in the event, the Agency cannot meet your request without checking your attendance.

In the event that photographs, audio or video recordings (hereinafter collectively referred to as the "recordings") are made, stored and published at the event, we will inform you in advance that recordings will be made of the event, and that the controller will endeavour to ensure that the recordings do not show the image of any individual person, but rather recordings of several people (crowd recording). You will also receive this information separately on the attendance sheet, which you acknowledge by signing.

The Agency shall publish recordings made at public events for the purpose of informing the public. The place of publication may be the Agency's website, Facebook and Instagram social media pages, as well as a Facebook page (event, group) created for the purpose of promoting the event in question. Photos and videos presenting the events may be used in the Agency's own publications and reference material for the purposes specified in this clause.

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Keeping an attendance sheet to identify the data subjects and to confirm that you participated in the event	The legitimate interest of the Agency [Article 6(1)(f) of the GDPR], or, if you request official confirmation of your participation in the event, the consent of the data subject [Article 6(1)(a) of the GDPR]	Name, institution (workplace, represented organisation) and signature	After the event, the data will be deleted and the data carriers destroyed by the end of the year
Photographs, video and/or audio recordings made by the Agency for the purpose of informing the public about the event or events organised by the Agency	The Agency's legitimate interest in informing the public about the events it organises [Article 6(1)(f) of the GDPR]	Sound recording and/or image (portrait, body image)	After the event, the data will be deleted and the data carriers destroyed by the end of the year
In the case of events financed by grants or other projects, the additional purpose of processing is to certify that the event took place	The legitimate interest of the Agency, which consists in certifying the implementation of the event to the project financier [Article 6(1)(f) of the GDPR]	Sound recording and/or image (portrait, body image)	After the event, the data will be deleted and the data carriers destroyed by the end of the year

4.9 Creation and management of an expert database

4.9.1 Project development expert database

In the framework of the project development service provided under the project with code number GINOP Plus-2.1.2-22—specified in Government Decree No. 1300/2021 (V. 21.) on the establishment of the annual development framework for the Economic Development and Innovation Operational Program Plus (hereinafter referred to as the "GINOP Plus")—, the Agency is creating a permanent database of experts that can also be used for other projects in the future. In order to establish and maintain the expert database, as well as during the preparation and conclusion of commission contracts and framework agreements with natural persons performing expert tasks, and during the performance thereof, it processes the personal data of these natural persons (experts).

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Establishing contact, requesting information, and maintaining contact with partner organisations, companies, and institutions	Consent of the data subject [Article 6(1)(a) of the GDPR] or performance of a contract [Article 6(1)(b) of the GDPR] or enforcement of the legitimate interests of the Agency/third party [Article 6(1)(f) of the GDPR]	Name, email address, phone	Processing continues until the purpose ceases to exist.

Ensuring the performance of tasks under the commission contract, payment of the expert fee due to the person concerned.	Consent of the data subject [Article 6(1)(a) of the GDPR] or performance of a contract [Article 6(1)(b) of the GDPR] or enforcement of the legitimate interests of the Agency/third party [Article 6(1)(f) of the GDPR]	Name, birth name, mother's name, place and date of birth, tax identification number, social security number, email address, phone number, and personal identification document number (only for non-Hungarian citizens)	50 years from the termination of the related contract or framework agreement.
Verification of the controller's appropriate legal basis for processing personal data relating to the data subject for accountability purposes.	The legitimate interest of the Agency, which consists in verifying the lawfulness of its processing [Article 6(1)(f) of the GDPR]	Personal data provided by the data subject during the application process.	Until the end of the year following the termination of the processing of the mentor's personal data.

4.9.2 Mentor database

In the framework of the mentoring service provided under the project with code number GINOP Plus-2.1.2-22—specified in Government Decree No. 1300/2021 (V. 21.) on the establishment of the annual development framework for GINOP Plus—, the Agency is creating a permanent database of mentors that can also be used for other projects in the future. In order to establish and maintain the mentor database, as well as during the preparation and conclusion of commission contracts and framework agreements with natural persons performing mentoring tasks, and during the performance thereof, it processes the personal data of these natural persons (mentors).

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Establishing contact, requesting information, and maintaining contact with partner organisations, companies, and institutions	Consent of the data subject [Article 6(1)(a) of the GDPR] or performance of a contract [Article 6(1)(b) of the GDPR] or enforcement of the legitimate interests of the Agency/third party [Article 6(1)(f) of the GDPR]	Name, email address, phone	Processing continues until the purpose ceases to exist.
Ensuring the performance of tasks under the commission contract, payment of the expert fee due to the person concerned.	Consent of the data subject [Article 6(1)(a) of the GDPR] or performance of a contract [Article 6(1)(b) of the GDPR] or enforcement of the legitimate interests of the Agency/third party [Article 6(1)(f) of the GDPR]	Name, birth name, mother's name, place and date of birth, tax identification number, social security number, email address, phone number, and personal identification document number (only for non-Hungarian citizens)	50 years from the termination of the related contract or framework agreement.
Verification of the controller's appropriate legal basis for processing	The legitimate interest of the Agency, which consists in verifying the lawfulness of its	Personal data provided by the data	Until the end of the year following the termination of the

personal data relating to the data subject for accountability purposes.	processing [Article 6(1)(f) of the GDPR]	subject during the application process.	processing of the mentor's personal data.

4.9.3 Publication of mentors' personal data on the Agency's website

The Agency publishes the name, position, field of expertise, and contact details (email address) of mentors registered in its database on its website, based on the mentor's voluntary or contractual consent. After publication, the data disclosed will be accessible to anyone who visits the relevant page of the website.

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Referral of mentors to third parties	Consent of the data subject [Article 6(1)(a) of the GDPR] or performance of a contract [Article 6(1)(b) of the GDPR]	Name, position, field of expertise, email address	Until the end of the year following the termination of the disclosure of the mentor's personal data on the website.
Verification of the controller's appropriate legal basis for processing personal data relating to the data subject for accountability purposes	The legitimate interest of the Agency, which consists in verifying the lawfulness of its processing [Article 6(1)(f) of the GDPR]	Name, position, field of expertise, email address	Until the end of the year following the termination of the disclosure of the mentor's personal data on the website.

4.10 Processing of Personal Data of Participants in the HSUP Doctorate Programme

The Agency launches the HSUP Doctorate Programme within the framework of Project No. 2022-1.1.2-STARTUP-2022-00001, implemented with the support of the National Research, Development and Innovation Fund (NRDI Fund).

The objective of the Programme is to support PhD and DLA students in transforming their research results into viable innovations and in establishing new start-up businesses based on cutting-edge research results or technological solutions. To this end, the Agency provides expert support, business training, mentoring and financial support.

The processing of personal data serves the purpose of implementing the HSUP Doctorate Programme and thereby enabling the Agency to perform its tasks carried out in the public interest in connection with the promotion of innovation. It also serves the purpose of further developing the HSUP Doctorate Programme, designing and implementing targeted training programmes and providing related support through the research, analysis, organisation and evaluation of the data collected from PhD and DLA students, as well as through the development and implementation of concepts.

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Facilitating participation in the programme and maintaining contact with participants; facilitating the completion of study requirements related to business training; providing assistance in transforming research results into viable innovations; facilitating the establishment of new start-up businesses; providing expert support and mentoring; participating in the assessment and provision of financial support; performing monitoring and control activities relating to the provision of such support; and collecting, analysing, organising and evaluating PhD/DLA student data and developing concepts in connection with the above activities.	Compliance with a legal obligation to which the Controller is subject [Article 6(1)(c) of the GDPR], the Act on Scientific Research, Development and Innovation (KFI Act), and point (bc) of subparagraph (b) of paragraph (1) of Section 5/A of Government Decree No. 344/2019 (XII. 23.)]; and the performance of a task carried out in the public interest [Article 6(1)(e) of the GDPR].	The following personal data of PhD/DLA students participating in the HSUP Doctorate Programme are processed: name; email address; place of residence; name of the higher education institution providing the training; name of the field/programme of study; Neptun code; and the modules completed and the scores obtained by the PhD/DLA student during their participation in the Programme.	The personal data are retained for 10 years from the date of application to the Programme.
The processing serves the purpose of enabling the Controller to perform its tasks of public interest by supporting and promoting the excellence and talent development of PhD/DLA students. This includes the conclusion and performance of scholarship agreements and contracts for services/assignments, the provision of scholarships and project development support, and the processing of personal data in connection with these activities.	Performance of a contract [Article 6(1)(b) of the GDPR]	For the purposes of concluding a scholarship agreement or a contract for services/assignment, the following personal data of the PhD/DLA student are processed: name; personal identification data; residential address; Neptun code; and bank account number.	The personal data are retained for 8 years following the termination of the PhD/DLA scholarship agreement or contract for services/ assignment.
The processing of PhD/DLA student data serves the purposes of measuring the effectiveness of the programme, preparing and analysing statistical indicators, and further developing the programme.	Performance of the Agency's task carried out in the public interest [Article 6(1)(e) of the GDPR]	The following personal data of PhD/DLA students are processed: name; email address; place of residence; name of the higher education institution providing the training; field/programme of study; modules completed by the PhD/DLA student; and scores obtained by the PhD/DLA student.	The personal data are retained until the termination of the user account managed on the PtB platform.

4.11 E-learning

The Agency shall make digital learning materials available, through the e-learning platform established on its website, to university lecturers, students, and other invited users (the "Data Subjects"). Access to the e-learning platform shall be subject to prior registration. Upon the request of a registered Data Subject, the learning materials or parts thereof (e.g. individual chapters) offered by the Agency shall be made available in a downloadable format.

Purpose of processing	Legal ground of processing	Scope of the data processed	Duration of processing
Collection and ongoing processing of personal data for the purpose of granting access to the e-learning platform and enabling the use of the services available thereon.	Consent pursuant to Article 6(1)(a) of the GDPR, according to which the processing of personal data is lawful where *"the data subject has given consent to the processing of his or her personal data for one or more specific purposes."*	Name, login password	The Controller shall process the personal data of the Data Subject until the deletion of the registration, but for no longer than ten (10) years. If, upon the expiry of ten (10) years following registration, the Data Subject wishes to continue using the e-learning service, the Data Subject shall be required to review again the information notice relating to the processing of his or her personal data.
Provision of digital learning materials to Data Subjects and enabling their use thereof.	Consent pursuant to Article 6(1)(a) of the GDPR, according to which the processing of personal data is lawful where *"the data subject has given consent to the processing of his or her personal data for one or more specific purposes."*	Name, position/title, represented institution, signature	One (1) year from the date of downloading the relevant digital learning material.

4.12 Automated decision-making and profiling

The Agency does not carry out automated decision-making and/or profiling in the course of its processing activities.

5. PROCESSORS

Processor: REON DIGITAL Kft. (registered seat: H-1093 Budapest, Boráros tér 7. 1. lház. 7. em. 12., company registration number: Cg. 01 09 996116**,** website: www.reon.digital, hereinafter referred to as the "Processor"), as the operator of the www.niu.hu website and the operator of the IT system.

The Processor performs the following processing activities:

- IT consulting, website development, web hosting services, and other IT services, including the following related to personal data:
    - collection,
    - recording,
    - sorting,
    - storage,
    - deleting.

The Controller shall determine the rights and obligations of the Processor in relation to the processing of personal data within the relevant legislative framework. The Controller is responsible for the legality of instructions relating to processing operations. In the course of performing its processing activities, the processor may not engage any further processors and may not perform processing for its own purposes. The Controller also guarantees that the Processor may only access personal data if this is essential for the performance of its tasks.

The Controller shall ensure that the rights of data subjects are not infringed upon during the Processor's activities by establishing guarantees in a contractual environment and introducing appropriate organisational and technical measures.

After completing its activities, the Processor shall transfer all personal data stored on its server to the Controller and undertakes to permanently delete such data from its server.

6. DATA SECURITY

The Controller shall process the personal data of data subjects in accordance with the principles of the GDPR and in compliance with the provisions of the GDPR, the Privacy Act and other Hungarian data protection laws, confidentially and in compliance with the confidentiality obligations prescribed by law.

The Agency shall design and implement its processing operations in such a way that the privacy of data subjects is adequately protected. In view of the current state of technology, it shall take the technical and organisational measures and establish the procedural rules necessary to ensure data security. The data is protected in particular against unauthorised access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction and damage, damage to data and accidental loss, and against becoming inaccessible due to changes in the technology used.

The Controller shall process the personal data it processes as confidential and shall not transfer or disclose them, unless the data subjects or persons exercising parental authority over minor data subjects expressly consent to this for any reason, or unless required to do so by law. In case of doubt, it shall be assumed that the data subjects have not given their consent.

Once the purpose of processing has ceased to exist, the Agency shall ensure that the data is deleted. The deletion may be verified at any time by the manager responsible for processing and the Controller's data protection officer.

7. EXERCISE OF RIGHTS OF THE DATA SUBJECTS, LEGAL REMEDIES

You have various rights in relation to processing, as detailed below. If you wish to exercise any of your rights, please contact us at the following contact details:

postal address: Nemzeti Innovációs Ügynökség Nonprofit Zrt. H-1077 Budapest, Kéthly Anna tér 1. 1. em.
email address: gdpr@niu.hu

Before fulfilling your request, we shall always verify your identity. If we cannot identify you, we will unfortunately be unable to fulfil your request.

Following identification, we will provide information regarding the request in writing, by electronic message, or verbally, at your request. Please note that if you submit your request electronically, we will respond electronically. Of course, in this case, too, you have the option to request a different method.

We will inform you of the measures taken in response to your request within 1 month of receiving it. If necessary, taking into account the complexity of the request and the number of requests, this deadline may be extended by a further 2 months, of which we will inform you within the 1-month administrative deadline.

We are also obliged to inform you of the failure to take action within the one-month administrative deadline.

The requested information and measures are free of charge. An exception is made if the request is clearly unfounded or excessive, particularly due to its repetitive nature. In this case, we may charge a fee or refuse to fulfil the request.

You have the following rights in relation to our processing:

7.1 Right to access

The data subject may request information from the Controller via the contact details provided in Clause 1 as to whether their personal data is being processed and, if such processing is taking place, they have the right to know the following:

- what personal data;
- under what legal ground;
- for what processing purpose;
- for what duration are processed by the Controller.

The data subject has the right to know the following:

- to whom, when, on what legislative basis, and to which personal data the Controller has granted access or to whom it has transferred their personal data;
- the source of their personal data;

In order to comply with data security requirements and protect the rights of the data subject, the Controller shall verify the identity of the data subject and the person wishing to exercise their right of access. To this end, the provision of information, access to data, and the issuance of copies thereof are also subject to the identification of the data subject.

7.2 Right to rectification

The data subject may request that the Controller modify any of their personal data by contacting the Controller at the contact details provided in Clause 1. If the data subject can credibly prove the

accuracy of the corrected data, the Controller shall comply with the request within a maximum of 1 month and notify the data subject thereof at the contact details provided by the data subject.

7.3 Right to withdraw consent

The data subject may withdraw their consent at any time without justification with regard to processing operations for which the legal basis is the data subject's consent. The withdrawal shall not affect the lawfulness of processing based on consent prior to the withdrawal. However, the Controller will no longer perform any operations using the personal data of the data subject and shall delete them. The withdrawal of consent can be made via any of the Controller's contact details.

7.4 Right to blocking (restriction of processing)

The data subject may request that the Controller restrict the processing of their personal data (with clear indication of the restricted nature of the processing and ensuring that the data is processed separately from other data) if:

- they dispute the accuracy of their personal data (in this case, the Controller will restrict processing for the period during which it verifies the accuracy of the personal data);
- the processing is unlawful and the data subject opposes the erasure of the data and requests the restriction of their use instead;
- the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise, or defence of legal claims; or
- the data subject has objected to the processing (in this case, the restriction applies for the period until it is determined whether the legitimate grounds of the controller override those of the data subject).

7.5 Right to objection

The data subject may object to the processing of their personal data at any time for reasons relating to their particular situation, or if they believe that the Controller is not processing their personal data in accordance with the purposes set out in this Privacy Notice. In this case, the Controller shall demonstrate that the processing of personal data is justified by compelling legitimate grounds that override the interests, rights, and freedoms of the data subject, or that are related to the establishment, exercise, or defence of legal claims.

7.6 Right to erasure

The data subject shall have the right to request the erasure of personal data concerning them processed by the Controller, on the basis of a request submitted via the Controller's contact details, if one of the following conditions applies:

- the purpose of processing no longer exists and there is no further need to process the data in question;
- the processing of your data is unlawful, for example, if the Controller processes your data without a proper legal basis;
- your data must be deleted in order to comply with a requirement of the law;
- the data subject has exercised their right to object and, based on the information provided in their request, the termination of processing is justified;

If, following your request, the Controller determines that it is obliged to erase the personal data it processes, it will terminate the processing of the data and destroy the previously processed personal data. In addition, the obligation to erase personal data may also arise from the withdrawal of consent, the exercise of the right to object, and legislative obligations.

8. OPTIONS FOR THE ENFORCEMENT OF RIGHTS

If the data subject considers that the Controller has violated the applicable data protection requirements in the processing of their personal data, then the data subject

- *may submit a complaint* to the Controller at the postal address or email address specified in Clause 1. The Controller shall provide written information about the complaint as soon as possible, within a maximum of 1 month (within 15 days in the case of an objection) (this deadline may be extended by a further 2 months in view of the complexity of the request— the Controller shall inform the data subject of the reasons for this extension within 30 (thirty) days of receipt of the request);

- *may contact the National Authority for Data Protection and Freedom of Information* (address: H-1055 Budapest, Falk Miksa utca 9-11.); furthermore

- , they have the option of *turning to the courts* for the protection of their data, which will act on the matter as a matter of priority. In this case, the data subject is free to decide whether to file a claim with the regional court having jurisdiction over their place of residence (permanent address) or place of stay (temporary address), or with the regional court having jurisdiction over the Controller's registered seat. You may look for the regional court having jurisdiction over your place of residence or place of stay at the http://birosag.hu/birosag-kereso website.

The contact details for the **National Authority for Data Protection and Freedom of Information** are as follows:

mailing address:	H-1374 Budapest, Pf. 603.
address:	H-1055 Budapest, Falk Miksa u. 9-11.
Phone:	+36 (1) 391-1400
Fax:	+36 (1) 391-1410
website:	https://www.naih.hu
email:	ugyfelszolgalat@naih.hu

If the Agency causes damage by unlawfully processing the data subject's data or violates the data subject's personal rights, compensation and damages may be claimed from the Controller. The Controller shall be exempt from liability for damages and from the obligation to pay compensation if it proves that the damage or the infringement of the data subject's personal rights was caused by an unavoidable reason outside the scope of processing**.**

Date of the last amendment to this privacy policy:

26 October 2026