Hungarian Innovation Agency Non-profit PLC
Data Protection Notice relating to its Hungarian Startup University Programme (HSUP) and Pathway to Business Programme (PtB)

Part I
General provisions

Hungarian Innovation Agency Non-profit PLC, as the data controller (hereinafter: the **Agency** or the **Data Controller**), processes personal data obtained in connection with the **Hungarian Startup University Programme** (hereinafter: the HSUP Programme) and the Pathway to Business Programme (PtB), in accordance with the provisions of **Act No. CXII of 2011** on the right to informational self-determination and freedom of information (hereinafter: the Information Act) and in accordance with the position statements issued by the President of the National Authority for Data Protection and Freedom of Information, in accordance with **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 (**General Data Protection Regulation** – hereinafter: **GDPR**).

The purpose of this data processing notice is to facilitate the lawful and secure processing by the Data Controller of the personal data provided to it by participants in the HSUP and PtB programmes (hereinafter collectively referred to as 'data subjects'). A further aim is to inform data subjects of all the circumstances and conditions relating to the processing of personal data, thereby promoting the protection of data subjects' rights and freedoms in relation to the processing of their personal data.

1. **Data Controller:**

The Hungarian Innovation Agency Non-profit PLC
Short name: Hungarian Innovation Agency Ltd.
registered seat: H-1077 Budapest, Kéthly Anna tér 1. 1. em.
Business premises and postal address: H-1088 Budapest, Rákóczi út 1–3. 2. em.
e-mail: office@niu.hu
Telephone: +36 1 445 1865
website: www.niu.hu
Place and registration number: Company Registry Court of Budapest-Capital Regional Court, Cg. 01-10-049678
Tax number: 26231019-2-42

Represented by: BÓDIS László, CEO
Name of Data Protection Officer: Dr. FONYÓ Gyula
Contact details of Data Protection Officer: gdpr@niu.hu, +36 20 932 9144

The Agency acknowledges that the contents of this data processing notice are binding upon it. In relation to the HSUP and PtB programmes, it endeavours to ensure that its data processing complies with the requirements set out in this Data Protection Notice, as well as in the Agency's general Data Protection Notice and internal regulations, and in the applicable legislation.

2. **Data Processor:**

The Agency does not engage a data processor in the course of its activities relating to the processing of personal data under the HSUP and PtB programmes.

3. **Published:**

The Agency's data protection notice relating to the management of this call for proposals is continuously available on the Data Controller's website at https://niu.hu/, and at the following website: https://hsup.niu.hu .

4. **Amendments to and scope of the Data Processing Notice:**

The Agency reserves the right to amend this Data Processing Notice unilaterally and without any time limit, provided that it notifies data subjects of any such changes in a timely and appropriate manner.

This Data Protection Notice is in force alongside the Agency's general Data Protection Notice and forms a supplement to it. In matters not covered by this notice, the provisions set out in the Agency's general data protection notice at https://niu.hu/storage/uploads/GDPR/260901_NIU_Altalanos-adatkezelesi-tajekoztato.pdf shall be deemed to be binding.

Part II
Definitions

In this Data Protection Notice:

- **HSUP Programme** – a university-level start-up training programme operated with the Agency's professional support, organised by the Agency for students at Hungarian higher education institutions. In the first semester of this two-semester e-learning course, students gain an insight into innovative thinking and the world of start-ups, whilst in the second semester they acquire practical knowledge relating to the structure of businesses. The course also serves as a support programme, and provided students fulfil the academic requirements (passing the end-of-module exams, preparing a one-pager setting out a business idea, presenting an initial, working version of the business idea) and, if selected on this basis, the students concerned may receive state funding (HSUP Scholarship). Interested students may

enrol in the course and take part in the training on a voluntary basis at higher education institutions participating in the programme.

- **The Pathway to Business (PtB) Programme** is an entrepreneurship programme aimed at doctoral (PhD) students and prospective PhD students in Hungary. The aim of the programme is to help PhD students transform their research findings into viable innovations and to launch new start-up businesses based on cutting-edge research findings or technological solutions. It achieves this through expert support, business training, mentoring and financial support.
- **Eligible** participants – students taking part in the HSUP programme, or PhD/DLA students taking part in the PtB programme, or doctoral candidates, who take part in the programme of their own volition and, for this purpose – having been informed in advance and of their own free will – consent to the processing by the Agency (Data Controller) of the personal data they provided during registration.

In addition to the above, in this Data Protection Notice, the Agency uses the terms employed in the Information Act, the GDPR and the Agency's General Data Protection Notice.

Part III
Processing of personal data of participants in the HSUP Programme

1. <u>Purpose and legal basis of data processing:</u>

The aim of the HSUP Programme is to introduce Hungarian university students to the world of innovation, modern entrepreneurial knowledge and, in particular, the workings of start-ups through a new, shared educational platform. Students from Hungarian and overseas higher education institutions take part in the HSUP Programme. By applying to the educational programme organised by their higher education institution, they consent to their personal data being transferred by that institution to the Agency for the purpose of enabling them to participate in the HSUP Programme, to undertake its academic tasks and fulfil the academic requirements, and, should they be selected on this basis, to receive state support (a scholarship). The purpose of data processing is the implementation of the HSUP Programme and, thereby, the fulfilment of the Agency's public interest tasks relating to the support of innovation.

The aim of the PtB Programme is to assist PhD/DLA students and doctoral candidates (hereinafter: PhD students) in transforming their research findings into viable innovations, as well as in launching new start-up businesses based on cutting-edge research findings or technological solutions. The Agency provides this support through expert guidance, business training, mentoring and financial support. The purpose of data processing is to implement the PtB programme and, thereby, to fulfil the Agency's public interest tasks relating to the promotion of innovation.

The purpose of data processing is also to further develop the HSUP and PtB programmes, and to implement and support targeted training programmes, through the research, analysis, systematisation and evaluation of the collected student and PhD student data, and the development and implementation of concepts.

2. The scope of the data processed and the transfer of data:

2.1. Student data registered and processed within the HSUP Programme

The collection (registration) of personal data takes place within the Neptun system, the standardised academic management system used by higher education institutions. When registering applications, the higher education institution draws the attention of the students concerned to the fact that the HSUP is a state-funded training programme under which students themselves may be eligible for state support (a scholarship), provided they fulfil and meet the necessary conditions. When applying for the training programme, the student undertakes to familiarise themselves with the terms and conditions of the HSUP and, upon joining the programme (registration), to accept these terms and conditions. Furthermore, the higher education institution shall inform students that a condition of their participation in the programme is that the Data Controller has access to their personal data processed under the HSUP programme – for the purpose of monitoring the use of state funding – to examine and use such data as necessary, and – where required for the purposes of such monitoring – that the higher education institution may transfer the personal data to the Data Controller.

As a result of the higher education institution's registration on the HSUP platform, a user account is created for the user (student), which contains the personal data required to use the platform and the login details needed to access it, and enables the user to make use of the services offered by the HSUP platform.

Scope of personal data processed	Legal basis	Purpose of data processing	Duration of data processing
The **name** and **email address of students** participating in the HSUP Programme, as well as the **name of the higher education institution providing the course and the programme, and level** (undergraduate, master's, doctoral / vocational and specialised programmes), as well as the student's **Neptun code**, the **modules completed by the student and the marks obtained** during their studies under the programme, and the **results of the psychological test**.	**Compliance with a legal obligation** [Article 6(1)(c) of the GDPR], the **Higher Education Act** and Section 5/A(1)(b) (bc) of **Government Decree No. 344/2019. (23 December)** on the KFI Act, Section 5/A(1)(b)(bc)], and the **performance of a task carried out in the public interest** [Article 6(1)(e) of the GDPR]	Ensuring participation in the programme, maintaining contact, fulfilling academic tasks, assisting in the assessment and award of grants, carrying out monitoring tasks relating to grants, in general, as well as the collection, analysis, organisation and evaluation of student data for this purpose, and the development of concepts	Some of the data is retained until the user account managed on the HSUP platform is deleted (see below this table!), whilst other data is retained for 10 years from the date of registration.

To conclude a scholarship agreement: the **student's name, personal identification details, address and Neptun code,** to award the scholarship, in addition to the above, the **student's bank account number**.	Performance of a contract [Article 6(1)(b) of the GDPR]	The Data Controller's performance of its public duty through the support and encouragement of student excellence and talent development, including the conclusion of a scholarship agreement and the provision of the scholarship, and the related data processing	For 8 years following the termination of the scholarship agreement.
The **name** and **email address of students** participating in the HSUP Programme, as well as the **name of the higher education institution providing the course and the programme, and level**, the **modules completed by the student and the marks obtained**	Performance of a task carried out in the public interest [Article 6(1)(e) of the GDPR]	Processing of student data for the purposes of measuring the programme's effectiveness, compiling and analysing statistical indicators, and developing the programme	Until the user account managed on the HSUP platform is deleted

Recipients of data transfers: Only anonymous data is transferred to higher education institutions participating in the HSUP Programme.

The Data Controller processes anonymous and aggregated data that does not contain personal data solely to the extent necessary for the evaluation and analysis of the HSUP Programme announced by it, and transfers such data to those assisting in the performance of these tasks for the purposes of scientific research and statistics.

To delete their user account, the user (student) must send an electronic request to the following e-mail address info.hsup@niu.hu. Following deletion, the following personal data provided during registration will be automatically deleted from the database managed on the HSUP platform: full name and email address. The Neptun code, the student's progress on the platform (modules completed, marks, etc.) and the results of the personality test will remain in the database.

During data processing, the Data Controller does not carry out automated decision-making and/or profiling.

2.2. Data on PhD students registered and managed under the PtB Programme

When applying for the programme, PhD students undertake to familiarise themselves with the terms and conditions of the PtB Programme and, upon joining the programme (registration), to accept these terms and conditions. The Agency informs PhD students that a condition of their participation in the programme is that the Data Controller may access, review and use their

personal data processed within the PtB Programme as necessary, for the purpose of monitoring the use of state funding.

Scope of personal data processed	Legal basis	Purpose of data processing	Duration of data processing
The **name** and **email address of students** participating in the PtB Programme, as well as the **name of the higher education institution providing the course and the programme**	**Compliance with a legal obligation** [Article 6(1)(c) of the GDPR], the **Higher Education Act** and Section 5/A(1)(b) (bc) Of **Government Decree No. 344/2019. (23 December)** on the KFI Act, Section 5/A(1)(b)(bc)], and the **performance of a task carried out in the public interest** [Article 6(1)(e) of the GDPR]	Ensuring participation in the programme, maintaining contact, completing academic tasks relating to business training, providing assistance in transforming research findings into viable innovations, as well as facilitating the launch of new start-ups, providing expert support and mentoring, participating in the assessment and awarding of grants, carrying out monitoring tasks relating to grants, as well as collecting, analysing, organising and evaluating PhD student data for this purpose, and developing	For a period of 10 years from the date of registration.

Recipients of data transfers: Only anonymous data is transferred to higher education institutions participating in the PtB Programme.

The Data Controller processes anonymous and aggregated data that does not contain personal data solely to the extent necessary for the evaluation and analysis of the PtB Programme announced by it, and transfers such data to those assisting in the performance of these tasks for the purposes of scientific research and statistics.

During data processing, the Data Controller does not carry out automated decision-making and/or profiling.

2.3. Personal data and cookies processed on the HSUP website

2.3.1. Browsing the website

Visitors to the HSUP website may view the website's pages at any time without revealing their identity or providing any personal information about themselves. When you view the website, certain data relating to your device is automatically recorded. The data recorded is automatically logged by the web server hosting the website whilst you are viewing the site, without any specific declaration or action on your part. The system generates statistical data from this information. The information is used exclusively in aggregated form to ensure the security and improvement of the website's operation, as well as for statistical purposes.

Purpose of data processing	Legal basis of data processing:	Scope of processed data:	Duration of data processing:
To distinguish between visitors to the HSUP website, identify their current session, monitor the functioning of the website's services and compile statistics. To ensure users have access to the website. To improve IT security, including by enabling the data to be used to identify the source in the event of misuse.	To pursue the Data Controller's legitimate interests [Article 6(1)(f) of the GDPR]	The data subject (website visitor) - IP address, - the time of the visit, - the pages visited, - the website from which the visit originated, - the type of browser used, - the type of operating system, and - the domain name and address of the internet service provider.	For a maximum of 30 days from the date of viewing the website.

2.3.2. Processing of cookies

On the HSUP website, the Data Controller uses cookies to facilitate the use of the website and to track activities carried out on the site. A cookie is a small data packet, a text file, which is stored for a pre-determined period in the central data storage of a user's computer or mobile device, or in their web browser, when they visit the website.

In managing cookies, we also use a service called Google Analytics on the HSUP website. This is an online information and analytics service introduced and operated by Google Inc., which enables Google Inc. and website operators to understand which users are visiting the website and how they are using it. The cookies placed collect data relating to the device and browser used for browsing, IP addresses, and data concerning activity on the website. These cookies are deleted two years after use. The data processor for this service is Google Inc., Amphitheatre Parkway, Mountain View, CA 94043, USA, whose European representative is Google Dublin EU HQ, Google Building Gordon House, Barrow St, Dublin 4, Ireland, 8QQ7+WJ6 Dublin, Ireland.

You can find details on how Google Inc. handles cookies via the links below:
https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
https://policies.google.com/technologies/cookies

2.3.3. References and links

On the HSUP website, visitors may also find references (links, hyperlinks) intended to provide information, but which redirect to pages maintained by other service providers, where the Data Controller has no influence over the practices relating to the processing of personal data. If the data subject clicks on such a hyperlink and navigates to another provider's website, they are advised to read the privacy policy of the provider of that website regarding the processing and protection of personal data. The Agency has no influence over the content or security of websites operated by its partners and therefore accepts no liability for them.

Part IV
Rights of data subjects and remedies

Data subjects may exercise the rights set out in this notice and those guaranteed to them by law by contacting the Agency using any of the contact details provided in this notice.

1. Rights of the Data Subject:

Withdrawal of consent:
Where data processing is based on consent, the data subject has the right to withdraw their consent at any time, free of charge.

Right to request information (right of access):
Any data subject may request information from the Agency as to whether their personal data is being processed, and, if so, what data the Agency is processing, on what legal basis, for what purpose, from what source, and for how long; to whom, when, under what legislation, access to which of their personal data has been granted, or to whom such data has been disclosed.
Upon the data subject's request, we will send the information to the data subject at the contact details provided without delay, but within a maximum of 25 days.

The right to rectification:
Any data subject may request that any personal data processed by the Agency be rectified or supplemented.

Right to erasure ('right to be forgotten'):
Any data subject may request the erasure of their data if
a) their personal data are no longer necessary for the purposes for which the Agency processed them;
b) the Data Subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
c) the data subject objects to the processing and there are no other legitimate grounds for the processing;
d) the Agency has processed the data subject's personal data unlawfully;
e) the data subject's personal data must be erased in order to comply with a legal obligation to which the Agency is subject;
f) the personal data were collected in connection with the offering of information society services to children.

The right to erasure and restriction of processing:
Any data subject may request the erasure of their data if
a) the data subject disputes the accuracy of the personal data; in this case, the erasure/restriction shall apply for a period enabling the Agency to verify the accuracy of the personal data;
b) the processing is unlawful and the data subject objects to the erasure of the data and requests, instead, that its use be restricted;

c) the Agency no longer needs the personal data for the purposes of processing, but the data subject requires it for the establishment, exercise or defence of legal claims; or
d) the data subject has objected to the processing; in this case, the restriction shall apply for as long as it remains to be determined whether the Agency's legitimate grounds take precedence over those of the data subject.
The restriction shall remain in place for as long as the specified reason necessitates the storage of the data.

Right to object:
Any person may object, via the contact details provided, to the processing of personal data carried out in the performance of a task carried out in the public interest or on the basis of a legitimate interest. In such cases, the Agency may no longer process the personal data unless it demonstrates that the processing is justified on legitimate grounds, which override the data subject's interests, rights and freedoms, or which relate to the establishment, exercise or defence of legal claims.
We will examine the objection as soon as possible after the request is submitted, but within a maximum of 15 days, reach a decision on its merits and send notification of the decision to the contact details provided.

Right to data portability:
The data subject may request that the Agency provide them with the personal data relating to them, which the data subject has made available to the Agency, in a structured, commonly used and machine-readable format; and is entitled to transmit those data to another data controller, provided that the processing is based on the data subject's consent or on a contract and is carried out by automated means. In exercising their right to data portability, the data subject is entitled – where technically feasible – to request the direct transfer of personal data between data controllers.

2. Remedies available in relation to data processing:

If the data subject considers that the processing of their personal data by the Agency contravenes the provisions of the GDPR or other legislation relating to data protection, they are entitled to lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH), which is responsible for supervising data protection.

Contact details for the supervisory authority:

Hungarian National Authority for Data Protection and Freedom of Information
Mailing address: H-1363 Budapest, Pf. 9.
Address: H-1055 Budapest, Falk Miksa utca 9-11.
Telephone: +36 (1) 391-1400
Fax: +36 (1) 391-1410
E-mail: ugyfelszolgalat@naih.hu
URL: https://naih.hu

In the event of a breach of the data subject's rights, they may bring the matter before a court. The court shall hear such cases in priority proceedings. The data subject may, at their discretion, bring the action before the court with jurisdiction over their place of residence or place of stay.

Date of the last amendment to this privacy notice:

24 September 2026