

EDUTUS University

Data Processing Policy on data processing regarding persons registering for the 2022 Drone Racing World Cup Hungary as competitors

I. General Provisions

EDUTUS University (OM identifier: FI83139, hereinafter referred to as: University) as data controller, pursuant to the laws applicable to the processing of personal data, notably the general data protection regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council, GDPR, hereinafter as: general data protection regulation), as well as Act CXII of 2011 on information self-determination and freedom of information (Infotv.), for the purposes of the data processing set out under point V hereto, hereby issues the present Data Processing Policy (hereinafter referred to as: Policy).

The University as data controller accepts the contents of the present Policy as legally binding to themselves, and undertakes to conform all data processing related to their activities with the requirements set out in the present Policy and in applicable legislation.

II. Terms and definitions

For the purposes of the present Policy, the terms below shall be construed as follows:

- **Personal data:** any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.
- **Sensitive personal data:** personal data, revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade- union membership; data concerning the health or sex life and sexual orientation of natural persons; and genetic data or biometric data aimed at the identification of natural persons.
- **Data subject:** a natural person who can be identified, directly or indirectly by the personal data.
- **Data processing:** any operation or set of operations performed upon personal data or sets of personal data, whether or not by automated means, 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.
- **Data controller:** the entity who alone (or in case of joint controllership, jointly with others) determines the purposes and means of the processing of personal data, and executes those (or has them executed with the data processor)
- **Data processor:** any entity which processes personal data on behalf of the controller.
- **Data processing by processor:** any operation or set of operations performed upon personal data by the data processor.
- **Personal data breach:** a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised communication or unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Any occurrence shall be construed as a personal data breach where unauthorised persons (persons not duly qualified and entitled) may access personal data, e. g. the forwarding of an e-mail containing personal data to a person other than the intended recipient thereof, the loss of an information or communications technological device, also including any breach of IT systems.

- **Third party:** any natural person, legal entity or entity without legal personhood, that is different from the data subject, data controller, data processor, or the persons involved in carrying out operations regarding the personal data under the direct supervision of the data controller or the data processor.
- **Recipient:** the natural person, legal entity or entity without legal personhood to whom (or to which) personal data is made accessible by the data controller or data processor.
- **Data erasure:** the final and irreversible destruction of data.
- **NAIH:** the National Authority for Data Protection and Freedom of Information

III. The data controller

The management of your data hereunder is controlled by EDUTUS University.

Name: EDUTUS University
Registered seat: H-2800 Tatabánya, Stúdió tér 1.
OM identifier: FI83139
Tax ID: 10897706-2-42
Represented by: Andrea Némethné dr. Gál, rector
E-mail: nemethne.gal.andrea@edutus.hu

IV. Data protection officer

The data protection officer may be contacted any time at the following contact details:

Name: Helén Hartdégén, dr.
Address: 2800 Tatabánya, Stúdió tér 1.
Telephone: +36 (20) 278 4647
E-mail: hartdegen.helen@edutus.hu

V. Data processing

1. Sphere of data processing: the management of data regarding the registering competitors registering to the 2022 Drone Racing World Cup Hungary organised by the University.
2. Data sources: The personal data per point 3 hereto is acquired by the University via the international registration interface of the Competition (<https://droneracehungary.hu/faiwc/en/registration-for-pilots>).
3. Processed personal data categories: In the course of the data processing per the present point, the University shall process the following personal data types:
 1. Name
 2. Country of origin
 3. Nationality
 4. Address
 5. E-mail address
 6. Phone number

7. Place of birth
 8. Date of birth
 9. Identity Document or Passport number
 10. FAI Number
 11. Photograph
 12. Social Media Link
4. Purpose of data processing: The personal data per point 3 hereto is processed by the University for the following purposes:
 - the competitor's nomination/registration, moreover, the provision of miscellaneous services in connection with the Competition (e. g. entry control to the Competition, provision of lodging and shuttling to the competition location and the lodgings);
 5. Legal grounds of the data processing: The University processes the personal data set out under point 3 hereto per Article 6 (1) of the General Data Protection Regulation (GDPR).
 6. Location of the data processing: The registered seat of the University, and the private server of the University.
 7. Timeframe of the data processing: The University processes the personal data set out under point 3 hereto until the 30th of September 2022.
 8. Legal consequences of failure in data provision: Should the data subject or their legal guarding fail to give the University consent to the processing of the personal data set out under point 3 hereto, the University shall then be unable to ensure the adequate participation of the data subject in the Competition, and will be rendered unable to provide their miscellaneous services connected to the Competition.
 9. Data forwarding:

| No. | Recipient of the forwarded data | Contact information of the recipient | Forwarded data categories |
|-----|---|--|---------------------------|
| 1. | Edutus University | edutus.egyetem@gmail.com | Personal Data (V./3.) |
| 2. | Hungarian Drone and Multicopter Association | info@droneracinghungary.com | Personal Data (V./3.) |
| 3. | AVL-ZalaZONE Kft | zone@apz.hu | Personal Data (V./3.) |

10. Data processor:

Company name: CSAO Gazdasági Szolgáltató Kft.

Company registry number: 10 09 022239

Address: 3346 Bélapátfalva, Marx K. utca 20.

E-mail address: csajtai.kristof@gmail.com

The rights of the data subjects and the exercising thereof

Pursuant to the data protection legislation in place, the data subject is entitled to:

- a) request access to their personal data,
- b) request corrections regarding their personal data,
- c) request deletion of their personal data,
- d) request the restriction of their personal data,

- e) object to the processing of their personal data,
- f) request the porting of their personal data,
- g) revoke their consent regarding data processing
- h) file a complaint regarding any grievances.

a) Right of access:

The data subject is entitled to receive feedback from the University on whether their personal data is being processed or not, and if so, to request access to their personal data.

The data subject is entitled to request copies of their personal data being processed. For the purposes of identification, the University may request additional information from the subject, and – with the exception of the first copy being handed out – to charge any warranted administrative fees that further copies may entail.

b) Right of correction:

The data subject is entitled to request any of their erroneous personal data to be rectified by the University. Based on the given data processing purpose, the data subject may be entitled to request incomplete personal data to be amended.

c) Right of deletion („right to be forgotten“):

The data subject is entitled to request the University to delete their personal data, and the University shall delete these if any of the following criteria are met:

- a) the personal data are no longer needed for the purpose that the University had collected or processed them for;
- b) the data subject revoked their consent given pursuant to Article 6 (1) a) of the general data protection regulation, and there are no further legal grounds to the data processing;
- c) the data subject objects per Article 21 (1) of the general data protection regulation to their personal data being processed, and no legal grounds warranting the data processing prevail over this, or if the data subject objects to their personal data being processed per Article 21 (2) of the general data protection regulation;
- d) the personal data was processed unlawfully by the University;
- e) pursuant to EU or Hungarian legislation, in order to comply with legal obligations of the University as data controller, the personal data have to be deleted.

d) Right of restriction:

The data subject is entitled to request the restriction of their personal data if any of the following criteria are met:

- a) the data subject contests the factuality of the personal data, in which case the restriction shall apply to the period of time affording the data controller the chance to verify the factuality of the personal data;
- b) the data processing is unlawful, and the data subject objects to the deletion of their personal data, and requests instead the restriction of the use thereof;
- c) the data controller no longer has need of the personal data for the purposes of data processing, but the data subject requires them for the filing of legal motions, claims, or to protect themselves against such; or
- d) the data subject has objected to their personal data being processed per Article 21 (1) of the general data protection regulation, in which case the restriction shall apply for the period of time necessary to ascertain whether the legal interests of the University prevail over the legal interests of the data subject.

In this case, the University shall mark the personal data in question, which, with the exception of storage, only be processed by the consent of the data subject, or for the filing of legal motions, claims or for the defence against such, for the protection of other natural or legal persons' interests, or for the public good of either the European Union or a member state thereof.

e) Right to objection:

The data subject is entitled to object at any time, for any reasons of their own, to the processing of their personal data per Article 6 (1) e) of f) of the general data protection regulation, including the profiling based on said regulations, and to request that the University no longer process their personal data.

f) Right to data portability:

The data subject is entitled to request that their given personal data be provided to them in an articulated, widely recognised, computer readable format (i. e. digital format) from the University, and is entitled moreover – where technically possible – to request these data to be forwarded to another data controller without the University hindering this.

g) Right to revoke consent:

The data subject is entitled to revoke their consent at any time. The revocation of consent does not affect the legality of any data processing conducted per the given consent prior to the revocation. The data subject shall be informed thereof prior to the consent being given. The revocation of consent shall be made possible in an equally simple manner such as the giving thereof.

Should the data subject revoke their consent given to the University regarding the processing of their personal data, it may be possible for the University to be rendered partially or wholly unable to provide the services requested of them.

Exercising of the right to revoke consent does not affect the legality of any data processing conducted per the given consent prior to the revocation.

h) Right of filing a complaint with the competent authority

Should the data subject be of the opinion that the data processing is in violation of the regulations of the general data protection regulation of the Infotv., the data subject is entitled to address the national data protection authority and to file a complaint, generally in the authority of their habitual place of abode, their place of employment, or in the country of the purported violation having taken place.

In case of a violation of their rights, the data subject may file a legal action against the University as data controller before a court of law. The lawsuit shall fall within the authority of the regional courts (Metropolitan Court of Budapest: 1055 Budapest, Markó u. 27.). Per the election of the data subject, the lawsuit may also be commenced in the venue of the data subject's domicile or habitual place of abode. The courts shall preside over the lawsuit out of turn.

Should the University as data controller damage other by the unlawful processing of data or by breaching the data security provisions that apply, they shall be required to pay damages. If the data controller infringes upon the personal rights of the data subject by the unlawful processing of their data or by breaching the data security provisions that apply, they may sue the University as data controller for compensation for aggravated damages. The data controller shall also be liable towards the data subject for any damage caused by the data processor as well. The University shall not be held liable, if the damage is due to an unavoidable cause falling outside of the scope of the data processing. The University shall not reimburse any damages occurring due to the wilful or grossly negligent conduct of the damaged party.

Rights of remedy and complaints may be exercised before the National Authority for Data Protection and Freedom of Information:

Name: National Authority for Data Protection and Freedom of Information

Registered seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, Pf.: 5.

Telephone: 06.1.391.1400

Fax: 06.1.391.1410

E-mail: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>

VI. Miscellaneous provisions

Due to the possibility of the pertaining laws being amended, the present Policy may also be subject to change. In any such cases, we will provide information of the changes having taken place. Should these changes affect the processing of data per your given consent, we will re-request your consent where necessary.

Budapest, 19th of August 2022.