

PERSONAL DATA AND PRIVACY POLICY
for Adult Training Programs and Teacher's Vocational Education and Training
at the Liszt Ferenc Academy of Music

This privacy policy shall cover the processing of personal data of students and applicants of Adult Training Programs and of Teacher's Vocational Education and Training (hereinafter referred to as: Adult Training) at the Liszt Ferenc Academy of Music in order to make this process transparent to the greatest extent feasible.

DATA CONTROLLER

Liszt Ferenc Academy of Music (hereinafter referred to as: Academy)

Seat: 1061 Budapest, Liszt Ferenc tér 8.;

Represented by: Dr. Andrea VIGH, President, and Attila Bertalan KOTÁN, Chancellor;

Website/contact details: <https://uni.lisztacademy.hu/contact-us>

The Academy, as data controller, shall make all efforts to comply with stipulations of Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter referred to as: Privacy Act), and 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 referred to as GDPR) under Regulation (EU) 2016/679 of the European Parliament and of the Council, and other related legal regulations.

The Academy's **data protection officer** is dr. Éva KUJALEK (E-mail: adatkezeles@zeneakademia.hu; Tel.: +36 (1) 462 46 00/155; Address: 1077 Budapest, Wesselényi utca 52.; Postal address: 1391 Budapest, Pf. 206.).

I. INFORMATION ON DATA PROCESSING

Purpose of data processing	Organization of Adult Training as stipulated by law.
Legal basis of data processing	Data processing is necessary for compliance with a legal obligation of the Academy under Article 6(1)(c) of the GDPR. Data processing is required for compliance with the contractual agreement between the Academy and the Adult Training Participant under Article 6(1)(b) of the GDPR.
Categories of data subjects	Adult Training Applicants and Students of such programmes.



Categories of personal data	<p>For organizational purposes of Adult Training, the Academy handles</p> <ul style="list-style-type: none">a) the Student's<ul style="list-style-type: none">aa) Personal Identifiable Information (PII)¹ and Student ID Number with respect to generating the Student ID Number at the educational authority;ab) correspondence e-mail address;ac) information on highest qualification. b) Adult Training related data about the Student's<ul style="list-style-type: none">ba) highest qualification, other qualifications and skills, knowledge of foreign language;bb) registration and completion of Adult Training; moreover, in case of failure of completion, deregistration;bc) grading, record-keeping and classification;bd) liabilities and granted student loans in connection to the programme.² <p>Information required complying with the contractual agreement between the Academy and the Adult Training Student (hereinafter referred to as Adult Training Contract):</p> <ul style="list-style-type: none">a) Personal Identifiable Information (PII);b) correspondence e-mail address;c) phone number;d) permanent address and postal address (if different from the permanent address);e) highest qualification;g) name of employer (workplace). <p>Billing information (for private individuals):</p> <ul style="list-style-type: none">a) billing name;b) billing address (permanent address);c) tax identification number. <p>Adult Training related documents of other type containing personal data such as:</p> <ul style="list-style-type: none">- original documents or certified copies of those, made by Academy staff, required for commencement of and participation in training;- competency tests and proof of prior results of attainment examinations;- digital learning and testing material serving
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¹ Personal Identifiable Information (PII), under Act XX of 1996 on the Identification Methods Serving to Replace the Personal Identifier and the Use of Identification Codes, is as follows: family name and given name; family name and given name at birth; place and date of birth; mother's full maiden name.

² Article 1 of Paragraph 21 of Act LXXVII/2013 on Adult Education.



	<p>as proof of e- learning;</p> <ul style="list-style-type: none">- teaching journal;- attendance register;- test records;- official records of final examination;- registry of certificates with a reference number.
Data storage time	<p>Complying with Article 1 of Paragraph 21 of Act LXXVII/2013 on Adult Education, personal data is stored by the Academy for eight consecutive years, counting from the day of signing the Adult Training Contract.³</p> <p>The Academy keeps, for a period of eight consecutive years, counting from the day of signing the Adult Training Contract, the following documents:</p> <ul style="list-style-type: none">- the registry of certificates with a reference number;- teaching journals;- the attendance register;- test records;- official records of final examination,;- proof of scheduled delivery of Adult Training Programme as per the Adult Training Contract;
Recipients	<p>The Kodály Zoltán Musical Pedagogy Institute and Associates of the Finance Directorate.</p>
Obligation to provide personal data	<p>Completion of the application form and signing of an Adult Training Contract is prerequisite for participation in Adult Training.</p>
Automated decision-making	<p>Non-applicable</p>

II. Access to data and data security measures

Personal data collected over the course of the application process is accessible to the following persons:

- a) the Kodály Zoltán Musical Pedagogy Institute and
- b) the Finance Directorate of the Academy, i.e. appointed staff members (one original copy of the Adult Training Contract is kept by Finance Directorate; the Finance Directorate has access to billing information to prepare the participation fee invoice).

Staff members of the Academy may only process and handle personal data received during the application process in connection to the organization of Adult Training.

³ Article 5 of Paragraph 21 of Act LXXVII/2013 on Adult Education.



If the applicant does not sign an Adult Training Contract with the Academy and does not participate in Adult Training, consequently, the applicant's personal data is erased by the Adult Training's start date, at the latest.

The Academy, hereby, informs Adult Training applicants that government agencies responsible for monitoring adult training (i.e. central state administrative body responsible for adult training, Educational Authority), in order to fulfil their legal obligations, can exercise their right to access documents related to Adult Training, hence, personal data of Adult Training applicants.

Moreover, the Academy informs Adult Training Students that, in order to comply with its legal obligations towards government agencies responsible for monitoring adult training, the Academy shares the Participant's:

- Personal Identifiable Information (PII);
- correspondence e-mail address;
- information on highest qualifications;
- information on the cost bearer of the Adult Training.

The Academy adapts required measures, such as Firewall Security and Endpoint Protection Software, to prevent unauthorized access and modification of personal data via uninterrupted monitoring of its systems.

The Academy makes every effort to prevent any data protection breach. In case of such event, the Academy shall respond to such claim within the timeframe specified by the GDPR and its internal regulations, i.e. within no more than 72 hours, and issues a reporting statement.

The Academy regularly tests the effectiveness of its adapted technical and organizational measures assuring security of data processing.

III. Rights for Data Subjects

- a) the right to access personal data and supplementary information – shared by the Academy upon request
- b) the right to be informed about the collection and the use of their personal data handled by the Academy
- c) the right to have inaccurate personal data rectified, or completed if it is incomplete
- d) the right to restrict processing in certain circumstances (e.g. in the case of debated accuracy of personal data)
- e) the right to object to processing in certain circumstances (if, under Article 6 section (1) point f) of the GDPR, the legal basis for data processing is of legitimate or public interest) – in case of objection, the Academy shall no longer process such personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims)
- f) the right to data portability, which allows the data subject to obtain and reuse their personal data for their own purposes across different services (in case the legal basis for data processing is consent of the data subject or a contract to which the data subject is party, then, under Article 6 section (1) points a) and b) of the GDPR, the data subject can



request access to personal data in commonly used, machine readable format; moreover, the data subject can request for this information to be shared with a third-party)

- g) the right to erasure (to be forgotten) of personal data in certain circumstances – i.e. if there is no further lawful basis to data processing.

The data subject has the right to withdraw his or her consent at any time. In case of data consent withdrawal, the Academy erases all personal data. The withdrawal does not affect the consent of the data subject related to prior data processing.

To exercise the rights for data subjects, you can contact Academy Staff via e-mail at adatkezeles@zeneakademia.hu. Your request will be handled with 15 days at the latest.

IV. Judicial Remedies and Data Processing

1. If you have a complaint about the Academy's data processing, please contact the data protection officer of the Academy, who can further investigate your claim.
2. You may also contact the Hungarian National Authority for Data Protection and Freedom of Information (Seat: Falk Miksa Str. 9-11, Budapest H-1055, postal address: Pf. 9, Budapest H-1363, e-mail: ugyfelszolgalat@naih.hu, website: <https://www.naih.hu/about-the-authority>).
3. In the event of unlawful processing of data, you may take your case to court (<https://birosag.hu/en/hungarian-judicial-system>).