



DATA PROCESSING INFORMATION

in connection with the remote online examinations in the
epidemiological emergency situation



This Data Processing Information is a summary of that information you need to know about how we will use, safeguard your personal data under General Data Protection Regulation (GDPR) during the remote online examinations in the epidemiological emergency situation.

1. Who can you turn to?

The University of Szeged is the data controller for the data processing of the remote online examinations due to the epidemiological emergency situation, but the concrete data processing is done through the following organizational unit.

University of Szeged

Name of contact person: Tamara Szabó

Address: 6726, Szeged, Temesvári krt. 31.

Phone: +36 (62) 342-347

E-mail: to-vez@etszk.u-szeged.hu

Webpage: <http://www.etszk.u-szeged.hu/>

Name and contact details of the data protection officer: see point 11.1. of this Data Processing Information.

Please do not hesitate to contact us if you have any questions regarding data processing.

2. What are the main legal rules?

We inform you that your personal data will be processed in compliance 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 (GDPR), and
- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information, and
- Act CCIV of 2011 on National Higher Education

3. Does University of Szeged have a Data Protection Code?

Yes. The Data Protection Code of the University of Szeged is available at the following link:

<http://www.u-szeged.hu/szabalyzatok>



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4. What data processing are we implementing?

The following data processing takes place during the remote online examinations due to the epidemiological emergency situation – 1. registration for examinations, 2. remote written (part) examination, 3. remote oral (part) examination, 4. making records in the form of video recording of the remote oral (part) examination.

4.1. Registration for examinations

What kind of data?	Why do we collect it?	What is the lawful basis of processing?	How long do we store it?
Registration for examinations <ul style="list-style-type: none"> • chosen subject and course • chosen exam date • registering person user • time of registration 	On basis of the obligation of the record keeping regulated by the law	Fulfilling legal obligation on the basis of the [Point c) of Subsection (1) of Article 6 of the GDPR and Sub Point bm), Point 1., Part I/B, Chapter I., Annex no. 3, of the Act CCIV of 2011 on National Higher Education]	For 5 years counted from the end of the academic semester.

4.2. Remote written (part) examination

What kind of data?	Why do we collect it?	What is the lawful basis of processing?	How long do we store it?
Visual identification (optional) <ul style="list-style-type: none"> • checking the examinee's identity via any personal documents having a portrait photo on it shown by the examinee 	For the sake of holding and taking remote online examinations	Public interest [Point e) of Subsection (1) of Article 6 of the GDPR]	We do not store data in connection with visual identification itself, however, see point 4.4



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<p>IT identification</p> <ul style="list-style-type: none"> checking username and password 	<p>On basis of the obligation of the record keeping regulated by the law</p>	<p>Fulfilling legal obligation on the basis of the [Point c) of Subsection (1) of Article 6 of the GDPR and Sub Point bm), Point 1., Part I/B, Chapter I., Annex no. 3, of the Act CCIV of 2011 on National Higher</p>	<p>For 5 years counted from the end of the academic semester.</p>
<p>Security log</p> <ul style="list-style-type: none"> the time of starting the exam the time of ending the exam 			
<ul style="list-style-type: none"> the date(s) of storing the data of the exam on servers the IP address of the workstation used for the examination 		<p>Education]</p>	
<p>Completed test, submitted/uploaded task</p> <ul style="list-style-type: none"> the data content depending on the nature of the test/task 			
<p>Recording of exam result in Neptun</p> <ul style="list-style-type: none"> grade date instructor giving the grade person recording the grade credit obtained 		<p>Fulfilling legal obligation on the basis of the [Point c) of Subsection (1) of Article 6 of the GDPR and Sub Point bd), Point 1., Part I/B, Chapter I., Annex no. 3, of the Act CCIV of 2011 on National Higher Education]</p>	<p>For 80 years counted from the date of the termination of the student legal status.</p>



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4.3. Remote oral (part) examination

What kind of data?	Why do we collect it?	What is the lawful basis of processing?	How long do we store it?
Visual identification (optional) <ul style="list-style-type: none"> • checking the examinee's identity via any personal documents having a portrait photo on it shown by the examinee 	For the sake of holding and taking remote online examinations	Public interest [Point e) of Subsection (1) of Article 6 of the GDPR]	We do not store data in connection with visual identification itself, however, see point 4.4
IT identification <ul style="list-style-type: none"> • checking username and password 	On basis of the obligation of the record keeping regulated by the law	Fulfilling legal obligation on the basis of the [Point c) of Subsection (1) of Article 6 of the GDPR	For 5 years counted from the end of the academic semester.
Security log			
<ul style="list-style-type: none"> • the time of starting the exam • the time of ending the exam • the IP address of the workstation used for the examination 		and Sub Point bm), Point 1., Part I/B, Chapter I., Annex no. 3, of the Act CCIV of 2011 on National Higher Education]	
Oral examination <ul style="list-style-type: none"> • the questions asked and the answers given during the examination 			We do not store data in connection with oral examination itself, however, see point 4.4



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Recording of exam result in Neptun <ul style="list-style-type: none"> • grade • date • instructor giving a grade • person recording the grade • credit obtained 		Fulfilling legal obligation on the basis of the [Point c) of Subsection (1) of Article 6 of the GDPR and Sub Point bd), Point 1., Part I/B, Chapter I., Annex no. 3, of the Act CCIV of 2011 on National Higher Education]	For 80 years counted from the date of the termination of the student legal status.
Inspection via camera (at the beginning of or during the exam upon the examiner's request for the purity of the exam the student rotates his/her camera)	For the sake of the purity of taking / holding the exam	Public interest (performing a public task) [Point e) of Subsection (1) of Article 6 of the GDPR	We do not store data in connection with visual identification itself, however, see point 4.4

4.4. Making records in the form of video recording of the remote oral (part) examination

What kind of data?	Why do we collect it?	What is the lawful basis of processing?	How long do we store it?
During the examination recording the screen content and voice with the framework used for online remote exams or with the software approved for data security running on the Instructor's workstation.	For the sake of ensuring publicity in a possible case of an exam participating in 1 instructor and 1 student optionally on the basis of the	Public interest [Point e) of Subsection (1) of Article 6 of the GDPR and subject to its resolution of NAIH/2020/2888 of the Hungarian National Authority for Data Protection and	Until the end of the second week following the examination period (till the end of the so-called complaint period).
	point 13.1 of the Academic and Examination Regulations of the University of Szeged.	The National Authority for Data Protection and Freedom of Information with regard to commitment 2888/2020/NAIH	



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5. Who can get to know your personal data?

In connection with the remote online examination in the epidemiological emergency situation your personal data may be disclosed to the data controller organizational unit mentioned in point 1 of this Data Processing Information, as well as to those to whom your personal data is given over or transferred (jointly: recipients).

5.1. Giving over of data within the organization

Due to the division of labour within the organization, in the legitimate interest [Point f) of Subsection (1) of Article 6 of the GDPR] the personal data will be given over to the following organizational units of the University of Szeged:

- to coordinate the educational administration for the Educational Directorate of the University of Szeged, and
- due to the coordination of the BigBlueButton video conferencing service (troubleshooting, problem detection) connected to the online attendance occasion in the Coospace system for the IT and Service Directorate of the University of Szeged, and
- in the case of student legal remedy, disciplinary and ethical proceedings, to the extent necessary for the Legal, Administrative and HR Chief-Directorate of the University of Szeged to carry out such tasks as may be necessary for the conduct such matters.

All organizational units of the University of Szeged are bound by data protection regulations, and with regard to their data processing, they pay special attention to the principles of purpose limitation, fairness, transparency and data minimisation.

5.2. Transfer of data outside the organization

In connection with the remote online examinations in the epidemiological emergency situation we do not transfer data either inland or abroad.

At the same time, we would like to inform you that, regardless of the epidemiological emergency, the fulfilment of a legal obligation from the Neptun system in general [Point c) of Subsection (1) of Article 6 of the GDPR] we provide data to the higher education information system as a national, central register.



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6. Do we resort to a data processor?

Yes, in connection with the remote online examinations in the epidemiological emergency situation, in the case of problem detection and troubleshooting we avail of the supporting service of a data processor which is the developer of the Coospace system, a part of the electronic academic system of the University of Szeged and used for the remote online examinations.

Name of the data processor:	DEXTER Informatics and Consulting Ltd.
Description of data processing operations:	problem detection, troubleshooting

7. Do we collect personal data about you from another source?

No. We collect the personal data about you from you, and do not collect data from other sources.

8. Is there an automated decision making during data processing?

There is an automated decision making only when the exam tests, being defined so by the instructor, are completed.

We inform you that the point 13.3 of the Academic and Examination Regulations of the University of Szeged (quoted as follows) applies also to the exam tests evaluated automatically. *“The examiner must notify students of the written evaluation, the answer key and the criteria of evaluation; direct inspection of the test itself must also be made available to students.”*

Based on this, in connection with the automated test evaluation, you have the right to

- check the evaluation in the same way as written exams evaluated by the instructor,
- request human intervention and to express your point of view on this,
- or - object to the automated test evaluation through the contact person.

9. What are the legal consequences for non-disclosure?

Generally, in the case of failing giving the data detailed in the point 4 at an online remote examination, it results in not holding the examination. If the registration for the exam (point 4.1.) is omitted, it means that the given registered subject will not be completed in the semester. In connection with this, it is



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important to pay attention to the rule written in the point 7.3 of the Academic and Examination Regulations of the University of Szeged: *“A non-completed (failed) subject (or course thereof) can be taken three times throughout the course of students’ studies.”*

Non-completion of a course registered for third time results in terminating the student legal status unilaterally.

In the case of failing giving data detailed in the points 4.2 and 4.3 at the remote online oral and written (part) examinations, the student is considered being absent in an unjustified way. We call your attention that on the one hand this has similar consequences as of failing registering for an exam, on the other hand after the unjustified absence, completion of the course can be made only by a retake exam, however, according to the Subsection (4) of Paragraph 59 of the Act CCIV of 2011 on National Higher Education: *“By means of a unilateral declaration, the institution of higher education shall terminate the student status of the student whose number of unsuccessful retake examinations and repeated retake examinations of the same subject reaches five.”*

You are allowed to object to taking video recording of the examination (point 4.4.) before or at the beginning of the recording, and to ask for non-recording. In this case, however, in practice you disclaim the device, which could serve as a proof for your benefit in the case of complaint or legal remedy.

10. What rights do you have?

You have the rights below in connection with the remote online examinations in the epidemiological emergency situation:

1. right to be informed – you have the right to ask for information on the processing of your personal data. We ensure your right to be informed by preparing and publishing this Data Processing Information.
2. right of access – you have the right to request personal information and a copy of the personal data we handle.
3. right to rectification – should you find inaccuracies in your personal data processed by us, you have the right to ask for rectification.
4. the right to erasure – following the objection when the processing of data is based on the legitimate interests or public task and there are no overriding legitimate grounds for the processing, then you can ask for the erasure of your personal data.
5. right to object – you have the right to object against data processing based on legitimate interests or public task at any time.
6. right to restrict processing – you have the right to ask for the restriction of the processing of your personal data, e.g. after you find inaccuracies in your personal data, you can ask for restriction of processing while the data controller is checking the data, or e.g. exercise of legal claim.
7. right to legal remedy – every data subject has the right to legal remedy in case of an infringement.



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11. What remedies can you make?

11.1. You can turn to the data protection officer (DPO) of the University of Szeged:

Dr. Dóra Lajkó

Address: University of Szeged, Rector's Office, Data Protection Office

H-6720 Szeged 13 Dugonics Square, 3rd floor, room 304

Phone: +36 (62) 342-376, +36 (62) 544-000/2376 Email:

dpo@szte.hu

11.2. You can submit a **legal remedy** request according to the Regulations of Submitting and Judging Student legal remedy request in the University of Szeged.

The request has to be addressed to the University Rector and has to be submitted at the data controller's address given in the point 1. You have 15 days for submitting your request counted from the day when the detrimental decision becomes known for you. The legal remedy regulations can be found here:

<https://u-szeged.hu/egyetemrol-141002/szabalyzatok/szabalyzat-hallgatoj>

11.3. You can lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information:

Hungarian National Authority for Data Protection and Freedom of Information Address:

H-1055 Budapest, Falk Miksa utca 9-11.

Mailing address: H-1363 Budapest, Pf. 9.

Phone: +36 (1) 391-1400

E-mail: ugyfelszolgalat@naih.hu

11.3. You can turn to **Court**

Depending on the nature of the unlawful data processing you are experiencing, you may institute legal action, even against the Authority. You can find out about the possibilities, methods and forums for starting a lawsuit at the following website: <https://birosag.hu/birosagi-szervezetek>

12. Does the University of Szeged have a DPO?

Yes. The contact details of the data protection officer (DPO) of the University of Szeged can be found in point 11.1. The DPO acts as a contact point between you and the University of Szeged.