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## Data Processing and Privacy Notice

The HUN-REN Headquarters or Data Controller is fully committed to ensuring the confidentiality and security of personal data and the exercise of the right to informational self-determination. The personal data provided by data subjects (hereinafter: Data Subject) are processed by the HUN-REN Headquarters lawfully and fairly and in a transparent manner (based on the principles of lawfulness, fairness and transparency), in accordance with the applicable legal provisions in force, ensuring their security and putting in place all the technical and organizational measures necessary to enforce the relevant legislative provisions.

This Data Processing and Data Privacy Notice (hereinafter: Data Privacy Notice) has been drawn up in accordance with 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: GDPR Regulation) and Act CXII of 2011 on the Right to Information Self-Determination and Freedom of Information (hereinafter: Info Act.) applicable from 25 May 2018.

The HUN-REN Headquarters reserves the right to alter or remove any of the content, naming or address of the website, as well as to modify its appearance, content, themes or functionality at any time without prior notice. These changes and modifications, however, shall be without prejudice to the purpose of the data processing and the consent to the processing, otherwise Data Subjects shall be informed in due time.

### 1. Name, Address and Contact Details of the Data Controller

HUN-REN Központ (HUN-REN Headquarters)  
Registered seat: 1052 Budapest, Piarista u. 4.  
Telephone: +36 30 155 9978  
Email: [hun-ren@hun-ren.hu](mailto:hun-ren@hun-ren.hu)

### 2. Data Processing

#### 2.1. Data processed by the Data Controller when processing data relating to recruitment

2.1.1. The Data Controller's data processing, in the context of the career opportunity it provides for the purposes of **recruitment** or **filling staff shortage** in its operations, and in the event of rejection of an application by a Data Subject applying for an advertised job vacancy, or despite a positive decision on the application if the job is not filled by a Data Subject applicant selected by the Data Controller, or, in the absence of a job advertisement by the Data Controller, when the application is sent to the Data Controller, or when arranging a job interview or meeting, or when **making** (repeated) **contact**, shall be based on the **Data Subject's consent** [Article 6(1)(a) of the GDPR]. Consent may be withdrawn at any time.

2.2.2. In this context, the Data Controller processes the following data:

– Name, e-mail address of the Data Subject; salary requirements if the job offer requires this data to be recorded, other personal data provided by the Data Subject in his/her CV for the purposes of applying for the job.

2.1.3. If a job application is accepted, the Data Controller will process the personal data of the selected Data Subject applicant for this purpose **until the position is filled**.

2.1.4. The Data Controller shall **erase the data without undue delay** or **process them for a further two years for the purpose of re-contacting** the Data Subject

– if the application is rejected, in respect of the Data Subject applicant who was not selected  
– if the application is accepted but the position is not filled by the Data Subject selected by the Data Controller,

subject to the Data Subject's specific consent. Consent may be withdrawn at any time.

2.1.5. In the absence of a job advertisement placed by the Data Controller, the Data Subject consents, by sending his/her CV to the Data Controller and thus by providing his/her personal data, to the processing of

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his/her personal data for a **period of one year** by the Data Controller **for the purposes of re-contacting** him/her in order to resolve the staff shortage in the Data Controller's operations.

## **2.2. Data processed for contact purposes**

2.2.1. The contact between the Data Controller and the Data Subject, and in this context, the possibility for the Data Subject to raise a question which does not constitute a complaint in writing or by electronic means about the activities of the Data Controller or for any other reason, and the processing carried out by the Data Controller to provide a response, shall be based on the **Data Subject's consent** [Article 6(1)(a) of the GDPR]. Consent may be withdrawn at any time.

2.2.2. In this context, the Data Controller processes the following data:

- personal data provided by the Data Subject in his or her message, including, where applicable, the Data Subject's name; e-mail address; telephone number

2.2.3. The Data Controller shall process the personal data **until the Data Subject's consent is withdrawn** or, in the absence of withdrawal of consent, for **five years** after the Data Controller has provided its services, subject to the statute of limitations for general civil law claims.

## **2.3. Data processed for the purposes of assessing requests for public interest data and data in the public interest**

2.2.1. The legal basis for the data processing carried out by the Data Controller and the Data Subject for the purposes of assessing requests for access to public interest data and data in the public interest is the performance of a task carried out in the public interest [Article 6(1)(e) of the GDPR].

2.3.2. In this context, the Data Controller processes the following data:

- the name and contact details of the Data Subject provided at the time of the request.

2.2.3. The Data Controller shall process the data for **one year**.

## **2.4. Data processed in the Electronic Bidding and Data Reporting System (EPAR)**

### **2.4.1 Creating a user profile in the Electronic Bidding and Data Reporting System (EPAR)**

2.4.1.1. The legal basis for the processing of personal data in the Electronic Bidding and Data Reporting System (EPAR) of the Data Controller for the purposes of creating a user profile is the performance of a task carried out in the public interest [Article 6(1)(e) GDPR].[]

2.4.1.2. The Data Controller processes the following data in the EPAR system:

- the Data Subject's name, date of birth, academic degree, name of the research institution that employs the Data Subject, user name, e-mail address, telephone number, password.

2.4.1.3. The Data Controller shall process the personal data until the Data Subject exercises his or her right to object pursuant to Article 21 of the GDPR.

### **2.4.2. Reporting data in the Electronic Bidding and Data Reporting System (EPAR)**

2.4.2.1. The legal basis for the processing of the personal data of the Data Subjects participating in tenders published by the Data Controller is the performance of a task carried out in the public interest [Article 6(1)(e) GDPR].[]

2.4.2.2. The Data Controller processes the following data in the EPAR system:

- the Data Subject's name, address, date and place of birth, mother's name, tax identification number, nationality, details of children (name, date of birth), professional qualifications, academic degree, position, name of research organization employing the Data Subject, type of employment, name of previous employers, duration of previous employment, applications/grants received, honors, awards, prizes, personal allowances, e-mail address, telephone number.

2.4.2.3. The Data Controller shall process the data until the Data Subject's consent is withdrawn or, in the absence of a withdrawal, for a **period of five years** after the expiry of the period for which the tender was announced, subject to the statute of limitations for general civil law claims.

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## **2.5. Data processed in the HUN-REN Research Network's intellectual property registry system (Orbit Invention and Orbit Asset)**

### **2.5.1. Creating a user profile in Orbit Invention and Orbit Asset**

2.5.1.1. The legal basis for the processing of personal data in the Orbit Invention and Orbit Asset systems of the Data Controller for the purposes of creating a user profile is the performance of a task carried out in the public interest [pursuant to Section 33 (1) of Act LXXVI of 2014, the effective Intellectual Property Management Policy of the HUN-REN Headquarters, the effective Rules of Procedure for the Use of the Intellectual Property Register System of the HUN-REN Research Network and Article 6 (1) (e) of the GDPR].

2.5.1.2. The Data Controller processes the following data in the Orbit Invention and Orbit Asset systems:

- the name, e-mail address, author's share, and employer of the Data Subject;
- details of contracts concluded for the exploitation of intellectual property.

2.5.1.3. The duration of the data processing is determined by the eligibility and exploitation status of the intellectual property concerned, in accordance with the following decisions of the research center:

- a) Registration of an intellectual property produced in the course of employment: a decision by the employer to claim ownership of the intellectual property produced.
- b) Exploitation of an employee's intellectual property: the employer's decision to exercise its right to exploit the employee's intellectual property to the extent permitted by law.
- c) Offering an intellectual property right to the creator: a decision by the employer not to claim ownership of the intellectual property described, and therefore to allow the creator to dispose of it freely.

2.5.1.4. The Data Controller shall retain the processed data for a period of 5 years from the date of offering of the intellectual property to the creator of the work, or from the date of waiving the right to use the intellectual property of the employee, or from the date of registering the work as an independent intellectual property. In respect of the registration of an intellectual property produced in the course of employment, the Data Controller shall continue to process the data for 5 years after the expiry of the validity of the industrial patent derived from it, or, in the case of a patent family, for 5 years after the expiry of the validity of the family member with the longest term of protection.

2.5.1.5. In respect of registered copyright that forms part of the intellectual property produced in the course of employment, or of the employee's exploited intellectual property, the Data Controller shall retain the process data for a period of 75 years from the date of the death of the last deceased author.

2.5.1.6. In the case of intellectual property that is part of or related to intellectual property produced in the course of employment, or the employee's exploited intellectual property protected as a trade secret or otherwise but not protected by industrial property rights, the Data Controller shall retain the processed data for 5 years after the end of the exploitation of the intellectual property.

2.5.1.7. In the event that intellectual property is exploited through the transfer of ownership or under a licensing agreement, the Data Controller shall process the data for 5 years following the end of the exploitation of the intellectual property.

2.5.1.8. The Data Controller shall process the data of persons involved in the process of registration or industrial property right protection or exploitation of a given intellectual property, patent agents or other service providers in the same way as the creators and beneficiaries of the intellectual property concerned, for a period corresponding to the period set out in Clause 2.5.1.2 to 2.5.1.6.

### **2.6. Personal data processed in the whistleblowing system**

2.6.1. The legal basis for processing personal data stored and processed in the whistleblowing system operated by the Data Controller is the fulfilment of the legal obligation applicable to the Data Controller {Article 6 (1) (c) of the GDPR and Sections 18-29 and 41-49 of Act XXV of 2023 on Complaints, Notifications of Public Interest and Rules on Whistleblowing (hereinafter: Complaints Act)}.

2.6.2. The Data Controller shall process the following personal data of the whistleblower, of the person whose conduct or omission gave rise to the notification and of the person who may have access to the information relevant to the investigation of the notification:

- the name, e-mail address or contact details of the contact person;
  - the information contained in the notification;
  - the employment data;
  - the data indicating the type of stakeholding.
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2.6.3. The Data Controller shall process personal data that are essential for the investigation of the notification for the sole purpose of investigating the notification and remedying or terminating the conduct that is the subject of the notification.

2.6.4. Data will be processed for a period of five years, which is the limitation period for general civil law claims, otherwise personal data not required for the investigation will be erased by the Data Controller without undue delay. The data of notifications whose retention is required to comply with a legal obligation of the Data Controller, to take legal action or to initiate an employer sanction: in such cases, the data will be processed until the legal obligation is fulfilled and the proceedings are closed with a final decision.

### **3. Data transfer and recipients**

From the registers maintained by the HUN-REN Headquarters, data are transferred to the following bodies/organizations, as defined by law:

- the research centers belonging to the HUN-REN Research Network;
- the Secretariat of the Hungarian Academy of Sciences (1051 Budapest, Széchenyi István tér 9., mailing address: 1245 Budapest, PO Box 1000.);
- Hungarian National Archives (1014 Budapest, Bécsi kapu tér 2-4., postal address: 1250 Budapest, PO Box 3.) pursuant to the Document Management Policy of the HUN-REN Headquarters and according to the archive plan concerning records not to be discarded;
- Magyar Posta Zrt. (1138 Budapest, Dunavirág u. 2-6.), in respect of data provided in the context of contacts with data subjects;
- the Hungarian Central Statistical Office (1024 Budapest, Keleti Károly u. 5-7., mailing address: 1525 Budapest, PO Box 51.) for statistical purposes, by any means not allowing the identification of the person;
- Questel SAS (WTC - 1300 Routes de Cretes - Batiment 2., entreé H CS 60239, 06904 Sophia - Antipolis Cedex, France) in respect of data relating to the registration of intellectual property;
- SDA DMS Zrt. (1111 Budapest, Budafoki út 59.) in respect of the personal data (e.g.: name, date of birth, place of birth, mother's name, address, tax identification number) contained in the documents recorded in the document management system and stored in the partner database of the system;
- CompuTREND Zrt. (registered seat: 1119 Budapest, Fehérvári út 84, Building A. Floor 2) in respect of data of system users (ID, user name, full name, password), partner master data (ID, full name, address, bank account number, tax ID and other optional data), and personal master data (full name, date of birth and other optional fields);
- in respect of data processed in the whistleblowing system, data may be transferred to the following bodies/organizations:
  - if the investigation into the notification requires the initiation of criminal proceedings, to the investigating authority;
  - to the occupational inspectorate pursuant to Section 29 (1) of the Complaints Act;
  - if the investigation into the notification requires the involvement of a third party organization pursuant to Section 26 (1) of the Complaints Act, to such third party organization;
  - in respect of data concerning a person not employed by the Data Controller or concerning a legal entity or organization other than the Data Controller, which is the subject of the notification, data may be transferred to the competent department or employee of the other organization entitled to carry out the procedure.

### **4. Data security measures**

The HUN-REN Headquarters ensures the security of the data, and puts in place all technical and organizational measures necessary to enforce the GDPR regulation, the Info Act and other regulations on data protection and privacy. The HUN-REN HQ also protects the data against unauthorized access, alteration, transfer, disclosure, deletion or destruction, as well as against accidental loss of or damage to the data.

### **5. Rights of Data Subjects in relation to Data Processing**

#### **5.1. Deadline**

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At the request of the Data Subject, the Data Controller shall provide an extract or a copy of the register or oral information about his or her data. The information must be provided no later than one month from the date of receipt of the request (exclusive of the date of receipt of the request).

If necessary, the HUN-REN Headquarters may, taking into account the complexity of the request and the number of requests received, extend the deadline by an additional two months, in which case the HUN-REN Headquarters will inform the Data Subject of the extension, stating the reasons for the postponement, within one month of receipt of the request.

## **5.2. The right of access**

The Data Subject has the right to request, through the contact details provided by the HUN-REN Headquarters, information on whether his or her personal data are being processed and, if so, to be informed of:

- what personal data;
- on what legal basis;
- for what purpose;
- how long will be processed by the HUN-REN Headquarters;
- the persons or entities to whom, when, and under what law the HUN-REN Headquarters transmitted data or granted access to;
- the source of the personal data.

The HUN-REN Headquarters will provide a copy of the processed personal data free of charge for the first time upon the Data Subject's request, and will charge a reasonable administrative fee thereafter.

In order to comply with data security requirements and to protect the rights of the Data Subject, the provision of information, access to and copying of data is subject to the identification of the Data Subject.

## **5.3. Right to rectification**

The Data Subject may request, using the contact details provided by the HUN-REN Headquarters, that any of his or her personal data processed by the HUN-REN Headquarters be rectified. To modify or rectify the data, the Data Subject must provide credible evidence of the accuracy of the data.

## **5.4. Right to restriction of processing**

The Data Subject may request, using the contact details provided by the HUN-REN Headquarters, that the processing of his or her personal data be restricted by the HUN-REN Headquarters, provided that:

- the Data Subject disputes the accuracy of his or her personal data;
- the processing is unlawful and the Data Subject does not request the erasure of the personal data concerning him or her, but instead requests the restriction of their use;
- 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 defense of legal claims; or
- the Data Subject has objected to processing pending the verification whether the legitimate grounds of the the HUN-REN Headquarters override those of the Data Subject.

## **5.5. Right to object**

The Data Subject may object to the processing of his or her personal data at any time via the contact details provided by the HUN-REN Headquarters for reasons relating to his or her particular situation, if he or she considers that the data are not processed by the HUN-REN Headquarters for the purposes stated in this Privacy Notice.

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### **5.6. Right to erasure ('right to be forgotten')**

The Data Subject may exercise his or her right to erasure in relation to the processing described in this Privacy Notice only if the data is no longer necessary for the performance of the tasks of the HUN-REN Headquarters in the exercise of its public tasks. With regard to documents to be submitted to the archives, the erasure of the data cannot be carried out without affecting the integrity of the documents, and therefore the request for erasure cannot be granted in these cases.

The request for erasure may also be refused if the processing is:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for scientific or historical research purposes or statistical purposes in so far as the erasure of the data is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- the data are necessary for the establishment, exercise or defence of legal claims.

The Data Subject may request the erasure of his or her data in person or through an authorized representative, or in electronic form in a request submitted/sent to the HUN-REN Headquarters.

### **5.7. Right to data portability**

The Data Subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, where:

- the processing is based on the performance of a contract or consent;
- the processing is carried out by automated means.

In exercising his or her right to data portability, the Data Subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

**5.8.** The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent, however, shall not affect the lawfulness of processing based on consent before its withdrawal.

## **6. Legal Remedies**

If the Data Subject has a complaint regarding the data processing activities of the HUN-REN Headquarters, he or she may:

- contact the Data Protection Officer of the HUN-REN Headquarters (Dr. András György, attorney-at-law, Data Protection Officer - SBGK Law Office, H-1062 Budapest, Andrassy út 113, [andras.gyorgy@sbgk.hu](mailto:andras.gyorgy@sbgk.hu)),
- lodge a complaint with the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa u. 9-11., mailing address: 1374 Budapest, Pf. 603., tel.: +36-30-683-5969), website: [www.naih.hu](http://www.naih.hu)), or
- take legal action for the protection of his or her personal data, which may be brought, at the Data Subject's choice, before the competent court in the place of his or her residence or domicile.

## **7. Cookies**

7.1. When the website is visited, cookies are stored on the Data Subject's computer. Cookies are small text files that the browser stores on the Data Subject's device to save certain information. The next time the Data Subject visits the website using the same device, the information stored in the cookies will be transferred either to the website ('First Party Cookie') or to another website to which the cookie belongs ('Third Party Cookie').

7.2. Using the saved and returned information, the website recognizes that the Data Subject has previously accessed and visited the website using the device's browser. This information is used by the Data Controller to design and present the website in an optimal way to meet the preferences of the Data Subject. In this

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context, only the cookie itself is identified on the Data Subject's device. Beyond this extent, the Data Controller will only store the Data Subject's personal data subject to the Data Subject's explicit consent or if it is strictly necessary for the use of the service offered to and accessed by the Data Subject.

7.3. The legal basis for the use of cookies by the Data Controller, i.e. the processing of data for the purpose of tailoring the services provided on the website to the needs of the Data Subject, is the consent of the Data Subject [Article 6(1)(a) of the GDPR]. Cookies which require the consent of the Data Subject are Advertising Cookies.

7.4. The Data Subject can give their consent to the use of cookies by clicking on the checkbox of the cookie on the website. The Data Controller will provide information about cookies which do not require the consent of the Data Subject as follows.

7.5. The website uses the following types of cookies, with scope and function explained below:

- Essential cookies
- Functionality and performance cookies

7.6. The website uses the following cookies:

Cookie	Type of cookie	Cookie service provider	Data processed by cookie	Purpose of cookie	Cookie lifetime
_ga	Analytical cookies	Google	Age, gender, interests, location	Analysis, monitoring	2 years
_gid	Analytical cookies	Google	Age, gender, interests, location	Analysis, monitoring	1 day
_gat_*	Analytical cookies	Google	Age, gender, interests, location	Analysis, monitoring	1 day
Used by the system	Required		Identification by the system	Identification	Session

### 7.7. Essential Cookies

7.7.1. Essential cookies provide functionality without which the website cannot be used for its intended purpose. These cookies are used exclusively by the Data Controller and are therefore First Party Cookies. This means that all information stored in the cookies is returned to the website.

7.7.2. Essential cookies are used, for example, to ensure that the Data Subject, as a registered user, remains logged in each time he or she accesses different sub-pages of the website, so that he or she does not have to re-enter his or her login details each time he or she accesses a new page.

7.7.3. The use of essential cookies on the website does not require the consent of the Data Subject. Therefore, essential cookies cannot be enabled or disabled individually. Nevertheless, the Data Subject may at any time disable cookies in his or her browser.

7.7.4. Legal ground: Article 6(1)(b) of the GDPR.

### 7.8. Functionality and Performance Cookies

7.8.1. Functionality cookies allow the website to store information that the Data Subject has already provided (such as registered name or language preference) and to offer improved and more personalized

features based on this information. These cookies only collect and store anonymous data so as not to track the Data Subject's movements on other websites.

7.8.2. Performance cookies collect information about how the website is used in order to improve the attractiveness, content and functionality of the website. These cookies help us to determine, for example, whether sub-pages of the website have been visited, which sub-pages have been visited, and which content in particular is of interest to users. Performance cookies are also used to record, in particular, the number of visits to a page, the number of times a sub-page is accessed, the time spent on the website, the order of the pages visited, the search terms that led the Data Subject to the Data Controller, the country, region and, where applicable, the city from which the Data Subject accesses the website, and the percentage of mobile devices accessing the website.

7.8.3. These data are processed by the Data Controller as part of a statistical report. As a result, the Data Controller can tailor the content of the website and optimize its offerings to meet the needs of users.

7.8.4. Legal ground: Article 6(1)(f) of the GDPR.

### 7.9. Managing and Deleting Cookies

The Data Subject may set his or her browser not to allow cookies to be saved as a default and/or to prompt the browser each time whether the Data Subject agrees to enable cookies. The Data Subject may at any time delete the cookies that he or she has repeatedly enabled. The Help function of the browser can be used to obtain detailed information on how this works. Disabling the use of cookies in general may limit the functionality of certain features of the website.

### 7.10. Google Analytics

7.10.1. The website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). In doing so, Google Analytics uses a specific form of cookie which is stored on the Data Subject's computer and which allows the analysis of the Data Subject's use of the website. The information generated by the cookie about the Data Subject's use of the website is usually transmitted to and stored by Google on servers in the United States.

7.10.2. The Data Subject can block the storage of cookies by using the appropriate settings in his or her browser. In addition, by downloading and installing the browser plug-in available at <https://tools.google.com/dlpage/gaoptout?hl=en>, the Data Subject can prevent Google from collecting and processing data (including his or her IP address) generated by the cookie in connection with the Data Subject's use of the website.

7.10.3. The website also uses Google Analytics to analyze the flow of visitors through the user ID in a device-independent way. The Data Subject can turn off the tracking of his/her usage across different devices in his/her Google Account under 'My Information', 'Personal Information'.

7.10.4. Legal ground: Article 6(1)(f) of the GDPR.

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