

**Privacy policy**  
**on the data processing performed by the UniPass Card**  
**Management Centre of the University of Debrecen**

**1. Name and contacts of the controller:**

UniPass Card Management Centre of the University of Debrecen

*Registered seat:* H-4028 Debrecen, Kassai út. 26. Chancellery, Building 4, Ground floor 26.

*Postal address:* H-4028 Debrecen, Kassai út. 26. Chancellery, Building 4, Ground floor 26.

*E-mail address:* [unipass@unideb.hu](mailto:unipass@unideb.hu)

*Phone number:* +36 (52)/512-900/ ext. 62771, 62773, 62774, 62775

**2. Regulations on data processing**

The data processing of the UniPass Card Management Centre of the University of Debrecen shall be subject to the following regulations:

- 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 referred to as GDPR).

**3. Processor**

The Controller uses a processor to ensure, develop and operate the IT background of the UniPass Card Management System:

UD INFOPARK Nonprofit Korlátolt Felelősségű Társaság, H-4028 Debrecen, Kassai út 26.

**4. Introduction of the UniPass Card Management System**

The card management system receives the personal data of the holder from the university directory (LDAP). In addition to the ID photo requested for application, the card management system generates the following data: card number, expiry date, card bar code, card RFID. The data generated in the card management system and the ID photos uploaded during the application and accepted by the UniPass Card Management Centre of the University of Debrecen are returned by the card management system to the university directory (LDAP), which data are under control of the IT Service Centre of the University of Debrecen.

On the site <https://unipass.hu>, the card management system creates the profile of the holder, which is available after login. The profile includes the discounts assigned to the card, programmes, library membership, card balance, vehicle entry data.

The profile data are processed during the existence of the legal relationship.

The profile data can be accessible for:

- the employees of the UniPass Card Management System
- the developers of the card management system
- employees with access of „Internal insight” (HAK, NOKK, ISZK, Office for checking-in and out)

## **5. Data processing performed by the controller**

### ***5.1. Data processing regarding the application for the UniPass card***

*5.1.1. Aim of data processing:* Pursuant to the UniPass Card Policy, UniPass University card can be applied by any university citizen, i.e. active employee or student. UniPass card can be applied for by logging in the site <https://unipass.hu> by a network identifier and a password and by uploading an ID photo.

*5.1.2. Processed set of data:* During application, the following personal data are processed:

Data taken from the university directory:

- Name
- Date of birth
- E-mail address
- Network identifier (eduID)
- Neptun code
- Faculty / Organisational unit
- University citizenship status (student or employee)
- ID photo

*5.1.3. Legal basis of the data processing:* Legitimate interest [specification of the legal basis according to GDPR: paragraph (1) of the article 6 of the GDPR].

*5.1.4. Scope of people having access:*

- the employees of the UniPass Card Management System
- the developers of the card management system
- employees with access of „Internal insight” (HAK, NOKK, ISZK, Office for checking-in and out)

### ***5.2. Data processing regarding the production of the UniPass card***

*5.2.1. Aim of data processing:* Production of the ordered UniPass card according to the application, by the card management system.

*5.2.2. Processed set of data:* During the production of the UniPass card, the following personal data are processed:

- Name
- Date of birth
- E-mail address
- Network identifier (eduID)
- Neptun code
- Faculty / Organisational unit
- University citizenship status
- Card number

- Expiry date
- Bar code of the card
- Card RFID
- ID photo

5.2.3. *Legal basis of the data processing:* Legitimate interest [specification of the legal basis according to GDPR: paragraph (1) of the article 6 of the GDPR].

5.2.4. *Scope of people having access:*

- the employees of the UniPass Card Management System
- the developers of the card management system
- employees with access of „Internal insight” (HAK, NOKK, ISZK, Office for checking-in and out)

### ***5.3. Data processing regarding the handover of the UniPass card***

5.3.1. *Aim of data processing:* Handover of the completed UniPass card to the holder via the organisational unit employing him/her. The Card Management Centre sends the completed cards together with a delivery list to the organisational unit of the holder or the assigned points of receipt, and sends an e-mail to the holder about the possibility of collection. The holder confirms receipt by signing the “UniPass receipt form”.

5.3.2. *Processed set of data:* During data processing, the following personal data are processed:

- E-mail address
- Name
- Organisational unit
- Card number
- Signature

5.3.3. *Legal basis of the data processing:* Legitimate interest [specification of the legal basis according to GDPR: paragraph (1) of the article 6 of the GDPR].

5.3.4. *Scope of people having access:*

- the employees of the UniPass Card Management System
- employees of the University of Debrecen playing a role in the handover of the UniPass card

### ***5.4. Data processing regarding the operation of customer centre***

5.4.1. *Aim of data processing:* The Card Management Centre provides you help in questions and issues arisen regarding the use of the card.

5.4.2. *Processed set of data:* During data processing, the following personal data are processed:

- Data of the profile
- Name
- Data of reporting the question/issue

5.4.3. *Legal basis of the data processing*: the consent of the data subject (item a of the GDPR (1) of the article 6 of the GDPR).

5.4.4. *Period of data processing*: according to the Document Processing Policy of the University of Debrecen

5.4.5. *Scope of people having access*:

- the employees of the UniPass Card Management System
- the developers of the card management system

## **6. Rules on your rights and exercising thereof**

### ***6.1. Right of information***

According to the paragraph (1) of the article 15 of the GDPR, you shall have the right to obtain information about your personal data processed by the UniPass Card Management Centre of the University of Debrecen. In this case, the UniPass Card Management Centre of the University of Debrecen shall send the following pieces of information to your indicated contact data (e-mail address, correspondence address):

- which of your personal data are processed by the controller;
- for which purpose of data processing;
- to whom it transfers the personal data;
- period of data processing and the aspects of the determination of such period;
- your rights regarding data processing;
- your right to submit a complaint to the Hungarian National Authority for Data Protection and Freedom of Information.

### ***6.2. Right to request copy***

According to the paragraphs (3)-(4) of the article 15 of the GDPR, you shall have the right to obtain a copy of the personal data processed by the UniPass Card Management Centre of the University of Debrecen. In this case, the University of Debrecen UniPass Card Management Centre shall send the data it processes about you to your contact information indicated by you (e-mail address, correspondence address).

### ***6.3. Right to rectification***

According to the article 16 of the GDPR, your personal data shall be modified and rectified according to your request.

### ***6.4. Right to erasure***

In case of the processing according to the subsection 3.4, according to the paragraph (1) of the article 17 of the GDPR, you may request the erasure of your disclosed personal data.

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

You may request the restriction of data processing in the following cases:

- if you challenge the accuracy of the personal data, data processing shall be restricted until the UniPass Card Management Centre of the University of Debrecen checks the accuracy of the personal data;
- the processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead;
- the UniPass Card Management Centre of the University of Debrecen no longer needs the personal data, but you require these data for the establishment, exercise or defence of legal claims; or
- if you exercise the right to object, data processing shall be restricted until the lawfulness of your request is assessed.

In case of a request on restriction, you shall indicate why you request restriction as well.

The UniPass Card Management Centre of the University of Debrecen shall comply with your request on restriction to store your personal data separated from any other personal data. Such as it saves to an external data storage medium in case of electronic data or stores the paper-based documents in a separate folder.

### ***6.6. Objection***

You shall have the right to object, on grounds relating to your particular situation, against the data processing performed on the basis of the balance of legitimate interest. Here the UniPass Card Management Centre of the University of Debrecen shall assess the data processing performed regarding you based on the balance of interest, and if it finds your request reasonable, we erase your personal data. You will be notified of our assessment by all means.

### ***6.7. Common rules of the exercising of rights***

Your request shall be fulfilled by the UniPass Card Management Centre of the University of Debrecen within a month at most, which may be prolonged once by at most 2 months.

In case of the refusal of the fulfilment of your request, the UniPass Card Management Centre of the University of Debrecen shall, within a month after the receipt of your request, inform you of the justification of such refusal and that you may submit a complaint to the Authority, and you may request judicial remedy.

The UniPass Card Management Centre of the University of Debrecen reserves the right to request the provision of information necessary for the confirmation of the personal identity of the data subject if it has reasonable doubts regarding the identity of the submitter of the request. This reasonable doubt may be especially when the data subject exercises his/her/its right to request a copy and in this case, it is justified to confirm by the UniPass Card Management Centre of the University of Debrecen whether the request was submitted by the entitled person.

## **7. Your law enforcement possibilities**

If you think that the data processing of the UniPass Card Management Centre of the University of Debrecen is not in compliance with legal regulations, you may initiate a procedure before the Hungarian National Authority for Data Protection and Freedom of Information (postal address: H-1363 Budapest, P.O. Box 9, e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) or may request judicial remedy.