

## **PRIVACY POLICY**

### **Scholarship Program for Christian Young People**

**(english version)**

**Date: 2024.10.10.**

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## **INTRODUCTION**

The purpose of this Privacy Policy (hereinafter: Policy) is to provide information on the data protection and data management principles applied by Hungary Helps Agency Non-profit Private Limited Company (hereinafter: Agency or Data Controller) in connection with the "Scholarship Program for Christian Youth" program (hereinafter: Scholarship Program).

The Policy has been prepared taking into account the GDPR, the Privacy Act and other legislation relevant to the Scholarship Program. The list of legal acts is contained in Annex 1 to the Prospectus and the most important concepts are described in Annex 2.

The Policy is effective from the date of entry into force of the Policy until revoked.

### **I. IDENTITY AND DETAILS OF THE CONTROLLER AND THE DATA PROTECTION OFFICER**

Name of data controller:	Hungary Helps Agency Nonprofit Zrt.
Registered office of the data controller:	1011 Budapest, Szilágyi Dezső tér 1.
Data controller's phone number:	+36 1 896 6344
Representative of the data controller:	Péter Kovács, Director General
Data Protection Officer:	dr. Alexandra Kassai, Legal Adviser
E-mail address of the Data Protection Officer:	gdpr@hungaryhelps.gov.hu

### **II. GENERAL DESCRIPTION OF THE SCHOLARSHIP PROGRAM FOR CHRISTIAN YOUNG PEOPLE PROGRAM DATA MANAGEMENT**

This Privacy Policy applies to data processing related to the activities of the Data Controller Scholarship Program. The Agency processes the personal data of those who apply and successfully participate in the Christian Youth Scholarship Program from August 5, 2020. The Scholarship Program for Young Christians is a scholarship program (hereinafter: Scholarship Program) established by Hungary Government in the spirit of its solidarity policy towards persecuted Christian minorities.

The Scholarship program was introduced by Government Decree No. 120/2017 (VI.1.) and is managed by the Minister responsible for assisting persecuted Christians and implementing the Hungary Helps Program (hereinafter: Minister), whose ministry implemented the scholarship program with the support of the Tempus Public Foundation until 4 August 2020.

The Christian Youth Scholarship was established to support the studies of international students at Hungarian higher education institutions. The basic mission of the scholarship program is to provide opportunities for Christian youth living in crisis regions of the world to continue their higher education studies in Hungarian host institutions exposed to religious persecution, threats or restrictions on their free religious practice in their home countries, thus contributing to the social appreciation of professionals returning to their home countries. From 5 August 2020, the Hungary Helps Agency manages the tasks of the Scholarship Program on the basis of legal succession.

In line with the above, transactional, coordination, contact, information and administrative tasks related to the scholarship programme will be performed by the Agency from 5 August 2020.

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### III. DETAILED DESCRIPTION OF THE DATA MANAGEMENT OF THE SCHOLARSHIP PROGRAM

#### 1. Data processing during the submission and evaluation of the application

<b>Data subject:</b>	Applicant
<b>Source of data:</b>	Applicant
<b>Purpose of data processing:</b>	<p>The applicant can submit an application on the DreamApply interface after registration.</p> <p>The controller collects personal data in connection with the application, selection and management of the scholarship. Individuals meeting the conditions set out in the Government Decree may apply for scholarships within the framework of Scholarship program.</p> <p>The primary purpose of data processing is the evaluation and processing of the Applicant's application, furthermore:</p> <ul style="list-style-type: none"> <li>Identifying the applicant and addressing the applicant appropriately in communication;</li> <li>Checking the eligibility of the application;</li> <li>Evaluation and selection procedures;</li> <li>Informing the applicant and, where applicable, specific addressees of the outcome of the application and handling any objections;</li> <li>Checking university entry requirements;</li> <li>Awarding scholarships/grants;</li> <li>Preparation and conclusion of a scholarship contract;</li> </ul>
<b>Scope of processed data:</b>	<p><b>Mandatory personal data:</b></p> <ul style="list-style-type: none"> <li>name (surname, first name, second name)</li> <li>mother's name</li> <li>Sex</li> <li>place and date of birth</li> <li>habitation</li> <li>passport data and copy (number, date of issue, period of validity, issuing authority)</li> <li>data and copy of identity card (number, date of issue, period of validity, issuing authority)</li> <li>photo</li> <li>Skype ID (required for online interview)</li> <li>e-mail address</li> <li>address</li> <li>mailing address</li> <li>telephone number</li> <li>study history (university or secondary school, training, level of training, place of training, method of training, subjects completed, source of funding, average of studies)</li> <li>certificate of qualification (number, date of issue, issuing institution)</li> <li>start of studies</li> <li>Date of obtaining the certificate (v. diploma)</li> <li>languages spoken</li> <li>work experience (company name, job title, tasks)</li> <li>recommendation (e.g. about a past university, workplace)</li> <li>school certificate/diploma</li> <li>proof of language proficiency</li> <li>University index</li> </ul> <p><b>Mandatory sensitive personal data:</b></p>

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	<ul style="list-style-type: none"> <li>• citizenship</li> <li>• Church letters of recommendation and denominational affiliation</li> <li>• health data contained in a medical certificate</li> </ul> <p><b>It is not mandatory, but the data subject may voluntarily provide:</b></p> <ul style="list-style-type: none"> <li>• professional and leisure activities</li> <li>• Hungarian tax number (if available)</li> <li>• Hungarian social security number (if available)</li> </ul>
<b>Legal basis for data processing:</b>	<p><b>With regard to mandatory personal data:</b></p> <p>Article 6 (1) (b) GDPR processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;</p> <ul style="list-style-type: none"> <li>• Conclusion of a scholarship contract</li> </ul> <p><b>With regard to mandatory sensitive personal data:</b></p> <p><b>Article 6 (1) (c) GDPR</b> processing is necessary for compliance with a legal obligation to which the controller is subject, and</p> <p><b>Article 9 (2) (g) GDPR</b> processing on the basis of Member State law:</p> <ul style="list-style-type: none"> <li>• Government Decree – special data on denomination and nationality</li> <li>• Nftv. – medical fitness examination and health data contained in the medical certificate [Section 80 (2) (h) and (2c) of the Nftv.]</li> </ul> <p><b>Optional for personal data:</b></p> <p><b>Article 6 (1) (a) GDPR</b> the data subject has given consent to the processing of his or her personal data for one or more specific purposes</p>
<b>Duration of data storage:</b>	<p>In case of an unsuccessful tender procedure, 5 years from the evaluation of the application.</p> <p>In case of successful application procedure, 10 years from the date of the report (final report).</p> <p>With regard to health data, until the termination of the scholarship relationship. In the event of an unsuccessful application, the Agency shall cancel the medical certificate containing the medical data within 2 months of the closure of the application.</p>
<b>Categories of recipients:</b>	<p><b>Ministry of Foreign Affairs and Trade:</b> The data is processed in order to prepare the scholarship donation decision.</p> <p><b>Higher education institutions:</b> The given higher education institution processes the data within the institution for the organization and processing of the entrance examination and enrollment, and after the award of the scholarship, the data for the purpose of concluding the student contract</p> <p><b>Hungary embassies and consulates:</b> for visa administration (acceptance of visa applications, identification of applicants)</p> <p><b>National Directorate-General for Aliens Policing:</b> examines visa applications (checking visa eligibility, issuing or refusing a visa) and issuing residence permits after the successful applicant enters Hungary</p> <p><b>Ministry of Culture and Innovation:</b> manages for scholarship donation</p>
<b>Data transfer abroad:</b>	<p>Your data will not be transferred to third countries or international organisations.</p>
<b>Processing:</b>	<p><b>Dream Group PLC</b> (provider of DreamApply service) Pärnu mnt 102b 11312, Tallinn, Estonia Operate the DreamApply application system. The Service Provider receives and processes the data for the management of the incoming applications.</p> <p><b>NISZ National Infocommunications Service Co., Ltd.</b> 1149 Budapest, Róna street 52-80. Electronic Information System Operation</p>

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**Consequence of failure to provide data**

With regard to mandatory information:

- failure to verify eligibility and compliance with the tender dossier
- failed to verify input requirements
- scholarship donations cannot take place
- visa processing failed

For optional information:

- in case of organizing cultural and community-building programs, the scholarship recipient fails to be involved in the programs

#### IV. YOUR RIGHTS

It is important for the Data Controller that its data processing complies with the requirements of fairness, legality and transparency. To this end, you may request information about the processing of your personal data (access), withdraw your consent, request the rectification or erasure of your personal data, with the exception of mandatory data processing, and exercise your right to data portability and objection. To help you understand your rights and the conditions for exercising them, we provide you with the following information.

	Right of access	Right to rectification	Right to erasure (right to be forgotten)	Right to restriction	Portability	Right to object
Contribution	yes	yes	yes	yes	yes	Withdrawal of consent
Performance of a contract	yes	yes	yes	yes	yes	no
Compliance with a legal obligation	yes	yes	no	yes	no	no
Vital interest	yes	yes	yes	yes	no	no
Powers of public authority	yes	yes	no	yes	no	yes
Legitimate interest	yes	yes	yes	yes	no	yes

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### **1. Withdrawal of consent**

In the case of data processing based on consent, you have the right to withdraw your consent at any time without giving reasons. The withdrawal shall not affect the lawfulness of processing based on consent prior to its withdrawal. However, the Data Controller will no longer perform operations using your personal data and will delete them.

### **2. Access**

You have the right to obtain access to your personal data processed by the Data Controller upon request – submitted personally to the Data Controller. In this context, you will be informed about:

- whether your personal data is being processed;
- the purposes of data processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- the envisaged period for which the personal data will be stored;
- your rights;
- your legal remedies;
- information on data sources.

You may also request the Data Controller to provide you with a copy of your personal data undergoing processing. In this case, the Data Controller shall provide the personal data in a structured, commonly used, machine-readable format (PDF/XML) or in its printed version, on paper.

Requesting a copy is free.

### **3. Rectification**

Based on a request submitted personally to the Data Controller, you have the right to request the rectification of inaccurate personal data concerning you processed by the Data Controller and the completion of incomplete data.

If the information necessary to clarify or supplement the incorrect information is not available to the Data Controller, the Data Controller may request the submission of these additional data and the verification of the accuracy of the data. Until the data can be clarified or completed – in the absence of additional information – the Data Controller shall restrict the processing of the personal data concerned, and shall temporarily suspend the operations performed thereon, with the exception of storage.

### **4. Deletion**

You – upon request submitted personally to the Data Controller – have the right to request the erasure of personal data concerning you processed by the Data Controller, if one of the following conditions applies:

- we no longer need the data;
- you have concerns about the lawfulness of our processing of your data.

If, following its request, the Data Controller finds that the obligation to delete the personal data processed by it exists, it shall terminate the processing of the data and destroy the previously processed personal data. In addition, the obligation to delete personal data may also exist on the basis of withdrawal of consent, exercise of the right to object or legal obligations..

### **5. Restriction of processing**

You have the right to request the restriction of the processing of personal data concerning you processed by the Data Controller on the basis of a request submitted personally to the Data Controller in the following cases:

- you have concerns about the processing of personal data concerning you processed by the Data Controller
- requests restriction regarding its lawfulness and instead of erasure;
- the Data Controller no longer needs the given data, but you request them

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for the establishment, exercise or defence of legal claims. Az Adatkezelő automatikusan korlátozza a személyes adatok kezelését abban az esetben, ha Ön vitatja a személyes adatok pontosságát. Ez esetben a korlátozás arra az időtartamra vonatkozik, amely lehetővé teszi, a személyes adatok pontosságának ellenőrzését.

During the period of restriction, data processing operations cannot be performed on the marked personal data, only the data can be stored. Personal data may only be processed in the event of restriction of processing in the following cases:

- based on the consent of the data subject (you);
- to establish, exercise or defend legal claims;
- protection of the rights of another natural or legal person;
- important public interest.

The Data Controller shall inform you in advance of the lifting of the restriction.

## **6. Objection**

The Data Controller may object at any time to the Data Controller's data processing based on Article 6 (1) (f) of the GDPR on the basis of a request submitted through the contact details provided in Section I of this Policy. In this case, the Data Controller shall examine whether compelling legitimate reasons or interests exist (e.g. establishment, exercise or defence of legal claims) which override the interests, rights and freedoms of the data subject. If such grounds or interests can be identified, the Data Controller shall continue to process the personal data. Otherwise, however, the personal data will no longer be used.

## **7. Data portability**

Based on a request submitted through the contact details of the Data Controller, you are entitled to request the provision of personal data processed by the Data Controller concerning you for their further use, as determined by you. In addition, you may request that the Data Controller transfer your personal data to another controller designated by you.

This right is limited to the personal data provided by you to the Data Controller and processed on the basis of an agreement (Article 6 (1) (b) GDPR) and personal data processed on the basis of consent (Article 6 (1) (a) GDPR). Portability of other data is not possible. The Data Controller shall provide personal data in a structured, commonly used, machine-readable format (PDF/XML) or in its printed version, in paper form.

The Data Controller informs you that exercising this right does not automatically result in the deletion of personal data from the Data Management systems. In addition, you have the right to contact or contact the Data Controller again after the data has been ported.

## **8. Procedure for Your Request to Exercise Your Rights**

The Data Controller shall inform you without undue delay, and no later than within 1 month of receipt of the request, of the measures taken following your request to exercise your rights. If necessary, taking into account the complexity of the application and the number of applications, this time limit may be extended by a further 2 months. The Data Controller shall inform you of the extension of the deadline within 1 month of receipt of the request, indicating the reasons for the delay.

If the Data Controller does not take action on your request, it shall inform you without delay and at the latest within 1 month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The Data Controller shall provide information on the action or lack thereof in the form indicated by you. If you have submitted the request electronically, the information will be provided electronically, unless you request otherwise.

As a general rule, the Data Controller shall provide the requested information and information free of charge, but for further copies requested by you, the Data Controller may charge a reasonable fee based on administrative costs.



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The Data Controller shall communicate any rectification, erasure or restriction of processing carried out by the Data Controller to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. At your request, the Data Controller shall inform you of these recipients.

In order to comply with the request, the Data Controller is obliged to ensure that the person entitled to it wishes to exercise his rights. This may also require, if applicable, that you appear in person at the Data Controller's registered office for personal identification purposes.

## **V. YOUR REMEDIES**

Anyone who believes that their rights have been violated as a result of the Data Controller's data processing have the following options:

### **1. Complaint to the Data Protection Officer**

If the natural person concerned believes that his/her rights related to the processing of his/her personal data have been violated, he/she may turn to the Data Protection Officers of the Data Controller for information and for the exercise of his/her rights.

### **2. Lodging a complaint with a supervisory authority**

Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data relating to him or her infringes this Regulation.

Name:	National Authority for Data Protection and Freedom of Information
Headquarters:	1055 Budapest, Falk Miksa utca 9-11.
Postal address:	1363 Budapest, Pf.: 9.
Email:	ugyfelszolgalat@naih.hu
Phone:	+ 36 1 391 1400

### **3. Right to the court**

Regardless of your right to lodge a complaint, you may also turn to court if you believe that an infringement has occurred in connection with the processing of your personal data. You may also bring legal proceedings before the court competent for your domicile or residence.

You also have the right to go to court against a legally binding decision of NAIH concerning you, and also if NAIH does not deal with your complaint or does not inform you within three months about the procedural progress or outcome of your complaint.

## **VI. CLAUSE**

The data controller reserves the right to change its privacy statement. This may be the case, in particular, if the range of services is extended or if it is required by law. A change in data processing may not mean the processing of personal data other than for the purpose. The controller shall publish this information on its website 15 days in advance.

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#### **ANNEX 1.: SUBJECT OF THIS PRIVACY POLICY, LEGAL BASIS FOR DATA PROCESSING**

The main legal acts applicable to data processing under this Notice and their abbreviations used in this Notice:

- **GDPR / Regulation:** 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 (General Data Protection Regulation or GDPR)
- **Information Act:** Act CXII of 2011 on Informational Self-Determination and Freedom of Information
- **Áht.:** Act CXCIV of 2011 on Public Finance
- **Nftv.:** Act CCIV of 2011 on National Higher Education
- **Government Decree:** Government Decree No 120/2017 (VI.1.) amending Government Decree No 51/2007 (III.26.) on the scholarship programme entitled "Scholarship Programme for Christian Youth" and on the allowances and certain reimbursements payable by students participating in higher education
- **HHPTv.:** - Act LXXXIX of 2023 on the Hungary Helps Program

## ANNEX 2.: KEY CONCEPTS

1. „**personal data**’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural 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, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
2. **‘processing**’ means any operation or set of operations which is performed on personal data or on 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
3. **‘profiling**’ means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
4. **‘controller**’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
5. **‘processor**’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
6. **‘recipient**’ means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
7. **‘third party**’ means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
8. **‘consent**’ of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
9. **‘data concerning health**’ means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;
10. **‘international organisation**’ means an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.