



INFORMATION ON DATA PROCESSING

in regards to conducting online remote examinations in
the state of an epidemiological emergency



The aim of the present data processing guide is to provide you with information on how we process data during online remote examinations in the state of an epidemiological emergency.

1. 1. Who can you turn to?

The processor of data during online remote examinations in the state of an epidemiological emergency is the University of Szeged, however, actual data processing occurs through the following unit.

University of Szeged Faculty of Medicine

Contact person: Rita Rózsahegyi

Postal address: 6723 Szeged, Tisza Lajos krt. 107. I.em. 148-151.

Telephone: +36 (62) 545-020

E-mail address: rozsahegyi.rita@med.u-szeged.hu

Web address: <http://www.med.u-szeged.hu/>

The name and contact information of the data protection officer is found in section 11.1. of the present document.

Turn to us with confidence using one of the contact methods above if you have questions regarding data processing.

2. What legal directives do we follow?

The University of Szeged as the processor of data processes your personal data according to the directions of

- 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),
- Act CXII of 2011 on Informational Self-determination and Freedom of Information, and
- Act CCIV of 2011 On National Higher Education.

3. Does the University of Szeged have its own data protection regulations?

Yes. The data protection regulations of the University of Szeged is found here:

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

4. What kind of data processing do we do?

During online remote examinations in the state of an epidemiological emergency, the University of Szeged performs the following actions: 1. Examination registration; 2. Remote written (partial)



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examination; 3. Remote oral (partial) examination; 4. Making on-record videos of remote oral (partial) examinations.

4.1. Examination registration

What kind of data is collected?	Why is it collected?	What is the legal basis for its processing?	How long is it stored for?
Examination registration <ul style="list-style-type: none"> • selected subject and course • selected examination date • Registering user • Time of registration 	Record-keeping obligation as per legal directive.	Legal obligation to execute in accordance with Sub-Item bm) of Item 1. of Article I/B of Chapter I. of Annex 3 to Act CCIV of 2011.	For five years after the end of the semester.

4.2. Remote written (partial) examination

What kind of data is collected?	Why is it collected?	What is the legal basis for its processing?	How long is it stored for?
Visual identification (optional) <ul style="list-style-type: none"> • Supervision of identity by showing photo identification 	The necessity of online remote examinations.	Public interest [Item e) of section (1) of Article 6 of the General Data Protection Regulation]	Storage is not applied in concerning visual identification; see section 4.4., however.
IT identification <ul style="list-style-type: none"> • User name and password supervision 	Record-keeping obligation as per legal directive.	Legal obligation to execute in accordance with Sub-Item bm) of Item 1. of Article I/B of Chapter I. of Annex 3 to Act CCIV of 2011.	For five years after the end of the semester.
Safety record <ul style="list-style-type: none"> • beginning of the examination • end of the examination • date and time of the storage of examination data on the server 			



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What kind of data is collected?	Why is it collected?	What is the legal basis for its processing?	How long is it stored for?
<ul style="list-style-type: none"> IP address of the workstation used for the examination 			
Filled-in questionnaire, submitted task <ul style="list-style-type: none"> data content depending on the nature of the test/task 			
Examination result <ul style="list-style-type: none"> grade date teacher giving the grade person uploading the grade credit point(s) acquired 		Legal obligation to execute in accordance with Sub-Item bd) of Item 1. of Article I/B of Chapter I. of Annex 3 to Act CCIV of 2011.	For 80 years after the student status ends.

4.3. Remote oral (partial) examination

What kind of data is collected?	Why is it collected?	What is the legal basis for its processing?	How long is it stored for?
Visual identification (optional) Supervision of identity by showing photo identification	The necessity of online remote examinations.	Public interest [Item e) of section (1) of Article 6 of the General Data Protection Regulation]	Storage is not applied in concerning visual identification; see section 4.4, however.
IT identification User name and password supervision Safety record <ul style="list-style-type: none"> beginning of the examination end of the examination 	Record-keeping obligation as per legal directive.	Legal obligation to execute in accordance with Sub-Item bm) of Item 1. of Article I/B of Chapter I. of Annex 3 to Act CCIV of 2011.	For five years after the end of the semester.



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What kind of data is collected?	Why is it collected?	What is the legal basis for its processing?	How long is it stored for?
<ul style="list-style-type: none"> date and time of the storage of examination data on the server IP address of the workstation used for the examination 			
Oral examination <ul style="list-style-type: none"> The questions and the answers to them 			Storage is not applied in concerning visual identification; see section 4.4, however.
Examination result <ul style="list-style-type: none"> grade date teacher giving the grade person uploading the grade credit point(s) acquired 		Legal obligation to execute in accordance with Sub-Item bd) of Item 1. of Article I/B of Chapter I. of Annex 3 to Act CCIV of 2011.	For 80 years after the student status ends.

4.4. Making on-record videos of remote oral (partial) examinations

What kind of data is collected?	Why is it collected?	What is the legal basis for its processing?	How long is it stored for?
Screen content and sound is recorded with the help of the framework used for online remote examinations or with the teacher's software running on their workstation.	Occurring between a teacher and a student, to ensure openness to the public, in accordance with section 13.1 of the Academic and Examination Regulations of the University of Szeged.	Public interest [Item e) of section (1) of Article 6 of the General Data Protection Regulation and regulation NAIH/2020/2888 sz. of the National Data Protection and Information	Until the end of the second week after the end of the examination period (until the end of the so-called complaint period).



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What kind of data is collected?	Why is it collected?	What is the legal basis for its processing?	How long is it stored for?
		Freedom Authority].	

5. Who is the data shared with/forwarded to?

5.1. Data sharing within the organization

Data sharing within the organization does not occur by default. Data processing, however, is performed by the Directorate of Education of the University of Szeged. In the case of the Coospace system's online presence monitor, the "BigBlueButton", used for videoconferencing, the Directorate of Informatics and Service processes the data. As processors of data, in cases of problem identification and troubleshooting, they can have access to the data specified in section 4. based on legal interest.

In cases of student legal remedy, disciplinary, and ethical procedures, the authority of competent jurisdiction is the Directorate of Legal and Human Resources which is consequently entitled to gain access to the data specified in section 4. to a necessary degree.

5.2. Data sharing with entities outside the organization

In general, in regards to the data in section 4., we do not share data intra- or internationally.

The data collected on you is processed by the individuals specified by the processor of data as per section 1., with the aim and legal basis and within the storage timeframe as per section 4.

6. Do we make use of a data processor?

Yes. We make use of the supporting service of the Coospace system's (a part of the electronic academic system used for handling online remote examinations) developer as data processor in cases of problem identification and troubleshooting.

Name of data processor:	DEXTER Informatikai és Tanácsadó Kft.
Names of data processing operations concerning data processing	problem identification, troubleshooting



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Apart from the Coospace system, the Faculty of Medicine uses Zoom, Skype, MS Teams for online remote oral examinations; Zoom (via publishing a test link), Moodle (avmed.moodle.school) system, Redmenta for online remote written examinations.

7. Do we collect data on you from other individuals?

No. We receive the data on you we process by you only; we do not collect data from other sources.

8. Does automatic decision-making occur during data processing?

Automatic decision-making occurs only with examination-tests if the teacher sets such a form of examination in the system. You are informed that section 13.3. of the Academic and Examination Regulations of the University of Szeged (“[t]he 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”) also applies to automatic evaluation examination-tests. It is on this basis that, as with written examinations, you can inspect or lodge a complaint against an automatic examination evaluation.

9. What are the legal consequences of a lack of data provision?

The lack of data provisions detailed in section 4. concerning online remote examinations results in the unviability of the examination in general. Failure to register for an examination means that you will not be able to complete the subject you registered for, so it is important to note that according to section 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”. Not completing a course for a third time results in the termination of the student status.

In cases of remote oral and written (partial) examinations, if the data referred to in sections 4.2. and 4.3. is not provided, then the examination’s status will be an unaccounted-for absence. Your attention is called to the fact that this leads to consequences similar to that of not registering for an examination, moreover, following an unaccounted-for examination, the completion of a subject is only possible via a repeated examination. At the same time, according to Section (4) of Article 59 of Act CCIV of 2011 on National Higher education, “Higher education institutions shall terminate the student status unilaterally in cases where the total number of unsuccessful and repeated retake examinations in a given unit of study has reached five”.

Concerning making a video recording of the examination, you can object to or ask the examiner to refrain from being recorded. In this case, however, you renounce the very tool which could serve as the basis of proof to your advantage in the event of a complaint or when seeking legal remedy.

10. What rights do you have concerning the program?

You have the following rights regarding the online remote examinations in the state of an epidemiological emergency:



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1. The right to receive information—you can ask for information on how your data is processed.
2. The right to access—you can access the data on you we process.
3. The right to correction—if you see inaccuracies in your data we process on you, you have the right to ask for it to be corrected.
4. The right to the withdrawal of voluntary consent and the right to deletion—the right of voluntary consent can be withdrawn at any time. Note that withdrawing voluntary consent does not affect the legality of data processing prior to the withdrawal. If data processing is based on voluntary consent and there is no other legal basis for data processing, furthermore, after having objected to data processing based on public or legal interest and there is no other legal reason with a higher priority, you can request the deletion of your personal data.
5. The right to objection—you can object to data processing based on legal or public interest at any time.
6. The right to restriction—you can ask your data to be restricted such as when you contest the accuracy of your data processed for the duration of its supervision by University of Szeged or to enforce a legal claim.
7. The right to legal remedy—you can seek legal remedy in case of a violation of your rights.

11. What kind of legal remedy can you seek?

11.1. You can refer to the data protection officer of the University of Szeged:

Dr. Dóra Lajkó

Address: Szegedi Tudományegyetem, Rector's Office, Data Protection Office

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

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

E-mail address: dpo@gmf.u-szeged.hu

11.2. You can submit a request for legal remedy in compliance with the student redress submission and evaluation regulations procedure.

The request must be submitted to the data processor given in section 1. addressed to the Rector. The request must be submitted within 15 days after the prejudicial decision has come to your attention.

11.3. You can contact the National Data Protection and Information Freedom Authority:

National Data Protection and Information Freedom Authority (Nemzeti Adatvédelmi és Információszabadság Hatóság)

Address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C

Telephone: +36 (1) 391-1400

E-mail address: ugyfelszolgalat@naih.hu

11.4. You can turn to a court of law.

Depending on the nature of the unlawful data processing you can file a lawsuit even against the Authority. You can acquaint yourself with the possibilities, methods and forums of a lawsuit on the following website: <https://birosag.hu/birosagi-szervezetek>



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12. Does the University of Szeged have a data protection officer?

Yes. The contact information of the data protection officer of the University of Szeged is available in sub-section 11.1. The data protection officer serves as a point of contact between you and the data processor.