

## **Privacy Statement Scholarship Programme for Christian Young People**

The Scholarship for Christian Young People is a scholarship programme (hereinafter: Scholarship Programme), founded by the Government of Hungary in the spirit of its solidarity policy towards persecuted Christian minorities.

The Scholarship for Christian Young People has been concluded for the support of the studies of international students in Hungarian higher education institutions, in accordance with Act CCIV of 2011 on the National Higher Education (hereinafter referred to as: 'ANHE'), Government Decree No. 120/2017 (VI.1.) on the amendment to the Government Decree No. 51/2007 (III.26.) on the Scholarship Programme for Christian Young People and other allowances to and payments by higher education students (hereinafter: Government Decree on the Scholarship Programme). The Scholarship Programme was introduced by Government Decree 120/2017 (1 June) and is managed by the Minister responsible for the aid of persecuted Christians and the implementation of the Hungary Helps programme (hereunder: Minister), whose Ministry implemented the Scholarship Programme with the assistance of the Tempus Public Foundation until August 4 2020.

The core mission of the Scholarship Programme is to provide opportunities to pursue higher education studies in Hungarian host institutions for Christian youth living in crisis regions of the world who are exposed to religious persecution, threats or restrictions on the exercise of free religion in their home country, in order to contribute to the social appreciation of professionals returning to their home countries.

According to the Government Decree 365/2020 (VII.28.) on the Amendment to the Government Decree 120/2017. (VI.1) on the Amendment to the Government Decree 51/2007 (III. 26.) on the Scholarship Program "Scholarship Programme for Christian Young People" and for Grants Available for Higher Education Students and Fees Paid by them and under the Government Decision, No. 1450/2020 (VII. 28.), in line with the acceptance process between Tempus Public Foundation and the Hungary Helps Agency Private Limited Liability Company (hereinafter referred to as 'Hungary Helps Agency') related to the "Scholarship Programme for Christian Young People" manages the tasks of the „Scholarship Programme for Christian Young People" (hereinafter referred to as the Scholarship Programme) from the date of the 5th August 2020 with legal succession based on Section 1 (1) of the Government Decree.

In line with the above, the transaction, coordination, liaising information and administrative duties related to the Scholarship Programme will be performed by the Hungary Helps Agency Private Limited Liability Company commencing on 5th August 2020.

This Statement is issued for the reason that starting from August 5 2020, the Hungary Helps Agency becomes the data controller of the Scholarship Programme for Christian Young People.

**Issued:  
August 5 2020, Budapest**

## **1. PURPOSE OF THE STATEMENT**

The purpose of this Statement (hereinafter: Statement) is to provide information about the principles of data protection and data management applied by the Hungary Helps Agency Private Limited Liability Company (hereinafter referred to as 'Hungary Helps Agency') regarding the Scholarship Programme for Christian Young People.

The Hungary Helps Agency manages the personal data of those who register in the online application system and who apply for the Scholarship Programme for Christian Young People starting from August 5 2020.

## **2. THE DATA CONTROLLER'S NAME**

Name: Hungary Helps Agency Private Limited Liability Company (hereinafter: Data Controller)  
Headquarters and mailing address: 1011 Budapest, Szilágyi Dezső tér 1.  
Phone number: + 36 1 896 6344  
Represented by: Péter Kovács-Pifka  
Data protection officer: Kristóf Kőrösi  
E-mail address: [gdpr@hungaryhelps.gov.hu](mailto:gdpr@hungaryhelps.gov.hu)

## **3. SCOPE OF THE PERSONAL DATA MANAGEMENT**

The Hungary Helps Agency manages the personal data of those who register in the online application system and who apply for the Scholarship Programme for Christian Young People during the application process and the implementation of the Scholarship Programme.

Besides the personal data of those who register in the online application system and applicants, the Church recommendation and health care documents, which are compulsory requirements in this scholarship, are used for the purpose of checking eligibility. After the application procedure, it is kept for 10 years together with all the relevant personal data according to the provisions of the general data protection rules.

Health care data is needed exclusively for the purposes of the application procedure. It should be about general health condition and that the applicant has no infectious disease, including COVID-19 infection, at the time of the application. After the admission procedure, it is kept for 10 years together with all the relevant personal data according to the provisions of the general data protection rules.

If any modification or change occurs in the data management period of the data handled by the Hungary Helps Agency, in particular regarding a possible COVID-19 infection, please notify us immediately of the above availability – at [gdpr@hungaryhelps.gov.hu](mailto:gdpr@hungaryhelps.gov.hu).

## **4. THE LEGAL BASIS, OBJECTIVE AND METHOD OF DATA MANAGEMENT**

### 4.1 Data management in the framework of the application process

The Management of data is based on the information-based statement, which includes the agreement for the use of the personal data provided during the submission of the application in the system. Legal Basis of the management of data: General Data Protection 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 ensure the protection of the rights of the data subjects; (General Data Protection Regulation, hereinafter: GDPR) Article 6 (1) (b).

In the case of processing health care data the management of the data is based on the explicit consent of the applicants (GDPR Art 9. (2) a) and h)).

The data process lasts until the evaluation of the application. In case the application is successful, for the further data process see 4.2 of this Statement. In case the application is rejected, the data is processed exclusively for the purpose of data storage and research, in the framework of the legal duties of the Hungary Helps Agency. In this case, the data is stored for 10 years after the application process.

4.1.2. The primary purpose of data management is to evaluate, and process the application. Furthermore the data may be used for research purposes anonymously. In case of positive decision on the application, the data is going to be stored for 10 years in accordance with the provisions of the Hungary Helps Agency general data protection rules. In case of positive decision on the application paragraph 4.2 of this Statement applies.

#### 4.2 Data management in the framework of the realization of the scholarship

The Management of data is based on the performance of the contract between the scholar and the entitled Higher Education Institution. Legal Basis for the management of data: Article 6 (1) (b) of Regulation (EU) 2016/679 (GDPR).

During the application procedure the Data Controller is using all relevant personal data for the different phases of the application: submitting application, forwarding the application to the higher education institutes for admission exams, notification on the result of the admission and visa procedure. After the decision on granting a scholarship to a student, the Data Controller is keeping the data of the student for reports to the relevant governmental bodies. After the termination of the scholarship status, the data controller keeps the data only for a record, follow up and alumni purposes.

4.2.1. The purpose of data management is to realize the scholarship. The Data Controller uses the data you have provided for this and research purposes. If the application receives positive decision the data will be preserved and used according to the scholarship programmes' rules and regulations. The data will be kept until 10 years after end of scholarship holder status.

The Data Controller may not use or use the provided personal data for purposes other than those set out in these points. Disclosure of personal data to a third party – unless otherwise provided by law – is only possible with prior express consent of the scholar.

## **5. THE DURATION OF THE DATA PROCESSING**

The duration of the data processing is 10 years counted from submitting the final report to the entitled Higher Education Institution in case of successful applications, and 10 years counted from the evaluation of the application in case of non-successful applications.

The duration of the data management regarding the newsletter lasts until the end of the scholarship status, which is defined by the report of the Higher Education Institution on the termination of the legal student status at the end of each semester. Higher Educational Institutions provide data on 30 October and 15 March each year.

## **6. SCOPE OF PERSONS WITH ACCESS TO THE DATA, DATA TRANSFER AND DATA PROCESSING**

6.1. It is primarily the Data Controller and its internal staff who are entitled to have access to the data in order to accomplish their employment duties. Besides the Data Controller, the following entitled persons are allowed to access to your data:

- State Secretariat for the Aid of Persecuted Christians and for the Hungary Helps Program of The Ministry of Foreign Trade and Affairs checking the validity and eligibility of the Church recommendations, they ensure to process this data within the framework of GDPR. The legal basis for data processing is Article 2(1) of Government Decree 120/2017 (VI. 1.) (hereinafter: Government Decree).
- The entitled Higher Education Institutions where applicants apply and with whom the scholarship holders make scholarship agreements. The entitled Higher Education Institutions ensure that they process the data within the framework of the GDPR. The legal basis for data processing is Article 2(1) of Government Decree 120/2017 (VI. 1.) (hereinafter: Government Decree).
- The respective Higher Education Institutions are processing the data within the institutions in order to organize and process entry examination and enrolment. The higher education institutions are entitled to circulate the data within their own institution to any institutional employee that is responsible for above mentioned duties. The legal basis for data processing is Article 2(1) of Government Decree 120/2017 (VI. 1.) (hereinafter: Government Decree).
- Legal authorities of Hungary: Scholarship programme for Christian Young People is a governmental programme therefore several governmental authorities have access to the data.
- The State Secretariat for the Aid of Persecuted Christians and for the Hungary Helps Program and the Hungary Helps Agency are responsible for the Scholarship programme.
- The Embassies and Consulates of Hungary are also involved in the follow up of Scholarship Programme for Christian Young People.
- Several Bodies of the the Ministry of the Interior Matters, for example the National Directorate General for Aliens are also involved in the Scholarship Programme for Christian Young People during the operation and implementation for immigration and security matters. The legal basis for data processing is Act II of 2007 on the the Admission and Right of Residence of Third-Country Nationals.

6.2. The Data Controller may use a Data Processor to operate the IT system.

Name of the Data Processor: Dream Group Plc.

Activity: to operate the application system, DreamApply

Details of the data processor's tasks:

The role of Dream Group Plc (provider of the DreamApply service; hereinafter Service Provider) is to serve as data processor and therefore process personal data on behalf of Hungary Helps Agency. The Provider is receiving and processing the data for managing incoming applicants, students.

The main purpose of the data processing is to manage the data and application materials of applicants, who has submitted their data to Hungary Helps Agency Nonprofit Liability Company Plc and to Hungarian higher education institutions.

Categories of data stored in DreamApply system:

**Reg. number: ÖKF/374-2/2022**

1. User Data (personal data) of the Applicants: personal information necessary for submitting application(s) to the Institution – contact information, information about prior education and experiences on the field, identification information, information about language skills and other relevant info necessary for applying.

2. User Data (health data) of the Applicants: sensitive data as such can be collected only about health. Health information may be collected only in occasions where it is absolutely necessary for fulfilling the contract with the applicant or required by the law.

**The subject matter of the processing:**

The personal data transferred will be subject to the following basic processing activities:

1. application filing and processing within the Institution;
2. statistical reports gathering - only non-personalized data about the Applicants for research purposes (including for non-personalized statistics)
3. automatic requirements analysis;
4. offer and document generation;
5. during marketing activities collection of contacts, study interests and data about information channels.

**The duration of the processing:**

Detailed description of duration is regulated by the contract between the Data Controller and the Service Provider. When Hungary Helps Agency orders DreamApply to delete the data, it will be automatically deleted also from back-ups during 15–45 days.

**Service Provider (DreamApply):**

1. shall follow and fulfil its obligations as a data controller set down in General Data Protection Regulation
2. processes the personal data only on documented instructions from Hungary Helps Agency, unless required to do so by law
3. guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of the General Data Protection 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 ensure the protection of the rights of the data subjects;
4. ensures that persons authorised to process the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality

shall notify Hungary Helps Agency without undue delay after becoming aware of a personal data breach.

**7. THE RIGHTS AND RECOURSE TO LAW AVAILABLE TO THE PERSONS CONCERNED**

7.1. Applicant and Scholarship Holder (hereinafter: Parties) are entitled at any time to request information about their personal data managed by the Data Controller and may modify such data at any time by sending an e-mail request addressed to the contact details provided in Point 7.3.

7.2. At the Parties request, the Data Controller must provide Parties with information regarding the personal data it manages, the data processed by the data processor entrusted by it, the source of such data, the purpose, legal basis and duration of the data management, the data processor's name, address and activities in connection with the handling of the data, the circumstances and effects of the data protection incident, the measures taken to remedy the incident, and – in the case of transmission of the personal data – the legal basis and the recipient of the data transfer. The service provider must provide the requested information in writing within 30 days of the submission of the request.

The Data Controller - through its data protection officer - keeps a record to supervise and keep Parties informed of any measures taken in connection with the data protection incident including the scope of personal data concerned, the scope and number of persons affected by the data protection incident, the date, circumstances and effects of the data protection incident and the measures implemented in order to remedy the incident, as well as any other data specified in the laws governing the management of data.

7.3. Parties can exercise their rights via the following contact details:  
E-mail address: [gdp@hungaryhelps.gov.hu](mailto:gdp@hungaryhelps.gov.hu)

Parties may contact the Data Controller's data processing officer with any questions or observations regarding the processing of data via the contact details provided in Point 7.3.

7.4. Parties are entitled at any time to request the correction of any incorrectly recorded data. Parties are allowed to change data within the application system. If any difficulty occurs Hungary Helps Agency corrects the data within 30 working days of the receipt of the request at the [gdp@hungaryhelps.gov.hu](mailto:gdp@hungaryhelps.gov.hu) email address.

7.5. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

(a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

(b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2) of GDPR, and where there is no other legal ground for the processing;

(c) the data subject objects to the processing pursuant to Article 21(1) of GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);

(d) the personal data have been unlawfully processed;

(e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;

(f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

7.6. In case of complaint, Parties may apply to the National Authority for Data Protection and Freedom of Information (1125 Budapest, Erzsébet Szilágyi fasor 22/c, [www.naih.hu](http://www.naih.hu)).

**Reg. number: ÖKF/374-2/2022**

7.7. If Parties have provided third-party data for the use of the service, the Data Controller is entitled to seek damages from Parties. In such cases, the Data Controller must provide all available assistance to the competent authorities for the purpose of establishing the identity of the infringing person.

## **8. OTHER PROVISIONS**

8.1. In all cases where the Data Controller intends to use the data provided for purposes other than the purpose of the original data collection, it will notify and obtain from Parties prior express consent, and will provide the opportunity to prohibit such use.

8.2. The Data Controller undertakes to ensure the security of the data, to implement technical measures to ensure the protection of the recorded, stored or managed data, and to do everything in its power to prevent the destruction, unauthorized use and unauthorized alteration of the data. The Data Controller also undertakes to call on any third party to whom the data may be transferred or handed over to comply with these obligations.

8.3. The Data Controller reserves the right to unilaterally modify the rules and information on its website regarding the management of data.