PRIVACY NOTICE

by the Tempus Public Foundation regarding data processing in connection with the "University Portfolios" – Study in Hungary regarding data processing in connection with the call for content submissions

(for Stipendium Hungaricum scholarship students)

The purpose of this privacy notice (hereinafter: 'Notice') is to provide data subjects with information regarding the data processing carried out by the Tempus Public Foundation, as the Data Controller (hereinafter: **TKA** or **Data Controller**) in connection with the call for submissions of user-generated content (hereinafter: **UGC**) announced as part of the 'University Portfolios' Study in Hungary communication campaign (hereinafter: the 'Call') and the rights and remedies available to data subjects in connection with such data processing.

The provisions of this Notice apply exclusively to the processing of personal data of natural persons. Further information is available on the Data Controller's website, in the data protection policy and in other relevant notices: https://tka.hu/adatvedelem.

A separate privacy notice relating to the Stipendium Hungaricum programme provides information on other data processing activities connected with the status of a Stipendium Hungaricum scholarship holder.

1. **THE DATA CONTROLLER**

Name of the data controller:	**Tempus Public Foundation**
Registered office:	1077 Budapest, Kéthly Anna tér 1.
Telephone number:	+36-1-237-1300
Contact details of the Data Protection Officer:	adatvedelem@tpf.hu
Postal address:	1438 Budapest 70, PO Box 508.

2. DESCRIPTION OF DATA PROCESSING

Within the framework of this Call, the Data Controller processes the data of students aged 18 or over who hold active Stipendium Hungaricum scholarship status and who submit video content showcasing their studies and daily life in Hungary for publication. A data subject may submit more than one video.

A. The individual data processing operations

#	Data processing	Data subjects and categories of personal data	Purpose of data processing
2.1	**Registration / submission of content**	Identification and contact details of students applying for the Call and submitting content (name, email address), data required to verify Stipendium Hungaricum scholarship status and legal age, as well as the submitted video(s) (the image and voice of the participant and any third parties appearing in the video).	Receipt, editorial review and assessment of the submitted videos; verification of eligibility (active scholarship status, having reached the age of 18).
2.2	**Publication and use**	The video(s) selected for publication (the likeness and voice of the participant and any third parties appearing in the video).	The publication of the selected videos on the communication channels of Study in Hungary and/or Stipendium Hungaricum (website, social

			media), as well as their repeated use, without any temporal or geographical restrictions, in TKA's communications for educational, training and mobility purposes (e.g. further UGC campaigns, social media posts, reposts, promotional materials).
2.3	**Contact details**	The contributor's contact details.	Editorial communication regarding the submitted content, feedback, and notification of the decision on publication.
2.4	**Exercise of data subject rights and legal protection**	Data relating to the exercise of rights, and, in the event of a legal dispute, details of the underlying case.	Handling the exercise of data subjects' rights; protection of the Data Controller's legal rights in disputes arising in connection with the Call for Submissions (e.g. in the event of a breach of the declaration of legal compliance).

B. Legal basis for data processing

Legal basis for data processing: data processing is necessary for the performance of a task carried out in the public interest by the Data Controller in the interests of Hungarian vocational training, education, and research and development, pursuant to Article 6(1)(e) of the GDPR. Communication regarding 'Study in Hungary' and the international promotion of the Stipendium Hungaricum programme form an integral part of this remit.

The data subject may object, at any time and free of charge, to the processing of data on the legal basis necessary for the performance of a task carried out in the public interest. In the event of an objection, the Data Controller shall only continue to process personal data if this is justified by compelling legitimate grounds, or if it is necessary for the establishment, exercise or defence of legal claims.

Licence to use and warranty

By submitting the video, the data subject grants the Tempus Public Foundation, pursuant to Section 2:48 of the Civil Code and Act LXXVI of 1999 on Copyright, a free, non-exclusive licence, without any temporal or territorial restrictions, to the Tempus Public Foundation to use, reproduce, publish and – where necessary – edit or subtitle the submitted video for the purposes set out in point 2.

The TKA is entitled to remove the submitted or published content with or without prior notice, in particular if it infringes the rights of another person.

The submitter is solely responsible for ensuring legal compliance and for obtaining any necessary consents from third parties who may appear in the video; any claims arising from this and brought by third parties shall be borne by the submitter.

The Data Controller does not verify the personal data provided to it. The person providing the data is solely responsible for its accuracy.

3. PERSONS ENTITLED TO ACCESS THE DATA, DATA TRANSFER

3.1. Access to personal data is restricted to those internal staff members of TKA and its data processors for whom access to and processing of such data is necessary for the performance of their job duties and activities, in particular the direct organisers of the Event.

3.2. Following publication, the selected videos will be made available to anyone on the Data Controller's public online and social media platforms.

3.3. The Data Controller processes the data with the involvement of the following data processors:

3.3. **Data processors**. The operators of the technical platforms used for content submission and management (e.g. upload interfaces or file-sharing services).

3.4. **Data transfer to** a **third country**. Published videos may also appear on the Data Controller's social media platforms (e.g. Facebook, Instagram, YouTube); external service providers integrated into these platforms may transfer data outside the European Economic Area (EEA) in accordance with their own privacy policies, typically on the basis of Standard Contractual Clauses (SCCs) or the EU–US Data Privacy Framework.

4. RETENTION TIME

Content not selected for publication in accordance with section 2.1 and the associated contact details: for a maximum of 6 months following the conclusion of the editorial review process, after which they will be deleted.

2.2 **published, used videos**: for as long as the purpose of use persists; the Data Controller shall review the justification for further use at least every three years. In the event of a successful objection by the data subject or the withdrawal of the licence to use the content, TKA shall remove the content from platforms under its direct control; TKA cannot guarantee that, following publication, the content will also be removed from platforms outside TKA's direct control (e.g. content shared by others, online archives).

2.4 **enforcement of rights**: until the legal dispute is finally resolved; in other cases, for 5 years.

The Data Controller regularly reviews the justification for the continued storage of the data.

5. AUTOMATED DECISION-MAKING AND PROFILING

None of the data processing activities described involve automated decision-making or profiling as defined in Article 22 of the GDPR.

6. THE RIGHTS OF THE DATA SUBJECT

Detailed information on the data subject's rights can be found in Articles 14–22 of the GDPR. The data subject retains the right to control their personal data throughout the duration of data processing.

The data subject may exercise their rights by sending an email enquiry to the Data Protection Officer using the contact details provided in point 1. The data controller shall examine the request as soon as possible after it is submitted, decide on its merits within one month at the latest, and inform the data subject of its decision in writing (primarily by electronic means).

6.1 Right to information – we provide you with information about the processing of your personal data in clear and plain language, in a concise, transparent, comprehensible and easily accessible manner.

6.2 Right of access – You have the right to receive confirmation as to whether we are processing your personal data and, if so, to be provided with details of such processing following verification of your identity. As a data subject, you may also request a copy of your personal data held by us.

6.3 Right to rectification – You may request that any inaccurate data be rectified or supplemented. Should any amendments or changes occur to the data processed by the Data Controller during the data processing period, please notify us immediately using the contact details provided above.

6.4 Right to erasure ('right to be forgotten') – We will erase your data if the purpose of the data processing has been fulfilled, or if you lawfully object to the processing, if the data processing is unlawful, or if the data must be erased to comply with a legal obligation.

6.5 Right to restriction of processing – You may request that the processing of your data be restricted if you believe that the processing is inaccurate, unlawful or unnecessary, or if you object to the processing. In such cases, we will only store the data for as long as it takes to investigate the above concerns.

6.6 Right to object – As a data subject, you have the right at any time to object to the processing of your personal data for the performance of tasks carried out in the public interest. The Data Controller may only continue to process the data if there are compelling legitimate grounds for doing so, or for the purpose of establishing, exercising or defending legal claims.

7. THE DATA SUBJECT'S RIGHT TO REMEDY

DPO – The Data Subject may contact TKA's Data Protection Officer with any questions, comments or complaints regarding data processing using the contact details provided in point 1. TKA shall provide the requested information to the Data Subject in writing, primarily by electronic means, as soon as possible, but no later than one month from the date of receipt of the request. The procedure for complying with reasonable requests is free of charge.

NAIH – As a data subject, you may also lodge a complaint against the Data Controller's data processing with the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa u. 9–11; www.naih.hu) postal address: 1363 Budapest, P.O. Box 9, email address: ugyfelszolgalat@naih.hu).

Court – The data subject may also bring a claim against TKA before a court if, in their opinion, TKA is processing their personal data in breach of the provisions laid down in legislation or in a binding legal act of the European Union relating to the processing of personal data.

8. OTHER PROVISIONS

8.1 TKA declares that it has implemented administrative, technical and IT security measures in line with the current state of the art in order to protect the personal data it processes against unauthorised access, alteration, disclosure, erasure, destruction, accidental loss or damage, and against becoming inaccessible as a result of changes in the technology used.

8.2 In any instance where the Data Controller intends to use the data for a purpose other than that for which it was originally collected, it shall inform the data subject in advance and, where necessary, obtain their consent or provide them with the opportunity to prohibit such use.

8.3 The Data Controller reserves the right to amend this Notice unilaterally, subject to a notice published on its website. Data subjects will also be notified of any material amendments via the event's communication channels.

Budapest, 19 August 2026