



Doctoral Section of Literary and Cultural Studies, University of Debrecen General guidelines about the Section's data processing policy for doctoral students

The Doctoral Section of Literary and Cultural Studies, University of Debrecen (hereafter: Section) as Controller considers the protection of personal data a matter of high priority, and takes care at all times to ensure that the keeping of data processing records as well as the processing and protection of data take place in a safe and transparent manner, in compliance with the current Hungarian legislation and the European Union's General Data Protection Regulation (GDPR). One prerequisite of data protection compliance is the provision of adequate information about data processing.

These Guidelines accordingly provide information about the Controller's data processing operations: the sources of obtaining the processed data and the nature and scope of these data, the legal basis, objective and duration of data processing, the rights concerning personal data and the possibilities regarding these rights; the Guidelines also include contact details for inquiries concerning the data protection procedures implemented by the Controller processing personal data.

The Doctoral Section of Literary and Cultural Studies as Controller is in full compliance with relevant the laws regulating personal data protection, and offers the following information regarding GDPR.

1. The Controller's denomination and contact details

Controller	
Place of processing data	University of Debrecen, 3 Ground floor, Main Building
Controller's representative	Head: Dr. Tamás Bényei, full professor Secretary: Dr. Monika Gönczy academic coordinator
Address	4032 Debrecen, Egyetem tér 1.
E-mail address	deidi@arts.unideb.hu
Telephone	52/512-957; 52/512-900/ ext. 22650



2. Laws and regulations concerning data processing

Data processing carried out by the Section of Literary and Cultural Studies, School of Linguistics, Literary and Cultural Studies, University of Debrecen, is regulated by the following laws and regulations:

- Regulation 2016/679/EU 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: the General Data Protection Regulation of the European Union or GDPR),
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereafter: the Information Act)
- Act CCIV of 2011 on National Higher Education (hereafter: the National Higher Education Act)
- Act I of 2012 on the Labour Code (hereafter: the Labour Code),
- Government Decree 87/2015 (IV.9.) on the Implementation of Certain Provisions of the Act on National Higher Education Act (IV. 9 (hereafter: Implementing Decree)
- Government Decree 423/2012 (XII.29.) on the Admission Procedure to Higher Education (XII. 29 (hereafter: the Admissions Decree)
- Government Decree 387/2012. (XII. 19.) on the order of doctoral and habilitation procedures
- Government Decree 19/2012. (II.22.) on certain questions concerning quality assurance, control and development in higher education
- Act LXXXIX of 2018 on Education Records
- Government Decree 137/2008. (V.16) on language examinations certifying foreign language proficiency recognised by the state and on the nostrification of proficiency certificates issued abroad;
- Government Decree 389/2016. (XII.2.) on the financing of the basic activities of higher education institutions;
- Government Decree 51/2007. (III.26.) on benefits payable to students in higher education and fees to which students are liable;
- Government Decree 423/2012. (XII. 19.) on the admission procedures in higher education;
- Act LXXVII of 2013 on Adult Education (hereafter: Adult Education Act)
- Act CXC of 2011 on National Public Education
- the provisions of law pertaining to child welfare institutions, the continued education of teachers, as well as other relevant provisions of law, in harmony with the applicable rules of the University, hereby adopts the following internal policy (hereinafter: Policy), in which it shall present how it complies with the obligations arising from the relevant provisions of law and applicable to its activities.
- the Doctoral Regulations of the University of Debrecen
- the regulations of the University of Debrecen concerning the institutional processing of the applications submitted for New National Excellence Programme
- the internal data protection regulations of the University of Debrecen



3. Data processing performed by the Section of Literary and Cultural Studies, School of Linguistics, Literary and Cultural Studies, University of Debrecen

3.1. Data processing related to application and admission to PhD training

- 3.1.1. ***The objective of data processing:*** ensuring the smooth conduct of the application and admission procedure.
- 3.1.2. ***The nature and range of the processed data:*** The applicant's full name, sex, full name at birth, the applicant's mother's full name at birth, place and date of birth, citizenship, nationality, ID number (in the case of non-Hungarian citizens, the legal claim for their residence in Hungary and the residence permit – according to special legislation, in the case of persons endowed with the right to free mobility and residence the name and number of the residence permit), tax ID, Neptun code, educational identification number, social insurance number, photograph, bank account number, home address, place of residence, contact address, telephone number, e-mail address, the details of their secondary school, data of GCE certificate, details of university diploma, details of language proficiency examination.
- 3.1.3. ***The legal basis of data processing:*** Fulfilling a legal obligation according to Article 6 (1) paragraph point c, of GDPR, National Higher Education Act 18. § (1) paragraph b); Doctoral Rules and Regulations of the University of Debrecen, Annex 2.
- 3.1.4. ***The duration of data processing:*** duration as defined in Annex 3 (I/B) of the National Higher Education Act.
- 3.1.5. ***The circle of those having access to the data:*** the head, secretary and council of the doctoral section; the head and secretary of the doctoral programme; the admission board; the doctoral council and coordinator of the relevant academic field, the director for academic affairs.

3.2. Data processing related to registration for the doctoral training and for each academic term

- 3.2.1. ***The objective of data processing:*** organising the doctoral training for the students in a legal relationship with the university and registered for any particular semester.
- 3.2.2. ***The nature and range of the processed data:*** The applicant's full name, sex, full name at birth, the applicant's mother's full name at birth, place and date of birth, citizenship, nationality, ID number (in the case of non-Hungarian citizens, the legal claim for their residence in Hungary and the residence permit – according to special legislation, in the case of persons endowed with the right to free mobility and residence the name and number of the residence permit), tax ID, Neptun code, educational identification number, social insurance number, photograph, bank account number, home address, place of residence, contact address, telephone number, e-mail address, the details of their secondary school, data of GCE certificate, details of university diploma, details of language proficiency examination.
- 3.2.3. ***The legal basis of data processing:*** Fulfilling a legal obligation according to the National Higher Education Act 18. § (1) paragraph b), and the Doctoral Rules and Regulations of the University of Debrecen, 3. § és 6. § (4).



- 3.2.4. ***The duration of processing:*** as defined in National Higher Education Act, Annex 3 (I/B. 3.).
- 3.2.5. ***The circle of those having access to the data:*** the head and secretary of the doctoral section; the head and secretary of the doctoral programme; the supervisor; the coordinator of the relevant academic field, the director for academic affairs.

3.3. **Data processing related to the advertising of research topics**

- 3.3.1. ***The objective of data processing:*** to enable candidates to choose a research topic
- 3.3.2. ***The nature and range of the processed data:*** the name of the supervisor, the advertised research topics and the supervisor's data listed in the database doktori.hu
- 3.3.3. ***The legal basis of the data processing:*** Fulfilling a legal obligation according to Article 6 (1) of GDPR.
- 3.3.4. ***The duration of data processing:*** continuing; renewed in each term
- 3.3.5. ***The circle of those having access to the data:*** the head and secretary of the doctoral section; the head and secretary of the doctoral programme; the supervisor.

3.4. **Data processing related to course registration**

- 3.4.1. ***The objective of data processing:*** to enable the student to sign up for the courses and subjects they wish to take in the Neptun system when registration is possible.
- 3.4.2. ***The nature and range of the processed data:*** Neptun code, data of study records stored in Neptun.
- 3.4.3. ***The legal basis of data processing:*** Fulfilling a legal obligation according to Article 6 (1/c) of GDPR.
- 3.4.4. ***The duration of data processing:*** as defined in National Higher Education Act, Annex 3 (I/B. 3.).
- 3.4.5. ***The circle of those having access to the data:*** the head and secretary of the doctoral section; the head and secretary of the doctoral programme; the supervisor.

3.5. **Data processing related to the recording of examination results**

- 3.5.1. ***Objective of data processing:*** the evaluation of the candidate's performance
- 3.5.2. ***The nature and range of the processed data:*** name, Neptun code
- 3.5.3. ***The legal basis of data processing:*** Fulfilling a legal obligation according to Article 6 (1/c) of GDPR.
- 3.5.4. ***The duration of data processing:*** as defined in National Higher Education Act, Annex 3 (I/B. 3.).
- 3.5.5. ***The circle of those having access to the data:*** the head and secretary of the doctoral section; the head and secretary of the doctoral programme; the supervisor.

3.6. **Data processing related to the handling of petitions**

- 3.6.1. ***Objective of data processing:*** obligation to supply study-related information about the student for the doctoral council of the relevant academic field; decision preparation.



- 3.6.2. ***The nature and range of the processed data:*** name, Neptun code, birth data, address, e-mail, telephone number, grades in the doctoral training per term, completed credits, certificates of study trips abroad
- 3.6.3. ***The legal basis of data processing:*** Fulfilling a legal obligation according to Article 6 (1/c) of GDPR the National Higher Education Act 18. § (1) paragraph b), and the Doctoral Rules and Regulations of the University of Debrecen.
- 3.6.4. ***The duration of data processing:*** as defined in the Document Management Regulation of the University of Debrecen.
- 3.6.5. ***The circle of those having access to the data:*** the head and secretary of the doctoral section; the head and secretary of the doctoral programme; the head and secretary of the doctoral section; the head and secretary of the doctoral programme; the supervisor.

3.7. Data processing related to the termination of academic semesters and doctoral studies

- 3.7.1. ***Objective of data processing:*** to calculate mean grade for each term; to prepare for the closing of the term; to check whether all prescribed credits have been completed and to validate their completion.
- 3.7.2. ***The nature and range of the processed data:*** name, Neptun code, name of the supervisor, grades in the doctoral training per term, completed credits.
- 3.7.3. ***The legal basis of data processing:*** Fulfilling a legal obligation according to Article 6 (1/c) of GDPR, 18. § (1) paragraph b) of the National Higher Education Act, and the Doctoral Rules and Regulations of the University of Debrecen.
- 3.7.4. ***The duration of data processing:*** as defined in National Higher Education Act, Annex 3 (I/B. 3.).
- 3.7.5. ***The circle of those having access to the data:*** the head and secretary of the doctoral section; the head and secretary of the doctoral programme; the supervisor, the coordinator of the relevant academic field, the director for academic affairs.

3.8. Data processing related to registration for the complex examination and for the procedure of obtaining a doctoral degree

- 3.8.1. ***Objective of data processing:*** preparing, organising the complex examination and the procedure of obtaining a doctoral degree.
- 3.8.2. ***The nature and range of the processed data:*** The applicant's full name, sex, full name at birth, the applicant's mother's full name at birth, place and date of birth, citizenship, nationality, ID number (in the case of non-Hungarian citizens, the legal claim for their residence in Hungary and the residence permit – according to special legislation, in the case of persons endowed with the right to free mobility and residence the name and number of the residence permit), tax ID, Neptun code, educational identification number, social insurance number, photograph, bank account number, home address, place of residence, contact address, telephone number, e-mail address, details of university diploma, details of academic publication record, the subject of their doctoral dissertation, the name of the supervisor.
- 3.8.3. ***The legal basis of data processing:*** Fulfilling a legal obligation according to Article 6 (1/c) of GDPR, 18. § (1) paragraph b) of the National Higher Education Act, and the Doctoral Rules and Regulations of the University of Debrecen, Annex 4.



3.8.4. ***The duration of data processing:*** as defined in the National Higher Education Act, Annex 3 (I/B. 3.).

3.8.5. ***The circle of those having access to the data:*** the head and secretary of the doctoral section; the head and secretary of the doctoral programme; the board members of the complex examination and the dissertation defence; the doctoral council and coordinator of the relevant academic field, the director for academic affairs.

3.9. Data processing related to taking the minutes during the complex examination and the procedure of obtaining a doctoral degree

3.9.1. ***The objective of data processing:*** to record the student's level of preparation and the outcome of the procedure.

3.9.2. ***The nature and range of the processed data:*** name, Neptun code, examination subjects, examination results, questions posed, the evaluation of the answers, the materials submitted according to the doctoral regulations

3.9.3. ***The legal basis of data processing:*** Fulfilment of a legal obligation according to Article 6 (1/c) of GDPR.

3.9.4. ***The duration of data processing:*** data are stored by the University for the duration defined in the National Higher Education Act, Annex 3 (I/B. 3.).

3.9.5. ***The circle of those having access to the data:*** the head and secretary of the doctoral section; the head and secretary of the doctoral programme; the board members of the complex examination; the doctoral council and coordinator of the relevant academic field, the director for academic affairs.

3.10. Data processing related to the PhD dissertation, the thesis booklet, the evaluation procedure and the public defence

3.10.1. ***Objective of data processing:*** to keep records of the documents pertaining to the dissertation, the thesis booklet; the preparation and organisation of the public defence.

3.10.2. ***The nature and range of the processed data:*** the name of the candidate, the name of the supervisor, the documents pertaining to the public defence as specified in the Rules and regulations; the name and educational ID of the members of the board; in the case of participants liable to receive a honorarium, their full name, place and date of birth, mother's full name at birth, citizenship, nationality, ID number (in the case of non-Hungarian citizens, the legal claim for their residence in Hungary and the residence permit – according to special legislation, in the case of persons endowed with the right to free mobility and residence the name and number of the residence permit), tax ID, social security ID, bank account number, place of residence, telephone number, e-mail address.

3.10.3. ***The legal basis of data processing:*** Fulfilling a legal obligation according to Article 6 (1/c) of GDPR, 18. § (1) paragraph b) of the National Higher Education Act, and the Doctoral Rules and Regulations of the University of Debrecen.

3.10.4. ***The duration of data processing:*** the duration defined in the National Higher Education Act, Annex 3 (I/B. 3.).

3.10.5. ***The circle of those having access to the data:*** the head and secretary of the doctoral section; the head and secretary of the doctoral programme; the board members of the defence board; the doctoral council and coordinator of the



relevant academic field, the director for academic affairs; the doctoral and habilitation council of the University.

3.11. Data processing related to the organisation of the events and conferences of the Doctoral Section

- 3.11.1. **Objective of data processing:** the preparation and organisation of events
- 3.11.2. **The nature and range of the processed data:** name, e-mail address
- 3.11.3. **The legal basis of data processing:** consent, according to Article 6 (1) of GDPR.
- 3.11.4. **The duration of data processing:** *until the end of the event or conference.*
- 3.11.5. **The circle of those having access to the data:** the head and the secretary of the doctoral section, the organisers of the event.

3.12. Data processing related to the making and public disclosure of photographs (video or voice recordings)

- 3.12.1. **Objective of data processing:** to provide documentation about events and conferences, to supply information (including visual illustrations) about them on the university website and other university platforms, online platforms, social media pages, as well as for other media pending the permission of the University of Debrecen.
- 3.12.2. **The nature and range of processed data:** Photograph or video of the data subject, that is, the data subject's visual representation, general conduct, enabling conclusions to be drawn about the data subject.
- 3.12.3. **The legal basis of data processing:** the consent of the data subject, according to Article 6 (1/a) of GDPR.
- 3.12.4. **The duration of data processing:** Until the withdrawal of the data subject's consent or the announcement of the data subject's objection.
- 3.12.5. **Disclosure:** university website, university magazine and newsletter, university almanac.

4. Controller: to support the operation and maintenance of the Neptun Uniform Academic System, the University involves the IT company SDA as controller (seat: 1117 Budapest, Hauszmann Alajos u. 3/b.)

5. Access to data and safeguarding measures

The Controller takes care to ensure the safety of the processed data, implementing all the necessary measures in order to prevent unauthorised access to, alteration, transmission, disclosure, deletion or destruction, accidental destruction or damage, as well as the data's becoming inaccessible due to alteration of the technology applied, that is, the Controller will try to ensure that the personal data of the data subject receive the protection specified by the relevant laws.

As part of the measures necessary to fulfil the criterion of data safety, the Controller processes the data subject's data in a computer database, in an automatic and manual fashion, and has taken the necessary measure to ensure that the processing of the data subject's data is conducted in a closed system invariably protected by a password, saved on a hard disk and that these



systems are used by those authorised to access the data only in connection with supplying the service and only to the extent that is absolutely necessary for the provision of the service.

The computer systems are equipped with a firewall and adequate virus protection.

The Controller performs the technical overhaul of the system, implementing the necessary measures in case a fault is perceived or indicated.

Guaranteeing data safety, the Controller's leading officials and employees are bound by the obligation of secrecy and confidentiality and legal responsibility with regard to the personal data they have accessed in the course of data processing.

Visitors to the website, as well as all the information and network ID (IP address) that becomes accessible for the Controller through the use of the data subject's computer are duly logged in order to generate website statistics and detect possible faults and attacks. User IDs are not linked by the Controller to any other data on the basis of which the website visitor or the data subject could be identified.

6. Data subject rights and the rules applicable to the exercise of such rights

6.1. Right to information

In accordance with Article 15 (1) of the GDPR, the data subject may request information concerning the personal data processed by the Section of Literary and Cultural Studies, University of Debrecen. In such cases, the Section of Literary and Cultural Studies, University of Debrecen, using the contact address (e-mail address, postal address) of the data subject, will supply the information below:

- what personal data related to the data subject are processed;
- what are the purposes of the processing;
- to what parties the personal data are transmitted;
- the duration of the processing and the criteria for determining this duration;
- the rights of the data subject related to the processing;
- the right of the data subject to file a complaint to the National Authority for Data Processing and Freedom of Information.

6.2. The right to receive a copy of the data

In accordance with Article 15 (3)-(4) of the GDPR, the data subject may request a copy of your data processed by the Section of Literary and Cultural Studies. In such cases, the Section



of Literary and Cultural Studies forwards the personal data of the data subject using the provided contact information (e-mail address, postal address).

6.3. Right to rectification

Pursuant to Article 16 of GDPR, upon the request of the data subject, their personal data can be amended or clarified.

6.4. Right to erasure

Pursuant to Article 17 (1) of the GDPR, the data subject may request the erasure of their disclosed personal data.

6.5. The right to restrict the processing

The data subject may ask for the restriction of processing in the following cases:

- if the data subject contests the accuracy of the personal data, processing will be restricted until the accuracy of the personal data is checked by the Section of Literary and Cultural Studies;
- if the data processing is unlawful, and the data subject opposes the erasure of the personal data, requesting instead the restriction of the use of the data in question;
- if the *Section of Literary and Cultural Studies* (Controller) no longer needs the personal data, but the data subject requires the same data for submitting, enforcing or defending a legal claim; or
- if the data subject exercises the right to object, the Section will restrict the processing to the period of time during which the well-founded nature of the objection is examined.

Requests for the restriction of data processing have to specify the reason for the request. The Section of Literary and Cultural Studies complies with the request for the restriction of data processing by storing the personal data in question separated from all other personal data. In the case of electronically stored data, for instance, access to these data is restricted by storing the data in question on an external data device, while, in the documents stored on paper, storing the contested data in a sealed envelope, separated from all other documents.

6.6. The right of objection

The data subject has the right to object against the processing of their personal data with the application of a balancing test as the legal basis [Article 6 (1), point f) of the GDPR]. In case of an objection, the Section of Literary and Cultural Studies will examine if, with respect to the processing indicated, the Controller has an opportunity to delete the personal data due to the facts and reasons referenced by the data subject, or to discontinue the processing with respect to the data subject if the objection is found to be well-founded.

7. The joint rules of the exercise of rights



The request of the data subject is fulfilled by the Section of Literary and Cultural Studies within one month (the duration can be extended by no more than two months). In case the request is refused, the Section of Literary and Cultural Studies notifies the data subject within a month from the submission of the request, informing them about the reasons for the rejection as well as about the opportunities for seeking legal remedy: the data subject has the right to file a complaint with the National Authority for Data Protection and Freedom of Information (postal address: 1363 Budapest, P.O. Box 9, e-mail address: ugyfelszolgalat@naih.hu) to initiate a procedure or may submit a claim to the courts. If having well-founded doubts concerning the identity of the person submitting the request, the Section of Literary and Cultural Studies reserves the right to request any further information that is necessary for confirming the identity of the data subject concerned. Such cases include, in particular, those where data subjects exercise their right to obtain a copy of their personal data, in which case the Section of Literary and Cultural Studies is justified in verifying that the request indeed comes from the data subject concerned.

8. Opportunities for seeking legal remedy

In case the data subject thinks that the data processing of the Section of Literary and Cultural Studies, School of Linguistics, Literary and Cultural Studies does not comply with the legal regulations in force, they have the right to file a complaint with the National Authority for Data Protection and Freedom of Information (postal address: 1363 Budapest, P.O. Box 9, e-mail address: ugyfelszolgalat@naih.hu) to initiate a procedure or may submit a claim to the courts.

9. Additional provisions

In case the Controller decides to modify its Data Processing Guidelines, the Controller places an announcement about the change on its website, also making the modified Guidelines available on its website to ensure that all data subjects have access to it.

About types of data processing not listed in these Guidelines, information is provided by the Controller at the time when the particular data is recorded. The court of justice, the prosecution office, other investigating authorities, designated authorities, administrative authorities, the National Authority for Data Protection and Freedom of Information, or, if authorised by the law, other bodies might seek out the Controller to request information, data, or documents. The Controller – provided that the authority has specified the exact objective and the nature of the requested data – does produce personal data, but only to the extent that is absolutely necessary for realising the objective of the request.

If the Controller wishes to undertake data processing beyond the objectives behind their acquisition, it is bound to inform the data subject about the additional objective and all other relevant complementary circumstances.



If the Controller transmits the data to a third party, it has to inform the data subject about this not later than at the time when the data are first provided.

The GDPR Guidelines of the Scientific Directorate of the University of Debrecen are available through the link below:

<https://kancellaria.unideb.hu/adatkezelesi-tajekoztatok>

Debrecen, 1 September 2025.