

# Data Repository Platform Website - Full Privacy Policy

(Last updated: 08 March 2026 – v2.03)

The purpose of this summary of the Privacy Policy ("Privacy Policy") is to briefly describe how the HUN-REN Wigner Research Centre for Physics, the ELTE Centre for Social Sciences and the HUN-REN SZTAKI process your personal data when you use the HUN-REN Data Repository Platform ("ARP") website (<https://researchdata.hu/>; "Website").

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| <b>JOINT CONTROLLERS</b>                                | <p>The HUN-REN Institute for Computer Science and Control (headquarters: 1111 Budapest, Kende u. 13-17, contact: <a href="mailto:support@researchdata.hu">support@researchdata.hu</a> - "SZTAKI" or we) acts as the data controller of your personal data in connection with the operation of the Website as an information society service.</p> <p>In the case of certain data processing operations designated as such, HUN-REN Wigner Research Centre for Physics (headquarters: 1121 Budapest, Konkoly-Thege Miklós út 29-33, contact: <a href="mailto:support@researchdata.hu">support@researchdata.hu</a> - "Wigner FK"), ELTE Research Centre for Social Sciences (headquarters: 1097 Budapest, Tóth Kálmán utca 4., contact: <a href="mailto:support@researchdata.hu">support@researchdata.hu</a> - "TK") and SZTAKI act as joint data controllers in relation to your data. SZTAKI is then designated as the data controller on the basis of a joint controller agreement.</p>   |
| <b>THE ESSENCE OF OUR JOINT CONTROLLER AGREEMENT</b>    | <p>Wigner FK, TK and SZTAKI have entered into a joint data controller agreement for the data processed in the context of the user needs assessment. The substance of the agreement is that both Wigner and SZTAKI are independently responsible for their data protection compliance, but that data subject requests and data protection incident reports are handled via the email address <a href="mailto:support@researchdata.hu">support@researchdata.hu</a>.</p>   |
| <b>THE PURPOSES OF DATA PROCESSING</b>                  | <p>We process your personal data in relation to ARP for the following data processing purposes:</p> <ol style="list-style-type: none"><li><b>1. Maintenance and provision of the ARP Website:</b> we process your personal data in connection with the provision of the information society service related to the ARP Website to the extent technically necessary for the provision of the information society service, the legal basis for which is the implementation of the terms of use of the Website as a contract.</li><li><b>2. Contact and communication:</b> the purpose of the processing is to process and, in cooperation with Wigner FK and TK, to respond to your questions and requests received by us as joint controllers; for this purpose, we rely on <b>our legitimate interest</b> as legal basis.</li><li><b>3. User needs assessment:</b> we use a separate form to assess your user needs, in cooperation with Wigner FK and TK as joint controllers, in order to develop the ARP project further, for which we rely on <b>your consent</b>.</li><li><b>4. Newsletter sending:</b> the purpose of the processing is to ensure the sending of invitations, news and educational material related to the ARP project to the e-mail address you have provided. The data provided by you will be used by us, as a joint controller, for the sole purpose of sending newsletters, and will be processed on the basis of <b>your consent</b>.</li></ol> |
| <b>WHAT PERSONAL DATA RELATED TO YOU DO WE PROCESS?</b> | <p>For the purposes described above, we process the following types of personal data:</p> <ol style="list-style-type: none"><li><b>A. User identification data:</b> your name, email address, discipline (optional)</li><li><b>B. Communication data:</b> such as your questions, requests or communications with us.</li><li><b>C. Survey data:</b> your answers to the questions in each of our questionnaires.</li></ol>   |
| <b>LEGAL GROUNDS FOR PROCESSING</b>                     | <p>We process your personal data on the following legal bases:</p> <ul style="list-style-type: none"><li>• The processing of your personal data is necessary for the performance of a contract with you pursuant to Article 6(1)(b) of EU Regulation 679/2016 ("GDPR") ("<b>Contract</b>").</li><li>• You have given us your consent in accordance with Article 6(1)(a) of the GDPR ("<b>Consent</b>").</li><li>• We process your personal data on the basis of our legitimate interest pursuant to Article 6(1)(f) of the GDPR ("<b>Legitimate Interest</b>").</li></ul> <p>It is in our legitimate interest to respond to users' questions, requests and complaints, as it</p>  |

|  | <p>is in our legitimate interest to meet users' needs and answer their questions. If you contact us directly with questions or complaints, you can reasonably expect that your data will be processed when responding these. For more information about the outcome of the interest assessment, please contact us at the above email address.</p> <p>We may process your personal data for the following purposes and on the following legal bases:</p> <table border="1" data-bbox="435 423 1401 992"> <thead> <tr> <th data-bbox="435 423 762 512">Purpose of data processing</th> <th data-bbox="762 423 1082 512">Personal data processed categories</th> <th data-bbox="1082 423 1401 512">Legal Basis</th> </tr> </thead> <tbody> <tr> <td data-bbox="435 512 762 660"><b>Maintenance and provision of the ARP Website</b></td> <td data-bbox="762 512 1082 660"> <ul style="list-style-type: none"> <li>User identification data</li> </ul> </td> <td data-bbox="1082 512 1401 660">Contract</td> </tr> <tr> <td data-bbox="435 660 762 779"><b>Relationships, communication</b></td> <td data-bbox="762 660 1082 779"> <ul style="list-style-type: none"> <li>User identification data</li> <li>Communication data</li> </ul> </td> <td data-bbox="1082 660 1401 779">Legitimate interest</td> </tr> <tr> <td data-bbox="435 779 762 898"><b>User needs assessment</b></td> <td data-bbox="762 779 1082 898"> <ul style="list-style-type: none"> <li>User identification data</li> <li>Survey data</li> </ul> </td> <td data-bbox="1082 779 1401 898">Consent</td> </tr> <tr> <td data-bbox="435 898 762 992"><b>Send newsletter</b></td> <td data-bbox="762 898 1082 992"> <ul style="list-style-type: none"> <li>User identification data</li> </ul> </td> <td data-bbox="1082 898 1401 992">Consent</td> </tr> </tbody> </table> | Purpose of data processing | Personal data processed categories | Legal Basis | <b>Maintenance and provision of the ARP Website</b> | <ul style="list-style-type: none"> <li>User identification data</li> </ul> | Contract | <b>Relationships, communication</b> | <ul style="list-style-type: none"> <li>User identification data</li> <li>Communication data</li> </ul> | Legitimate interest | <b>User needs assessment</b> | <ul style="list-style-type: none"> <li>User identification data</li> <li>Survey data</li> </ul> | Consent | <b>Send newsletter</b> | <ul style="list-style-type: none"> <li>User identification data</li> </ul> | Consent |
|--|---|----------------------------|------------------------------------|-------------|---|--|----------|-------------------------------------|--|---------------------|------------------------------|---|---------|------------------------|--|---------|
| Purpose of data processing                                 | Personal data processed categories  | Legal Basis                |                                    |             |   |  |          |                                     |  |                     |                              |   |         |                        |  |         |
| <b>Maintenance and provision of the ARP Website</b>        | <ul style="list-style-type: none"> <li>User identification data</li> </ul>  | Contract                   |                                    |             |   |  |          |                                     |  |                     |                              |   |         |                        |  |         |
| <b>Relationships, communication</b>                        | <ul style="list-style-type: none"> <li>User identification data</li> <li>Communication data</li> </ul>  | Legitimate interest        |                                    |             |   |  |          |                                     |  |                     |                              |   |         |                        |  |         |
| <b>User needs assessment</b>                               | <ul style="list-style-type: none"> <li>User identification data</li> <li>Survey data</li> </ul>   | Consent                    |                                    |             |   |  |          |                                     |  |                     |                              |   |         |                        |  |         |
| <b>Send newsletter</b>                                     | <ul style="list-style-type: none"> <li>User identification data</li> </ul>  | Consent                    |                                    |             |   |  |          |                                     |  |                     |                              |   |         |                        |  |         |
| <p><b>FOR HOW LONG DO WE STORE YOUR PERSONAL DATA?</b></p> | <p>We will process and store personal data for as long as necessary for the performance of our services and obligations and strictly for the time necessary to achieve the purpose for which the data was collected. Your personal data will be deleted or anonymized when it is no longer necessary for us.</p> <p>In the case of data processing based on consent, we will process your data until your consent is withdrawn, but no longer than two years in the case of communications for marketing purposes. We will retain personal data relating to any complaint or legal claim until the civil statute of limitations expires (i.e. 5 years).</p> <p>The personal data stored in contracts, communications and business correspondence are subject to legal retention requirements. If you are in a contractual relationship with us, we will retain your personal data for the duration of the civil limitation period (i.e. 5 years).</p>   |                            |                                    |             |   |  |          |                                     |  |                     |                              |   |         |                        |  |         |
| <p><b>WHO HAS ACCESS TO YOUR PERSONAL DATA?</b></p>        | <p>Our staff may access your personal data on a "need to know" basis. Our service provider and other third parties may have access to your personal data as data processors. Furthermore, we may be required by courts, authorities and other official bodies to provide them your personal data. We may transfer your personal data to third parties for the following reasons:</p> <ul style="list-style-type: none"> <li><b>To certain third parties:</b> we may transfer your data to external advisors (such as lawyers) for the purpose of responding to legal claims.</li> <li><b>Public authorities and other official bodies:</b> for public authorities and other official bodies, such as supervisory authorities, at their request as required by law or for the security of our rights or those of our customers, staff or property.</li> </ul> <p>Personal data will not be transferred to countries outside the European Economic Area (EEA) that do not ensure an adequate level of protection.</p>   |                            |                                    |             |   |  |          |                                     |  |                     |                              |   |         |                        |  |         |
| <p><b>YOUR RIGHTS</b></p>                                  | <p>Where we process your personal data on the basis of your consent, you may withdraw your consent at any time without giving any reason. However, the withdrawal of consent does not affect the lawfulness of the processing that took place before the withdrawal of consent. You also have the following rights, which you can exercise against any controller:</p> <ol style="list-style-type: none"> <li><b>Right of Access:</b> you have the right to obtain confirmation/feedback from us as to whether or not your personal data is being processed and, if so, you have the right to access your personal data.</li> </ol>   |                            |                                    |             |   |  |          |                                     |  |                     |                              |   |         |                        |  |         |

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|  | <p>We may ask you for additional information to identify you or charge a reasonable fee for additional copies.</p> <ul style="list-style-type: none"> <li>ii. <b>Right to rectification:</b> you have the right to have inaccurate personal data about you rectified at your request.</li> <li>iii. <b>Right to erasure (right to be forgotten):</b> you have the right to request the erasure of your personal data.</li> <li>iv. <b>Right to restriction of processing:</b> in certain cases, we may restrict the processing of your <b>personal</b> data at your request. In such cases, we may process your data only for the purposes specified by law.</li> <li>v. <b>The right to data portability:</b> you have the right to receive the personal data we hold about you in a structured, commonly used, machine-readable format, and the right to have that personal data transferred to another controller.</li> <li>vi. <b>Right to object:</b></li> </ul> <p style="text-align: center;"><b>You have the right to object to our processing of your personal data for any reason relating to your particular situation at any time, in which case we may no longer process your personal data. Where you have the right to object and where the exercise of that right is justified, we will no longer process your personal data for the purposes of the processing to which the objection relates.</b></p> <p>You also have the right to contact the National Authority for Data Protection and Freedom of Information (headquarters: 1055 Budapest, Falk Miksa utca 9-11.; website: <a href="http://www.naih.hu">www.naih.hu</a>; telephone: +36-1-391-1400; email: <a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>; fax: +36 1 391 1410).</p> <p>You also have the right to take your complaint related to the protection of your data to court, which will rule on the matter out of turn. In such a case, you are free to choose whether to bring your action before the competent court in your place of residence (permanent address) or in the place where you are staying (temporary address). You can find the court of your permanent or temporary residence at <a href="https://birosag.hu/birosag-kereso">https://birosag.hu/birosag-kereso</a>.</p> |
| <p>DATA<br/>PROTECTION<br/>OFFICER</p> | <p>SZTAKI has appointed a Data Protection Officer whose contact details are:<br/><a href="mailto:andras.gyorgy@sbgk.hu">andras.gyorgy@sbgk.hu</a></p> <p>Wigner FK has appointed a Data Protection Officer whose contact details are:<br/>Dr. Krisztián András Tivadar, Tivadar Ügyvédi Iroda, <a href="mailto:drtivadar@drtivadar.hu">drtivadar@drtivadar.hu</a></p> <p>TK has appointed a Data Protection Officer whose contact details are:<br/><a href="mailto:kerekes.zsuzsa@tk.hu">kerekes.zsuzsa@tk.hu</a></p>  |