

PRIVACY STATEMENT

CENTRAL EUROPEAN UNIVERSITY

- EMPLOYEE -

In this document you find a detailed description of the data processing activities performed by your current employer. Being your employer and the same time the controller of all the data connected to your employment, we place great emphasis on the protection of your personal information and compliance with the applicable data privacy requirements, including specifically the EU General Data Protection Regulation ("GDPR"). This Privacy Notice relates to the collection, use, transfer, and retention of personal data related to your employment.

There might be specific privacy notices for future policies or data processing activities. These should be seen as an addition to this General Employee Privacy Notice and the rights herein shall also be applicable to the specific privacy notices.

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1 WHO ARE WE?

CEU GmbH ("CEU PU")

Quellenstraße 51
1100 Vienna, AUSTRIA

Közép-európai Egyetem ("KEE")

Nador u. 9.
1051 Budapest, HUNGARY

CEU Service GmbH ("CEU Service")

Wipplingerstraße 15/7
1010 Vienna, AUSTRIA

together "CEU"

2 JOINT DATA CONTROLLERSHIP

In case you have an employment with two or more entities, they qualify as joint data controllers according to Article 26 of the GDPR (the "Joint Data Controllers").

3 WHAT ARE OUR PURPOSES TO COLLECT YOUR PERSONAL DATA?

3.1 Preparing and modifying your employment contract and related documents + Onboarding in SAP Success Factor Onboarding Module

Description of the processing activity: When you apply for a position at CEU we collect your personal data to prepare our pre-contractual agreement. If you accept our employment proposal and sign your employment contract you become subject of our personal data processing activities performed as your employer. If you are onboarded in the SAP Success Factor Onboarding Module your data will be stored in this module until the first day of employment. Once your employment starts, you will be set as inactive, and your data is then "moved" to SAP Success Factors Employee Central module.

Categories of personal data concerned: Name, name at birth, citizenship, title, gender, marital status, place/date of birth, (permanent) address in Austria/Hungary, address abroad, private and office email address, CV provided in the recruitment process, offered position, salary package, benefits and other conditions and terms of employment, term of contract, type of employment relationship, working hours, activities performed, job title, qualification, department/unit, supervisor, job description, place of work, salary, social security number, tax number, dependent data, bank account information, employer's summary sheet for contract signing, signature, documents issued by employee's previous employer (e.g. health insurance booklet, certificate of employment, statement regarding any legally mandated wage deductions, statement showing the earnings and deducted taxes for the given tax year), start date of employment, employee ID number, performance and disciplinary information and/or any other information that might be required by relevant legal legislation.

Legal basis for the processing:

AT	HUN
Performance of a contract (Art 6 (1) (b) GDPR) or legal obligation (Art 6 (1) (c) GDPR)	Performance of a contract (Art 6 (1) (b) GDPR) or legal obligation (Art 6 (1) (c) GDPR) Act I. of 2012. on the Labour Code, Art. 10 (1) - (4), Act XCIII of 1993 and 5/1993. (XII. 26.) MüM ordinance on work safety, Carrying out obligations and exercising specific rights in the field of employment and social security (Art 9 (2) (b) GDPR; Act CXXII of 2019 on social security, Act CXXIII of 2019 on mandatory health security.

Retention period:

AT	HUN
Three years after the termination of your employment contract, or longer if necessary, for the establishment, exercise or defense of legal claims (Art 9 (2) (f) GDPR; sec 1486 (5), 1489 Austrian Civil Code ["Allgemeines bürgerliches Gesetzbuch"; "ABGB"])	Three years or five years - depending on the case - after the termination of your employment contract, or longer if necessary, for the establishment, exercise or defense of legal claims (Art 9 (2) (f) GDPR; sec 286 of the Labour Code + 1 year under Act CXXX of 2016 on the Code of Civil Procedure; If a dispute and/or potential legal action/proceeding is initiated relating to current or former employment, personal data should be kept until final binding decision. Data relevant for the provision of old-pension retirement should be kept until the end of the 5th year of the year when the employee becomes eligible for the statutory old-pension retirement (Act LXXXI of 1997 on old-pension retirement). Private phone number 6 months after termination will be deleted.

Recipients:

- The Hungarian Tax and Customs Administration (NAV),
- the National Health Insurance Fund Manager (NEAK)

- the Hungarian Statistical Office (KSH),
- National Pension Directorate,
- Labor Inspectorate

Transfer of personal data to a third country: Your personal data may be transferred to CEU NY on a need to know basis.

Provision of personal data: If you do not submit requested personal data, we may not be able to enter into an employment contract with you.

3.2 Education, scientific research and supervision

Description of the processing activity: We use the adequate personal data for our main activity, performing higher education and/or non-degree programs offline or online while we evaluate your performance, promote you in your carrier, issue awards or run procedures in line with internal policies or other mandatory documents. We also collect personal data for scientific research purposes (such as application for tender, committee approval/institutional endorsement, ethical research assessment, application for management of projects/research grants, records of projects, copy grant agreements and contracts) and international mobility programs. This is for instance necessary to submit applications for projects or to report to supervisory authorities on request.

Furthermore, we are obliged to collaborate in statistical surveys and report academic staff data to the Agency for Quality Assurance and Accreditation Austria ("Agentur für Qualitätssicherung und Akkreditierung Austria") and the Austrian federal ministry competent for the supervision of CEU PU (sec 6 Austrian Private University Act ["Privatuniversitätengesetz "; "PUG"]; sec 3 (3) Austrian Higher Education Quality Assurance Act ["Hochschul-Qualitätssicherungsgesetz "; "HS-QSG"]).

Exceptional data subject rights: You may object to the publication of your personal data for personal reasons (e.g. if scientists are involved in politically sensitive issues, they could be exposed to risk or harassment).

Categories of personal data concerned: Name, degree, title, gender, place/date of birth, citizenship/nationality, address and contact data, educational activity, main research, information on publications, information about project partners, information about education, funded projects and mobility programs as well as information on the CVs of scientific staff including data about associates, project title, communication with project team and project funders, academic review chart for appointment scheduling (name, rank, contract, end data, credits, notes), application form for requesting institutional endorsement for external funding, contractual information (like credits taught, working time, salary, waivers, e-mail address, amount of grant, travel contribution, individual supports) research proposal, checklist on ethical issues in research, the outcome on ethical review, application form for management of projects/research grant, support documents for auditing services and/or any documents or data required by relevant laws.

Legal basis for the processing:

AT	HUN
Performance of a task carried out in the public interest or legal obligation (Art 6 (1) (c) GDPR, Art 6 (1) (e) and (3), Art 9 (2) (j), Art 89 GDPR; sec 2h Austrian Research Organization Act ["Forschungsorganisationsgesetz"; "FOG"]; sec 6 PUG; sec 3 (3) HS-QSG) Legitimate interest (Art 6 (1) (f) GDPR)	Performance of a task carried out in the public interest or legal obligation (Art 6 (1) (c) GDPR, Art 6 (1) (e) and (3), Art 9 (2) (j), Art 89 GDPR) Legitimate interest (Art 6 (1) (f) GDPR)

Retention period:

AT	HUN
Three years after the termination of your employment contract, or longer if necessary, for the establishment, exercise or defense of legal claims (Art 9 (2) (f) GDPR; sec 1486 (5), 1489 ABGB)	Three years or five years - depending on the case - after the termination of your employment contract, or longer if necessary, for the establishment, exercise or defense of legal claims (Art 9 (2) (f) GDPR; sec 286 of the Labour Code + 1 year under Act CXXX of 2016 on the Code of Civil Procedure; If a dispute and/or potential legal action/proceeding is initiated relating to current or former employment, personal data should be kept until final binding decision. Education related data will be stored for 80 years.

When your employment contract terminates, if our legitimate interest requires, we may use some of your personal data (e.g. photo, your list of publications and other information about you) on our website, in publicly available reports/documents and research reports. If you do not agree, you can object to our data processing information about you. However, we may continue to publish your name on our website and in publicly available reports if and as long as we consider it necessary for public relations purposes and transparency (sec 2h (1) (2) FOG).

Recipients:

- Research partners and/or grant providing institutions
- Agency for Quality Assurance and Accreditation Austria (sec 6 PUG)

- Austrian federal ministry competent for the supervision of CEU PU (sec 2h (2) FOG; sec 6 PUG)
- EU Auditing services
- Auditor company with relevant competences, expertise and experience for auditing EU and non-EU funded programs and schemes.

Transfer of personal data to a third country: Your personal data may be transferred to CEU NY on a need to know basis.

Third party sources of personal data: We may collect data from publicly available sources, e.g. for project applications.

3.3 Tax, accounting and payroll purposes

Description of the processing activity: We process your personal data for wage, salary and remuneration accounting purposes, for reimbursement of travel expenses, cost control, budget planning, basis for bonus entitlement/benchmarking, work time recording, internal statistics and to comply with record keeping, access and reporting obligations, insofar as this is required by laws or contractual obligations. Moreover, we are legally obliged to cooperate with authorities if requested.

Categories of personal data concerned: Name of the insured employee, tax number, title, address, salary details, number of children, information about children (name, country of residence, social security number of each child), sick leave, unpaid leave, child care allowance, child care benefit, maternity or paternity leave, bereavement leave, documents necessary for receiving tax benefits, holiday requests, financial forms (e.g., but not limited to: grant application forms, salary advance, cash advance, travel request, fuel settlement form, etc.) travel information, overtime administration (overtime agreement, correspondence, budget approval), time recording (attendance sheet), information on work-related accident and/or any documents or data required by relevant laws.

Legal basis for the processing:

AT	HUN
Legal obligation (Art 6 (1) (c) GDPR; sec 84 Austrian Income Tax Act ["Einkommensteuergesetz"; "EStG"]; sec 26 Austrian Working Hours Act ["Arbeitszeitgesetz"; "AZG"]; sec 25 Austrian Act on Rest Periods ["Arbeitsruhegesetz"; "ARG"]; sec 294 and 299 Austrian Enforcement Code ["Exekutionsordnung"; "EO"]) Performance of a contract (Art 6 (1) (b) GDPR)	Legal obligation (Art 6 (1) (c) GDPR; Act XCVII on personal income tax, Act I. of 2012. on the Labour Code, Art. 10 (1) - (4), Act XCIII of 1993 and 5/1993. (XII. 26.) MüM ordinance on work safety, Carrying out obligations and exercising specific rights in the field of employment and social security (Art 9 (2) (b) GDPR; Act CXXII of 2019 on social security, Act CXXIII of 2019 on mandatory health security.

Legitimate interest (e.g. assistance for official travels, Art 6 (1) (f) GDPR)	Performance of a contract (Art 6 (1) (b) GDPR) Legitimate interest (e.g. assistance for official travels, Art 6 (1) (f) GDPR)
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Retention period:

AT	HUN
Seven years, or longer if necessary, for the establishment, exercise or defense of legal claims (Art 6 (1) (f) GDPR; sec 132 Federal Fiscal Code ["Bundesabgabenordnung"; "BAO"]; sec 212 Commercial Code [Unternehmensgesetzbuch; "UGB"]; Art 9 (2) (f) GDPR).	Three years or five years - depending on the case - after the termination of the employment contract, or longer if necessary, for the establishment, exercise or defense of legal claims (Art 9 (2) (f) GDPR; sec 286 of the Labour Code + 1 year under Act CXXX of 2016 on the Code of Civil Procedure; If a dispute and/or potential legal action/proceeding is initiated relating to current or former employment, personal data should be kept until final binding decision. Data relevant for the provision of old-pension retirement should be kept until the end of the 5th year of the year when the employee becomes eligible for the statutory old-pension retirement (Act LXXXI of 1997 on old-pension retirement). Data that only has relevance for taxation, must be kept for 8 years.

Recipients or categories of recipients:

AT	HUN
Tax authorities Social Insurance Agency Carriers (health, accident and pension insurance) Valida Plus AG Austrian Labor Inspectorate Tax accountants and attorneys	Tax authorities National Health Fund National Pension Directorate Labor Inspectorate Voluntary Pension Fund Voluntary Health Fund Tax accountants and attorneys

Transfer of personal data to a third country: Your personal data may be transferred to CEU NY on a need to know basis.

3.4 Human resources administration purposes

Description of the processing activity: CEU's HR department manages your personnel file, your employment contract and everything related to your employment. For instance, the HR department is responsible to issue your employee ID card and, on request, your CEU Business cards. The HR department instruct other department(s) to activate your work e-mail account and related access rights, may organize medical check-ups, administrates staff development, organizes mandatory trainings (e.g. fire safety, work safety) and other trainings (e.g. technical skills, soft skills, language courses), carries out performance evaluation of non-academic staff members and maintains records of all data generated by other units having impact on your employment (e.g. academic performance evaluation (IAAR), awards, decision of relevant CEU PU Committees (Disciplinary Committee) or bodies). The Individual Academic Activity Reports include results of periodic reviews, promotion and re-appointment materials, letters of reference, and other material relevant to academic performance.

The HR department may also distribute funds allocated for Family Support Scheme and administrates your personal budget plan (budget memo), study contracts as well as your participation in ERASUMS mobility programs.

Finally, the HR department is responsible for termination letters, resignation letters, recommendation letters, exit interview questionnaires and other documents issued at the end of an employment term.

Additionally, if you consent, the RESAVER Pension Plan may be included into your employment contract. In which case personal data will be processed for the RESAVER membership monthly report and the RESAVER contribution monthly report and transferred to the service provider.

Categories of personal data concerned: employee ID card data (name, photo, card number, identification number of employee department, validity of the card, level of access, date & time when the ID card is used to enter a door/gate), CEU e-mail address, internal training session data (topic of the training, name of attendees and the lecturer, signature, date), decisions or other documents concerning you, performance evaluation data (name, job title, unit, supervisor's name, period evaluated, performance evaluation details, data defined in the Academic Staff Handbook), data required for recommendation letters, emergency contact details, information on work-related accident, employee satisfaction survey, time-sheet, training history.

Personnel file: In your personal file, we store your name, job title, name of department, term of contract, working hours, salary, salary forecast, planned salary, notes about decisions, leaves, promotions, participation in research projects, your employment contract and appendices and other data categories addressed in this section and under other sections in this document.

Special categories of personal data: When we process information about your sick leaves, no inference regarding your health condition is possible. In case that non-mandatory

medical check-ups are organized by our HR department, we do not receive any health data regarding these medical checks. All we may know is, when and which type of medical check-up you attend. We might need to obtain health data from you after you consented to it, to assist you if you have special needs (e.g. in case of pandemic).

Obligatory medical checks: If you are engaged in an occupation, where you are exposed to occupational disease, a medical check is required whether you are fit for such a position. We store your name, address, date of birth, type of occupation, because of which the medical check is required, start and end date of that occupation, name and address of the doctor carrying out the medical check, date of each medical examination, fitness for the given position. In Austria, this information is retained until the termination of your employment contract and is then transferred to the institution responsible for accident insurance, which retains this information for at least **fourty years** (sec 58 ASchG). The Austrian Labor Inspectorate is involved in this process.

At the end of the employment relationship your ID card will be immediately destroyed.

Legal basis for the processing:

AT	HUN
Performance of a contract (Art 6 (1) (b) GDPR)	Performance of a contract (Art 6 (1) (b) GDPR)
Legal obligation (Art 6 (1) (c) GDPR; AZG; ARG; Sec 16 Austria Workers Protection Act ["ArbeitnehmerInnenschutzgesetz"; "ASchG"])	Legal obligation (Art 6 (1) (c) GDPR; Act I. of 2012. on the Labour Code, Art. 10 (1) - (4), Act XCIII of 1993 and 5/1993. (XII. 26.) MüM ordinance on work safety,
Carrying out obligations and exercising specific rights in the field of employment and social security (Art 9 (2) (b) GDPR; Sec 58 ASchG and related ordinances)	Carrying out obligations and exercising specific rights in the field of employment and social security (Art 9 (2) (b) GDPR; Act CXXII of 2019 on social security, Act CXXIII of 2019 on mandatory health security.
Consent, e.g. to participation to non-mandatory medical check-ups organized by CEU (Art 9 (2) (a) GDPR) or assistance in case of special health related need	Consent, e.g. to participation to non-mandatory medical check-ups organized by CEU (Art 9 (2) (a) GDPR) or assistance in case of special health related need

Retention period:

AT	HUN
Three years after the termination of your employment contract, or longer if necessary, for the establishment, exercise	Three years or five years - depending on the case - after the termination of the employment contract, or longer if

or defense of legal claims (Art 9 (2) (f) GDPR; sec 1486 (5), 1489 ABGB).

Data required for your recommendation letter will be retained for **thirty years** after the termination of your employment contract (sec 1479 ABGB).

Data required for obligatory medical checks will be retained for **fourty years**.

necessary, for the establishment, exercise or defense of legal claims (Art 9 (2) (f) GDPR; sec 286 of the Labour Code + 1 year under Act CXXX of 2016 on the Code of Civil Procedure;

If a dispute and/or potential legal action/proceeding is initiated relating to current or former employment, personal data should be kept until final binding decision.

Your health fitness result(s) for your position, exit interview, time-sheet will be kept for three years after termination of employment while training history and performance evaluation(s) will be deleted right after termination.

Case documents and decisions of Disciplinary Committee) or other bodies will be kept according to the respective Policies or internal rules.

Data relevant for the provision of old-pension retirement should be kept until the end of the 5th year of the year when the employee becomes eligible for the statutory old-pension retirement (Act LXXXI of 1997 on old-pension retirement).

Recipients:

AT	HUN
Institution responsible for accident insurance Austrian Labor Inspectorate RESAVER	Tax authorities National Health Fund National Pension Directorate Labor Inspectorate Voluntary Pension Fund Voluntary Health Fund Tax accountants and attorneys

Transfer of personal data to a third country: Your personal data may be transfer-red to CEU NY on a need to know basis.

3.5 Intranet, Communication, Collaboration, Library

Description of the processing activity: In our legitimate interest to enhance collaboration we publish your photograph and some employment related details about you in our intranet and for better communication with our students, we may further internally publish your e-mail address, office desk phone number, office location, lectures and news.

We may process your CEU e-mail address to send you essential communications, newsletters or invitations to CEU events.

If you use our library services, your data will be processed to submit requests, place holds in the library and to track borrowed and returned books.

Categories of personal data concerned: Name, job title, phone number, e-mail address, office location, CEU ID barcode

Legal basis for the processing:

- Legitimate interest (Art 6 (1) (f) GDPR)

Retention period: all your data published on the intranet will be deleted right after the termination of your employment contract.

3.6 CEU's IT system, Internet and e-mail usage, IT Security and Support-Policy

Description of the processing activity: For the operation of CEU's It infrastructure and IT security reasons your activities (metadata only) are logged, whenever you are signing with your user credentials to a CEU physical or virtual device and/or use any of the systems, services offered by CEU to you. Your behavior pattern (network resources used, data volumes, time of processing, etc.) is monitored for unusual behavior (e.g. we use anti-virus software).

Employees are expected to protect CEU's operational, business and personal data and must follow the IT/ data security or other measures, instructions provided by the expert unit(s). Employees during their employment must always use the e-mail address (account) provided for them for employment purposes. Forwarding emails to a non-CEU e-mail address is not allowed. This prohibition shall also be applicable for forwarding mails between CEU-employment e-mail address and CEU-student e-mail address freely available cloud-based services shall not be used for storing and processing any personal data related to CEU. (e.g. gmail or other e-mail service providers, dropbox, doodle).

The use of e-mail is permitted for private and business purposes. However, private e-mails must be stored in the sub-folder called "private" set-up by the employee following instructions of the IT Department. If e-mails are not moved to "private" folder, you must expect that private e-mails can be viewed by CEU.

CEU is entitled to access the employee's mailbox during retention time if this is required for the proper course of business or internally regulated processes (e.g. disciplinary case, breach of Code of Ethics), external audit. This access must take place in the presence of the data protection officer or similar privacy or legal professional at CEU and the "private" folder cannot be subject of it. Minutes must be taken of the access properly documenting all the facts and findings occurred during the check including the potential personal data.

Employee is not allowed to delete business e-mail shortly before terminating his/her employment.

Categories of personal data concerned: IT usage metadata, content data (only if necessary), data available from the mobile devices used and returned by employees.

Legal basis for the processing:

- Performance of a contract (Art 6 (1) (b) GDPR)
- Legitimate interest (Art 6 (1) (f) GDPR)

Retention period: **One year** after the end of the employment relationship, employee's e-mail account, Office365 files stored in folders connected only to him/her and other data resulting from the use of CEU's IT system will be deleted. Please find corresponding details on the IT Department's SharePoint Site. Data on returned CEU devices will be deleted as soon as feasible.

Please find corresponding details regarding the Usage of IT, Logging and Deletion of data on the [IT Department's SharePoint Site](#) which is the **Appendix 1 to this document**. Data on returned CEU devices will be deleted as soon as feasible.

3.7 Assistance to residence and work permit issues, other services (Austria-specific)

Description of the processing activity: If you are a third country citizen (non-EU/EEA country), you might need a residence or employment permit in Austria. We offer you our support if you are applying for a residence permit, e.g. for the translation of diplomas or certificates.

We may also offer several types of assistance to our employees, e.g. we may distribute funds allocated for Family Support Scheme or assist you to obtain a private, third-party health insurance. We may also provide you travel and accommodation support through our third-party service provider.

In such cases we do not act as data controllers, but data processors and when asking for our assistance you give your consent for data processing performed by us.

On request, we are obliged to transfer the names and number of foreign employees to the Austrian Employment Market Service, health insurance providers and tax authorities (sec 26 Austrian Aliens Employment Act ["Ausländerbeschäftigungsgesetz "; "AuslBG"]).

Categories of personal data concerned: Email correspondence about the process, a copy of the diploma and passport, application form (social security number, name, gender, date/place of birth, name at birth, citizenship, civil status, address, residency title, profession), authorization letter for the person collecting the employment permit, residence permit, questionnaire for internal use (data concerning employees and their family members), marriage certificate, birth certificate and/or other documents as required by relevant laws, or any information that depends on the type of service that we can offer and you use for yourself and/or your family members.

Legal basis for the processing:

- Legal obligation (Art 6 (1) (c) GDPR; sec 3 AuslBG)
- Consent (Art 6 (1) (a) GDPR)
- Legitimate interest (Art 6 (1) (f) GDPR)

Retention period: Personal data processed for this purpose will be stored in your personnel file as long as you require it but maximum for a period of **three years** after the termination of your employment contract, or longer if necessary, for the establishment, exercise or defense of legal claims (Art 6 (1) (f) GDPR; sec 132 BAO; sec 212 UGB; Art 9 (2) (f) GDPR; sec 1486 (5), 1489 ABGB). Work permit, however, will be stored for **three years** after the termination of your employment contract according to relevant legislation.

Recipients or categories of recipients:

- Austrian Employment Market Service
- Health insurance providers
- BCD Travel Hungary Kft.

3.8 Events and Photos/Videos

Description of the processing activity: Contacting, register, selecting participants for events organized by CEU, collecting payment, taking and publishing pictures/videos/voice recordings.

Categories of personal data concerned: Name, e-mail address, institution or any other personal data specified in registration form, Bank Account Details and Amount, Image, Video, Voice

Legal basis for the processing: The legal basis for data processing is the legitimate interests pursued by CEU under Article 6 (1) (f) GDPR. For collecting payment it is Article 6 (1) (b) GDPR and for taking and publishing pictures/videos/voice recordings it is your consent under Article 6 (1) (a) GDPR, which you can withdraw at any time without reasons and without negative effects.

Retention period: Your registration data will be deleted **5 days** after the event. In case any cost was generated to the event or reimbursed by CEU, we are obliged to store your name for **seven years** together with the cost supporting documents. We store the valuable

photos, videos in our archive for **ten years**. We normally keep the photos, video recordings of the events on our website and on our social media platforms (Facebook, Twitter, LinkedIn, YouTube) for **three years** after the publication year.

Recipients or categories of recipients: For the proper performance of the activities, we may need to pass your information to third-party service providers (e.g. location, hotel,...)

3.9 Meal Voucher

Description of the processing activity: Providing monthly meal voucher in Austria and transferring the monthly amount to the SZEP Card bank account of the employee in Hungary

Categories of personal data concerned: Amount, first and last name, e-mail address, SZEP Card number, SZEP Card bank account number

Legal basis for the processing: Legitimate interest for providing monthly meal voucher for employees

Retention period: AT 7 years, HUN 6 years after termination

Recipients or categories of recipients: Edenred for Austria and OTP Bank, K&H Bank and MKB Bank for Hungary

3.10 Family Support Scheme (also Paid Partner Leave)

Description of the processing activity: Providing fringe benefits

Categories of personal data concerned: ID, E-Mail-Address, Employee Name, First and last name of child, year of birth of the child

Legal basis for the processing: Consent

Retention period: AT 7 Years, HUN 3 years from termination

3.11 Treatment of Employees with a Disability

Description of the processing activity: CEU has developed the Policy on the Rights of Employees with a Disability for effectively providing disability accommodations to colleagues with a disability. The Policy applies to all areas of university operations and programs. Due to the nature of your application for accommodation, the Data Controller might have access, use and store special category of personal data (e.g. health related data) forming part of your application and the decision making process, indicated to us either by you or generated during the process according to the provisions of the Policy.

Categories of personal data concerned:

Processing Activity	Purpose of data processing	Category of personal data	Legal basis
application for available accommodation	management of the appeal for accommodation and decision making	• full name, e-mail address, submission date • personal data included in the application (nature of the disability, evidencing document(s), accommodations requested) • personal data obtained by the DRO in line with the provisions of the Policy • procedural steps according to the Policy • decision • communication of the decision	Legitimate interest of the Data Controller Article 6 (1) (f) and explicit consent of the requesting individual Article 6 (1) (a)
appeal against decision	management of the appeal for accommodation and decision making	• full name, e-mail address, submission date • personal data included in the application (nature of the disability, evidencing document(s), accommodations requested) • personal data obtained by the DRO in line with the provisions of the Policy • procedural steps according to the Policy • decision	Legitimate interest of the Data Controller Article 6 (1) (f) and explicit consent of the requesting individual Article 6 (1) (a)
Reporting (only Austria)	management of disability levy payment	• full name, evidencing document(s)	Evidence of a disability can be in accordance with § 3 BGStG provisions of the Employment of Persons with Disabilities Act (Behindertengleichstellungsgesetz)

Retention period: Personal data collected and used when implementing the provisions of the Policy will be retained for 7 years after the termination of your employment. Withdrawal of an application for accommodation will automatically lead to the deletion of the personal data processed while dealing with the given case.

Recipients or categories of recipients: The Disability Rights Officer is responsible for any transmission of your personal data to the Medical Practitioner, the Psychological Counseling, the Supervisor, the Committee on Employees with a Disability or any other unit/department/program of the Data Controller that might have a role while performing the provisions and implementing the rules of the Policy. In these cases, the Policy gives right to the dedicated CEU employees to have access to some elements of the personal data while completing their task. The potential access rights and type of procedures are regulated in depth in the Policy and only provided after your written permission. The Disability Rights Officer cannot share your personal data with community members or third parties who are not indicated in the Policy. For Reporting we must send the data to our Service Provider and to the Authority.

3.12 Pay Gap Analysis

Description of the processing activity: Monitoring gender discrimination in remuneration by the Gender Equality and Diversity Officer (only for CEU PU).

Categories of personal data concerned: Unique Identifier of the employee, Legal Gender, Preferred Gender, Citizenship, Place of Birth, Number of dependents: relationship and date of birth, Date of birth, Main Employer and all Legal Employer(s), Date of start of contract(s), Date of end of contract(s), Category (academic staff/administrative staff), Job Title, Rank, Unit, Working hours per week/number of credits, Annual gross salary, Annual bonuses: type, amount, Parental leave(s) taken (yes/no), Starting date of parental leave(s), End date of parental leave(s)

Legal basis for the processing: Legitimate Interest by processing the data for equality reports, it can be achieved that no individual within the organization is discriminated against based on their personal data.

4 WHAT ARE YOUR RIGHTS?

- **Access** your personal information – you can obtain a confirmation that we are processing your data and information how we process it. We suggest that you make a request in writing.
- **Object** to the processing of your personal information – this allows you to ask us to stop processing your data at any time. Where we rely on legitimate interest, you must give specific reasons why you are objecting the processing of your data. In this case this is not an absolute right, we can demonstrate compelling legitimate grounds for processing, which override your interests, rights and freedoms. Where we are processing personal data for scientific or historical research, or statistical purposes, you only have a right to object if our lawful basis for processing is legitimate interest.

- **Rectify** – you have a right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- **Erase** (also known as the right to be forgotten) – in certain circumstances you can ask for the data we hold about you to be erased from our records. Your personal data will be erased where the data are no longer needed for their original processing purpose, or you have withdrawn your consent and there is no other legal ground for processing, or you have objected and there are no overriding legitimate grounds for the processing, or erasure is required to fulfill a statutory obligation under the EU law or the right of the national law.
- Request **data portability** – you can ask to have the data we hold about you transferred to another organization.
- **Restrict processing** your personal information – where certain conditions apply you have a right to restrict the processing of your personal information
- **Withdraw consent** at any time – without affecting the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise any of these rights, please email privacy@ceu.edu or write to us at Quellenstraße 51, 1100 Vienna.

We will make every effort to fulfill your request to the extent allowed by law and will respond within 1 month of receiving your request.

You also have the right to lodge a complaint with the relevant national authority, the contact details are as follows:

AT	HUN
Austrian Data Protection Authority Barichgasse 40-42 1030 Vienna, AUSTRIA Phone: +43 1 52 152-0 E-Mail: dsb@dsb.gv.at Web: www.dsb.gv.at	Hungarian Data Protection Authority Falk Miksa utca 9-11 1055 Budapest, HUNGARY Phone: +36 (30) 683-5969 E-Mail: ugyfelszolgalat@naih.hu Web: https://naih.hu/

In addition to the legal remedy, you have the right to apply to the court against the activities of the Joint Data Controllers.

5 SECURITY OF YOUR INFORMATION

We are committed to holding your data securely and treating it confidential. All data are held securely and in accordance with the relevant data privacy laws and our internal policies. We do not sell to or trade your data with any other organizations.

6 FUTURE CHANGES

If our information policies or practices change at some time in the future, we will post the changes on Privacy [Website](#).