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The University of Nyíregyháza, as a data controller ("University", "Controller"), pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("GDPR"), hereby informs chatbot users ("User") about the processing of their personal data.

1) Name and contact details of the Data Controller, Data Protection Officer:
- Data Controller.
- Headquarters.
- Institutional identification number: FI 74250
- Tax number: 19308708-4-15
- Group tax identification number: 17782311-5-15
- E-mail: hszk@nye.hu
- Telephone number: + (36) 42 / 599-400; 599-431
- Website: https://www.nye.hu
- Data Protection Officer: Mrs György Makszim Dr. Tímea Nagy
- E-mail: makszim.gyorgyne@nye.hu
- Phone: + (36) 42-599-400/2460

2) Purpose of processing, legal basis, scope of personal data processed, duration of processing:
The use of the chatbot is used without any obligation for Users to provide prior data, however, in order to use certain functions (Ticketing module) it is necessary to provide the User's name, e-mail address and telephone number.

However, in addition to the use of the Ticketing module, the User may voluntarily provide certain personal data during the use of the chatbot (telephone number, e-mail address, first name, surname) via the e-mail address collection module (Lead module).

In any case, the messages of the conversation between the User and the AI-based chatbot will be stored.

2.1. Purpose of data processing
The University processes Users' data for the following purposes:
- The use of the Ticketing module allows Users to send their chatbot chatted conversation in its entirety to an administrator and to send further messages and questions to the administrator in order to have their question fully answered.
- The email address collection module (Lead module) allows the User to voluntarily provide his/her email address, phone number and first name, last name during the conversation. The institution may use the data collected in this way for marketing, information and other information purposes.
- The content of the conversation between the User and the chatbot will help the Institution to improve its customer service processes, analyse incoming queries, generate statistics and reports, and improve the chatbot's response capability.

2.2. Scope of personal data processed
- Personal data: first name, last name
- Contact details: e-mail address, telephone number
- Message exchange conversations transcript

2.3 Duration of processing until revocation

2.4 Legal basis for processing
- Data subject's consent (Article 6(a) GDPR)
- The Data Subject's consent may be withdrawn at any time, the withdrawal of consent does not affect the lawfulness of the processing prior to the withdrawal.

2.5 Data provided by the Data Subject:
- Personal data: first name, last name,
- Contact details: e-mail address, telephone number
- E-mail address E-mail address E-mail address

In particular, the legislation relating to the provision of the Service:
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC ("GDPR"), in particular Article 6(a) thereof.
- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Act on the Freedom of Information Act).
- Act V of 2013 on the Civil Code (Civil Code Act).

3) Publicity of data processing:
The personal data provided by Users and the content of the conversation will in any case be visible to employees with administrator privileges for the operation of the system, who are bound by confidentiality obligations.

4) Transfer of personal data, recipients of personal data and categories of recipients:
4.1 The Data Controller uses the following data processors in connection with the processing:
- Name, address, contact details of the Data Processor.
- Data repository service provided by DigitalOcean platform.

4.2 The University will disclose the personal data processed in accordance with the legal obligation only in the cases and to the recipients specified therein.

5) Data subject's rights in relation to data processing:
5.1. General rules on the exercise of rights of access:
- The Data Controller shall inform the Data Subject of the measures taken in response to his/her request without undue delay, but no later than one month from the receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. The Data Controller shall inform the Data Subject of the extension of the time limit within one month of receipt of the request, stating the reasons for the delay. If the Data Subject has submitted the request by electronic means, the information shall be provided by electronic means where possible, unless the Data Subject requests otherwise.
- The Controller shall provide the information and take action free of charge to the Data Subject. If the Data Subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the Controller may, taking into account the administrative costs of providing the information or information requested or of taking the action requested: a) charge a reasonable fee, or b) refuse to act on the request.

- The burden of proving that the request is manifestly unfounded or excessive shall lie with the Controller.
- Where the Controller has reasonable doubts as to the identity of the natural person making the request, it may request additional information necessary to confirm the identity of the Data Subject.

5.2. Right of access:
- The data subject has the right to receive feedback from the Data Controller as to whether or not his or her personal data are being processed and, if such processing is ongoing, the right to access the personal data. Where such processing is ongoing, the Data Controller shall provide the Data Subject with a copy of the personal data that are the subject of the processing. For additional copies requested by the Data Subject, the Controller may charge a reasonable fee based on administrative costs. If the Data Subject has made the request by electronic means, the information shall be provided in a commonly used electronic format, unless the Data Subject requests otherwise.

5.3 Right to rectification:
- The Data Subject shall have the right to obtain, upon his or her request, the correction of inaccurate personal data relating to him or her by the Controller without undue delay.

5.4 Right to restriction of processing:
- The Data Subject shall have the right to obtain, at his or her request, the restriction of processing by the Controller if one of the following conditions is met: (a) the data subject contests the accuracy of the personal data, in which case the restriction shall be for a period of time which allows the Controller to verify the accuracy of the personal data; (b) the processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use; (c) the Controller no longer needs the personal data for the purposes of the processing but the data subject requires them for the establishment, exercise or defence of legal claims; or (d) the data subject has been informed of the existence of a legitimate interest in the processing of personal data in accordance with Article 21.1 of the GDPR. (d) the data subject has objected to the processing pursuant to Article 21(1) of the GDPR; in this case, the restriction shall apply for the period until it is established whether the legitimate grounds of the controller override the legitimate grounds of the data subject.
- Where processing is subject to restriction, such personal data, except for storage, may only be processed with the consent of the Data Subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the Union or of a Member State.

5.5 Right to data portability:
- The Data Subject also has the right to receive the personal data concerning him or her that he or she has provided to the Controller in a structured, commonly used, machine-readable format and the right to transmit such data to another controller without hindrance from the controller to whom the personal data have been provided, if: (i) the processing is based on consent within the meaning of Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation or on a contract within the meaning of Article 6(1)(b) of the General Data Protection Regulation; and (ii) the processing is carried out by automated means.

5.6 Right to erasure:
- A data subject may request the University to erase his or her personal data processed. The University will examine the request and, if justified, take action to delete the data. The

University will refuse the request for erasure in the cases provided for in Article 17(3) of the GDPR, in particular in cases where the data are still necessary for the performance of the University's tasks carried out in the public interest or where the processing is necessary for the establishment, exercise or defence of legal claims.

6) Enforcement possibilities:

6.1 The Data Subject may at any time contact the Data Protection Officer of the Controller (György György Makszimné Dr. Tímea Nagy, e-mail: makszim.gyorgyne@nye.hu) in relation to the processing of his or her personal data.

6.2 In the event of a complaint regarding the processing of personal data, the Data Subject may also contact the National Authority for Data Protection and Freedom of Information (postal address: 1363 Budapest, Pf. 9., address: 1055 Budapest, Falk Miksa utca 9-11., telephone: +36 (1) 391-1400; fax: +36 (1) 391-1410; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu).

6.3 The Data Subject may take legal action against the Data Controller in case of violation of his/her rights. The court shall rule on the case out of turn. The Data Controller shall prove that the processing complies with the law. The court of law, in the capital city the Metropolitan Court, has jurisdiction to hear the case. The action may also be brought before the court of the place of residence or domicile of the Data Subject.

6.4 The Data Controller shall compensate for any damage caused to another party by unlawful processing of the Data Subject's data or by breach of data security requirements. The Data Controller shall be exempted from liability if it proves that the damage was caused by an unavoidable cause outside the scope of the processing. No compensation shall be due in so far as the damage was caused by the intentional or grossly negligent conduct of the injured party.