



File no.: NKE/22120/2025.

INFORMATION ON DATA PROCESSING regarding the registration and use of Ludovika WIW search tool

1. Name of Data Controller

University of Public Service
Address: 1083 Budapest, Ludovika tér 2.
Phone: +36 1 432 9000,
E-mail: nke@uni-nke.hu;
Website: <https://www.uni-nke.hu/>
Represented by: Dr. Gergely Deli Rector

2. Name and contact details of the Data Protection Officer

Data Protection Officer of the University:
Adrienn Bernadett Kincses dr. iur.
Direct contact: adatvedelem@uni-nke.hu
Phone: +36 1 432 9000/ extension: 29833

3. Information about processing personal data regarding the Ludovika WIW tool in case personal data is collected directly from the data subjects

3.1. Personal data provided during registration

Categories of data subjects	Scope of processed data	Purpose of data processing	Legal basis
Natural persons registering on the web application of Ludovika WIW	Name, public name, e-mail address, password, status, type of institution. Optional data: country, areas of interest by theme and/or country/region.	Creating a user account on the Ludovika WIW web application.	Pursuant to Article 6 (1) a) of the GDPR ¹ , the processing is based on the data subject's explicit consent.

Consequences of failure to provide such data: The user account cannot be created without a username and an e-mail address. Not providing the data listed as optional above may result in the search tool's results being tailored to the user's needs on a lower level.

3.2. Personal data acquired through using the AI-assisted features of the Ludovika WIW search tool

Categories of data subjects	Scope of processed data	Purpose of data processing	Legal basis
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¹ 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 (General Data Protection Regulation)

Researchers using the search tool's AI-assisted features.	User information provided at registration, user interactions, search data and search success rates, user feedback and profile data created using the data above.	The purpose of processing data is to develop the search tool's AI-assisted features providing better results through easier and quicker searches for users.	Pursuant to Article 6 (1) a) of the GDPR, the processing is based on the data subject's explicit consent.
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Consequences of failure to provide such data: Personal data acquired through the AI-assisted tool is used for the constant development of such features. Users are not obliged to use the AI tools, in which case their usage is limited to the basic search tool of Ludovika WIW.

4. Recipients of personal data, the persons entitled to access the data

Employees of the departments or research institutes who are required to access the concerned personal data based on their employment relationship, especially the employees of

- Eötvös József Kutatóközpont
- TRH Tudománystratégiai Iroda
- ÁNTK Kormányzástani és Közpolitikai Tanszék
- FT RH Informatikai Igazgatóság, ISZI Digitális Információszerzési Osztály

5. Duration of data processing

Personal data controlled on the legal basis of the data subject's consent shall be processed until the withdrawal of such consent, but such withdrawal shall not affect the lawfulness of the processing carried out on the basis of the consent before its withdrawal. Withdrawal of consent results in the deletion of the user's account.

In the absence of withdrawal of consent, the data controller evaluates the necessity of processing data annually.

Personal data used for the development of AI-assisted features of the search tool may be processed for a maximum of 36 months and shall be subject to an annual review to ensure continued necessity and proportionality of processing.

6. Implementation of the processing activity

Ludovika WIW is an indicator search tool developed jointly by the University of Public Service and the National Media and Infocommunication Authority (NMHH). It can be utilised by researchers who search for indicators in a number of scientific fields.

The application has an AI-assisted search feature which aims to provide users better results through easier and quicker searches.

The University shall process the data transmitted to it solely for the purposes and under the conditions specified above. The data processing activities shall be carried out in full compliance with the University's regulations on the protection and security of personal data and data of public interest, as well as the University's IT Security Policy.

7. Data protection

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity

for the rights and freedoms of natural persons, the University shall implement appropriate technical and organisational measures to ensure a level of data security appropriate to the risk.

The University shall take all reasonable measures to ensure that the data processed by it do not become accessible to unauthorised parties. Access to data is limited, password protection is in place.

The University has a policy on protection and security of personal data and data of public interest and also an IT Security Policy.

8. Automated data processing (including profiling)

The AI-assisted search tool aims to provide the most relevant search results for the users. In order to accomplish better results, it creates and utilizes user profiles based on search history, success rates (information about the user finding previous search results useful or not) and information provided at registration.

9. Data transfers to third countries or international organisations

There is no direct transfer of personal data to third countries regarding the processing detailed above.

10. Exercise of rights, legal remedies

The data subject may exercise the rights provided for in the GDPR for the entire duration of the data processing, which he may do at any time at the contact details specified in Section 1 and 2.

The data subject may request

- *access to personal data* (the data subject has the right to obtain confirmation from the data controller as to whether or not personal data concerning him or her are being processed, and where that is the case, the right to access personal data and information specified in the GDPR) (Article 15 GDPR),
- *rectification of personal data* (the data subject has the right to obtain the rectification of inaccurate personal data concerning him or her, at his or her request, without undue delay. Taking into account the purpose of the data processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.) (Article 16 GDPR),
- *erasure of personal data* (the data subject has the right to obtain from the data controller the erasure of personal data concerning him or her, at his or her request, without undue delay and the data controller shall have the obligation to erase the personal data of the data subject without undue delay on the grounds specified in the GDPR; in case of data processing for compliance with a legal obligation the erasure request shall be declined) (Article 17 GDPR),
- *restrictions on the processing of personal data* (the data subject has the right to obtain from the data controller restriction of processing if the conditions set out in the GDPR are met) (Article 18 GDPR),
- *exercise the right to personal data portability* (The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the data controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the data controller to which the personal data have been provided, as long as the conditions set out in the GDPR are met) (Article 20 GDPR),

- *may object to the processing of personal data* (shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6 (1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims; in case of data processing for compliance with a legal obligation the objection request shall be declined) (Article 21 GDPR),
- *withdrawal of the abovementioned consent to processing of personal data*, the data subject may withdraw his or her consent at any time by sending an e-mail to adatvedelem@uni-nke.hu, without affecting the lawfulness of the processing carried out on the basis of consent prior to its withdrawal.

The application must be submitted to the postal address of the data controller or to the following e-mail address: adatvedelem@uni-nke.hu. The data controller shall provide written information as soon as possible, within a maximum of 1 month (within 15 days in the event of an objection) (this deadline may be extended by a further 2 months due to the complexity of the request). If any rights of the data subject have been violated, the data subject may apply to a court (the data subject may, at his or her choice, initiate a proceeding before the court competent according to his or her place of residence or stay) or may turn to the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11., phone: 06-1-391-1400, website URL: <http://naih.hu>, e-mail address: ugyfelszolgalat@naih.hu).

Budapest, 13 November 2025.

