

PRIVACY STATEMENT -STUDENT RECRUITMENT -

At **Central European University** (address: 224 West 57th street, New York, NY 10019, USA and Quellenstrasse 51, 1010 Vienna, Austria) and **Central European University Private University** (seat: Quellenstrasse 51, 1010 Vienna, Austria) (hereinafter collectively referred to as Joint Data Controllers) 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)¹. This Privacy Notice relates to the collection, use, transfer and retention of your personal data.

Please read it carefully before submitting your personal data.

[Who are we and what do we do?](#)

Central European University (CEU) is a graduate institution of advanced research and teaching, dedicated to socially and morally responsible intellectual inquiry. The University is accredited by the Middle States Commission on Higher Education in the United States with a teaching site in Vienna.

Central European University Private University (CEU PU) is established in Vienna under the Austrian Federal Act on Private Universities.

The recruitment process of the Joint Data Controllers is managed by the Student Recruitment Office of Közép-európai Egyetem.

[Identity and contact details of the Joint Data Controllers](#)

Central European University, and Central European University Private University qualify as joint data controllers according to Article 26 of the GDPR (the “Joint Data Controllers”).

Central European University

224 West 57th street
New York
NY 10019, USA

Kohlmarkt 8-10
1010 Vienna, Austria

Central European University Private University

Kohlmarkt 8-10

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.

What is the purpose and legal basis of processing your data?

Data category	Purpose of data processing	Category of personal data	Special category of personal data	Legal basis Central European University	Legal basis Central European University Private University
Collecting personal data					
Online inquiry form	•Collecting personal data of prospective students for creating a database in order to send them personalized communications	<ul style="list-style-type: none"> • First Name • Last Name • E-mail address • Country of residence • Citizenship • Year of interest • Date of birth • Academic interest • Degree level of study 	No	Legitimate interest of the data controller	Legitimate interest of the data controller
Inquiry form Interest card (hard copy)	•Collecting personal data of prospective students for creating a database in order to send them personalized communications	<ul style="list-style-type: none"> • First Name • Last Name • E-mail address • Country of residence • Citizenship • Year of interest • Date of birth • Academic interest • Degree level of study 	No	Legitimate interest of the data controller	Legitimate interest of the data controller
GRE data – (collecting student prospects)	•Collecting personal data of prospective students for creating a database in order to send them personalized communications	<ul style="list-style-type: none"> • First Name • Last Name • E-mail address • Citizenship • Date of birth • Academic interest 	No	Legitimate interest of the data controller	Legitimate interest of the data controller

Data received from external parties (e.g. student organizations, group visits)	<ul style="list-style-type: none"> Collecting personal data of prospective students for creating a database in order to send them personalized communications 	<ul style="list-style-type: none"> First Name Last Name E-mail address Academic interest Degree level of study 	No	Legitimate interest of the data controller	Legitimate interest of the data controller
Referral form	<ul style="list-style-type: none"> Collecting personal data of prospective students for creating a database in order to send them personalized communications 	<ul style="list-style-type: none"> First Name Last Name E-mail address 	No	Legitimate interest of the data controller	Legitimate interest of the data controller
External partner contacts (administration of partner information: contacts for NGOs, student and other organizations, academic partners, Local Area Coordinators, etc.)	<ul style="list-style-type: none"> Communicating with partners about our programs. Recruiting candidates for our academic degree programs via their network. 	<ul style="list-style-type: none"> First Name Last Name E-mail address Country of residence Citizenship Year of interest Date of birth Academic interest Degree level of study 	No	Legitimate interest of the data controller	Legitimate interest of the data controller
Registration for webinars, group visits, CEU Open House etc.)	<ul style="list-style-type: none"> Collecting personal data of prospective students for creating a database in order to send them personalized communications 	<ul style="list-style-type: none"> First Name Last Name E-mail address Academic interests 	No	Legitimate interest of the data controller	Legitimate interest of the data controller
Sending e-mails					
Direct questions via e-mail (direct inquiries coming in via e-mail: student-info@ceu.edu)	<ul style="list-style-type: none"> Responding questions occurred in the email 	<ul style="list-style-type: none"> First Name Last Name E-mail address Content of the e-mail 	It may occur	Legitimate interest of the data controller	Legitimate interest of the data controller
Sending newsletters and follow-up e-mails to enquirers	<ul style="list-style-type: none"> Sending personalized communications to prospective students and applicants based on their academic interest 	<ul style="list-style-type: none"> First Name Last Name E-mail address 	No	Consent of the data subject	Consent of the data subject
Other data processes					
Registration for events (webinars, group visits, CEU Open House	<ul style="list-style-type: none"> Providing information on events 	<ul style="list-style-type: none"> First Name Last Name E-mail address 	No	Legitimate interest of the data controller	Legitimate interest of

etc.)	organized by the Recruitment Office	<ul style="list-style-type: none"> Academic interests 			the data controller
Student interns, Alumni scholarship Recipients volunteering with the Student Recruitment Office.	<ul style="list-style-type: none"> Administration of student interns, and other volunteers who support activities of STRO Communicating and assigning projects to them 	<ul style="list-style-type: none"> First Name Last Name E-mail address Contact Information Citizenship Department, Program 	No	Legitimate interest of the data controller	Legitimate interest of the data controller
TOEFL test registration (registration form)	<ul style="list-style-type: none"> Administering the Institutional TOEFL test 	<ul style="list-style-type: none"> First Name Last Name E-mail address Date of birth Citizenship Country of residence 	No	Consent of the data subject	Consent of the data subject
Presenting an identification document (ID) at the TOEFL exam	<ul style="list-style-type: none"> Administering the Institutional TOEFL test - identity verification 	<ul style="list-style-type: none"> First Name Last Name Place and date of birth Citizenship ID number 	Photo	Consent of the data subject	Consent of the data subject

[Who receives your information?](#)

The Joint Data Controllers work closely together to provide a coordinated approach. Any transmission of data between the Joint Data Controllers and their internal units is managed through agreed processes which comply with relevant data protection legislation.

The Student Recruitment Office of Közép-európai Egyetem is collecting personal data of prospective students and sending newsletters and follow up e-mails to enquirers and applicants.

Unless we have a legal obligation to do so, we will not disclose your data to individuals, organizations, or other entities outside the universities other than those who are acting as agents and data processors working on our behalf.

For the purposes set out above, we may need to pass your information to our third-party service providers, agents, and subcontractors, for the purposes of completing tasks and providing services to you on our behalf. However, with all external entities with whom data is shared, we share only those data needed to perform the specific service and require a data processing contract to be signed before any data transfer—requiring them to keep your information secure and not to use it for their own purposes.

Specific third parties acting as data processors we work with include:

- **Közép-európai Egyetem:** Qualifies as data processor of Central European University and Central European University Private University.

Qualify as data processors of Közép-európai Egyetem:

- **Microsoft Office 365:** Based in the US, with our data stored within EU in datacenters located in Amsterdam and Dublin. Software As A Service which provides our email and document management.
- **TRIBAL:** Located in Bristol, UK, Tribal Group plc. is a global provider of software and services to the education sector. To provide software and services, Tribal collects, stores, and processes personal data about its customers, potential customers, suppliers, contractors, partners, and staff as well as contracted to process information on behalf of their customers.
- **Unibuddy:** Based in London, UK, Unibuddy Limited carries on the business of developing and providing access to its communication platform which enables potential university applicants to communicate directly with current university students and university staff.
- **Eventbrite:** Based in the US, Eventbrite provides us with an event technology platform which enables our
- **Educational Testing Service**, founded in 1947, is the world's largest private nonprofit educational testing and assessment organization. For more information please see <https://www.ets.org>.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

[How long will your information be held?](#)

We keep the personal data of those potential applicants who expressed their interest in studying at us for no more than two years following the year they expressed their interest for. Processing of personal data of *potential candidates* applying to us depends on whether they are accepted to us or not. If your application is successful and you are *admitted* to us, your personal data will be handled in line with our data privacy rules applicable to students' personal data.

If you decide that you no longer wish to receive communication from us, please be aware that we still need to retain a minimal amount of personal data so that we can keep a record that you have asked us not to contact you.

[What are your rights?](#)

You have the right:

- to 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.
- to 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.

- to rectify – you have a right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- to 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.
- to request data portability – you can ask to have the data we hold about you transferred to another organisation.
- to restrict processing your personal information – where certain conditions apply, you have a right to restrict the processing of your personal information.
- to withdraw your 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

Central European University, Kohlmarkt 8-10, 1010 Vienna.

We will make every effort to fulfill your request to the extent allowed by law and will respond in writing within 25 days of receiving your request.

Should you wish to request help from the relevant national authority, the details are as follows:

Österreichische Datenschutzbehörde
Barichgasse 40-42,
1030 Vienna
Austria/Europe
Telephone: +43 1 52 152-0
E-Mail: dsb@dsb.gv.at
Web: <https://www.data-protection-authority.gv.at/>

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

[Security of your Information](#)

We are committed to holding your data securely and treating it with sensitivity. 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. For further details please see our Data Protection Policy.

Although most of the information we store and process stays within Austria and Hungary, some information may be transferred to countries outside the European Economic Area (EEA). This may occur if, for example, one of our trusted partners' servers are located in a country outside the EEA (see above: data processors). Where these countries do not have similar data protection laws to the European Union, we will take steps to make sure they provide an adequate level of protection in accordance with EU data protection law.

Future Changes

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