At Central European University (address: 224 West 57th street, New York, NY 10019, USA and Quellenstrasse 51, 1010 Vienna) and CEU GmbH – CEU Central European University Private University (seat: Quellenstrasse 51, 1010 Vienna) (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). This Privacy Notice relates to the collection, use, transfer and retention of your personal data related to bachelor, master, doctoral and/or non-degree admissions.

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.

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

Quellenstrasse 511010 Vienna

CEU GmbH – CEU Central European University Private University
Quellenstrasse 511010 Vienna
(+43) 1 25307911
E-mail: privacy@ceu.edu

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

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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.
<table>
<thead>
<tr>
<th>Category of personal data</th>
<th>Purpose of data processing</th>
<th>Special category of personal data</th>
<th>Legal basis</th>
<th>Legal basis</th>
</tr>
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<tbody>
<tr>
<td>Personal Details</td>
<td>- the sound operation of the higher education institution, - the exercise of rights and fulfilment of obligations by applicants, - the organisation of education and research activities, - the maintenance of the records specified by law, - the determination, assessment and certification of eligibility for the benefits granted pursuant to law and the higher education institution's rules for organisation and operation, - the exercise of rights and fulfilment of obligations by applicants and students</td>
<td>No</td>
<td>Legal obligation, GDPR Article 6 (1) c) (Education documentation Act (Bildungsdokumentationsgesetz); Private University Act (Privatuniversitätengesetz); Research Organisation Act (Forschungsorganisationgesetz); Higher Education Quality Assurance Act (Hochschul-Qualitätssicherungsgesetz) and Student Union Act (Hochschülerinnen- und Hochschülerschaftsgesetz 2014) and consent, GDPR Article 6 (1) a) where indicated</td>
<td>Contractual necessity, GDPR Article 6 (1) b where no legal obligation applies</td>
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<tr>
<td>Contact Details</td>
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<td>Contractual necessity, GDPR Article 6 (1) b where no legal obligation applies</td>
<td></td>
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<tr>
<td>Qualifications</td>
<td></td>
<td></td>
<td>Legal obligation, GDPR Article 6 (1) c) (Education documentation Act (Bildungsdokumentationsgesetz); Private University Act (Privatuniversitätengesetz); Research Organisation Act (Forschungsorganisationsgesetz); Higher Education Quality Assurance Act (Hochschul-Qualitätssicherungsgesetz) and Student Union Act (Hochschülerinnen- und Hochschülerschaftsgesetz 2014) and consent, GDPR Article 6 (1) a) where indicated</td>
<td>Contractual necessity, GDPR Article 6 (1) b where no legal obligation applies</td>
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<tr>
<td>CV/Resume</td>
<td></td>
<td></td>
<td>Legal obligation, GDPR Article 6 (1) c) (Education documentation Act (Bildungsdokumentationsgesetz); Private University Act (Privatuniversitätengesetz); Research Organisation Act (Forschungsorganisationsgesetz); Higher Education Quality Assurance Act (Hochschul-Qualitätssicherungsgesetz) and Student Union Act (Hochschülerinnen- und Hochschülerschaftsgesetz 2014) and consent, GDPR Article 6 (1) a) where indicated</td>
<td>Contractual necessity, GDPR Article 6 (1) b where no legal obligation applies</td>
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<tr>
<td><strong>Account registration</strong> (e-mail address, password)</td>
<td>asking their professional evaluation about the eligibility of applicants, sending them application related information</td>
<td>No</td>
<td>Legitimate interest of the data controller, GDPR Article 6 (1) f or Consent of data subject, GDPR Article 6 (1) a</td>
<td>Legitimate interest of the data controller, GDPR Article 6 (1) f or Consent of data subject, GDPR Article 6 (1) a</td>
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<td><strong>Referees and/or person indicated by referee</strong> (Title; First/Given Name; Last/Family Name; Position; Institution/Company; E-mail Address; Country of referees)</td>
<td>- providing equal treatment - providing assistance granted pursuant to law and the higher education institution’s rules for organization and operation of selection process</td>
<td>Yes</td>
<td>Consent of data subject, GDPR Article 6 (1) a</td>
<td>Consent of data subject, GDPR Article 6 (1) a</td>
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<td><strong>Disability</strong></td>
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<tr>
<td><strong>Funding</strong> (Financial Aid needs; personal and other privates sources for your studies; other sources of Financial Aid; Previous Education; Optional Personal Statement, Alumni Scholarship)</td>
<td>the determination, assessment and certification of eligibility for the benefits granted pursuant to the higher education institution’s rules for organization and operation of selection process</td>
<td>No</td>
<td>Consent of data subject, GDPR Article 6 (1) a</td>
<td></td>
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<tr>
<td><strong>Personal Details</strong> Title; First/Given Name; Middle Name; Other Middle Names; Last/Family Name,</td>
<td>documentation required for accounting purposes</td>
<td>No</td>
<td>Legal obligation, GDPR Article 6 (1) c) (Section 132 Federal Fiscal Code and sections 190 and 212 Commercial Code)</td>
<td>Legal obligation, GDPR Article 6 (1) c) (Section 132 Federal Fiscal Code and sections 190 and 212 Commercial Code)</td>
</tr>
<tr>
<td><strong>Contact Details</strong> (Address Line; City; County /State/Province; Postcode; Country)</td>
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<tr>
<td><strong>Bank account number</strong> (in case of bank wire transfer)</td>
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<tr>
<td><strong>Application documents</strong></td>
<td>- formal review of applications - academic evaluation of applicants</td>
<td>Yes</td>
<td>Contractual necessity, GDPR Article 6 (1) b</td>
<td>Contractual necessity, GDPR Article 6 (1) b</td>
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</tbody>
</table>
| Contact Information | - communication with applicant if clarification required  
- sending official documents (confirmation letter for visa purposes, acceptance letter for other purposes, etc.) | No | Contractual necessity, GDPR Article 6 (1) b | Contractual necessity, GDPR Article 6 (1) b |
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<tr>
<td>Program-specific tests</td>
<td>program-specific testing for pre-selected candidates</td>
<td>No</td>
<td>Contractual necessity, GDPR Article 6 (1) b</td>
<td>Contractual necessity, GDPR Article 6 (1) b</td>
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<tr>
<td>Interviews (Application documents, notes taken during interviews, skype address)</td>
<td>conducting personal or skype interview</td>
<td>Yes</td>
<td>Contractual necessity GDPR Article 6 (1) b</td>
<td>Contractual necessity GDPR Article 6 (1) b</td>
</tr>
</tbody>
</table>
| Assessment of applications (Application documents and, if applicable, the program-specific exams or interviews) | - final ranking of candidates  
- notification of placement on the waiting list  
- notifying unsuccessful applicants about admissions decisions | Yes, if disclosed | Contractual necessity GDPR Article 6 (1) b | Contractual necessity GDPR Article 6 (1) b |
| Waiting list notification (Name, e-mail address, result) | | No | | |
| Notification of rejected candidates (Name, e-mail address, result) | | No | | |
| Study agreement including financial aid offer (Name, department, conditions of the Study program) | notification for successful applicants | No | Legal obligation, GDPR Article 6 (1) c  
(Education documentation Act (Bildungsdokumentationsgesetz); Private University Act (Privatuniversitätengesetz)); Contractual necessity GDPR Article 6 (1) b | Legal obligation, GDPR Article 6 (1) c  
(Education documentation Act (Bildungsdokumentationsgesetz); Private University Act (Privatuniversitätengesetz)); Contractual necessity GDPR Article 6 (1) b |
| Applicant inquiries (Name, e-mail address, subject of inquiry) | - email inquiries received from applicants | It may occur | Contractual necessity GDPR Article 6 (1) b  
Legitimate interest of the data controller GDPR | Contractual necessity GDPR Article 6 (1) b  
Legitimate interest of the data controller GDPR |
| Confirmation of Acceptance (Name, Address, Contact Information, Date of Birth, Place of Birth, Citizenship) | No | Legal obligation GDPR Article 6 (1) c Section 64 (1) (2) Settlement and Residence Act (Niederlassungs- und Aufenthaltsgesetz) | Legal obligation GDPR Article 6 (1) c Section 64 (1) (2) Settlement and Residence Act (Niederlassungs- und Aufenthaltsgesetz) | Article 6 (1) f where no legal obligation applies | Article 6 (1) f where no legal obligation applies |
For statistical purposes, your data will be anonymized. We have put in place suitable data protection procedures to safeguard your information in line with the applicable data protection laws.

**Who receives your information?**

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

The Admissions Office of Közép-európai Egyetem (as data processor) checks each incoming application to make sure it complies with formal application requirements, then forwards it to the respective academic units for academic review. It is the main point of contact for all applicants for any questions or issues regarding technical and/or content related questions about the application form and application requirements. Moreover, admissions decisions are communicated by the Admissions Office.

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:

- **Microsoft 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.
- **SAP**: Our Enterprise Resource Planning system (ERP) for integrated applications, such as Finance, Grants management, Procurement.
- **Közép-európai Egyetem**: Qualifies as data processor of Central European University and Central European University Private University.

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 unsuccessful applicants as well as of those who started but did not submit their application or where a program has been suspended until October 31 of the selection year. Personal data required to be retained for Austrian accounting purposes will be kept for 7 years based on Section 132 Federal Fiscal Code and Section 212 Commercial Code, in line with Article 6 (1) c) of the GDPR. Your data will be anonymized for further statistical use. The principles of data protection should not apply to anonymous information.

If your application is successful and you are admitted to CEU, your personal data will be handled in line with CEU’s data privacy rules applicable to students’ personal data.
If you request to cancel your application at the e-mail address admissions@ceu.edu at any point of time during the admissions process, your data will be anonymized for further use within 25 days after your request. The principles of data protection should not apply to anonymous information. If you withdraw your consent, CEU will take the necessary steps to delete your personal data as soon as possible, but not later than 15 days.

The personal data of referees and people indicated by them will be removed from our records by December 31 of the selection year unless they provide consent to future use of their data.

**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 organization.
- 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, Quellenstrasse 51, 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  
Phone: +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 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 we modify this Privacy Notice at some time in the future, we will post the new version on our website.

Last updated on: 10 February 2022