



PRIVACY STATEMENT

At Central European University and Közép-európai Egyetem (jointly as “CEU” or the “University”) we place great emphasis on the protection of your personal information and on compliance with the EU General Data Protection Regulation¹ (GDPR). This Privacy Statement relates to the collection, use, transfer and retention of your personal data throughout your cooperation with the Career Services Office. Please see below for information on the Career Services Office activities covered by this statement.

1. Who are we and what we do?

CEU’s Career Services Office (CSO) is committed to providing students and alumni with guidance, support, and information designed to help them develop and pursue personal visions for impact and success all over the world. CEU Careers also works in partnership with employer organizations from around the world to help them connect with our diverse community of students and alumni and promote opportunities in line with their professional aspirations.

Acting as a bridge between university leadership, academic departments, students and alumni, and external partners, CEU Careers shares information through channels including: the CSO website, online careers platform career>next, newsletters, virtual and on-campus information sessions featuring specific career paths and opportunities, on-campus employer presentations, career education modules, and Careers in ... events.

In order to do this, CSO maintains a data storage system containing personal data collected by CEU during the course of our relationship with students, alumni, employers.

Please see below for further details about why and how we collect this information, how we process it, how we store or share it, and how you can check whether the contact details we have for you are correct and, where appropriate, update them. We value our relationship with you and we use your personal data to ensure we contact you in the most appropriate way, improve our services, and ensure we work efficiently and effectively.

The Career Services Office (CSO) is part of CEU, and CEU is the Data Controller.

2. Identity and contact details of the Data Controller

1. Közép-európai Egyetem
1051 Budapest

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.

Nador u. 9.
Phone: + 36 1 3273000

2. Central European University
1051 Budapest
Nador u. 9.
Phone: + 36 1 3273000

Email: privacy@ceu.edu

4. What is the purpose of processing your data?

4.1. Students

Collecting and processing student data (detailed below under 'What kind of personal data do we collect?') allows CSO to engage with you shortly after you become a CEU student in order to offer you customized career services and guidance in line with your experience and career interests. Additionally, CSO uses anonymized data about student engagement with the office for its own activity reports and performance reviews and also to provide relevant statistics leading to ranking in the Higher Education sector. CSO processes the student data required to carry out its student-facing activities within the framework established by the Student Records Office (SRO), the data steward for student data at CEU.

4.2. Alumni

Collecting and processing alumni data (detailed below under 'What kind of personal data do we collect?') allows us to offer alumni our mission-specified task of supporting them on a life-long basis. Such support requires gathering and reporting on alumni career information. It allows us to invite alumni to engage with the office as career volunteers and to track and report on such engagement for the purposes of stewardship and recognition. CSO processes alumni data required to carry out its alumni-facing activities within the framework established by the Alumni Relations Office (ARO), the data steward for alumni data at CEU.

4.3 Employers

Collecting and processing data of contacts within organizations that are current or potential employers of our students and alumni allows us to gather information about the job market and current recruitment practices. We also use this data to share invitations to take specific action in support of the recruitment efforts of current and potential employers and to support the career development of CEU students and alumni. CSO is the data steward for employer data at CEU.

5. What is our legal basis for processing your data?

As part of our work we process and store personal information relating to students, alumni, and employers, and we therefore adhere to the applicable data protection rules. We take our

responsibilities under these rules seriously and ensure the personal information we obtain is held, used, transferred and processed in accordance with the applicable data privacy rules.

The CSO processes the information outlined in this Privacy Notice in pursuit of our **legitimate interests** in:

- Communicating with students, alumni, employers and other partners;
- Providing benefits and services to students, alumni, employers and other partners;
- Furthering the University's educational and charitable mission (which includes securing the support of volunteers);
- Enabling the University to achieve its strategic and operational goals.

We may pursue these legitimate interests by contacting you by telephone, email, post, or social media. Information about how you can manage the ways that we contact you, including how to opt out from some or all contact from CSO, is outlined in the 'Your rights' section below.

Although CSO relies on legitimate interest as the legal basis for processing where this is not overridden by the interests and rights or freedoms of the data subjects concerned, it recognizes that it is not the only lawful ground for processing data. As such, where appropriate, CEU will sometimes process your data on an alternative legal basis – for example, based on your explicit consent given us to do so.

6. What kind of personal data do we collect?

6.1 Students

At the start of each academic year, student personal data is transferred to the CSO data storage system from the student records system, consisting of:

- full name, gender and date of birth;
- citizenship;
- CEU affiliation (CEU academic department);
- date of enrollment and expected date of graduation.

We also maintain records about student engagement with our office via individual career advising sessions, user account on the opt-in careernext online careers platform, and participation in events and educational programs organized by our office. This personal information, provided by you or developed in conversation with you, includes data such as:

- career interest area/s;
- history and notes of individual career advising sessions;
- CV, cover letters; and job application documents as subject of the individual career advising sessions;
- e-mail address other than the CEU e-mail address;
- employment history;
- information about internships, jobs, or projects pursued while a student.

6.2 Alumni

CSO staff has access to and contributes to processing of data in the alumni records data storage system, which contains personal data including:

- full name, title, gender and date of birth;
- contact details including postal address, email address, phone number and links to social media accounts;
- information about your time at the University and other academic institutions;
- your occupation and professional activities;
- volunteering by you on behalf of the University.

We also maintain records about your engagement with our office via individual career advising sessions, user account on opt-in careernext online careers platform, participation in events and educational programs. This personal information, provided by you or developed in conversation with you, includes data such as:

- career interest;
- history and notes of individual career advising sessions;
- CV, cover letters and job application documents as subject of the individual consultations;
- e-mail address;
- employment history;
- information about internships, jobs, or projects pursued while a student.

The information we collect through our advising work with alumni is gathered for the sole purpose of supporting our work to assist you in defining and pursuing career goals. In addition to relevant data protection and privacy legislation, we refer to the Principles for Ethical Practice of the National Association of Colleges and Employers (NACE), which charges us to “protect confidentiality of all personal information related to candidates and their interviews, and their engagement with services, programs, and resources and of student information related to professional plans.” We also refer to the Code of Practice of the Association of Graduate Careers Advisory Services (AGCAS) promote and deliver impartiality, confidentiality, and professional integrity in all aspects of service design and performance.”

6.3 Employers

Representatives of current or potential employers of CEU student and alumni provide data to CSO directly as part of their professional relationship with the office. This data is gathered via business cards, e-mails, telephone, web forms, and event registration. We may also obtain data about you from public sources such your organization website or your professional profile. The data thereby gathered is stored in our data storage system and updated as part of this ongoing relationship. It includes:

- full name;
- contact information: address, e-mail address, telephone number/s;
- Job title or role, affiliation with organization.

7. How do we process your data?

7.1 Students

CSO stores information about enrolled students in its own data storage system.

E-mails, monthly e-newsletter: We use your CEU e-mail to send occasional invitations to career programs and events and to distribute the monthly electronic Career Newsletter. We identify legitimate interest as the basis for communicating with enrolled students via this newsletter, as this is vital to our ability to provide students with access to timely and accurate information in service of their career development. However, you have the possibility to unsubscribe or to update your preferences using the link be provided at the bottom of the monthly newsletter or by contacting us directly to ask us to exclude you from these occasional e-mailings.

Measuring and reporting on engagement: In order to support strategic planning and engagement with academic departments, we record details about career consultations, attendance at career events and career development modules and other forms of engagement with our office (possession of careernext user account, internship completion). This information, when shared, is shared in anonymous reports. The information is stored in specific folders in the Microsoft SharePoint site to which only CSO staff members have password-protected access.

Registration forms: For individual appointments and career events that require prior registration, you will be invited to fill out a secure webform on the CEU Careers website. Access to this information is managed by CEU Careers staff members as password-holding administrators of the website. In the specific case of events, the list of names, status (student or alumni) and academic department affiliation is usually printed and made available at the venue entrance so that event attendance can be recorded by a staff member or volunteer with our office.

Careernext platform: As a CEU student, you have the option of using the online CEU [careernext](#) careers platform. The information you provide upon registration is accessible by you and by CSO staff members with appropriate access rights. If you create a resume on the platform, you may choose for it to be made available to registered, employers who can access career>next only via password. This occurs only upon your explicit request and you may revoke your intention for your resume to be available in this way at any time. Unless your resume is clearly labelled as “published” (the term used on career>next for sharing a resume in this manner), it will not be available to any employer or to any other individual except for CSO staff.

Career advising sessions: The information and documents we collect through our advising work with students is gathered for the sole purpose of supporting our work to assist you in defining and pursuing career goals. In addition to relevant data protection and privacy legislation, we refer to the Principles for Ethical Practice of the National Association of Colleges and Employers (NACE), which charges us to “protect confidentiality of all personal information related to candidates and their interviews, and their engagement with services, programs, and resources and of student information related to professional plans.” We also refer to the Code of Practice of the Association of Graduate Careers Advisory Services (AGCAS) promote and deliver impartiality, confidentiality, and professional integrity in all aspects of service design and performance.”

7.2 Alumni

Depending on the nature of the information gathered and the purpose for which it is required, CSO stores information about alumni in its own data storage system or relies on the alumni database managed by the Alumni Relations Office, data stewards of alumni data at CEU.

Gathering and reporting on data related to alumni career outcomes: Usually within 6 months of graduation for master's graduates or within 6-30 months in case of doctoral graduates, alumni are invited to report on their career outcomes via Career Destination Surveys. The surveys, designed for

this purpose, are administered through external software platforms, Survey Monkey and Qualtrics. The data we gather via the survey is anonymized before it is analyzed and reported upon. After processing the reports, your data will be treated as follows:

- After surveys are closed by CSO, complete survey data is transferred to CSO data systems, where will be kept for 5 years for further reference
- Collected data will be deleted from the online survey platforms after transfer to the CSO systems
- In pursuit of legal obligation, the contact information (address, e-mail, telephone number), gender, information on continuing studies and employment (institution, position, specialization, city, country) are transferred to the alumni database, administered by the Alumni Relations Office (ARO), the data steward for alumni data at CEU.
- Based on consent solicited in the survey, Name, affiliation with CEU department and address are used in a prize drawing organized by CSO. Upon selection, the winners are asked individually for additional consent regarding publishing their identity when communicating the results with all survey participants.

Measuring and reporting on engagement: In order to support strategic planning and engagement with academic departments, we record details about career consultations, attendance at career events and career development modules and other forms of engagement with our office (possession of careernext user account, internship completion). This information, when shared, is shared in anonymous reports. The information is stored in specific folders in the Microsoft SharePoint site to which only CSO staff members have password-protected access.

Registration forms: For individual appointments and career events that require prior registration, you will be invited to fill out a secure webform. Access to this information is managed by CEU Careers staff members as password-holding administrators of the CEU Careers website. In the specific case of events, the list of names, status (student or alumni) and academic department affiliation is usually printed and made available at the venue entrance so that event attendance can be recorded by a staff member or volunteer with our office.

Careernext platform: As a CEU student, you have the option of using the online CEU [careernext](#) careers platform. The information you provide upon registration is accessible by you and by CSO staff members with appropriate access rights. If you create a resume on the platform, you may choose for it to be made available to registered, employers who can access career>next only via password. This occurs only upon your explicit request and you may revoke your intention for your resume to be available in this way at any time. Unless your resume is clearly labelled as “published” (the term used on career>next for sharing a resume in this manner), it will not be available to any employer or to any other individual except for CSO staff.

Career advising sessions: The information and documents we collect through our ongoing advising work with alumni is gathered for the sole purpose of supporting our work to assist you in defining and pursuing career goals. In addition to relevant data protection and privacy legislation, we refer to the Principles for Ethical Practice of the National Association of Colleges and Employers (NACE), which charges us to “protect confidentiality of all personal information related to candidates and their interviews, and their engagement with services, programs, and resources and of student information related to professional plans.” We also refer to the Code of Practice of the Association of Graduate Careers Advisory Services (AGCAS) promote and deliver impartiality, confidentiality, and professional integrity in all aspects of service design and performance.”

7.3 Employers

CSO maintains a secure data storage system for storing employer data. We always aim to keep your details up to date, and we will conduct projects to check the contact details we have for you are correct, and, where appropriate, update them.

Registration forms: For career events that require prior registration, you will be invited to fill out a secure webform on the CEU Careers website. In certain cases, the list of names of representatives from your organization will be shared with the Campus Management Services in electronic and printed form so that we can provide you with temporary access cards during your time on the premises. The rest of the information is only accessible by CSO staff members with authenticated access to the secure website form.

Careernext platform: As representative recruiting current or potential employer of CEU students and alumni, you have the option to use the online CEU [careernext](#) platform. The information you provide upon registration is accessible by you and the staff members from the CSO with appropriate access rights. You will be given the option of providing consent for your contact information to be shared publicly with authenticated student and alumni users.

E-newsletter: Each year, CSO will contact you occasionally via a newsletter containing news and invitations to take part in events and services of potential relevance to your organization's recruitment efforts. If, at any stage, you are concerned about the content and/or frequency of these communications, you can unsubscribe or update your preferences using the link which will be provided at the bottom of the relevant correspondence.

8. Who receives your information?

In order to provide the tasks, services and communication detailed in points 4. and 7. above, we may need to pass your information to our third-party service providers or volunteers (for example to send you mailings, surveys or to record attendance at events). However, with all external entities with whom data is shared, we share only those data needed to perform the specific service and require a contract and/or confidentiality and non-disclosure agreement to be signed before any data transfer—requiring them to keep your information secure and not to use it for their own purposes. We will not sell or rent your information to third parties.

Specific third parties we work with include:

- **Microsoft Office 365:** Based in the US (with datacenters in Europe).
- **Raiser's Edge and related Blackbaud providers (Online Express, Blackbaud Merchant Services):** Based in the US and UK, this group of providers serves as a contact management platform. CSO uses the platform for keeping an updating employer and alumni records, in a shared manner with other CEU offices.
- **Mailchimp and Constant Contact:** Based in the US, Mailchimp and Constant Contact enable CEU and CSO to create professional communication messages and provide us with data on opens and clicks from our newsletters.
- **SurveyMonkey:** Based in US with offices in Ireland and Luxembourg, this is an online survey development cloud-based software as a service company, allowing CSO to collect, analyze and represent data from multiple respondents.
- **Qualtrics:** Headquartered in US with offices on four continents (European offices in Dublin, London, Paris, Munich and Krakow) this is an online survey development cloud-

based software as a service company, allowing CSO to collect, analyze and represent data from multiple respondents.

We do not share personal data of students, alumni, and employers with other third parties under any circumstances, except for in the following situations, for which we will ask for specific consent in advance:

1. Students and alumni

- Very rarely, CSO manages an application process on behalf of an employer or internship host partner and gathers application documents (CV/resume and/or other application documents) to share directly with the employer;
- Very rarely, CSO assists academic departments in gathering representative CVs/resumes to share with external partners;
- Publication of your resume via the career>next online platform, with the contact information in the resume being available exclusively to employers registered on the website
- We regularly publish material on the Careers website (story, interview, article, testimonial), individuals who are personally identified via such content are asked to provide their specific consent for this to take place;
- (specific to alumni) Updated contact and/or employment information is also recorded in the alumni database.

On any other occasion the data we share about students and alumni is anonymized.

2. Employers

- There is a valid reason connected with the recruitment or professional development of CEU students and alumni for your contact information to be shared directly with specific candidates.
- You allow the contact information you provide as part of your organization's profile or part of a vacancy text on career>next platform to be shared with all other authenticated users on the platform;
- Your name or picture is published on the Careers website (story, interview, article, testimonial), and you can be personally identified.

On any other occasion the data we share about CEU employer partners is anonymized before being made public.

9. How long will your information be held?

9.1 Students

We will keep your personal information in the CSO database for the duration of your studentship (one or two years for Master's students, 4+ years for doctoral students), with additional 2 years from your graduation or termination of your enrollment.

9.2 Alumni

For information regarding alumni data, please consult the Alumni Relations Office Privacy Statement

9.3 Employers

We will keep your personal information for as long as we maintain a professional relationship with you. Should this relationship end (for instance, when your affiliation with your employer organization finishes), we will keep your data for up to 5 years from the last contact. We do so for research or statistical purposes, cases in which your data will be anonymized, making sure that your privacy is protected.

10. What are your rights?

You have a right

- to access your personal information,
- to object to the processing of your personal information,
- to rectify,
- to erase and
- to restrict processing your personal information.

If you wish to exercise any of these rights, please email privacy@ceu.edu or write to us at CEU Data Protection Officer, Nádor utca 9, 1051 Budapest, Hungary. CEU will make every effort to fulfill your request to the extent allowed by law and will respond in writing within 30 days of receiving your request.

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

National Authority for Data Protection and Freedom of Information (1363 Budapest, Pf.:9., ugyfelszolgalat@naih.hu)

11. 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.

Although most of the information we store and process stays within 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. 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.

12. Future changes

If we modify this Privacy Notice at some time in the future, we will post the new version on our website.