



## Privacy Policy of the Vistula Group

### Information on the processing of personal data

The processing of personal data at the Vistula Group of Universities is governed by 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 the repeal of Directive 95/46/EC (General Data Protection Regulation); further referred to, as "GDPR".

Controllers of personal data submitted as part of registration to the admissions database are particular Vistula Group universities, depending on the field of study selected by the applicant.

#### Data Controllers' data:

- Vistula University, Stokłosa 3, 02-787 Warsaw, e-mail: [info@vistula.edu.pl](mailto:info@vistula.edu.pl),
- Vistula School of Hospitality, Stokłosa 3, 02-787 Warsaw, e-mail: [info@vistula.edu.pl](mailto:info@vistula.edu.pl),

#### Data Protection Officer:

Based on Article 37, section 1 GDPR, data controllers appointed Mr. Tomasz Wojtyś as data protection officer. The data subjects may contact the Data Protection Officer on all matters related to the processing of their personal data and exercise their rights under GDPR.

Contact to the DPO, email: [iod@vistula.edu.pl](mailto:iod@vistula.edu.pl).

#### Why, on what basis and how long do we process your personal data?

- **administering the user's account** on the admissions website - legal basis for data processing - voluntary consent of a person expressed by setting up an account on the website. Data processing until the consent is withdrawn, e.g. by deleting the account,
- **recruitment for a chosen field of studies** - legal basis for data processing - necessity to comply with the Controller's legal obligation, i.e. the Act of July 20, 2018 - Law on Higher Education and Science (Journal of Laws of 2018, item 1668. Data will be processed until the completion of the recruitment process)
- **conclusion and implementation of the study agreement** - legal basis for data processing - necessity of processing data for the purposes of concluding and implementing the agreement. Data processing held until the legal claims based on the contract are time-barred or until the expiration of the obligation to keep accounting documents in connection with the accounting regulations and until the end of the storage period for the documents related to the learning process, in accordance with the Law on Higher Education.

- **providing information about the Vistula Group universities' offer** - legal basis for data processing - voluntary consent of the data subject. Data processing until the data subject withdraws their consent.
- **profiling** - the legal basis for data processing is the legitimate interest of the Controller. A legitimate interest of the Controller consists in profiling data subjects as part of marketing activities in order to match the offer and information with the recipient. Data processing held until the data subject objects to profiling.
- **answering questions** sent in the contact form or by e-mail. In this case, we will not process your data for marketing purposes - the legal basis for data processing is the necessity to process data for the legitimate interest of the Controller consisting in providing reliable information for persons contacting us and in order to redirect the case to the appropriate department in our universities. We will keep the completed correspondence for the period of one year, unless the matter concerns issues that require a longer period of storage, e.g. until the expiration of claims or in connection with litigation/debt collection.

For marketing purposes, additional voluntary consents are obtained for the transmission of commercial information via telecommunications terminal equipment, via e-mail, text messages, and telephone contact. At any time, a person may withdraw their consent.

The **Careers** tab enables you to send your CV for recruitment purposes to a specific job offer. In this case, the Data Controller will be the university that the job offer is related to.

The data will be processed for the following purposes:

- **recruitment for the post**, in accordance with the job offer - legal basis - in the scope of data necessary for employment, the legal basis for data processing the Labour Code. In the scope of additional data provided in the application, the legal basis is the voluntary consent of the person expressed by adding a statement of consent in the sent documents or by an explicit action consisting in submitting the application in connection with the offer. Data processing will be held until the recruitment process is completed.
- **future recruitment processes** – the legal basis - voluntary consent of the person. Data processing will be held until the consent is withdrawn, but not longer than half a year.
- **provision of the personal data** to other universities from the Vistula Group for recruitment purposes. Legal basis - voluntary consent of the person. Data processing will be held until the consent is withdrawn, but not longer than half a year.

#### Data recipients

- authorized data Controller's employees, including lecturers,
- service providers entrusted with Personal Data processing for the purpose of providing services for the data Controller, in particular such entities as the Call Center, student recruitment agencies, IT service providers, accounting companies, debt collection agencies, advertising agencies, mailing services companies - in the scope necessary for the correct provision of the commissioned services,
- independent data Controllers to whom the data will be made available in connection with the implemented agreement for the benefit of the data subject, in particular entities providing electronic payment, banking, courier, postal and legal services.
- Personal data is also entered to the POLON system, an integrated information system about science and higher education, which supports the work of the Ministry of



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Science and Higher Education, as well as the Central Statistical Office and the Central Commission for Degrees and Titles.

### **Voluntary data provision**

Providing data for the purposes of the agreement is voluntary, but necessary for its implementation. Providing data for marketing purposes is voluntary.

### **Rights related to the processing of personal data**

You have the right to:

- access your data and demand its correction.
- object to data processing for the purposes of profiling.
- withdraw voluntary consent for marketing services of other universities from the Vistula Group of Universities. Withdrawal of consent does not affect the lawfulness of data processing that was carried out before consent withdrawal.
- transfer personal data, i.e. to receive personal data, in a structured, commonly used machine-readable format, in the case of processing data for the purposes of concluding and executing an agreement/order.
- restrict data processing or to delete data ("the right to be forgotten")
- file a complaint to the President of the Office for the Protection of Personal Data.

### **How you can modify your personal data and consents.**

In the case of the recruitment database for university candidates, modification of expressed consents settings, or account deletion can be made in the Data protection tab after logging in to the website. You can also update your personal data in the Profile Tab.

In other cases, in order to make any changes, please, contact the Data Controller.

**In matters related to the processing of personal data and the exercise of the above rights, please, contact the Data Controller or the Data Protection Officer. Contact details are provided at the beginning of the information.**

### **Links to websites of other entities**

Please be advised that the Website may contain links to third-party websites that are not covered by this Privacy Policy. This means that through a link posted on our Website you will be redirected to an external website, for which we are not accountable. The rules for collecting and processing information about people using these external websites are probably described in the Privacy Policies of these external entities.

### **Cookies policy**

Cookies are text files sent by a website, saved on a hard disk on a computer, smartphone or other end device, through which the user connects to the Internet. Cookies do no harm to



computers, devices or files saved on them. Cookies are useful because they allow websites to recognize the user's device and display accordingly.

### **Do we use cookies and how do we use them?**

Our websites use cookies. Thanks to this, we are able to recognize the user's device during the next visit. Cookies are used, among other things, to save preferences set by the user. With the consent of the user, our websites and cooperating entities place cookies on computers visiting our websites. They allow us to get to know the tastes and ratings of users, while helping to constantly improve our websites. Cookies, however, do not recognize the user (e.g. by name), only the settings and behaviour of an anonymous user who used the service on a selected device.

### **What types of cookies do we use?**

On our websites, we can use the following types of cookies:

- *necessary for the operation of our services* - enabling the correct use of services available within the website, e.g. authentication cookies used for services requiring authentication,
- *performance* - enabling the collection of information on the use of websites,
- *functional* - allowing to remember user-selected settings and personalization of the user interface,
- *advertising* - enabling providing users with advertising content more tailored to their interests and limiting the number of views of a given advertisement,
- *statistical* - used to count statistics on websites

### **How long is the data stored in cookie files?**

As part of our services, two types of cookies can be used - *session* and *permanent*. The former are temporary files stored on the user's end device until logging out, leaving the website or turning off the software (web browser). Persistent cookies are stored on the user's end device for the time specified in the cookie file parameters or until they are removed by the user.

### **Do we use third-party cookies?**

The user of our services may receive cookies from third parties cooperating with us, such as Facebook and Google. More information on those cookies can be found on the websites of individual third parties.



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## **Managing cookie files**

Cookies help in particular in improving the user's convenience while using the Website. Restricting the use of cookies may affect the functionalities available on the Website. Disabling the cookies required for authentication processes, security, maintaining user preferences can make it difficult, and in extreme cases, prevent the use of the website.

## **How to express and withdraw consent to cookies in practice**

Programs for browsing websites (web browsers) usually allow cookies to be stored in the user's end device by default. Website Users can change the settings themselves in this regard. The web browser enables, among others, cookie files management for a specific website, complete deletion of all saved cookies, as well as automatic blocking of cookies.

Detailed information in this respect is provided in the help or documentation of the web browser.

**Persons using our websites agree to the terms and conditions set out in this Privacy Policy.**

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