We would like to inform you that the Personal Data Controllers for the purposes of the recruitment system are individual universities from the Vistula Group of Universities, depending on the selected field of study for which the candidate is applying, i.e. Vistula University, Vistula School of Hospitality, University of Business in Wrocław, Olsztyn University.

Personal data will be processed in particular for the purpose of administering the user's account on the website and recruitment for a selected field of study. **Detailed information on data processing**.

INFORMATION ON THE PROCESSING OF PERSONAL DATA

Personal Data Controllers are individual universities from the **Vistula Group of Universities**, depending on the selected field of study for which the candidate is applying.

Data Controllers:

- Vistula University, Stokłosy 3, 02-787 Warsaw, e-mail address: info@vistula.edu.pl,
- Vistula School of Hospitality, Stoklosy 3, 02-787 Warsaw, e-mail address: info@vistula.edu.pl,
- University of Business in Wrocław, Ostrowskiego 22, 53-238 Wrocław, e-mail address: rektorat@handlowa.eu
- Olsztyn University, Jagiellońska 59, 10-283 Olsztyn, e-mail address: biurorektora@osw.edu.pl

In the case of creating a candidate's account without submitting an application for a selected field of study, the data controller in connection with handling the candidate's account is the university whose field of study was initially chosen by the candidate. The legal basis for data processing is consent expressed by registering an account, Art. 6 section 1 letter a of the GDPR. The data will be processed until the candidate deletes the account or submits an application to close the account.

The Controllers have appointed **Data Protection Officers** who can be contacted to the following e-mail addresses:

- Vistula University iod@vistula.edu.pl
- Vistula School of Hospitality iod@vistula.edu.pl
- University of Business in Wrocław rodo@handlowa.eu
- Olsztyn University iod@osw.edu.pl.

Purpose, legal basis and the period of personal data processing

administering the user/candidate account in the recruitment system. The legal basis
for data processing is the person's voluntary consent expressed by creating an
account on the website. All data entered in the candidate's account for the purpose of
submitting an application is stored in the candidate's account. Data processing will

- continue until the account is deleted, individual data is deleted, or an application is submitted to close the account,
- recruitment for a selected field of study. The legal basis for data processing is the
 necessity of data processing in connection with the legal obligation of the controller,
 which is the Act of July 20, 2018 Law on Higher Education and Science. The data
 will be processed until the completion of the recruitment process. Data marked as
 voluntary and not resulting from the above provisions is processed on the basis of
 consent expressed by providing data in the form.
- In the case of voluntarily provided data regarding disability, data processing is based on the provisions of Art. 9 section 2 letter g, related to the implementation of an important public interest, which is the implementation of tasks related to ensuring conditions for people with disabilities to fully participate in the process of admission to studies, doctoral schools, education at studies and doctoral schools or conducting scientific activities, to which we are obliged in accordance with the regulations the Law on Higher Education and Science. The data will be processed until the completion of the recruitment process.
- conclusion and performance of the study contract. The legal basis for data processing is the necessity of processing data necessary to conclude and perform the contract and the fulfilment of the controller's obligations in connection with the Act on Higher Education and Science. Data will be processed until the expiration of the limitation period for claims under the contract or until the expiration of the obligation to store accounting documents in connection with accounting regulations and the storage of documents related to the learning process, in line with the Law on Higher Education and Science.
- providing information about the offer of the Vistula Group universities. For the purposes of sending commercial information, voluntary consents are obtained for sending commercial information transmitted via telecommunications terminal devices and automatic calling systems, via e-mail, text messages and telephone contact. The legal basis for data processing is the person's voluntary consent, expressed by checking the appropriate checkbox or providing contact details for this purpose. Data processing will continue until the person withdraws his/her consent. The consent can be withdrawn at any time by changing the consent status in the account or sending a request to the controller to withdraw the said consent.
- profiling related to selecting the offer. The legal basis for data processing is the legitimate interest of the controller. The legitimate interest of the controller consists in profiling as part of marketing activities aimed at tailoring the offer and the sent information. Data processing will continue until the person objects to profiling.
- response to a question sent in the contact form, via e-mail or in connection with telephone conversation. In this case, data will not be processed for marketing purposes. The legal basis for data processing is the necessity to process data in order to implement the legitimate interest of the controller, which is to provide reliable information to persons contacting us and to redirect the matter to the appropriate department in our universities. The correspondence will be stored for the period of 1 year, unless the case concerns issues requiring a longer storage period, e.g. until the limitation period for claims expires or in connection with ongoing court/debt collection cases.
- considering complaints or defending against claims, which is the legitimate interest of the data controller. The data will be processed until the claims expire.

Data recipients

- authorized employees and contractors of the data controller, including lecturers (in the case of starting studies),
- service providers contractually entrusted with the processing of personal data for the purposes of providing services to the data controller, in particular entities such as call

centres, student recruitment agencies, IT service providers, accounting companies, debt collection companies, advertising agencies, entities supporting the recruitment process, companies providing mailing services - to the extent required for the proper performance of the ordered services,

- entities that are independent data controllers to whom data will be made available in connection with the contract being performed for the data subject, in particular entities providing services: electronic payments, banking, courier, postal and legal services.
- Personal data is also entered into the POLON system, an integrated information system on science and higher education, which supports the work of the Ministry of Science and Higher Education, as well as the Central Statistical Office and the Central Commission for Degrees and Titles.

Transferring data to third countries (i.e. outside the European Economic Area)

Due to the use of IT solutions from external suppliers, e.g. Microsoft, it may be necessary to transfer personal data to recipients in third countries, but we ensure that the data is appropriately secured. For that purpose, we cooperate only with entities based on Standard Contractual Clauses approved by the European Commission, while maintaining appropriate measures to guarantee the security of processed data at least at the level applicable in the European Union.

Voluntary data provision

Providing data for the performance of the contract is voluntary, however it is necessary for its performance. The scope of data necessary for the recruitment for studies process and in connection with studying also results from the provisions of the Law on Higher Education and Science. Providing data for marketing purposes is voluntary.

Transfer of data to third countries

Personal data will not be transferred to a third country, unless we are obliged to do so by law or when it is necessary for the performance of the contract with the student. In other cases, we will transfer data to third countries only on the basis of standard contractual clauses approved by the European Commission.

Rights related to the processing of Personal Data

You have the right to:

- access your data and to demand its correction, restrict data processing or to delete data ("the right to be forgotten")
- object to the processing of data, which is carried out on the basis of the legitimate interest of the Data Controller.
- withdraw voluntary consent. Withdrawal of consent does not affect the lawfulness of data processing that was carried out before consent withdrawal. The consent may be withdrawn at any time.
- transfer Personal Data, i.e., to receive Personal Data in a structured, commonly used machine-readable format, in the case of data processing related with concluding and performing a contract/order.

Changes to selected personal data, as well as deletion of the account, can be made in your account after logging in to the recruitment website.

In matters related to data processing and implementation of the above rights, you may contact the Data Controller or the Data Protection Officer. Contact details are provided above.

In addition, the data subject has the right to lodge a complaint to the President of the Office for the Protection of Personal Data, if he/she feels that the Data Controller is processing data in breach of the law.