

INFORMATION ON THE PROCESSING OF PERSONAL DATA - STUDY CONTRACT

Personal Data Controller is Vistula University,

Contact details to the Data Controller:

Vistula University, Stokłosa 3, 02-787 Warsaw, e-mail address: info@vistula.edu.pl,

Contact to the Data Protection Officer - e-mail address: iod@vistula.edu.pl

Purpose, legal basis and the period of personal data processing

- Conclusion and performance of the study contract, implementation of the education process. The basis for data processing is the necessity to process data for the conclusion and performance of the contract and the obligation incumbent on the Data Controller, i.e., the Act of 20 July 2018 - Law on Higher Education and Science (Journal of Laws of 2018, item 1668), (Article 6 section 1, letters b and c of the GDPR). Data processing will be conducted until the expiry of the obligation to store accounting documents in connection with the accounting regulations and to store documentation of the course of studies, in connection with the Law on Higher Education and Science. The documents contained in the student's personal file folder will be stored for the period of 50 years, excluding the documents referred to in Article 15 section 1 item 1 letter a and items 2-4 of the Regulation of the Minister of Science and Higher Education of 27 September 2018 regarding studies.
- Investigation or defence against claims in connection with the performance of the study contract, in connection with the education process, debt collection (Article 6 section 1 letter f of the GDPR). The data will be processed until the claims expire.
- Compliance with information, archiving and statistical obligations arising from the Act on Higher Education and Science (Article 6 section 1 letter c of the GDPR).
- Enabling student access to the library, which constitutes the basis of the university's library and information system. The legal basis for data processing is the Law on Higher Education and Science (Article 6 section 1 letter c of the GDPR). The data will be stored for the period resulting from the provisions of law.
- Organization and documentation of student internships / job placements. The legal basis for data processing is the necessity to fulfil the legal obligation incumbent on the Data Controller, which is the Act on Higher Education and Science. The data will be processed until the end of the storage of documents related to the study process, in accordance with applicable regulations.
- Monitoring the professional careers of graduates, in terms of name and surname, correspondence address and e-mail address, based on the Act on Higher Education and Science, and in the case of processing other data, on the basis of voluntary consent (Article 6 section 1 letters a and c of the GDPR). Personal data will be stored for the maximum period of 10 years from the date of graduation.
- Informing about the offer of the Vistula Group of Universities. The legal basis for data processing is the voluntary consent of the person. Marketing activities will consist in sending information about the offer and events, transmitted via telecommunications terminal equipment, using automated calling systems, by electronic means or telephone (e-mail, SMS, telephone contact) depending on the consent given (Article 6 section 1 letter a of the GDPR). Data processing will be conducted until the consent is withdrawn.
- Profiling. The legal basis for data processing is the legitimate interest of the Data Controller, which consists in the possibility of profiling in connection with marketing activities, in order to adapt the offer and the information sent (Article 6 section 1 letter f of the GDPR). Data processing will be conducted until the person objects to profiling.
- In the case of online studies, and therefore classes conducted using distance learning methods and techniques, the University records the classes and places the recordings on an internal educational platform which can only be accessed by

University employees and students concerned. Class recordings are used solely for the purpose of providing students with educational materials from classes and will be deleted from the platform after 3 years. The legal basis for data processing is our legitimate interest in connection with the performance of the study contract with the student.

- When photographing or filming events at the University, we will publish materials on our websites and social media. We will only use a person's image if we provide the legal basis for publishing the image in accordance with copyright and related laws. Data processing will be conducted until the consent given is withdrawn or an objection is expressed.

Data recipients

- authorized employees of the Data Controller, including, to a limited extent, lecturers,
- service providers entrusted with the processing of Personal Data based on a contract for the purposes of providing services for the Data Controller, in particular such entities as the Call Centre, student recruitment agencies, IT service providers, accounting companies, debt collection companies, advertising agencies, postal and delivery service providers - in the scope necessary for the proper provision of the commissioned services,
- entities that are independent data controllers to whom data will be made available in connection with the contract performed for the data subject, in particular entities providing electronic payment, bank, 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 into the systems of the Central Statistical Office and the Central Commission for Degrees and Titles. The scope of the entered data is determined by law.

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 in connection with studying results from the provisions of the Law on Higher Education and Science. Providing data for marketing purposes is voluntary.

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.

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.