

APPROVED

ISMA University of Applied Sciences
27.06.2018. Senate meeting, Protocol No 3-18

ISMA University of Applied Sciences

Privacy Policy

No amendments to this document

1. Supervisor and contact information

- 1.1. Supervisor of personal data processing is SIA “Informācijas sistēmu menedžmenta augstskola” / ISMA University of Applied Sciences (hereinafter – ISMA), unified registration No. 40003607453, legal address: Riga, Valerijas Seiles Str. 1 k-6, LV-1019, isma@isma.lv, phone No. +37167100607.
- 1.2. Contact information of ISMA data protection specialist: e-mail privacy@isma.lv, phone No. +37167100692.

2. General provisions

- 2.1. The aim of the privacy policy is to provide natural persons (hereinafter - persons) with information about the purposes of personal data processing, legal bases, scope of processing, rights of natural persons, personal data processing regulations, etc.
- 2.2. Privacy policy is developed in compliance with the 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 (General Data Protection Regulation) (hereinafter – Regulation).

- 2.3. Privacy policy is applied to ensure the protection of personal data in relation to:
 - 2.3.1. ISMA students, applicants, employees, including potential, former and existing cooperation partners, as well as third parties who receive or transfer any information to ISMA;
 - 2.3.2. persons who are on the territory of ISMA and in the facilities, if there is video surveillance
 - 2.3.3. ISMA website visitors and persons whose personal data is processed in ISMA social networks in connection with marketing or public information on ISMA activities;
 - 2.3.4. persons participating in events organized by ISMA;
 - 2.3.5. other cases in which ISMA processes personal data.
- 2.4. Privacy policy applies to the processing of personal data regardless of the form and/or environment in which personal data is processed (electronically, in paper format, by telephone).
- 2.5. In certain cases of personal data processing, which are not listed in the Privacy Policy, other regulations or purposes and legal bases of personal data processing may be binding, about which the person is informed before the start of personal data processing.

3. Legal basis for personal data processing

- 3.1. ISMA processes personal data based on the following legal bases:
 - 3.1.1. consent of the person (Article 6, Clause 1, subparagraph a) of the Regulation);
 - 3.1.2. conclusion of contracts and ensuring performance (Article 6, Clause 1, subparagraph b) of the Regulation);
 - 3.1.3. in order to fulfil the legal obligations set out in ISMA regulatory acts (Article 6, Clause 1, subparagraph c) of the Regulation);
 - 3.1.4. to protect the vital interests of persons (Article 6, Clause 1, subparagraph d) of the Regulation);
 - 3.1.5. in order to pursue the legitimate (lawful) interests of ISMA (Article 6, Clause 1, subparagraph f) of the Regulation).

4. Purposes of personal data processing

- 4.1. ISMA processes personal data for the following purposes::
- 4.1.1. interviewing of applicants, selecting applicants and preparing the student's file. Processing of personal data is carried out on the basis of law, contract, personal consent and legitimate interest;
 - 4.1.2. ensuring the study process, including preparation of the study contract, preparation, awarding and accounting of diplomas, preparation, awarding and accounting of certificates, awards, etc. Personal data processing is carried out on legal and contractual basis;
 - 4.1.3. for the analysis and provision of studies, science and administrative management processes. Processing of personal data is carried out on the basis of law, contract, personal consent and legitimate interest;
 - 4.1.4. provision of library and reading room services. The processing of personal data is carried out on legal and contractual basis;
 - 4.1.5. receiving of services and preparation of contracts, fulfilment of the conditions of concluded contracts and related regulatory acts, incl. amendment of contracts. The processing of personal data is carried out on legal and contractual basis;
 - 4.1.6. establishment of employment legal relations (including selection of employees) and provision. Processing of personal data is carried out on the basis of law, contract, personal consent and legitimate interest;
 - 4.1.7. fulfilment of the requirements of accounting regulatory acts. Processing of personal data is carried out on the basis of law, contract and legitimate interest;
 - 4.1.8. payment service and control, including salary payment, recovery and collection of student debts. Processing of personal data is carried out on the basis of law, contract and legitimate interest;
 - 4.1.9. provision of labour protection requirements for students and employees. Processing of personal data is carried out on the basis of law or contract;
 - 4.1.10. examination and processing of submissions, reports, complaints and claims. Processing of personal data is carried out on the basis of law and legitimate interest;
 - 4.1.11. administration and control of access rights. Processing of personal data is carried out on the basis of law, contract, personal consent and legitimate interest;

- 4.1.12. maintenance and improvement of the ISMA website (cookies). Processing of personal data is carried out on the basis of legitimate interest;
- 4.1.13. provision of information to state administrative institutions and subjects of operational activity in the cases and to the extent specified in external regulatory acts. Processing of personal data is carried out on the basis of law and legitimate interest;
- 4.1.14. ISMA organizational management, planning and accounting (including document management, processes, services, information systems, ISMA succession, public relations and social responsibility implementation). Processing of personal data is carried out on the basis of law, contract, personal consent and legitimate interest;
- 4.1.15. security of ISMA's infrastructure, services, information, employees, students and visitors, prevention of illegal or other threats, promotion of detection of criminal offences, incl. ensuring security and property protection (video surveillance, access control systems). Processing of personal data is carried out on the basis of law, contract, personal consent, vital interests and legitimate interest;
- 4.1.16. scientific or academic research. Personal data processing is carried out on the basis of law, contract, personal consent;
- 4.1.17. for the prevention of student and staff health risks, and for the provision of studies, scientific and administrative activities of ISMA - processing of special categories or sensitive personal data, if there is a legal basis, and one of the special conditions for processing sensitive personal data, which are reserved in Article 9 of the Regulation, is applicable. Processing of personal data is carried out on the basis of law, contract, personal consent and legitimate interest;
- 4.1.18. provision of an alarm system. Processing of personal data is carried out on the basis of the law;
- 4.1.19. for other specific purposes, about which individuals are informed before personal data processing.

5. Acquisition and duration of storage of personal data

- 5.1. Personal data may be obtained in the following ways:
- 5.1.1. clear and unequivocal consent of the person has been received;
- 5.1.2. information provided to ISMA by the person themselves, i.e. when the person or their authorized person communicates or cooperates with ISMA, for example, when

concluding a contract, requesting information or submitting an application for consideration of a specific issue or request, visiting ISMA facilities, communicating on informational channels, including social networks, attending events or activities organized by ISMA, during which photos may be taken or a video recording may be made, for which information is provided above;

5.1.3. in order to fulfil the requirements stipulated in the regulatory acts, to ensure long-term cooperation and credit risk management, ISMA can also request data from publicly available registers;

5.1.4. when visiting the ISMA website, cookies may be used, information about which is provided during the visit to the website;

5.1.5. from audit records of information systems (access time, actions performed, etc. in the information system).

5.2. ISMA stores and processes personal data as long as at least one of the following criteria is met:

5.2.1. as long as the contract concluded with the person is valid;

5.2.2. as long as the ISMA or a person can realize their legitimate interests (for example, submit objections or file a claim in court) in accordance with the procedures specified in external regulatory acts;

5.2.3. as long as there is a legal basis or a legal obligation to store the data;

5.2.4. while the person's consent to the relevant personal data processing is valid.

6. Transfer of personal data to third parties and transfer of personal data outside the European Union and the European Economic Area

6.1. ISMA does not disclose personal data to third parties except for:

6.1.1. in the case and to the extent specified in the regulatory enactments;

6.1.2. if a clear and unambiguous consent of the person has been received;

6.1.3. if personal data must be transferred to a third party based on the concluded contract;

6.1.4. to law-enforcement institutions in accordance with the procedure specified in regulatory acts;

6.1.5. ISMA employees who process personal data;

6.1.6. sworn auditors, auditors or personal data processors on the basis of a contract.

- 6.2. Providing information to the Ministry of Education and Science, the Central Statistical Bureau, the State Revenue Service, and other state administrative institutions takes place in the cases and to the extent specified in the regulatory acts.
- 6.3. In the event that ISMA transfers personal data to personal data processors or data recipients outside the European Union or the European Economic Area, ISMA ensures that the data protection level of the personal data processors or data recipients is equivalent to the data protection level of ISMA provider.

7. Personal rights, obligations and implementation procedure

7.1. In accordance with the laws and regulations, a person has the right to request access to their personal data, to request its addition, correction or deletion, to request restriction of processing, to request a copy of the data, as well as to object to the processing of personal data and to file a complaint with the Data State Inspectorate. ISMA provides a person with the right to data portability.

7.2. A person has the right to obtain information about such natural or legal persons who have received information about a person from ISMA, except for cases where disclosure of such information is prohibited in accordance with regulatory enactments.

7.3. A person can submit a request for the exercise of their rights:

7.3.1. in written form in person, presenting an identity document;

7.3.2. in the form of electronic mail, by sending the relevant submission, signed with a secure electronic signature, to the ISMA e-mail address isma@isma.lv.

7.4. ISMA ensures compliance with data processing and protection requirements in accordance with regulatory enactments and, in case of objections, takes appropriate actions to resolve the objection. In any case, the person has the right to apply to the supervisory authority - the Data State Inspectorate.

8. Other provisions

- 8.1. ISMA has the right to make additions or changes to the Privacy Policy, making it available to individuals on the ISMA website at <https://www.isma.lv/en/isma/privacy-policy> or in ISMA premises in paper format.