

PRIVACY POLICY: STUDENTS

1. Who we are

The Higher School of Security and Economics (HSSE) is a data controller within the meaning of the General Data Protection Regulation (Regulation (EU) 2016/679). You can contact the Controller at:

HIGHER SCHOOL OF SECURITY AND ECONOMIC

Management address:

Plovdiv 4004, bul. "032/622 522; 0882/392 731

E-mail: info@vusi.bg

2. Definitions

This declaration uses terms introduced by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

2.1. Personal data

Any information relating to an identified natural person or to an identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2.2. Data controller

A natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its determination may be laid down in Union or Member State law.

2.3. The data processor

A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

2.4. Processing (of personal data)

Any operation or set of operations which is performed upon personal data or upon a set of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2.5. Restriction of processing

Where HSSE may only retain relevant personal data unless:

- the individual has given his or her consent;
- the processing is necessary for the establishment, exercise or defence of legal claims;
- the processing is necessary for the protection of the rights of another natural person;
- there are important reasons of public interest for the Republic of Bulgaria or the EU.

2.6. Personal data subject

A person who is:

- employed under an employment relationship and/or under civil contracts;
- students (undergraduates, postgraduates, postgraduate students, including prospective students);
- contractors and partners;
- Visitors, and other natural persons connected with the conduct of the activities of HSSE.

2.7. Consent of the data subject

Any freely given, specific, informed and unambiguous indication of the data subject's wishes, by means of a statement or a clear affirmative action, which signifies the data subject's consent to the processing of personal data relating to him or her.

3. Principles

The Higher school of Security and Economics processes your personal data in compliance with applicable local and European legislation, namely lawfully, fairly and transparently. All personal data collected over time is for a specific, explicit purpose. The processing of your data is linked to a specific reason and cannot be carried out without restriction.

Such data shall be kept in a form which permits identification of the data subject for a specified period, which shall be no longer than is necessary for the purposes for which your personal data are processed. HSSE shall process the data in a manner that ensures an appropriate level of timeliness and security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, by implementing appropriate technical or organisational measures

4. Rights of natural persons whose data are processed by VUSI and conditions for exercising the rights

4.1. Right to information (in relation to the processing of personal data by the controller).

4.1.1. Right of access to own personal data

Any person has the right to obtain from the controller confirmation as to whether personal data relating to him or her are being processed. If this is the case, he/she shall have access to the data and to the following information relating to his/her personal data:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed (including in third countries or international organisations);
- where possible, the intended period for which the data will be kept and, if this is not possible, the criteria used to determine that period;
- the existence of the right to require the controller to rectify or erase personal data or to restrict the processing of personal data relating to the individuals concerned or to object to such processing;
- the right to lodge a complaint with the Data Protection Commission;
- where the personal data are not collected from the individuals themselves, any available information about their source;
- the existence of automated decision-making, including profiling, and, at least in these cases, substantial information about the logic used and the meaning and intended consequences of such processing for individuals

Where personal data are transferred to a third country or to an international organisation, individuals have the right to be informed of the appropriate safeguards in relation to the transfer.

HSSE shall provide you on request with a copy of the personal data processed relating to you in electronic or other appropriate form. The provision of access to the data is free of charge, but HSSE reserves the right to charge an administrative fee in the event of repetitive or excessive requests.

4.1.2. Right to rectification (if data is inaccurate)

You have the right to request from HSSE:

- correct inaccurate personal data relating to you;
- complete and/or complete incomplete personal data relating to you.

4.1.3. Right to erasure of personal data (right to be forgotten)

You have the right to request that HSSE erase some or all of the personal data relating to you and HSSE has the obligation to erase it without undue delay where any of the following grounds apply:

- the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- you withdraw your consent on which the processing is based and there is no other legal basis for the processing;

- You object to the processing of the personal data relating to you and there are no legitimate grounds for the processing which take precedence;
- the personal data have been unlawfully processed;
- the personal data needs to be erased in order to comply with a legal obligation under EU or Member State law applicable to HSSE;
- the personal data have been collected in connection with the provision of information society services.

HSSE is not obliged to delete personal data if it stores and processes them:

- to exercise the right to freedom of expression and the right to information;
- to comply with a legal obligation requiring processing under EU law or the law of a Member State applicable to the CEI, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the CEI;
- for reasons of public interest in the field of public health;
- for archiving purposes in the public interest, scientific or historical research or statistical purposes;
- for the establishment, exercise or defence of legal claims.

4.1.4. Right to restriction of processing by the controller

This gives you the opportunity to contact us with a request to stop the processing of your personal data in the following situations:

- if you want us to prove the accuracy of the data;
- where you believe that our use of the data is unlawful;
- where you require us to retain the data even if we no longer need to do so because you need to establish in order to exercise or prove your claims;
- where you have objected to us using your data but we need to check that we have lawful grounds to use it.

4.1.5. Right to data portability between controllers

If you have consented to the processing of your personal data or the processing is necessary for the performance of the contract with HSSE, or if your data is processed in an automated manner, you may, after you have legitimised yourself to HSSE:

- request that HSSE provide you with your personal data in an appropriate format and transfer it to another controller;
- request that HSSE transfer your personal data directly to a controller you have indicated, where this is technically feasible.

4.1.6. Right to object to the processing of personal data

You have the right to object to certain processing of your personal data. Particularly where the basis for that processing is the performance of a task carried out in the public interest or in the legitimate interests of HSSE. HSSE will cease processing your personal data unless there is compelling evidence for the processing which overrides your interests, rights and freedoms.

Processing will also cease if you object to the processing of personal data for direct marketing purposes.

4.1.7. Right to notification of a personal data breach

Where the personal data for which the controller is responsible is affected by a security incident which results in a breach of confidentiality, availability or integrity of the data. In the event of a personal data breach, the Data Protection Officer shall be notified without delay.

The controller shall document any personal data breach, including the facts relating to the breach, its consequences and the action taken to address it.

4.2 Exercise of the rights of individuals whose data is processed by HSSE

The procedure for exercising the right of access, the right to erasure, rectification or restriction of processing shall be by submitting a written application to the controller or processors, including by electronic means, in person or through an authorised person.

The submission of the application shall be free of charge. Where the request is manifestly unfounded or excessive or additional copies are requested from the data applicant, the controller may charge a fee, taking into account the administrative costs of providing the information. The rectification and completion of incomplete data shall be by written declaration submitted by the data subject. The right to withdraw your consent to the processing of your personal data where the processing is based on your consent. Withdrawal of consent does not affect the lawfulness of processing based on consent given before its withdrawal. Access to your data is provided in the form of:

- oral reference;
- a written reference;
- a review of the data by the person himself or by his authorised representative;
- provision of a copy of the information requested.

When a request for access is made, the representative of the controller shall examine the request for access. The information shall be provided at the latest within one month of receipt of the application. Where more time is needed to collect the personal data of the person, the time limit may be extended by a further two months in view of possible difficulties in the controller's activities. The controller shall inform the person of any such extension within one month of receipt of the request, indicating the reasons for the delay. Where the data do not exist or cannot be provided on a specific legal basis, the applicant shall be refused access to them by a reasoned decision. The refusal to grant access may be appealed to the supervisory authority, the Commission for the Protection of Personal Data, or by way of judicial review.

5. Basis for collection, processing and storage of personal data

5.1. Collection

VUSI collects personal data from its prospective students and students who are designated as data subjects under the Personal Data Protection Act. It is the policy of HSSE to collect personal data limited to what is necessary. This is personal data that HEI has a legal obligation to collect and that which it needs to protect your interests.

VUSI carries out its activities in compliance with the requirements of the legal framework and the application of the Law on Higher Education, published in State Gazette No. 112 of December 1995 and all subsequent supplements and amendments thereto, Decrees of the Council of Ministers, as well as internal acts of HSSE bodies.

5.2. Processing

HSSE processes your data for the following purposes:

- **Application and admission.** When you apply to HSSE, we have a legal obligation to ask for the diploma from your previous education and so collect the personal data contained therein. If you give your consent, you can provide us with a telephone number and/or email address where we can inform you of the results of your admission and the enrolment procedure.
- **Administration of the training.** We have a legal obligation to maintain a Student General Ledger, issue a student record book, certificate, transcript, diplomas and degree and degree certificates and records of further study. These documents have mandatory attributes and by law contain a larger set of personal data, such as SSN, date and place of birth, permanent address, photograph, etc. When organising the learning process - the allocation of lecture and seminar groups, the issuing and processing of examination reports, the organisation of internships and practicals, state examinations, diploma defences, we only handle your name and faculty number.
- **Social and welfare services.** We have a legal basis to process your personal data when you apply for a hostel or bursary. The conditions and procedure for applying are described in the Decree No. 90 of the Council of Ministers of 26.05.2000 on the conditions and procedure for granting scholarships to students, postgraduate students and postgraduate students of state higher education institutions and scientific organizations.
- **Access to training resources.** Students and postgraduate students of the HSSE have access to additional resources supporting their studies. These include library resources, e-learning platforms and e-services. Use of such resources involves registration using your details, which is voluntary and **with your explicit consent**.
- **Financial relations.** We have a legal obligation to process your personal data when issuing invoices and other payment documents for semester and administrative fees paid. In order to satisfy your financial interests, we may process personal data if you apply for a student loan under the Undergraduate and Postgraduate Student Loans Act and if you apply for scholarships under programmes and projects of the Ministry of Education and Science.
- **Application processing.** Your rights as a student - to interrupt and resume your studies, to change your major and form of study, to study in a shortened term and/or on an individual plan, to transfer from or to another higher education institution, to benefit from financial concessions in the payment of tuition fees, etc. - are settled through your written applications. They only need your name and faculty number. In some individual cases, your request may be based on sensitive data (e.g. about your health).
- **Ensuring effective communication.** HSSE collects data about your address, telephone number and e-mail address. These are necessary to communicate with you about your studies, to inform you promptly of decisions made by the HSSE governing bodies on your applications, to ensure that your interests are safeguarded in relation to your studies in the same or a new degree, and to enable you to participate in various programmes. We collect this data with your consent and you may request that it be deleted.
- **Security and Safety.** HSSE is committed to ensuring the security and safety of the university campus. This includes the capturing of images through the CCTV system.

We have a legal obligation and will be required to share this information with law enforcement if necessary.

Access to your personal data at HSSE is granted to authorised officers in the performance of their essential duties. Any employee who has access to personal data is responsible for ensuring that they process that data only for the purposes for which they are authorised and must treat the data as confidential.

5.3. Storage period

HSSE retains the personal data of employees, faculty and students for as long as necessary to achieve the purposes set out in this Privacy Policy or to comply with applicable law. HSSE shall retain the personal data provided at the time of enrolment as a newly admitted student for the duration of the studies. After the student graduates, the data is archived and stored indefinitely for the purpose of safeguarding the legitimate interests of HSSE.

The longest retention period for your personal data relates to our legal obligation to issue duplicate higher education diplomas. The retention period for data contained in higher education diplomas is 50 years.

This does not mean that we actively retain this data for this period. We keep them in an archive under strict rules and restricted access and only use them when a duplicate is requested.

5.4. Data sharing with third parties

HSSE has a legal obligation to share personal data with third parties (outside HSSE). HSSE is obliged to provide personal data to:

- **Ministry of Education and Science.** Under the Higher Education Act, the Ministry is obliged to maintain a Register of current and discontinued undergraduate and postgraduate students and a Register of Higher Education Diplomas. We also provide the Ministry of Education with your personal data when you request to receive the hologram stickers placed on your higher education diplomas. In practice, we provide the MES with all of your personal data collected by us through our application and enrolment forms, that contained in your prior learning diplomas, and in the higher education diplomas we issue.
- **The National Revenue Agency** - for health insurance purposes. Your name and NIN will be provided to the NRA for health insurance purposes if you are aged 26 or under and in full-time education.
- **Ministry of Foreign Affairs, Ministry of Interior - Migration Directorate and Ministry of Education.** HSSE is required to provide personal details of international students for the issue of a D visa. The HEI may share personal data with immigration officials about the status of prospective students or students whose nationality is outside the European Union.

Some data about you may sometimes be shared with third parties on other grounds. Your data may need to be shared with partner universities if you participate in student exchange programmes or international projects, and with funders if you receive grants, sponsorship or other funding from them. In the event of this or similar situations, you will be separately informed and your rights will be guaranteed by contract or other means applicable to the specific case.

We may take photographs of you as you participate in the educational process or at public events and ceremonies at HSSE. These photographs may be published on the HSSE websites.

HSSE may also share personal data in certain exceptional circumstances, for example: if the data is necessary to protect your vital interests or the vital interests of another person; where it is not possible or appropriate to obtain your consent; may provide data to the police or other investigative authorities to prevent or detect crime; or if required by a court order.

6. Protection of personal data

All data collected over time is stored in registers established for this purpose, which can only be accessed by authorised persons.

In full compliance with the legal requirements for the protection of personal data, HSSE applies strict organisational and technical security measures, including:

- encryption of personal data;
- measures to ensure the continued confidentiality, integrity, availability and resilience of data processing systems;
- measures to restore the availability of and access to personal data in a timely manner in the event of a physical or technical incident;
- regular testing and evaluation of the effectiveness of the measures implemented to ensure the security of data processing.

In the event of a breach of the rights of data subjects, each of them shall have the right to a remedy, which he or she may exercise by referring the matter to the Data Protection Commission