

INFORMATION ON THE PROCESSING OF PERSONAL DATA

I. INTRODUCTION

This document, in accordance with 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 (hereinafter also referred to as the “GDPR”), sets out detailed information on the processing of personal data of applicants for study, students, and graduates (hereinafter referred to as the “data subject”) by the higher education institution CEVRO University, registered institute, ID No.: 275 90 101, with its registered office at Jungmannova 17, 110 00 Prague 1 – Nové Město (hereinafter also referred to as “CU”), as the controller of such personal data.

This document provides a clear, complete, and accurate overview of the scope of personal data processed that the data subject shares with CU. CU declares that it has implemented appropriate technical and organizational measures to ensure the protection of the personal data of data subjects. CU has also adopted all necessary measures to minimize the risk of unauthorized or accidental access to personal data of data subjects, their alteration, destruction, or loss, as well as unauthorized transfers or unauthorized processing.

In the event of any additional questions regarding the processing of personal data, it is possible to contact the Data Protection Officer: Mgr. Julie Poklopová, Attorney-at-law, or her deputy, Mgr. Adam Silovský, Attorney-at-law, via the email address poverenec.gdpr@cevro.cz, or by sending a written request to the address Jungmannova 17, 110 00 Prague 1 – Nové Město. The Data Protection Officer may also be contacted in person at the address Jungmannova 17, 110 00 Prague 1 – Nové Město, at a time agreed in advance.

SECTION I.

Personal Data Controller

I. CU, as the controller of the personal data of data subjects, determines the purposes and means of processing such personal data.

SECTION II.

Purpose of Personal Data Processing

I. The controller processes personal data for the purpose of:

- a) processing submitted applications for study, in all their forms, and ensuring the conduct of the admission procedure;
- b) ensuring the conclusion and subsequent performance of study agreements in all forms of study (Article 6(1)(b) GDPR). Such a relationship gives rise to further statutory obligations, and CU is therefore required to process personal data also for this purpose (Article 6(1)(c) GDPR);
- c) marketing activities, in order for CU to be able to present its services (Article 6(1)(a) GDPR);
- d) protection of its legitimate interests (Article 6(1)(f) GDPR), which are described in more detail below;
- e) compliance with statutory obligations in relation to accounting;
- f) fulfilment of its statutory obligation to record data on students in the student registry for registration,

budgetary, and statistical purposes.

II. CU considers it necessary to process the above-mentioned data for the purposes stated above, as without such data it would not be possible to fulfil the contractual relationship with the data subject.

SECTION III. Legitimate Interests of CU

I. CU also processes the personal data of data subjects for the purpose of protecting its legitimate interests. CU considers direct marketing to be one of its legitimate interests, as only in this way can it effectively develop and improve the services it provides. Another legitimate interest of CU is the protection of its property, for which purpose CCTV systems are installed on the premises of CU's registered office; the use of such systems is governed by a specific internal regulation (available for inspection at the controller's premises). Further legitimate interests of CU include the taking of photographs and video recordings at events organized or co-organized by CU. Such events include, in particular, professional conferences, seminars, lectures, social events for students, and graduation ceremonies. Photographs and video recordings may be taken during these events and may be used in CU's promotional materials, on CU's website, and on its social media platforms (facebook.com, instagram.com).

II. In order to protect their personal data, the data subject is entitled to object and request that their personal data be processed only to the extent necessary for the fulfilment of CU's legitimate interests.

SECTION IV. Collection of Personal Data

I. CU obtains the personal data of data subjects on the basis of a completed application for study, through which the applicant for study themselves provides their personal data to CU.

II. If the applicant is subsequently admitted and enrolls in the study program, CU may obtain additional personal data on the basis of the concluded study agreement and/or in the course of the studies. Such personal data may include, in particular but not exclusively, examination results, a study email address, information on books borrowed from the CU library, and records of the student's likeness captured at events organized by CU or by another entity.

III. For marketing purposes, CU may obtain personal data from publicly available sources.

IV. CU further obtains the personal data of data subjects from third parties (as controllers) who are authorized to access and process the personal data of data subjects. In relation to these controllers, CU acts as a processor of personal data. CU acts as a processor of personal data in relation to companies:

a) www.scio.cz, s.r.o., which provides the National Comparative Examinations;

SECTION V. Categories of Processed Personal Data

I. For the purpose of ensuring the proper course of studies, CU processes the following categories of personal data:

- a) basic identification data – first name, last name, date of birth, permanent residence address, contact address, personal identification number, place of birth, and in the case of foreign nationals also passport number
- b) contact details – telephone number and email address;
- c) information on previous education – at secondary or higher education level (depending on whether it concerns bachelor's, master's, or postgraduate studies) – including information on the name of the (secondary or higher education) institution, its address, field of study or study program and faculty, year of the school-leaving examination or state examination, and the awarded academic degree;
- d) accounting data – bank account number and variable symbol;
- e) personal data relating to the course of studies – attendance records and results of written tests and oral examinations;
- f) sensitive data – processed within the information system, on the basis of a legal obligation arising from Decree No. 277/2016 Coll. on the submission of statistical data by higher education institutions.
- g) capture of the data subject's likeness in photographs
- h) identification via IP address, MAC address, or mobile device identification when the data subject connects to the Wi-Fi network;
- i) access to the study email mailbox.

SECTION VI.

Legal Basis for the Processing of Personal Data

I. The lawfulness of the processing of personal data is determined pursuant to Article 6(1) GDPR, under which processing is lawful if it is necessary for the performance of a contract, for compliance with a legal obligation, for the protection of CU's legitimate interests (protection of its property, marketing), or if the processing is carried out on the basis of consent granted by the student.

II. The lawfulness of processing that is necessary for compliance with a legal obligation to which the controller is subject is based, for example, on Act No. 563/1991 Coll., on Accounting, pursuant to which invoicing data are processed and stored, and on Act No. 111/1998 Coll., on Higher Education Institutions.

SECTION VII.

Transfer of Personal Data to Third Parties

I. CU is obliged and entitled to transfer the personal data of data subjects to third parties (recipients, e.g. processors) in the exercise of public authority, for the fulfilment of its statutory obligations, for the performance of contractual obligations, or on the basis of its legitimate interests.

II. CU is obliged to provide the personal data of data subjects to public authorities, such as the Ministry of Education, Youth and Sports of the Czech Republic, tax authorities, courts, authorities involved in criminal proceedings, and the Police of the Czech Republic.

III. CU transfers the personal data of data subjects to the following entities as processors on the basis of a personal data processing agreement:

- a) To Masaryk University, Faculty of Informatics, with its registered office at Žerotínovo nám. 617/9, 601 77 Brno, ID No.: 00216224, which operates an information system; CU uses this system as an internal automated information system for the purpose of fulfilling its statutory obligation imposed by Section 88 of Act No. 111/1998 Coll., on Higher Education Institutions, and for the transfer of data to the Ministry of Education, Youth and Sports. CU provides the processor in particular with the following personal data of the data subject: first name, last name, date of birth, personal identification number, personal email address, school email address, telephone number, bank details, place of birth (including district and state), permanent and temporary residence, contact address, identity card number, passport number, date of commencement and completion of education, data on marital status, number of children, previous education, health condition, disability, health or social disadvantage, individual study plan, and information on the school-leaving examination;
- b) To bfinance.cz accounting s.r.o., with its registered office at Praha-Štěrboholy – Štěrboholy, K učilišti 40/20, District of the Capital City of Prague, Postal Code 102 00, ID No.: 28918991, which provides accounting services to CU, for the purpose of fulfilling CU's statutory obligations pursuant to Act No. 563/1991 Coll., on Accounting. CU transfers to the processor the personal data of data subjects to the extent of first name, last name, and the variable symbol for payments generated for the data subject;
- c) To the law firm Pečený, Fučík, Langer, with its registered office at Purkyňova 2, Prague 1, ID No.: 11371544, which provides legal services to CU;
- d) To partner institutions that provide professional internships and traineeships for CU students; a list of such institutions will be provided by CU upon request;
- e) To Magnas Performance s.r.o., with its registered office at Příkrá 271/16, Braník, 147 00 Prague 4, ID No.: 02802414, which provides advertising services to CU and may therefore process the personal data of data subjects who consent to the capture of their likeness (and possibly other personal data) in advertising materials;
- f) To ELTODO, a.s., with its registered office at Novodvorská 1010/14, Prague 4, 142 00, ID No.: 45 274 517, which provides CU with the management and maintenance of CCTV systems. Personal data of data subjects consisting of the capture of their likeness on CCTV recordings may be made accessible to the processor solely in cases where the processor is addressing a technical malfunction of the CCTV systems;
- g) To MAMA TELMA AI s.r.o., with its registered office at Revoluční 764/17, Staré Město, 110 00 Prague 1, ID No.: 14022087, which provides CU with security-related services, specifically the operation of a warning system for building visitors. The processor is provided with the data subjects' telephone numbers, first names, and last names;
- h) To Wolters Kluwer ČR, a.s., ID No.: 63077639, with its registered office at U Nákladového nádraží 3265/10, Strašnice, 130 00 Prague 3, which provides CU and its students with the ASPI legal information system. The processor is provided with the personal data of data subjects to the extent of first name, last name, and an email address registered under the CU domain;
- i) To Tritius Solutions a.s., with its registered office at Škrobárenská 502/1, Trnitá, 617 00 Brno, ID No.: 05700582, which provides CU with services related to the CU library lending system. The processor is provided with the personal data of data subjects to the extent of first name, last name, telephone number, year of birth, and an email address registered under the CU domain;

j) To CESNET, an interest association of legal entities, with its registered office at Generála Píky 430/26, Dejvice, 160 00 Prague 6, ID No.: 63839172, which provides CU with services related to the verification of the identification of data subjects participating in short-term study programs (e.g. Erasmus). The processor is provided with personal data to the extent of first name and last name;

k) To ECOMAIL.CZ, s.r.o., with its registered office at Na Příkopě 388/1, Staré Město, 110 00 Prague 1, ID No.: 02762943, which provides CU with marketing services, in particular the distribution of newsletters. The processor is provided with personal data to the extent of first name, last name, and email address;

l) To AITOM Digital s.r.o., with its registered office at Na Cihlářce 3177/30, Smíchov, 150 00 Prague 5, ID No.: 24171816, which provides CU with services consisting in the administration of websites and web forms, such as study applications. The processor is provided with the personal data of data subjects to the extent of first name, last name, email address, in some cases telephone number, data on citizenship, personal identification number, gender, permanent residence address, and in some cases the name of the secondary school;

m) To MICROSOFT s.r.o., with its registered office at Vyskočilova 1561/4a, Michle, 140 00 Prague 4, ID No.: 47123737, which provides CU with cloud applications and services. The processor is provided with the personal data of data subjects to the extent of first name, last name, and an email address registered under the CU domain;

n) To GTS ALIVE, s.r.o., with its registered office at Na Maninách 1092/20, Holešovice, 170 00 Prague 7, ID No.: 26193272, which provides ISIC/ALIVE cards to data subjects; these cards serve as student identification cards and also as access cards to CU buildings. The processor is provided with the personal data of data subjects to the extent completed by the data subject in the relevant form, as well as the capture of the data subject's likeness in a photograph;

SECTION VIII.

Transfer of Personal Data to a Third Country or an International Organization

I. CU transfers the personal data of data subjects to third countries and international organizations within the framework of the Erasmus project. Such personal data are transferred on the basis of the informed consent of the data subjects. CU provides the personal data of data subjects only to the foreign higher education institution selected by the data subject in their application. All personal data are processed in accordance with the GDPR. These data are processed exclusively in connection with the performance of the study agreement and subsequent activities in accordance with the subject matter of that agreement by the host institution, the national agency, and the European Commission.

SECTION IX.

Retention Period of Personal Data

I. CU will process and store personal data at least for the duration of the contractual relationship. Certain personal data required, for example, for tax and invoicing purposes will be retained for a longer period, namely for 5 years starting from the end of the accounting period to which they relate.

II. Certain personal data that are processed for the purpose of fulfilling a legal obligation, pursuant to Section 3(1)(i) in conjunction with Section 11(5) of Act No. 499/2004 Coll., on Archives and Records Management, will be retained in accordance with the statutory retention periods.

III. Personal data that are not subject to the provisions set out in paragraph II of this article will never be retained longer than the maximum period prescribed by law. After the expiry of the retention period, personal data will be securely and irreversibly destroyed in such a manner as to prevent their misuse.

SECTION X.

Rights of Data Subjects in Relation to the Processing of Their Personal Data and the Exercise of These Rights

I. CU informs data subjects that the controller of their personal data is CEVRO University, registered institute, ID No.: 275 90 101, with its registered office at Jungmannova 17, 110 00 Prague 1 – Nové Město, registered with the Municipal Court in Prague, Section U, File No. 350.

II. CU declares that all information it is obliged to provide to data subjects pursuant to Article 13(1)(c)–(f) and Article 13(2)(a) GDPR is set out in this document, specifically in Sections II–IV and Sections VIII–X.

III. The data subject is entitled to exercise their rights by sending a message to the email address poverenec.gdpr@cevro.cz. The data subject may also contact the Data Protection Officer in person, by prior arrangement. Data subjects may further exercise their rights by sending a written request to CU at the address Jungmannova 17, 110 00 Prague 1 – Nové Město, or by submitting an inquiry via the ISDS data box uz3paee. For the protection of the personal data of data subjects, the Data Protection Officer will not provide information to applicants in cases where there are doubts as to their identity. In order to remove such doubts, the Data Protection Officer may be contacted in person at an agreed time.

IV. All information, communications, statements, and corrections of personal data in the event of their modification are provided by CU free of charge. In the case of repeated requests, CU is entitled to request payment of an administrative fee reflecting the administrative costs of processing the request. CU is prepared to provide data subjects, upon request, with a copy of the personal data being processed. In the case of repeated requests, CU is entitled to charge a reasonable fee covering the administrative costs associated with providing such a copy. In the event of abuse of the right under this paragraph, CU is entitled to refuse access to the data.

V. CU will provide the information pursuant to paragraph III of this section in written or electronic form, provided there is no doubt as to the identity of the applicant. In particular, CU will have no doubts as to the applicant's identity if the request is sent from the applicant's email address, if the request is signed with a qualified electronic signature, via the study email account, or via the ISDS data box. In the event of doubts, CU (in order to protect personal data) reserves the right to provide the requested information to the applicant in person after verification of their identity, at a time agreed in advance. CU reserves the right not to provide information orally or by telephone.

VI. CU is obliged to provide such information to the data subject within one month of receipt of their request. In justified cases, CU may reasonably extend this period, however by no more than an additional two months.

VII. If there is a change in personal data (for example a change in marital status, surname, bank account number, permanent residence address, or telephone number), the data subject is entitled to request that such change be reflected. In connection with this right, the data subject is obliged to notify CU of the change in personal data. The data subject may notify such change by sending a written notice to CU, via the ISDS

data box, by email, or in person at CU's registered office. The data subject is obliged to provide supporting documentation for the change in personal data if requested to do so. CU will rectify the personal data without undue delay, and no later than within one month of receipt of the notification of the change in personal data. The same procedure shall apply mutatis mutandis in the case of clarification of inaccurately stated personal data.

VIII. CU hereby informs data subjects of their right to lodge complaints or submit initiatives with the supervisory authority if they believe that the processing of their personal data infringes the GDPR. Data subjects have the right to lodge a complaint with a supervisory authority in the Member State of their habitual residence or in the place where the alleged infringement of their rights in relation to personal data occurred. The supervisory authority in the Czech Republic is the Office for Personal Data Protection, with its registered office at Pplk. Sochora 27, 170 00 Prague 7.

IX. In certain specified cases, the data subject is entitled to request that CU erase their personal data. Such a situation may arise, for example, where the processed data are no longer necessary for the purposes specified herein, or where the consent given for the processing of personal data has been withdrawn (and there is no other legal basis on which the personal data would be processed).

IIX. The above right to erasure of personal data pursuant to paragraph VIII of this section does not apply to the circumstances envisaged in Article XI, paragraph II of this document, nor to cases where CU is fulfilling its legal obligations or where processing is necessary for the establishment, exercise, or defence of CU's legal claims. If CU exercises its right to refuse a data subject's request for erasure of their personal data under this paragraph, CU is obliged to notify the data subject of this decision within one month, duly justify its decision, and at the same time inform the data subject of their rights.

XI. CU processes the personal data of data subjects only to the extent strictly necessary. In the event that a data subject has doubts as to the necessity of the processing of such personal data, the data subject is entitled to request that their personal data be processed only to the minimum extent necessary. In this connection, the data subject is entitled to request the restriction of the scope of the processing of their personal data.

XII. Where the processing of a data subject's personal data is based on their consent, the data subject is entitled to withdraw such consent at any time, free of charge, by sending a notice to CU or to the contact email address of the Data Protection Officer (poverenec.gdpr@cevro.cz). In the case of an electronic request, however, it is necessary to eliminate any doubts as to whether the applicant is indeed the data subject concerned.

XIII. The data subject is entitled to request the portability of their personal data that they have provided to or made available to CU. The data subject may request that such data be provided directly to them for the purpose of transfer, or that they be transmitted directly to a controller of their choice. Such personal data will be provided in a machine-readable format (e.g. XML). The transfer of personal data will be carried out in a manner that minimizes potential security risks during transmission (e.g. through the use of encryption).