



**UNIVERSITY OF
LATVIA**

PRIVACY POLICY OF THE UNIVERSITY OF LATVIA

Annex

**APPROVED
by UL Order No. 1/177
of 07.05.2019.**

The document hereby has no amendments.

Issued in accordance with
Article 5.10 of the Constitution of the University of Latvia

I. General provisions

1. The privacy policy of the University of Latvia (hereinafter - UL) (hereinafter - policy) shall determine what personal data is processed and for which purposes UL processes it, including the volume, protection, processing deadline and other personal data protection issues.

2. Policy terms:

2.1. Controller - UL, registered office: Raina Boulevard 19, Riga, LV - 1586;

2.2. User - a natural person (data subject) who uses UL services, including visiting and using UL premises, Internet sites (internet sites, registers, systems, etc. of UL and its structural units) and other IT resources managed by UL;

2.3. Service - a service provided to the user in conformity with the applicable laws, documents and regulatory enactments of UL in force in the Republic of Latvia, including the activity of UL in relation to those information systems, data files and other information used for the processing, transmission, storage of information and performance of other functions with it;

2.4. User data - any information regarding the user, which is known by UL and which may identify the user directly or indirectly (for example, the given name, surname, personal identity number, date of birth, IP address, etc.);

2.5. the processing of user data - activity or activities that are performed with user data (including the collection, retention, storage and modification of user data, granting access, making requests, use, transfer, etc.) in any way and with any tools used for that purpose;

2.6. third party - any person who is not a user, an employee of UL or an authorised data processor.

3. When a user uses a UL service, visits UL premises, territory, website or otherwise provides UL with information about themselves, it is considered that the user has familiarised themselves with the policy hereby, read it and understood it.

4. The terms and concepts used in the policy, which are related to the protection of personal data, in so far as they are not defined differently, correspond to the terms and concepts specified in the General Data Protection Regulation and other regulatory acts applicable to the processing of personal data in Latvia.

5. All information provided by the user to UL has been provided on a voluntary basis. The user shall be personally responsible for the accuracy, relevance and applicability of the data and information provided.

6. Questions related to the processing of personal data at UL should be sent to e-mail address datu.specialisti@lu.lv.

7. When communicating with the user, UL is entitled to take additional measures to identify as well as to document the fact of user identification, as well as to document the fact of the information provided or any other activity performed.

8. UL has the right to refuse to ensure the enforcement of the rights of the user in the cases specified in the effective regulatory enactments, as well as in the case where the user unduly refuses to provide the information that identifies them.

II. Scope of policy application

9. The policy hereby shall apply to the protection of privacy and personal data relating to:

9.1. Natural persons - employees, students (including those who are in a study break, or are potential and former ones), other users, as well as third parties, who receive or transfer to UL any information (including contacts, paying persons, etc.) in connection with the provision of services to a natural person (student);

9.2. Visitors to UL auditoria and other premises, territories, including those in respect of which video surveillance is carried out;

9.3. Visitors to websites maintained by UL.

10. UL shall take care of the privacy of users and the protection of personal data, shall respect the right of users to the lawfulness of the processing of personal data in accordance with the applicable law, the Law on the Processing of Natural Personal Data, Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 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) and other applicable, existing laws and regulations in the field of privacy and data protection.

11. The privacy policy applies to data processing, regardless of which form and/or environment the user provides personal data (UL premises, internet sites, UL information systems, paper or telephone) and in which systems or paper forms they are processed.

12. For specific types of data processing (e.g. processing of cookies, taking photographs, filming, live broadcasting or audio recording, etc.), additional, specific rules may be established, which shall to be notified to the user at the time he or she provides the relevant data to UL.

III. Legal basis and objectives for the processing of user data

13. The legal basis for the processing of user data shall be one of the following:

13.1. entering into and performance of the contract - in order to enter into a contract with the user and to provide for the performance thereof;

13.2. the performance of regulatory enactments - in order to fulfil the duties specified in the external regulatory enactments binding to UL;

13.3. in accordance with the user's consent;

13.4. legitimate interests - in order to implement the obligations existing between UL and the user or the legitimate interests of UL arising from the drawn contract or law.

14. Purposes for processing user's data shall be as follows:

14.1. provision of the service to the user;

14.2. identification of the user;

14.3. verification of the user's identity;

14.4. the fulfilment of other duties and rights specified in other regulatory enactments in force in the Republic of Latvia.

15. To provide the service, UL processes the following personal data:

15.1. the given name and surname;

15.2. the personal identity number;

15.3. the date of birth, if the user does not have a personal identity code, or any other personally identifiable information granted to the user by the State (a combination of figures, a combination of names and figures, etc.);

15.4. contact information;

15.5. the data of personal identification documents;

15.6. data on education;

15.7. photograph;

15.8. information regarding studies, research and academic work, including data and information regarding user publications, patents and other information and documentation related to the professional, research and academic activities of the user;

15.9. the user's IP address;

15.10. the data of the activities performed during the use of the service, which are necessary in order to ensure the service;

15.11. other information which is necessary for the provision of the service.

16. In order to ensure that the objectives referred to in paragraph 14 of the policy hereby are achieved, UL shall maintain databases with user data.

17. User data shall be collected, stored and processed in accordance with the regulatory enactments in force in the Republic of Latvia.

18. When providing the service, UL shall act in accordance with the laws and regulations in force in the Republic of Latvia, the standards resulting therefrom or in accordance with the standards applicable thereto, the internal regulation of UL and the policy hereby.

IV. Security and transfer of user data to third parties

19. User data shall be received from the users themselves or their representatives, as well as from the third parties in accordance with the procedures specified in the effective regulatory enactments.

20. UL shall transfer user data to the third parties in the following cases:

20.1. the obligation to transfer user data is derived from the regulatory enactments in force in the Republic of Latvia;

20.2. it is necessary for the achievement of the purpose of processing of user data (provision of the service);

20.3. with a clear and unambiguous consent of the user.

21. UL information technology systems provide for the security measures and tools to protect user data. UL shall use all the reasonable means to ensure the security, integrity and privacy of user data. UL shall regularly review the safety measures taken and update the technical means and organisational measures used.

22. In the process of processing user data, UL shall take all necessary steps to achieve and not to exceed the purposes of processing user data.

23. UL shall provide access to user data to those UL employees who need it to perform their job duties. The UL employees mentioned above shall have the right to process user data to the extent necessary for the performance of their duties.

24. Personal data may be transferred to other designated beneficiaries for the performance of certain duties specified in the administrator's regulatory enactments, for the fulfilment of legal interests, as well as for the fulfilment of contractual obligations:

24.1. lawyers, auditors, financial advisers and other advisers, if such are involved for improving or verifying the activities of the controller;

24.2. The State Revenue Service, courts, out-of-court dispute settlement authorities, insolvency practitioners, debt collectors in accordance with the right to collect debt for the services provided by UL;

24.3. credit institutions and other persons who ensure the receipt and execution of the payment order;

24.4. service providers (hotels, carriers (air), etc.) who provide the service to a particular person and for this reason the exact identification of the relevant person is necessary.

25. Where it is necessary to transfer personal data outside the European Union, UL shall transmit minimum data and the transfer of data shall be ensured in accordance with the requirements of the General Data Protection Regulation.

26. UL shall not engage in the profiling of personal data and shall not adopt automatized individual decisions, which might cause legal consequences for the data subject.

27. The processing of individual personal data by UL shall be carried out by the following personal data processors:

27.1. processing of financial and accounting data - SIA "VISMA Enterprise", Reg. No. 40003734170;

27.2. processing of employee passes (access cards) data - Advanced Electronic Systems, Reg. No. 40003912743;

27.3. processing of records data - AS "RIX Technologies", Reg. No. 40003548427;

27.4. UL car and fuel data processing – SIA "Intelligent Systems", Reg. No. 40003757281.

28. When using the services of the personal data processor, UL shall take the necessary measures to ensure that personal data processors carry out the processing of personal data in accordance with the instructions of UL and in accordance with the applicable laws and regulations.

V. Processing cookies

29. In order to ensure the full functioning of UL websites, UL collects user data using cookies ("Cookies").

30. The user has the right to change the browser settings so that cookies are not accepted. In this case, some functions or tools may not work or work poorly on UL websites.

31. Links to third-party Internet sites that have their own usage and personal data protection rules, for which UL is not responsible, may be placed on UL websites.

32. The UL Cookie Processing Policy can be found at www.lu.lv .

VI. Video surveillance

33. UL carries out video surveillance with no audio recording at UL buildings and territories.

34. The period of storage of the video recording shall be up to 10 days from the time of recording.

35. The video surveillance is carried out with the aim:

35.1. to record and/or prevent a criminal offence and to identify the offender;

35.2. to protect the material values of UL, as well as the personal belongings of employees, students and visitors;

35.3. to protect the vital interests of persons, including life and health.

36. The notice on performing video surveillance is provided in the form of warning signs prior to the video surveillance area.

37. The video surveillance data shall be available only to the UL employees or service providers entitled to receive the data for performing their duties or providing security services. The data shall only be transmitted outside UL exclusively to law enforcement authorities following their special and documented request or by UL submitting an application to the competent authorities on a criminal offence and requesting its investigation. The data shall not be released outside Latvia.

VII. Audio recording of UL assemblies or meetings

38. In order to draw up minutes of assemblies or meetings of UL, UL may make an audio recording of the assembly or meeting, with a prior notice to the assembly or meeting participants.

39. The audio recording carried out during the assembly or meeting organised by UL shall be kept until the signing of the minutes. After the signing and/or approval of the protocol, the audio recording in question shall be destroyed.

VIII. Photographing, filming, or live broadcasting of public events or activities

40. To inform users and other interested persons about the events and activities taking place at UL and activities, as well as for building the archive of UL events and activities, the events and activities can be photographed, filmed or broadcast live.

41. UL may publish the photos and videos that have been taken in its of representation materials, websites as well as in the UL profiles in social networks.

42. UL shall display notices on filming, photographing or live broadcasting of an activity by warning signs, releases, announcements, by-laws or announcements of the planned event or activity.

43. UL shall preserve the videos and photos for an unlimited period of time.

44. The data subject has the right to address UL with the request to delete their image by writing to the e-mail address datu.specialisti@lu.lv and specifying the exact image the data subject wants to be deleted.

45. UL shall not be obliged to delete the images, in which the data subjects concerned are not directly identifiable. UL shall delete personal images or eliminates the possibility of identifying a person by face, as far as it is technically feasible.

46. UL shall not be responsible for the processing and/or making available of photographic or video materials other than those shot and taken by UL to mass media (television and press) and other publications and portals, the data controller and maintainer of which is not UL.

47. Visitors to public events or activities of UL have the right to take photographs of events, activities or film for their personal purposes, subject to restrictions on the further use of the videos and photographs so obtained. UL has the right to limit the shooting or filming of individual events by warning about it in advance.

IX. Changes to user data processing and termination of processing

48. UL shall keep and process the personal data of the users as long as at least one of the following criteria exists:

48.1. a contract entered into with the user is in force;

48.2. in accordance with the procedures specified in external regulatory enactments, the user or UL may exercise his or her legitimate interests (for example, to submit objections or bring an action before a court);

48.3. a legal obligation exists for one of the parties to store the data;

48.4. the consent of the user to the relevant processing of personal data shall be valid, if there is no other lawful basis for the processing of data.

49. The user shall be required to promptly inform UL of any changes to the user data referred to in paragraph 15 of the policy, as well as in cases where the user data are incorrect or inaccurate, at the same time providing the UL with the correct user data.

50. UL has the right to request, and the user is obliged to present to UL a document confirming changes in the user's data.

51. If necessary, the user shall have the right to modify, supplement or delete his or her data at any time, in so far as this does not conflict with the applicable laws and in so far as it does not restrict the provision of the service or other functions, rights and obligations of UL.

X. The rights of the data subject

52. The user is entitled to:

52.1. to receive information from UL regarding their data and the processing of such data in conformity with the regulatory enactments in force;

52.2. to access the user's data, to request the rectification or deletion thereof, if the regulatory enactments in force permit it;

52.3. to object to the processing of user data;

52.4. to the portability of user data;

52.5. to request the interruption or limitation of the processing of their data, if such right arises from the regulatory laws in force in the Republic of Latvia and it does not restrict the provision of the service or other functions, rights and duties of UL;

52.6. to withdraw data processing if it is based on the user consent. In such a case, the legality of the processing carried out prior to the withdrawal of the user consent shall not be affected;

52.7. in the event of a violation of his or her data-processing rights, to request that the person performing the violation stop the violation of such data processing;

52.8. to address the State Data Inspectorate at any time for the defence of their rights.

XI. Closing issues

53. UL shall have the right to unilaterally amend the policy hereby.

54. The policy hereby is available on the UL website www.lu.lv/par_mums/dokumenti . The users shall be obliged to make sure that they are familiar with the current version of the policy that applies whenever they receive the service, visit UL websites or otherwise use the Internet and other information resources of UL.